

Roundtable on Sustainable Palm Oil Certification RSPO

[✓] Surveillance

Name of Management Organisation : **Batu Ampar POM PT Tapian Nadenggan subsidiary of Golden Agri Resources Ltd.**

Plantation Name : PT Tapian Nadenggan: Batu Mulia Estate and Batu Ampar Estate

Location : Serongga Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia

Certificate Code : **MUTU-RSPO/172**

Date of Initial Registration : 26 November 2012

Date of Certificate Issue : 15 September 2022 Date of License Issue : 26 November 2023

Date of Certificate Expiry : 25 November 2027 Date of License Expiry : 25 November 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Tbk Auditor	Reviewed by	Approved by
ASA-2.1	4 to 8 September 2023	Leonada (Lead Auditor Witnessing), Kiki Fadli (Lead Auditor Witnessed), Johannes Kapri Pandiangan, Andre Bona Tito Pardede	Hasiholan Sihombing	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2.1	01 December 2023

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Figure 1. Location Map of PT Tapan Nadenggan

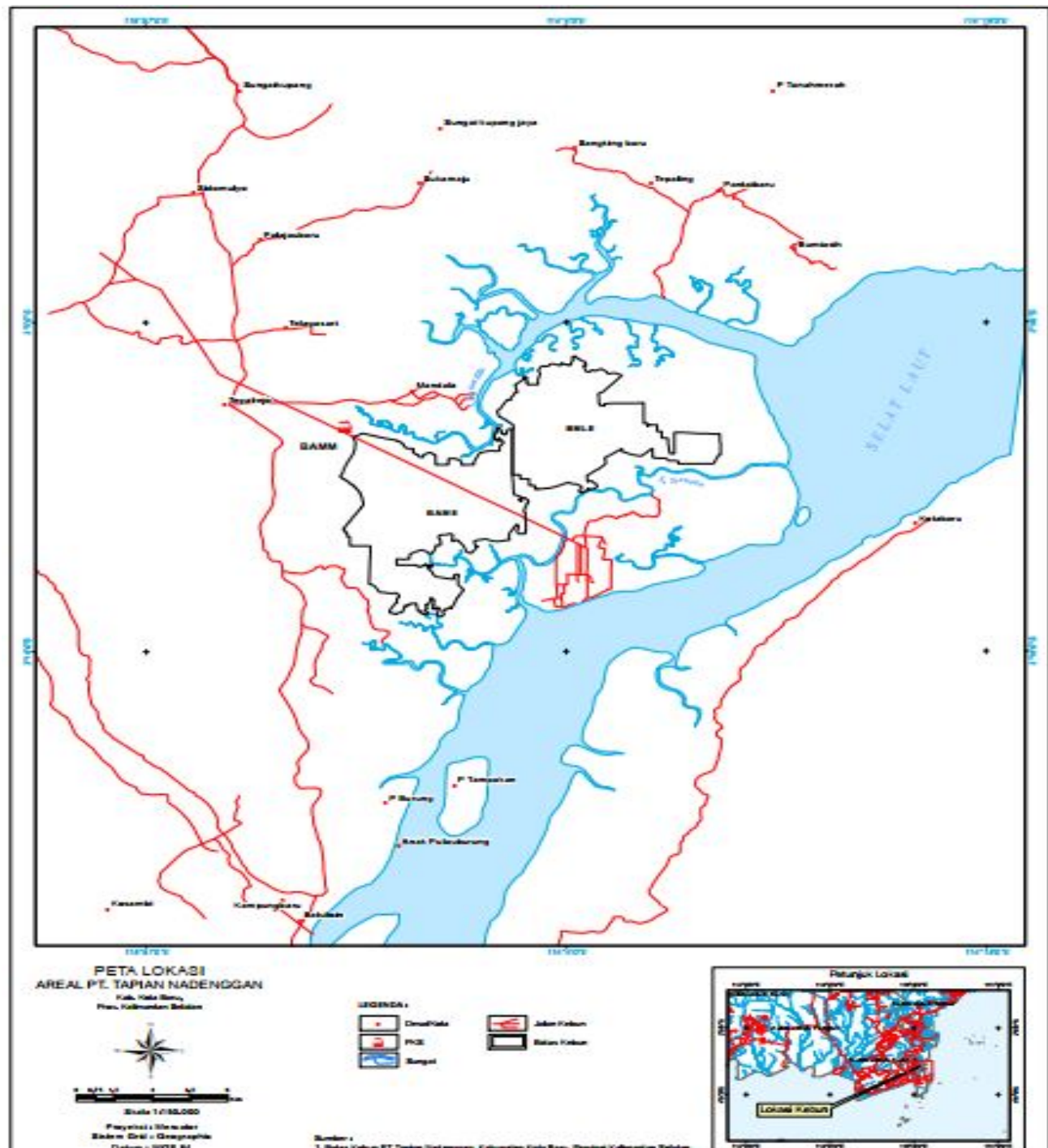


Figure 2. Operational Map of Batu Ampar Estate - PT Tapan Nadenggan

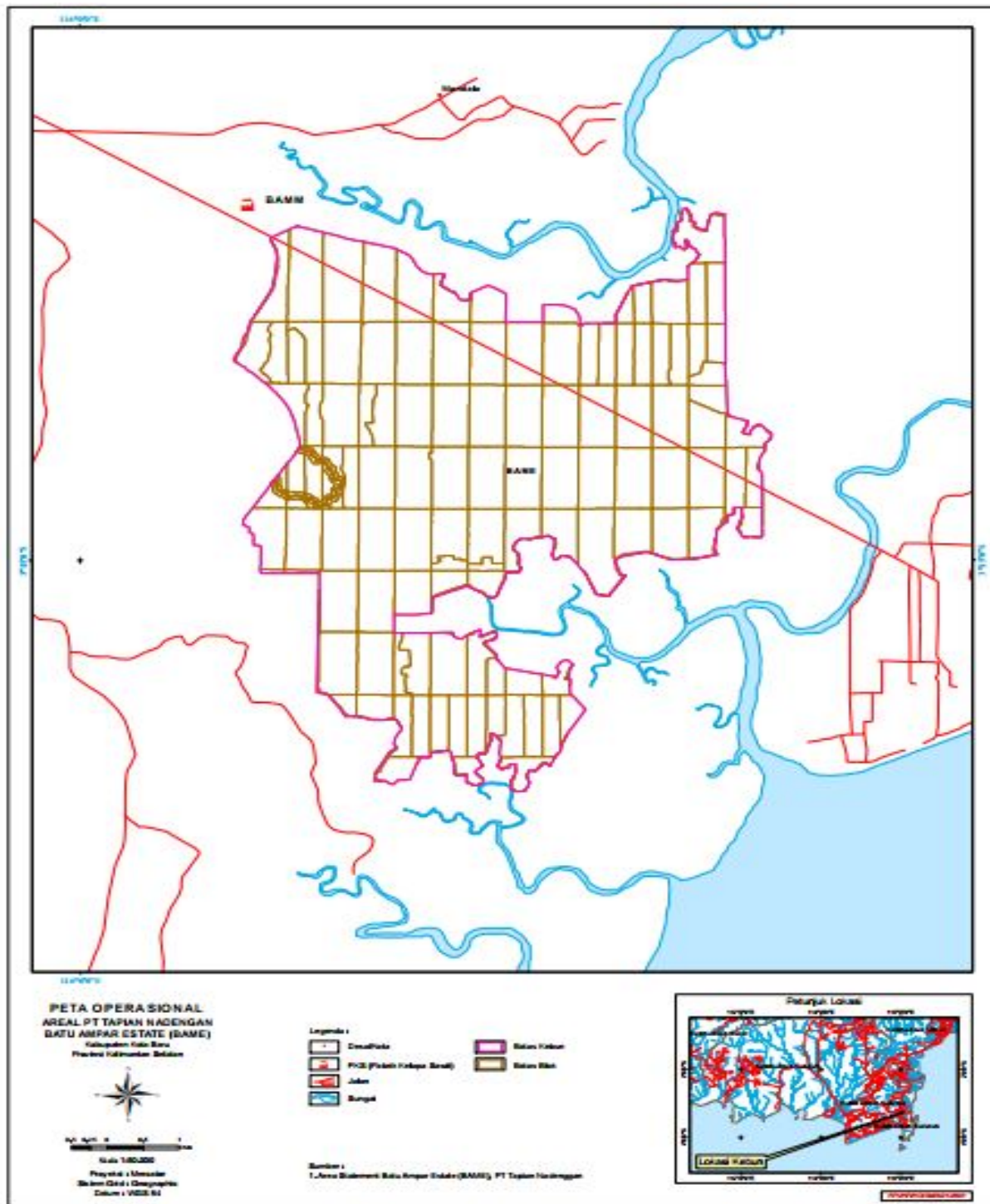
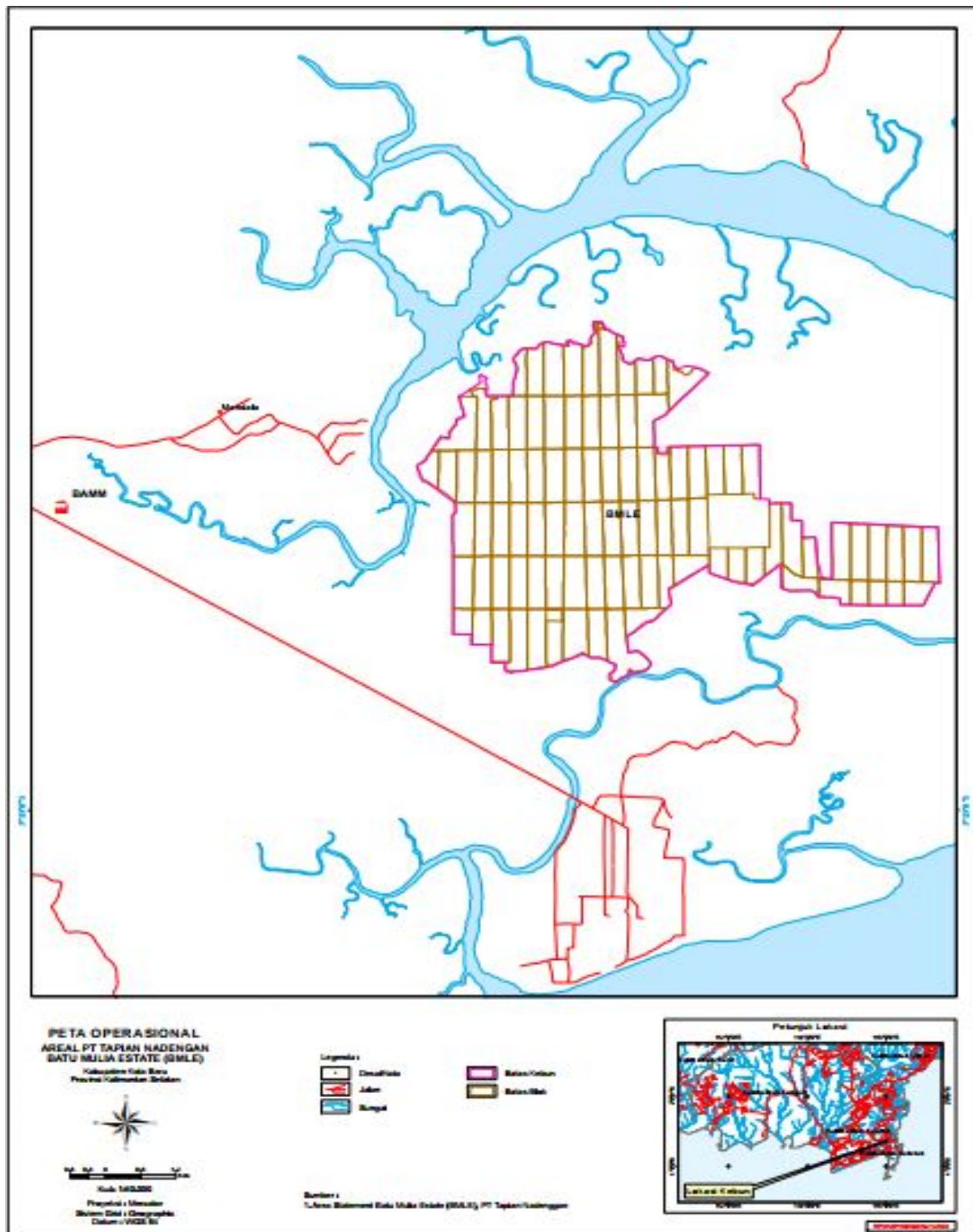


Figure 3. Operational Map of Batu Mulia Estate - PT Tapian Nadenggan



Abbreviations Used

AMDAL	:	<i>Analisis dampak lingkungan</i> (Environmental impact assessment)
B3	:	<i>Bahan Berbahaya dan Beracun</i> (hazardous and toxic materials)
BAME	:	Batu Ampar Estate
BAMM	:	Batu Ampar Mill
BMLE	:	Batu Mulia Estate
BOD	:	Biological Oxygen Demand
BPV	:	Back Pressure Valve
BPHTB	:	<i>Bea Perolehan Hak Atas Tanah dan Bangunan</i> (Land and Building Title Transfer Fee)
BWL	:	Buana Wiralestarimas
CH	:	Certification Holder
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DLH	:	<i>Dinas Lingkungan Hidup</i> (environmental services)
DPLH	:	<i>Dokumen Pengelolaan Lingkungan Hidup</i> (Environmental Management Document)
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Inform and Consent
FR	:	Frequency Rate
GAR	:	Golden Agri Resources
GHG	:	Green House Gas
GSEP	:	GAR, Social, and Environment Policy
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i> (Building Title)
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment and Control
Hiperkes	:	<i>Higiene Perusahaan dan Kesehatan Kerja</i> (Corporate Hygiene and Occupational Health)
IPAL	:	<i>Instalasi Pengolahan air Limbah</i> (WWTP)
IPM	:	Integrated Pest Management
ISBPR	:	<i>Identifikasi Sumber Bahaya dan Penilaian Risiko</i> (HIRAC)
ISCC	:	International Sustainability & Carbon Certification
IUCN	:	International Union for Conservation of Nature and Natural Resources
K3	:	<i>Kesehatan dan Keselamatan Kerja</i> (OHS)
KKPA	:	<i>Koperasi Kredit Primer Anggota</i> (Members' Primary Credit Cooperative)
KLHK	:	<i>Kementerian Lingkungan Hidup dan Kehutanan</i> (Ministry of environment and forestry)
KT	:	<i>Kelompok Tanil</i> Farmer Group
KUD	:	<i>Koperasi Unit Desa</i> (Cooperative Village Unit)
LA	:	<i>Land Application</i>
LSU	:	Leaf Sampling Unit
LUC	:	Land Use Change
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OFI	:	Opportunity for improvement
OHS	:	Occupational Health and Safety
P & C	:	Principle & Criteria

P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja (OHS Committee)</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama (Collective Labor Agreement)</i>
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu (Fixed Period Working Agreement)</i>
PKWTT	:	<i>Perjanjian Kerja Waktu Tidak Tertentu (Permanent Worker)</i>
PLB3	:	<i>Pengelolaan Limbah Bahan Berbahaya dan Beracun (Hazardous and Toxic material waste management)</i>
PP	:	<i>Peraturan Pemerintah (Government Regulation)</i>
PPA	:	<i>Pengendalian Pencemaran Air (Water pollution control)</i>
PPU	:	<i>Pengendalian Pencemaran Udara (air pollution control)</i>
PMNP	:	Plantation Monitoring and Planning
PMPTSP	:	<i>Penanaman Modal & Pelayanan Terpadu Satu Pintu (One Stop Investment & Integrated Services)</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personnel Protective Equipment
PT	:	<i>Pekerja Tetap (Permanent Worker)</i>
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan (Environment Management and Monitoring Plan)</i>
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
RTRWP	:	<i>Rencana Tata Ruang Wilayah Provinsi (Province Spatial Plan)</i>
SBU	:	Strategic Business Unit
SCCS	:	Supply Chain Certification System
SEIA	:	Social & Environmental Impact Assessment
SHM	:	<i>Sertifikat Hak Milik</i>
SIA	:	Social Impact Assessment
SIO	:	<i>Surat Izin Operasional (Operational Licence)</i>
SKP	:	<i>Surat Keterangan Penunjukkan (Certificate of Appointment)</i>
SKU	:	<i>Syarat Kerja Umum (Permanent Workers)</i>
SMARTRI	:	Sinar Mas Agro Resources and Technology Research Institute
SMD	:	Senior Managing Director
SOP	:	Standard Operational Procedure
SPO	:	Sustainable Palm Oil
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
TBM	:	<i>Tanaman Belum Menghasilkan (immature area)</i>
TBP	:	Time Bound Plan
THR	:	<i>Tunjangan Hari Raya (Religious Holiday Allowance)</i>
TKD	:	<i>Tim Kebakaran Desa (village fire team)</i>
TTE	:	<i>Tanda Terima Elektronik (Electronic receipt)</i>
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit (oil palm leaf caterpillar)</i>
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"> RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020). Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020. 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Tapian Nadenggan subsidiary of Golden Agri Resources Ltd.	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535. Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor. Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia.	
1.2.4	Telephone	(+62-21) 50338899	
1.2.5	Fax	(+62-21) 50389999	
1.2.6	E-mail	yahya.mustakim@sinarmas-agri.com	
1.2.7	Web page address	www.goldenagri.com.sg	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of Sustainability Management System and Certification Operations Sustainability)	
1.2.9	Registered as RSPO member	1-0096-11-000-00 – 30 January 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Batu Ampar POM, Batu Ampar Estate and Batu Mulia Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Batu Ampar Mill	Serongga Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 03° 11' 53.35" E 116° 01' 11.30"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Batu Ampar Estate	Serongga Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 03° 13' 34.82" E 116° 02' 20.86"
	Batu Mulia Estate	Langadai Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	S 03° 11' 53.75" E 116° 06' 04.27"

1.5	Description of Area Statement		
1.5.1	Tenure		
	• State	HGU = 7,648.71 Ha HGB = 27.01 Ha	
	• Community	- Ha	
	*There is an area of 775.60 Ha did not include in the scope of certification due to mining activities by the local mining company since the beginning of Estate started the oil palm plantation. Therefore, the total scope of certification is 6,900.12 Ha.		
1.5.2	Area Statement		
	Total Area	6,900.12	Ha
	Mature Area	5,603.82	Ha
	Immature Area	287.97	Ha
	Mill	27.01	Ha
	Building	65.13	Ha
	Road	251.31	Ha
	Trench, Swamp, River	253.49	Ha
	Air Strip	5.85	Ha
	HCV	152.52	Ha
	Power Line of PLN	9.23	Ha
	Asphalt Road	25.03	Ha
	Grave Area	0.04	Ha
	Occupation	174.37	Ha
	Shrubs	44.35	Ha
	*HCV area covering an area of 504.59 Ha, overlapping in other areas such as Planted Area, Road, Trench, Swamp, and Shrubs.		
1.6	Planting Year and Cycles		
1.6.1	Age profile of planting year		
Planting Year	Hectarage (Ha)		
	Batu Ampar Estate	Batu Mulia Estate	Total
1993	254.24	-	254.24
1998	94.78	-	94.78
1999	521.99	-	521.99
2005	991.48	-	991.48
2006	352.01	-	352.01
2007	236.29	-	236.29
2017	-	452.13	452.13
2018	-	724.79	724.79
2019	609.38	727.13	1,336.51
2020	-	639.60	639.60
Sub Total Mature	3,060.17	2,543.65	5,603.82
2021	287.97	-	287.97
Sub Total Immature	287.97	-	287.97
TOTAL	3,348.14	2,543.65	5,891.79
*The area planted in 1993 was last replanted in August 2022, but the registration approval process is still being submitted to become			

	an Immature area so that for assessment 2.1 it is still listed as a Mature area.						
1.6.2	New Planting area after January 2010			- Ha			
1.6.3	Planting Cycle			2 nd Cycle			
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Batu Ampar Mill	60	224,601.99	44,186.61	19.67	10,367.87	4.62
	*Production data source from September 2022 to August 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)	%
	Batu Ampar Estate	3,971.08	3,060.17	41,983.30	13.72	41,983.30	100
	Batu Mulia Estate	2,929.04	2,543.65	39,272.23	15.44	39,272.23	100
	TOTAL	6,900.12	5,603.82	81,255.53	14.50	81,255.53	100
		*Production data source from September 2022 to August 2023					
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)		Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)	
	Sungai Panci Estate (RSPO Certified)		PT Sinar Kencana Inti Perkasa	-	-	41,097.12	
	Sungai Panci Plasma (RSPO Certified)		PT Sinar Kencana Inti Perkasa	-	-	27,828.10	
	Total Certified					68,925.22	
	CV Joya Anugrah Jaya (RSPO Non-Certified)		Independent Supplier	-	-	27,199.58	
	Kelompok Tani Telagasari (RSPO Non-Certified)		Independent Supplier	-	-	2,244.26	
	Gapoktan Karya Tani (RSPO Non-Certified)		Independent Supplier	-	-	2,903.43	
	Gapoktan Sinar Kencana (RSPO Non-Certified)		Independent Supplier	-	-	562.37	
	Reyvel Victor Bella (RSPO Non-Certified)		Independent Supplier	-	-	9,718.65	
	CV Karya Sari (RSPO Non-Certified)		Independent Supplier	-	-	6,068.56	
	CV Bamega Perkasa (RSPO Non-Certified)		Independent Supplier	-	-	22,418.70	
	CV Borneo Sakti Antamaran (RSPO Non-Certified)		Independent Supplier	-	-	794.24	
	CV Borneo Palm Plantation (RSPO Non-Certified)		Independent Supplier	-	-	2,335.24	

	PT Mitra Nusa Permata - Sungai Manunggul Estate (RSPO Non-Certified)	Independent Supplier	-	-	215.35			
	Total Non-Certified				74,460.38			
	TOTAL				143,385.60			
*Production data source from September 2022 to August 2023								
1.7.4	Product categories			FFB, CPO, PK				
1.8	Estimate Tonnage of Certified Product							
1.8.1	Past Annual Claim Certified Product		Estimate Production period of 26 Nov 2022 – 25 Nov 2023 + Ext Volume		Actual Production (MT) of Sep 2022 – Aug 2023			
	FFB Processed		146,362		150,180.75			
	CPO Production		30,937		29,988.01			
	Palm Kernel (PK) Production		7,729		7,125.55			
1.8.2	Product selling							
	Type of selling product		Actual selling product for last year (Sep 2022 – Aug 2023) (MT)					
	CSPO sold as RSPO certified product		29,681.43					
	CSPK sold as RSPO certified product		6,956.64					
	CSPO sold under another scheme		0					
	CSPK sold under another scheme		0					
	CSPO sold as conventional		0					
	CSPK sold as conventional		0					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Batu Ampar Estate	3,971.08	2,805.93	43,660	15.56			
	Batu Mulia Estate	2,929.04	2,543.65	40,840	16.06			
	TOTAL	6,900.12	5,349.58	84,500	15.80			
*Projected FFB production for 12 months of certificate								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Batu Ampar Mill	60	84,500	16,630	19.68	3,910	4.63	MB
*Projected CSPO and CSPK production for 12 months of certificate								
1.9	Other Certifications							
	ISO 9001:2008		-					
	ISO 14001: 2004		-					
	OHSAS 18001:2007		-					

	ISCC	-			
	Others	ISPO (MUTU-ISPO/284) valid thru 3 August 2027 by PT Mutuagung Lestari			
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				
Pangkalan Panji Mill (PT Sawit Mas Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified
		Sawit Mas Estate (HGU on progress – 2,291 Ha)	2024		-
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified
		Bumi Sawit Estate (HGU on progress – 773.39 Ha)	2024		-
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified
		Muara Kandis Estate	2013		Certified
		Muara Kandis Estate (HGU on progress – 418.49 Ha)	2023		-
		Muara Tawas Estate (HGU on progress – 57.7 Ha)	2023		-
		Smallholder (KKPA Pandawa)	2024		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Permai Estate (PT Agrolestari Subur Sejahtera)	2024		-
		Bukit Lestari estate (PT Agrolestari Hijau Sentosa)	2024		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2024		-
		Tanjung Sawit Estate (PT Palmino Biliton Berjaya)	2024		-

		Tanjung Sawit Plasma (PT Palmino Biliton Berjaya)	2024		-
		Tanjung Rusa KKPA	2024		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process – 155.46 Ha)	2024		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung Province	Certified
		Sungai Merah Estate (HGU on process – 241.54 Ha)	2024		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2023	Cendrawasih Estate	2023	Papua Province	ST-1
		Nuri Estate	2023		ST-1
		Rajawali Estate	2023		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2023		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2022	Kayung Estate	2023	Kalimantan Barat Province	ST-1
		Pekawai Estate	2023		ST-1
		Sungai Kelik Estate	2023		ST-1
		Nanga Tayap Estate	2023		ST-1
		Smallholder (Kayung Plasma)	2024		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2023		-
		Delima Estate (PT Kencana Graha Permai)	2023		-
		Smallholder (Kencana Plasma)	2024		-
		Smallholder (Kenanga Plasma)	2024		-
Perdana Mill (PT)	2023	Perdana Estate	2025	Kalimantan	ST-1

Binasawit (Pratama)	Abadi		Langgana Estate	2025	Tengah Province	ST-1
			Semandau Estate	2025		ST-1
			Muara Dua Estate	2025		ST-1
Kuayan Mill (PT Agrokarya Lestari)	(PT Prima)	2023	Bukit Santuhai Estate	2025	Kalimantan Tengah Province	ST-1
			Tajur Beras Estate	2025		ST-1
			Seranau Estate	2025		ST-1
			Sungai Sambon Plasma	2025		-
			Sapiri Estate (PT Buana Adhitama)	2025		ST-1
			Sapiri Plasma	2025		-
			Bukit Dua Estate (PT Buana Adhitama)	2025		-
Belian Mill (PT Paramitra Pratama)	(PT Internusa)	2022	Belian Estate	2022	Kalimantan Barat Province	ST-1
			Tengkawang Estate	2022		ST-1
			Muara Tawang Estate (PT Kartika Prima Cipta)	2023		ST-1
			Kapuas Hulu Estate (PT Persada Graha Mandiri)	2023		ST-1
			Sungai Beran Estate (PT Persada Graha Mandiri)	2023		ST-1
			Smallholder (Belian KKPA)	2024		-
			Smallholder (Muara Tawang KKPA)	2024		-
			Smallholders (Kapuas Hulu KKPA)	2024		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)		2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	Certified
			Sungai Kupang KKPA	2024		-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)		2022	Sungai Kikim Estate	2023	Sumatera Selatan Province	-
			Sungai Pangi Estate	2023		-
			Sungai Musi Estate	2023		-
			Sungai Saling Estate	2023		-
			Sungai Enim Estate (PT Bumi Sawit Permai)	2023		-
			Sungai Lematang Estate (PT Bumi Sawit Permai)	2023		-
			Sungai Bungur Estate (PT Prima Cipta Mandiri)	2023		-
			Sungai Lingsing Estate (PT Prima Cipta Mandiri)	2023		-
Tangar Mill (PT)		2023	Sulin Estate	2025	Kalimantan	-

Mitrakarya Agroindo)		Sulin Plasma	2025	Tengah Province	-
		Nahiyang Estate	2025		-
		Katayang Estate	2025		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2023	Sungai Magalau Estate	2023	Kalimantan Selatan Province	-
		Senakin Estate	2023		-
		Sungai Manunggul Estate (PT Mitra Nusa Permata)	2023		-
Jalemo Mill (PT Agro Lestari Sentosa)	2023	Jalemo Estate	2025	Kalimantan Tengah Province	-
		Kajui Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2025		-
		Manuhing KKPA	2025		-
Sako Mill (PT Adi Tunggal Mahajaya)	2023	Mentaya Estate	2025	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2025		ST-1
		Sako Plasma	2025		-
		Sungai Ayawan Estate	2025		-
		Sungai Nusa Estate	2025		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Pernantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kintapura Estate	2012		Certified
		Kintapura Estate (HGU on process - 636.33 Ha)	2024		-
Langga Payung Mill (PT Tapian Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tapian Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2025		-
Semilar Mill (PT Tapian)	2013	Semilar Estate	2013	Kalimantan	Certified

Nadenggan)		Sei Rindu Estate	2013	Tengah Province	Certified
		Mandang Estate (PT Buana Arta Sejahtera)	2013		Certified
		Puri Estate (PT Buana Arta Sejahtera)	2013		Certified
Jak Luay Mill (PT Tapan Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2024		-
		Long Buluh Estate	2015		Certified
		Long Buluh Estate (HGU on progress - 329.66 Ha)	2024		-
		Bukit Subur Estate	2015		Certified
		Bukit Subur Estate (HCV identification on process - 569.62 Ha)	2024		-
		Bukit Subur KKPA	2024		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
		Bukit Intan Estate (PT Bumipermai Lestari)	2014		Certified
		Bukit Mas Estate (PT Bumipermai Lestari)	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2022	Gunung Kombeng KKPA	2024	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2023	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2024		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	Certified
		Batang Merangin Estate	2020		Certified
		Tiga Serumpun KKPA	2024		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate (PT Satya Kisma Usaha)	2023		-

		Batang Gading KKPA (PT Satya Kisma Usaha)	2024		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal KKPA	2015		Certified
		Muara Kilis Estate	2015		Certified
		Muara Kilis Estate (RacP process - 1,460.54 Ha)	2015		Certified
		Kilis KKPA	2024		-
Bukit Kapur Mill (PT SMART Tbk)	2022	Bukit Kapur Estate	2025	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2025		ST-1
Samsam Mill (PT Ivo Mas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2024		-
		Kandistasari Estate	2009		Certified
		Kandistasari Estate (HGU on progress – 158.46 Ha)	2024		-
		Palapa Estate	2009		Certified
Libo Mill (PT Ivo Mas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
		Nenggala Estate	2009		Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2024		-
		Sei Rokan Estate	2009		Certified
		Sei Rokan Estate (HGU on progress – 102.7 Ha)	2024		-
		Sungai Tapung Plasma	2009		Certified
Ujung Tanjung Mill (PT Ivo Mas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2024		-
Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Riau Province	Certified
		Naga Mas Estate (HGU on process – 253.39 Ha)	2024		-
		Naga Sakti Estate	2010		Certified
		Naga Sakti Estate (HGU on process – 59.79 Ha)	2024		-
		Rama Bakti Estate	2010		Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Estate	2010	Riau Province	Certified
		Kijang Estate (HGU on process – 56.07 Ha)	2024		-
		Kijang Kencana Plasma	2010		Certified

Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
		Ramarama Estate (HGU on process – 318.76 Ha)	2024		-
		Amartajaya Plasma	2010		Certified
		Smallholder (Ramarama KKPA – 760 Ha)			
		Smallholder (Berkat Ridho – 739,99 Ha)			
		Smallholder (Produsen Rama Sawit KKPA – 174,95)	2024		-
Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indralestari Estate	2011	Riau Province	Certified
		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Indrasakti Plasma	2011		Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
		Bumi Palma Estate	2012		Certified
		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process – 39.21 Ha)	2024		-
		Kharisma Estate (PT Kharisma Riau Sentosa Prima)	2024		-
		Kharisma Plasma (PT Kharisma Riau Sentosa Prima)	2024		-
		Mandian Jaya Plasma (PT Meganusa Inti Sawit)	2024		-
Sawita Mill (PT Sawitakarya Manunggul)	2022	Sawita Estate	2023	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2023		ST-1
		Sawita KKPA	2024		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2023	Gaharu Estate (PT Bangun Nusa Mandiri)	2025	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2025		ST-1
		KerANJI Estate (PT Bangun Nusa Mandiri)	2025		ST-1
		Smallholder (Gaharu Plasma)	2025		-
		Smallholder (Kenari Plasma)	2024		-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2023	Sungai Air Jernih Estate	2023	Jambi Province	-
		Sungai Mentawak Estate	2023		-
		Sungai Mentawak KKPA	2023		
		Sungai Merak Estate	2023		-

		Sungai Badak Estate	2023		-
Sungai Perak Mill (PT Kruing Lestari Jaya)	2023	Sungai Perak Estate	2024	Kalimantan Timur Province	-
		Sungai Basung Estate	2024		-
		Sungai Pikan Estate	2024		
		Sungai Pilos Estate	2024		-
		Sungai Pikan Plasma	2024		
Sungai Kedang Mill (PT Harapan Rimba Raya)	2023	Sungai Kedang Estate	2024	Kalimantan Timur Province	-
		Sungai Tohan Estate	2024		-
		Kedang Pahu Estate	2024		-
		Sungai Pahu Estate (PT Rimba Rayatama Jaya)	2024		-
		Sungai Tohan Plasma	2024		
		Sungai Pahu Plasma (PT Rimba Rayatama Jaya)	2024		

	<p><i>TBP revised on 19 May 2022 and approved by RSPO on 14 June 2022</i></p> <p>There is revision of timebound plan on 19 May 2022 made by Head of Operations Sustainability. There are justification for mills and estates that postpone, with explanation:</p> <ul style="list-style-type: none">• Pandawa KKPA supply base of Muara Kandis Mill is postponed to 2024 due to the SHM process.• Tanjung Rusa KKPA supply base of Tanjung Kembiri Mill is postponed to 2024 due to the SHM process.• Tanjung Sawit Estate dan Tanjung Sawit KKPA (PT Palmindo Biliton Berjaya) are postponed to 2024 due to still in process for HGU and land rights (SHM)• Kasuari Mill and supply bases are postponed to 2023 due to still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse• Pekawai Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.• Kayung KKPA supply base of Pekawai Mill are postponed to 2024 due to still in process for land rights (SHM).• Kenanga Estate (PT Cahaya Nusa Gemilang) dan Delima Estate (PT Kencana Graha Permai) are postponed to 2024 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.• Kencana KKPA and Kenanga KKPA supply base of Kenanga Mill are postponed to 2024 due to still in process for land rights (SHM).• Perdana Mill and supply bases are postponed to 2025 due to still in process for HGU.• Kuayan Mill and supply bases are postponed to 2025 due to still in process for HGU.• Belian Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.• Belian KKPA, Muara Tawang KKPA and Kapuas Hulu KKPA supply base of Belian Mill are postponed to 2024 due to still in process for land rights (SHM).• Sungai Kupang KKPA supply base of Sungai Kupang Mill are postponed to 2024 due to still in process for land rights (SHM).• Sungai Kikim Mill and supply bases are postponed to 2022 due to still in process of EIA (AMDAL) revision.• Tangar Mill and supply bases are postponed to 2025 due to still in process for HGU.• Sungai Magalau Mill and supply bases and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).• Jalemo Mill and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).• Sako Mill and supply bases are postponed to 2025 due to still in process for HGU.• Medang Sati Estate (PT Saya Kisma Usaha) supply base of Hanau Mill is postponed to 2025 due to still in process for HGU.• Jak Luay KKPA and Bukit Subur KKPA supply base of Jak Luay Mill are postponed to 2023 due to still in process for land rights (SHM).				
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- Gunung Kombeng KKPA supply base of Gunung Kombeng Mill are postponed to 2023 due to still in process for land rights (SHM).
- Rantau Panjang KKPA supply base of Rantau Panjang Mill are postponed to 2023 due to still in process for land rights (SHM).
- Tiga Serumpun KKPA supply base of Pelakar Mill are postponed to 2024 due to still in process for land rights (SHM).
- Batang Gading Estate supply base of Langling Mill are postponed 2023 due to still in process for RaCP (LUCA review).
- Batang Gading KKPA supply base of Langling Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kilis KKPA supply base of Sungai Bengkal Mill are postponed to 2024 due to still in process for land rights (SHM).
- Bukit Kapur Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Rama-Rama KKPA are postponed to 2023 due to still in process for land rights (SHM).
- Sawita Mill and supply bases are postponed to 2022 due to still in process for HGU.
- Sawita KKPA supply base of Sawita Mill is postponed to 2024 due to still in process for land rights (SHM).
- Kenari Mill and supply bases are postponed to 2025 due to the process for RaCP (LUCA review).
- Sungai Air Jernih Mill and supply bases are postponed to 2023 due to still in process for legality documents.

Then there are additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 plasma/KKPA) and have been included in the timebound plan to be certified in 2023, with the following details:

- PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.
- PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.
- PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).
- PT Agrolestari Subur Sejahtera (previously the company name is PT Bumi Permai Surya Lestari): Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
- PT Agrolestari Hijau Sentosa (previously the company name is PT Bumi Bangka Lestari): Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
- PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified.
- PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

In 2022, GAR has made additional units by acquiring 4 factories namely Sungai Perak Mill, Sungai Kedang Mill, Bukit Perak Mill, Bumi Palma Mill and 15 plantations (11 own plantations namely Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate, Bukit Permai Estate, Bukit Lestari Estate, Kharisma Estate and 4 plasma /KKPA namely Sungai Pikan Plasma, Sungai Tohan Plasma, Sungai Pahu Plasma, Kharisma Plasma).

There are some companies that are not fully certified, due to some area still on process to get land title (HGU) and RaCP process, consist of:

- PT Sawit Mas Sejahtera (Sawit Mas Estate);
- PT Bumi Sawit Permai (Bumi Sawit Estate);
- PT Djuanda Sawit Lestari (Muara Kandis Estate & Muara Tawas Estate);
- PT Forestalestari Dwikarya (Tanjung Rusa Estate);
- PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate). Based on the results of the ASA 1.4 audit, it is known that the Sungai Buaya Estate HGU for an area of 99.89 Ha has been issued, namely SK Number 2/HGU/BPN.18/2019 on June 12 2019 and certificate No. 36 of 2019 for an area of 26.18 Ha with a date of issue August 20, 2019 with a validity period of up to June 12, 2049. For an area of 73.71 Ha, HGU certificates have been issued with Certificate Number 37 of 2019 (Decree Number 1/HGU/BPN.18/2019 on June 12, 2019) with the

date of issue 20 August 2019 with validity period until 12 June 2049. For Sungai Merah Estate HGU has also been issued, namely SK HGU No. 1/HGU/BNP.18/2018 dated 8 November 2018 for an area of 241.54 Ha and HGU certificate No. 82 of 2019 area of 2,415,400 M2. The issuance date of the certificate is March 06, 2019 and the period of expiry of the rights is November 08, 2049.

- PT SMART Tbk (Kinta Pura Estate);
- PT Tapian Nadenggan (Long Buluh Estate and Bukit Subur Estate);
- PT Ivo Mas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);
- PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate);
- PT Rama Jaya Pramukti (Ramarama Estate);
- PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA);
- PT Bumipalma Lestari Persada (Bumi Palma Estate);
- PT Tapian Nadenggan (Sei Rindu Estate);
- PT Kruing Lestari Jaya (Sungai Perak Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.

In this assessment TBP becomes non conformity, where:

- RSPO Certification System Clause 5.5.2 (a) explains that all plantations and mills must be certified within five (5) years after obtaining RSPO membership. Every new acquisition must be followed by certification within three (3) years. Any exceptions outside this maximum period must be approved by the RSPO Secretariat.
- The RSPO announcement on 11 January 2023 regarding the process flow for the time bound plan (TBP) Revision explained that:
 1. Since the RSPO Certification System document was made effective from 1 July, 2018, existing RSPO members have 5 years from this date to comply with these requirements. This means any grower member with management unit(s) that have not yet been certified will need to ensure that the uncertified management unit(s) are certified by 30 June, 2023.
 2. Changes of the TBP due to deviation of the maximum period. The request for approval is send to RSPO via email by using the TBP Revision Template which can be downloaded from the RSPO website.
- Partial certification of Golden Agri Resources for Un Certified units on January 30, 2023, it is known that there are units that underwent Partial Certification Audits, for example the PT Ivo Mas Tunggal unit (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, and Nenggala Estate) with results still in progress. HGU management process.
- Based on the results of document verification and field visits, it is known that there are Non-Certified areas in the Nenggala Estate and Sei Rokan Estate units, with details:
 1. Sei Rokan Estate covering an area of 102.7 Ha
 2. Nenggala Estate with an area of 419.9 hectares
- The Unit of Certification has reported the GAR Bound Plan Team to RSPO and has received approval from RSPO on 14 June 2022. However, based on the verification results of the GAR Bound Plan Team documents that have been approved by RSPO it is known that the Non-Certified area is in Sei Rokan Estate, Nenggala Estate, Samsam Estate and Ujung Tanjung Estate are not included in GAR's Time Bound Plan which has been approved by the RSPO.
- The unit of certification has shown the RSPO document TBP Non-Certified areas in the Certified Estate which was signed by the Head of Operations Sustainability on December 5, 2022. The results of the document verification found that the Non-Certified Areas were in Sei Rokan Estate, Nenggala Estate, Samsam Estate, and Ujung Tanjung estate is planned to be certified in 2024, however the TBP for this area has not received approval from the RSPO.

Based on explanation above, the Unit of Certification has not been able to show evidence that the Time Bound Plan for several uncertified units exceeding 30 June 2023 has been reported and has received approval from the RSPO. This become non conformity No.2023.01.

1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
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TBP revised on 19 May 2022 and approved by RSPO on 14 June 2022

There is revision of timebound plan on 19 May 2022 made by Head of Operations Sustainability. There are justification for mills and estates that postpone, with explanation:

- Pandawa KKPA supply base of Muara Kandis Mill is postponed to 2024 due to the SHM process.
- Tanjung Rusa KKPA supply base of Tanjung Kembiri Mill is postponed to 2024 due to the SHM process.
- Tanjung Sawit Estate dan Tanjung Sawit KKPA (PT Palmindo Biliton Berjaya) are postponed to 2024 due to still in process for HGU and land rights (SHM)
- Kasuari Mill and supply bases are postponed to 2023 due to still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse
- Pekawai Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented
- Kayung KKPA supply base of Pekawai Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kenanga Estate (PT Cahaya Nusa Gemilang) dan Delima Estate (PT Kencana Graha Permai) are postponed to 2024 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.
- Kencana KKPA and Kenanga KKPA supply base of Kenanga Mill are postponed to 2024 due to still in process for land rights (SHM).
- Perdana Mill and supply bases are postponed to 2025 due to still in process for HGU
- Kuayan Mill and supply bases are postponed to 2025 due to still in process for HGU
- Belian Mill and supply bases are postponed to 2022 due to pandemic covid-19 so that on-site audit in 2021 cannot be implemented.
- Belian KKPA, Muara Tawang KKPA and Kapuas Hulu KKPA supply base of Belian Mill are postponed to 2024 due to still in process for land rights (SHM).
- Sungai Kupang KKPA supply base of Sungai Kupang Mill are postponed to 2024 due to still in process for land rights (SHM).
- Sungai Kikim Mill and supply bases are postponed to 2022 due to still in process of EIA (AMDAL) revision.
- Tangar Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Sungai Magalau Mill and supply bases and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).
- Jalemo Mill and supply bases are postponed to 2023 due to still in process for HGU and RaCP (LUCA review).
- Sako Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Medang Sati Estate (PT Saya Kisma Usaha) supply base of Hanau Mill are postponed to 2025 due to still in process for HGU.
- Jak Luay KKPA and Bukit Subur KKPA supply base of Jak Luay Mill are postponed to 2023 due to still in process for land rights (SHM).
- Gunung Kombeng KKPA supply base of Gunung Kombeng Mill are postponed to 2023 due to still in process for land rights (SHM).
- Rantau Panjang KKPA supply base of Rantau Panjang Mill are postponed to 2023 due to still in process for land rights (SHM).
- Tiga Serumpun KKPA supply base of Pelakar Mill are postponed to 2024 due to still in process for land rights (SHM).
- Batang Gading Estate supply base of Langling Mill are postponed 2023 due to still in process for RaCP (LUCA review).
- Batang Gading KKPA supply base of Langling Mill are postponed to 2024 due to still in process for land rights (SHM).
- Kilis KKPA supply base of Sungai Bengkal Mill are postponed to 2024 due to still in process for land rights (SHM).
- Bukit Kapur Mill and supply bases are postponed to 2025 due to still in process for HGU.
- Rama-Rama KKPA are postponed to 2023 due to still in process for land rights (SHM).
- Sawita Mill and supply bases are postponed to 2022 due to still in process for HGU.
- Sawita KKPA supply base of Sawita Mill are postponed to 2024 due to still in process for land rights (SHM).

- Kenari Mill and supply bases are postponed to 2025 due to the process for RaCP (LUCA review).
- Sungai Air Jernih Mill and supply bases are postponed to 2023 due to still in process for legality documents.

Then there are additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 plasma/KKPA) and have been included in the timebound plan to be certified in 2023, with the following details:

1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.
2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.
3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).
4. PT Agrolestari Subur Sejahtera (previously the company name is PT Bumi Permai Surya Lestari): Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
5. PT Agrolestari Hijau Sentosa (previously the company name is PT Bumi Bangka Lestari): Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified.
6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified.
7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

There are some companies that are not fully certified, due to some area still on process to get land title (HGU) and RaCP process, consist of:

- PT Sawit Mas Sejahtera (Sawit Mas Estate)
 - PT Bumi Sawit Permai (Bumi Sawit Estate)
 - PT Djuanda Sawit Lestari (Muara Kandis Estate & Muara Tawas Estate).
 - PT Forestalestari Dwikarya (Tanjung Rusa Estate);
 - PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate).
 - PT SMART Tbk (Kinta Pura Estate)
 - PT Tapian Nadenggan (Long Buluh Estate and Bukit Subur Estate)
 - PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);
 - PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate);
 - PT Rama Jaya Pramukti (Ramarama Estate);
 - PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA)
 - PT Bumipalma Lestari Persada (Bumi Palma Estate)
 - PT Tapian Nadenggan (Sei Rindu Estate)
- RSPO Certification System Clause 5.5.2 in letter (a) explains that all plantations and mills must be certified within five (5) years after obtaining RSPO membership. Every new acquisition must be followed by certification within three (3) years. Any exceptions outside this maximum period must be approved by the RSPO Secretariat.
 - The RSPO announcement on 11 January 2023 regarding the process flow for the time bound plan (TBP) Revision explained that:
 1. Since the RSPO Certification System document became effective from 1 July 2018, existing RSPO members have 5 years from this date to comply with these requirements. This means that every grower member who has a management unit that has not been certified must ensure that the management unit that has not been certified has been certified no later than 30 June 2023.
 2. Changes in TBP due to deviations in the maximum time period. Applications for approval are sent to the RSPO via email using the TBP Revision Template which can be downloaded from the RSPO website.
 - Partial certification of Golden Agri Resources for Un Certified units on January 30 2023, it is known that there are units that have undergone partial certification audits, for example PT Ivomas Tunggal units (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, and Nenggala Estate), Long Buluh Estate and Kintapura Estate with status still in the process of obtaining HGU and being a Non Certified area, for example:

	<ol style="list-style-type: none"> 1. Kintapura Estate covering an area of 636.33 Ha 2. Sei Rokan Estate covering an area of 102.7 Ha 3. Nenggala Estate covering an area of 419.9 Ha <ul style="list-style-type: none"> • The Certification Unit has reported the GAR Bound Plan Team to the RSPO and has received approval from the RSPO on June 14 2022. However, based on the results of the verification of the GAR Bound Plan Team documents which have been approved by the RSPO, it is known that the Non-Certified area is in Long Buluh Estate, Kintapura Estate, Sei Rokan Estate, Nenggala Estate, Samsam Estate and Ujung Tanjung Estate are not yet included in GAR's Time Bound Plan which has been approved by the RSPO. This has become nonconformity No. 2023.03 with major category.
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	The Company didn't have associated smallholders.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2.1	<p>1. Leonada (Lead Auditor Witnessing). Bachelor of Agriculture, Department of Agricultural Cultivation, Faculty of Agriculture, Plant Breeding and Seed Technology Study Program, Bogor Agricultural University. Has more than five years working experience as a plantation operations and sustainability staff in a private Indonesian oil palm plantation company. Trainings that have been attended include: Indonesian Sustainable Palm Oil (ISPO) Auditor Training, RSPO Lead Auditor, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, ISO 9001 Lead Auditor; 2008, ISO 14001; 2005, Training Management Deployment Program Agronomy, analysis base solution for operation, Training on peat management for oil palm, Training on Integrated Plant Pest and Weed Control (IPM), Training on Limited Use of Pesticides, Training on Pesticide and Fertilizer Waste Management, Mediation training and conflict resolution, training for General OSH Expert, OHS management system Auditor and currently working for an independent certification body as an auditor. In this audit activity, he served as Witnessing Lead Auditor.</p> <p>2. Kiki Fadli (Lead Auditor Witnessed). Indonesian citizen, Bachelor of Agricultural Engineering, Agricultural Engineering Study Program. Has experience working in the Department of Sustainability in private and state-owned oil palm plantations. Has attended ISPO New Refreshment Lead Auditor training, RSPO Lead Auditor, General OHS Expert, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, OHS management system and ISH Lead auditor training organized by RSPO. In this audit activity, an assessment of the legal aspects of land, SCCS aspect, TBP aspect, partial certification aspect, land disputes Best Management Practices and OHS aspects was carried out.</p> <p>3. Fauzi Prima Sanusi (Auditor). Indonesian citizens. Bachelor of Forestry. Has work experience in the field of HSE, Environmental NGOs, attended training including Proper Training, General Health and Safety Expert, Biodiversity Study, HCV, Water and Air Monitoring Management, ISO 14001: 2004 Auditor, FSC Auditor, Sustainable Forest Management Auditor 2014, ISPO Auditor 2018, Forest and Land Fire Control Training 2014, has participated in audit activities for SFM Since 2016 FSC Audit 2017, ISPO Audit 2019 In this audit activity carried out verification in the fields of environment, conservation and GHG.</p> <p>4. Johannes Kapri Pandiangan (Auditor). Bachelor of Agriculture, Department of Agricultural Social-Economics, Faculty of Agriculture. Has 7 years of experience working as operational staff in one of the leading private oil palm plantation companies in Indonesia. The training that has been attended includes Forest and land fire emergency response training by BKSDA Riau Province, IHT ISPO P&C Certification System, IHT Awareness ISO 17021 and 17065, IHT Awareness RSPO, ISO 14001: 2015 Lead Auditor Training, and ISO 9001:2015 Lead Auditor Training During this audit he verify Worker Welfare aspect and social.</p> <p>5. Andre Bona Tito Pardede (Auditor Trainee). Indonesian Citizen, with a Bachelor of Agriculture from a university in Indonesia. Experience working in private oil palm plantation companies in Indonesia as an Assistant in Sustainable and Internal Audit Agronomy. The training that has been attended includes ISO 9001: 2015 By IRCA, ISPO Auditor Certification, Awareness ISO 17021, Awareness ISO 9001, Awareness ISO 14001, Awareness ISO 45001, and Awareness ISO 19011. Has attended several simulations of audit activities related to the certification system for sustainable oil palm plantations with aspects of Best Management Practice and OHS. In this audit activity, we verified the aspects of Best Management Practices and OHS. In audit, supervise by lead auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari Tbk office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2.1	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for ASA-2.1 Onsite Audit: 5 days</p> <p>Number of working days for ASA-2.1 Onsite Audit: 15 Working days</p>
2.2.2	Assessment Process
ASA-2.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Batu Ampar POM – PT Tapian Nadenggan subsidiary of Golden Agri Resources to the requirements of RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the</p>

RSPO Board of Governors on 20th 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-2.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-2.2.

All information obtained was recorded in Check List of PT Mutuagung Lestari Tbk (MUTU) and part of ASA-2.1.

The opening meeting was held on September 4th, 2023, at Meeting Room Office. As for the participants who attended the opening meeting included Regional Controller, Production Controller, Mill/Estate Manager, Support Team from Jakarta and other staff at Estate and Mill units. Closing meeting was held on September 8th, 2023, which was attended by the same participants as the opening meeting. Management PT Tapan Nadenggan - Batu Ampar POM accept all the ASA-2.1 audit results.

Interviews were conducted with male workers, female workers and staff in person at the factory and plantation workplaces and also via teleconference. Field workers were interviewed informally in small groups in the field. Company officials were not present at internal or external stakeholder interviews. The list of stakeholders contacted is listed in Appendix 1.

The assessment program please find Appendix 2.

2.2.3

Locations of Assessment

ASA-2.1

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

Batu Ampar Mill (BAMM)

- **Security Post.** Field observations and interviews related to labor and OSH aspects.
- **Weighbridge.** Field observations and interviews related to employment aspects and SCCS
- **St. Grading.** Field observations and interviews related to aspects of OHS, BMP and Employment.
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Workshop.** Field observations workshop activity, OHS, environmental and worker welfare aspect.
- **Despatch.** Observations and interviews related to K3 aspects and product delivery.
- **CPO tank.** Observations and interviews related to K3 aspects and CPO storage.
- **Grading Station.** Observations and interviews related to criteria for EFB grading, wages, sampling techniques, and PPE.
- **Loading Ramp Station.** Observations and interviews related work procedure, safety aspect, worker welfare etc
- **Fire-fighting simulation.** Observations to see the ability of officers in handling fires and interviews related to quick response activities, training that has been given etc.
- **Engine room.** Observations and interviews related to medical check-up, PPE, and operator understanding of emergencies.
- **Boiler Station.** Observations and interviews related to OHS, understanding of emergency response, and operator licenses.
- **Sterilizer Station.** Observations and interviews related to the duties and responsibilities of daily work.
- **Press Station.** Observations and interviews related to medical check-up, PPE feasibility, and operator responsibility.
- **Composting Area.** Observation and interview related work procedure, waste utilization, employment, safety, and environmental aspect.

- **WWTP.** Observations and interviews related to IPAL operations, OHS, labor, waste recording and viewing the condition of the IPAL pool for potential leaks or potential pollution to the environment
- **Housing Complex BMM.** observation of housing conditions, conditions of household waste management, sanitation, availability of clean water, and suitability of houses, as well as management of other types of waste
- **Central Warehouse.** Observe the conditions of chemical warehouses, materials and temporary storage places for hazardous material waste regarding storage techniques, recording and suitability of types of goods or waste stored, availability of emergency response equipment in chemical warehouses and temporary storage places for hazardous material waste.
- **EFB area.** observe the condition of the EFB pile, transportation procedures, and the potential for leachate contamination to soil and water bodies.

Batu Ampar Estate (BAME)

- **Workshop.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Rinse House.** Observation related to implementation of procedure, rinse house conditions, OHS and waste management.
- **Fertilizer Storage.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Agrochemical Storage.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Material Storage.** Observations and interviews related to work procedures, PPE stock, worker welfare, OHS, and environmental aspects.
- **Oil Storage.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Fuel Storage.** Observation and interviews related to storage condition, OHS and emergency response facility.
- **Hazardous Waste Temporary Storage.** Observations and interviews related to work procedures, worker welfare, OHS, hazardous toxic and waste stock as well as environmental aspects.
- **Firefighting Storage.** Observation related to condition the firefighting facilities and equipment.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **Circle and Path Spraying Block E7 division 4.** Observation and interview regarding the implementation of weed control procedures and understanding in handling pesticides.
- **Harvesting Block E14 division I.** Observation and interview regarding FFB criteria and workers' understanding of their rights and obligations.
- **Replanting area (Planting Years 2023) Block H37 Division 3.** Observation related replanting activity, that conducted in 2021.
- **Land Application Area Block J27 Division 3.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Barn Owl Box Block E14 Division 1.** Observation related biological pest management.
- **Composting Application Block H34 Division 3.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Workshop.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Rinse House.** Observation related to implementation of procedure, rinse house conditions, OHS and waste management.
- **Fertilizer Storage.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Agrochemical Storage.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Material Storage.** Observations and interviews related to work procedures, PPE stock, worker welfare, OHS, and environmental aspects.

- **Oil Storage.** Observations and interviews related to work procedures, worker welfare, OHS, and environmental aspects.
- **Fuel Storage.** Observation and interviews related to storage condition, OHS and emergency response facility.
- **Hazardous Waste Temporary Storage.** Observations and interviews related to work procedures, worker welfare, OHS, hazardous toxic and waste stock as well as environmental aspects.
- **Firefighting Storage.** Observation related to condition the firefighting facilities and equipment.
- **Firefighting Simulation.** Observation related to condition the firefighting facilities and equipment and preparedness.
- **HCV 4.1/4.3 tidal area, block B27.** observe area conditions, potential damage, completeness of HCV attributes (boundary benchmarks, nameplates, warning and prohibition boards).
- **HGU Pole number 181 Block B07.** Observation the conditions and position of legal boundary.
- **HGU Pole number 179 Block B06.** Observation the conditions and position of legal boundary.
- **HGU Pole number 178 Block C06.** Observation the conditions and position of legal boundary.
- **HCV 1.2/1.3, Bekantan Habitat.** observe area conditions, potential damage, completeness of HCV attributes (boundary benchmarks, nameplates, warning and prohibition boards).
- **Landfill at Blok H7 Divisi II.** Observations related to domestic waste management.

Batu Mulia Estate (BMLE)

- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Diesel Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.
- **Fertilizer warehouse.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Firefighting warehouse and simulation of firefighting equipment.** Material handling observations for OHS and simulations.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Rinse House.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Daycare.** Observations and interviews with workers related to labor and OHS aspects.
- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Harvesting Block F46 division 3.** Observation and interview regarding FFB criteria and workers' understanding of their rights and obligations.
- **Circle and Path Spraying Block F34 division 1.** Observation and interview regarding the implementation of weed control procedures and understanding in handling pesticides.
- **Composting Application Division 2.** Observation and interview related worker welfare, BMP, OHS and environment aspects.
- **Barn Owl Box Block D30 Division 1.** Observation related biological pest management.
- **HCV 4.1/4.3 tidal area, block E47/48.** observe area conditions, potential damage, completeness of HCV attributes (boundary benchmarks, nameplates, warning and prohibition boards).
- **HGU Pole number 21 Block H37, Divisi II.** Observation the conditions and position of legal boundary.
- **HGU Pole number 23 and 26 Block I41, Divisi II.** Observation the conditions and position of legal boundary.
- **HGU Pole number 36 Block C06, Divisi II.** Observation the conditions and position of legal boundary.
- **Land fill at Blok G40/41 Divisi II.** Observations related to domestic waste management.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-2.1	<p>Summary of stakeholder consultation process for PT Tapian Nadenggan was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on MUTU Website on 21 August 2023 • Public consultation meeting with government institution 4 September 2023 • Public consultation meeting with communities (Pantai Village and Serongga Village) on 5 September 2023 • Public consultation meeting with internal stakeholders and contractors on 5 September 2023 • Public consultation with NGOs (by email) such as WALHI, WWF, AMAN, and Sawit Watch on 28 August 2023 <p>Numbers of input from stakeholders were clarified by PT Tapian Nadenggan.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-2.2) will be conducted eight (8) months to twelve (12) months after certificate issued

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Batu Ampar Palm Oil Mill – PT Tapian Nadenggan Subsidiary of Golden Agri Resources operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were one (1) nonconformity were assigned against Major Compliance Indicators; two (2) nonconformities were assigned against Minor Compliance Indicators; and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised, and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Batu Ampar Palm Oil Mill – PT Tapian Nadenggan Subsidiary of Golden Agri Resources complied with the requirements of *Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, endorsed by the RSPO Board of Governors on 20 April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governor on 12th November 2020.*

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification
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 communication and consultation (SOP/SMART/UMUM/SADV/II/004) validated on 1 July 2014 which explains the types of documents which are publicly accessible such as land certificates, OHS plans, environmental and social impact plans and assessments, HCV documentation, pollution prevention and reduction plans, complaints, negotiation procedures, continuous improvement plans, public summary reports on certification assessment, and human rights policy. These documents can be accessed by sending a request to the management. 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: plantation progress report to plantation agency)
1.1.2	Companies can show records of providing information to relevant agencies in the form of routine reports, for example: Legality of Plantations <ul style="list-style-type: none"> Report on the Use and Exploitation of Cultivation Rights for the period 2022 to the Kotabaru Regency Land Office on December 29, 2022. Plantation Business Development Report, for example the report for the first semester of 2023 which was sent to the Kotabaru Regency Agriculture Service on July 25, 2023. Reports on investment activities, for example reports for the second quarter of 2023 to BKPM via the online system on 10 July 2023. Occupational Health and Safety Aspect Based on the results of document review and interviews with agencies in Labuhanbatu District for example Plantation Service, the Environment Service, the Land Office, and the Manpower Office, it was known that the information presented by the certification unit has been presented in an appropriate language (Bahasa) and appropriate form. There is a sample document that informed the company is: <ul style="list-style-type: none"> 2023 Quarter II P2K3 Report to the South Kalimantan Province Manpower and Transmigration Service on 08 August 2023.

(Batu Ampar Mill)

- 2023 Quarter II P2K3 Report to the South Kalimantan Province Manpower and Transmigration Service on August 21 2023. (Batu Ampar Estate)
- 2023 Quarter II P2K3 Report to the South Kalimantan Province Manpower and Transmigration Service on July 29 2023 (Batu Mulia Estate)

Worker Welfare Aspect

- Employee report (*WLTk*) to Ministry of Manpower of PT Tapian Nadenggan – BMM unit with reporting number 72161.20230510.0003 reporting date May 10th, 2023 and the obligation to report back on May 10th, 2024.
- Employee report (*WLTk*) to Ministry of Manpower of PT Tapian Nadenggan – BAME unit with reporting number 72161.20230727.0001 the report date is July 27th, 2023 and the obligation to report back is July 27th, 2024.
- Employee report (*WLTk*) to Ministry of Manpower of PT Tapian Nadenggan – BMLE unit with reporting number 70723.20230622.0001 reporting date June 22nd, 2023 and obligation to report back on June 22nd, 2024.
- Minutes of the handing over of the BMLE unit PKWT to the Manpower and Transmigration Office of Kotabaru Regency on March 14th, 2023

Environment Aspect

- Electronic Receipt ID 1689995444-1168, period 1 April 2023 – 30 June 2023, quarter II, to KLHK, PLB3 Report, status has been reported
- Land Application and Hazardous Waste report for the second quarter of 2023, August 14, 2023, to DLH Kotabaru via email pplh.dlhktb@gmail.com
- Electronic Receipt ID 1689840936-1168, period 1 April 2023 – 30 June 2023, quarter II, to KLHK, PPA Report, status has been reported
- Electronic Receipt ID 1689995585-1168, period 1 January – 30 June 2023, Semester I, to KLHK, RKL-RPL Report, status has been reported
- Electronic Receipt of the Environmental Management and Monitoring Report, Semester I 2023, August 16, 2023, to the Kotabaru Regency Environmental Service
- Electronic Receipt ID 1689995585-1168, period 1 January – 30 June 2023, Semester I, to KLHK, RKL-RPL Report, status has been reported
- Electronic Receipt of the Environmental Management and Monitoring Report, Semester I 2023, August 16, 2023, to the Kotabaru Regency Environmental Service

Based on the document review, all documents and information that can be accessed by the public (mentioned in 1.1.1) are provided in Indonesian and can be understood by each stakeholder.

1.1.3

The company shows the Monitoring Form for Handling Complaints and Dissatisfaction for the period January – December 2022, with an example of an Employee Complaint regarding damage to the Bathtub and a leaking roof in the Employee's house, dated August 22, 2022, which has been responded to with repair of the damage, and declared complete.

The company also shows the Communication and Consultation Book, Update 31 July 2023:

- May 25, 2023, from Pantai Kelumpang Selatan Village, request for Stunting Program Basic Food Assistance: has been responded to with approval of the application proposal on May 29, 2023
- On June 7, 2023, Langadai Kelumpang Hilir village, borrowing a Company School Bus to transport MTQ Competition Participants, has been responded to by providing a School Bus loan on June 18, 2023
- On July 18, 2023, from Primary School 03 Kelumpang Hilir, a request to borrow a lawn mower for field maintenance in the context of Scout activities, was responded to on July 22, 2023, with assistance being provided with a lawn mower.

1.1.4

The company also showed records of socialization regarding the SOP mentioned in 1.1.1 on January 15, 2023, which was attended by every stakeholder such as: contractor workers, small farmer workers and the community. In addition, based on interviews with village residents, trade unions and gender committees, it was found that they had a good understanding of communication and

consultation procedures.

1.1.5

The company shows a current stakeholder list that informs internal and external stakeholders updated on 03 January 2023. These stakeholders include government agencies, community leaders, cooperatives, local suppliers, contractors and trade union organizations. The current list of stakeholders also explains the name, agency/position, address, category and contact person number.

At the time of the assessment, the auditor verified the list of stakeholders by carrying out public consultation activities via telephone, including the Kotabaru Manpower Office, and the contact number provided can be contacted and interviews can be conducted.

Status: Comply

1.2

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

1.2.1

The certification unit's commitment to ethical behaviour is contained in the Sinarmas Agribusiness and Food Business and Human Rights Policy which was ratified on December 12th, 2019, by the Head of Policy and Compliance Division. The policy consists of 11 commitments which include elements of respect for the rights and dignity of workers in accordance with applicable laws and regulations, preventing forced labor and human trafficking, not using child labor, respecting local communities or customary rights, respecting and protecting whistleblowers and defenders. human rights, comply with laws related to the prevention of bribery and corruption.

In addition, the unit of certification also has a GAR Social and Environmental Policy (GSEP). The policy was ratified on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. The document outlines the basic commitments of GAR's upstream and downstream palm oil operations which include environmental management, social and community engagement, work environment and supply chain industrial relations and labor.

Socialization related to this policy has been carried out in each factory and plantation unit. For example, socialization in BAMB unit, which was held on March 11th, 2023 and attended by 40 workers. As proof of implementation, when the auditors conducted interviews and field visits to all workers in the plantation and factory units, they already understood the code of conduct policies that apply in the company. This socialization has also been carried out to external stakeholders, for example when making/renewing/signing work contracts.

Based on interviews with employees, representatives of internal and external stakeholders, it is known that the policy has been understood and implemented in all business operations and transactions, including recruitment and contracts.

1.2.2

The unit of certification has a mechanism to monitor compliance and the implementation of ethical business policies and practices through inspection and evaluation of compliance. For example, conducting regular internal audits to ensure operational units comply with policies and SOPs. The scope of the internal audit is the compliance of each unit in the plantation and factory with all aspects contained in the RSPO P&C such as aspects of employment, environment, BMP and other aspects. PT Tapian Nadenggan's RSPO Internal Audit Report for the BAMB, BAME and BMLE units which was held on June 19th – 23rd, 2023.

In addition, the unit of certification ensures that contractors and their suppliers know and comply with Contractor Control SOP Number SOP/Smart/UMUM/SADV/006 as well as Sinarmas Agribusiness and Food Business and Human Rights Policies. In its implementation, the certification unit has an assessment of the contractor as stated in the Contractor Inspection Form Number F/SMART/UMUM/SADV/006/001 and the Contractor Evaluation and Recommendation Form Number F/SMART/UMUM/SADV/006/002. The two forms are used to assess the implementation of compliance with contractors including work environment, emergency response, work equipment, work in hazardous areas (height, confined space and heat), business ethics, contractor quality and performance criteria, timely completion of work, compliance with labor regulations, compliance with OHS implementation, housekeeping (5R) and compliance with environmental regulations.

Based on the results of interviews with workers in factories and plantations, information was obtained that they knew about the company's policies to respect human rights and commitment to ethical behaviour in all work operations. In addition, interviews with

representatives of local contractors revealed that the policy had been socialized at the time the contract was drawn up.		
	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 company has list of regulations of 2023 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:		
Land legality		
The company shown evidence over its compliance toward the applicable regulation related to the aspects of land legality such as:		
<ol style="list-style-type: none"> Plantation Business Registration Letter (<i>SPUP</i>) No. 464/Menhutbun-VII/2000, dated April 25, 2000, issued by the Minister of Forestry and Plantations, with details: <ul style="list-style-type: none"> Company Name: PT Inti Gerak Maju Area: 7,648.71 Ha (for Batu Mulia and Batu Ampar Estates) Crop Type: Oil Palm, Hybrid Coconut Location: Batulicin and Kelumpang Selatan sub-districts, Kotabaru District, Kalimantan Selatan Province. 		
<p>Apart from that, based on the Decree of the Minister of Law and Human Rights Number: C-28958 HT.01.01.TH.2004 concerning Approval of the Deed of Amendment to the Articles of Association of Limited Liability Companies dated 30 November 2004, it is explained that PT Inti Gerak Maju merged with PT Tapian Nadenggan to become PT Tapian Nadenggan.</p>		
<ol style="list-style-type: none"> Decree of the Regent of Kotabaru, No. 188.45/348/KUM/2011 dated October 11, 2011, regarding the Granting of a Plantation Business Permit covering an area of 1,747 Ha to PT Tapian Nadenggan I in Kotabaru District. This IUP is an integral part of the Plantation Business Registration Letter No. 464/Menhutbun-VII/2000 covering an area of 7,648.71 Ha with oil palm plantations and industrial plantations (Production Processing Units) with a capacity of 60 tons of FFB/hour. 		
OHS aspects and Best Management Practice		
<ul style="list-style-type: none"> Do not clear land by burning. Have adequate fire prevention facilities and infrastructure. Have an OHS Committee organization equipped with an OHS Committee secretary who has a General OHS Expert SKP. Have carried out health checks on all workers. Have personnel licenses and certificates according to the tools and machines operated. Provide PPE to all workers. 		
The company shows the OHS Committee structure and a list of SIOs (operator licensed) for each unit. Furthermore, the Company has the opportunity to follow up on the management of the Batu Ampar Mill OHS Committee structure as well as several operators permits whose validity period has expired. (OFI)		
Best Management Practices		
<ul style="list-style-type: none"> The company has carried out land clearing and land management without burning. The company has used registered pesticides. The company has carried out chemical management in accordance with applicable regulations. 		
Environment Aspect		
<ul style="list-style-type: none"> The company already has a permit for temporary storage of hazardous and toxic waste in accordance with the Permit of the Regent of Kota Baru Number 503/0832/PSLB3-P-DPMPTSP/2020 concerning the permit for temporary storage of hazardous and toxic waste (B3) PT Tapian Nadenggan in Kelurahan/Desa Tegal Rejo, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province on September 29, 2020 with a validity period of 5 years, namely until September 28, 2025. The Company already has Environmental Documents listed in the AMDAL Document (Andal, RKL and RPL) for Hybrid Coconut, Oil Palm and Rubber Plantations as well as Hybrid Coconut and Oil Palm Processing Factory PT Inti Gerak Maju in Batu Licin and Kelumpang Selatan Districts (IGM I), Kelumpang Hulu and Kelumpang Tengah Subdistricts (IGM II), Kotabaru District, Kalimantan Selatan Province. The AMDAL document has been approved in accordance with the Decree of the Minister of 		

Agriculture of the Republic of Indonesia Number 15/ANDAL/RKL-RPL/BA/IV/1998 on April 30, 1998. Batu Ampar POM, Batu Ampar Estate, and Batu Mulya Estate are included in IGM I

- Regency:
- PT Tapian Nadenggan Operational Feasibility Letter Number 660.3.4/1157/DLH-PPKL/XII/2022, dated 12 December 2022, Operational Feasibility Letter for waste water processing systems and utilization of waste water on land, processing systems: anaerobic pond, transfer pond and drainage on the application land, WWTP capacity is 20,100 m³/month or 67 m³/day, the maximum capacity that can be accommodated in the WWTP pond is 80,000 m³
- Surface Water Utilization Permit (SIPA) Number: 503/2.5.17/DPMPTSP/VI/2023, dated 19 June 2026, valid until 01 August 2026, issued by the South Kalimantan Province One Stop Investment and Integrated Services Service, intended for Industry and Household Services. There is no information on permitted water discharge
- Letter Number 660.3.4/680/DLH-PPKL/VIII/2022, dated 16 August 2002, concerning technical approval for quality standards for the use of waste water on land at PT Tapian Nadenggan-POM Batu Ampar, issued by the Environmental Service of Kotabaru
- News on How to Supervise Environmental Compliance, Kotabaru Regency Environmental Service, dated July 18 2023, with recommendations:
 - a. Closing the pipeline from the pool behind the factory which flows to WWTP pool no. 5, to avoid the perception that there is liquid waste dilution activity
 - b. Placement of medical/clinic waste storage in a separate/isolated place from other B3 waste storage locations, remaining in one B3 waste warehouse
 - c. Prepare and submit an application for technical approval for chimney emission disposal

Based on the above, the Company is given 90 days to carry out/fulfil the results of the field visit. Based on the Minister of Environment and Forestry Regulation No. 5 of 2021 CHAPTER III EMISSION DISPOSAL ACTIVITIES Part One, Article 28 Every Business and/or Activity subject to AMDAL or UKL/UPL which carries out Emission Disposal activities is required to have: a. Technical Approval; and b. SLO. Based on the results of interviews with company representatives, it was explained that the company was in the process of preparing documents for technical approval for chimney emissions.

Companies have the opportunity to ensure that the emission technical approval application process is immediately completed and submitted to the Kotabaru Regency Environmental Service, according to the deadline given by the Kotabaru Regency Environmental Service. (OFI)

2.1.2

The company has mechanisms for monitoring and updating statutory regulations including:

- Procedure No. PRO-BNM-005 revision 3 dated 1 October 2013 concerning Identification and Evaluation of Applicable Legislation
- Procedure No. PRO-BNM-004 revision 2 dated 1 October 2013 concerning Conformity or Fulfilment of Legislative and Regulatory Requirements.

This procedure states that monitoring and updating of statutory regulations is carried out every semester for each aspect, for example plantations, employment, the environment, etc.

The company has also carried out evaluations of regulatory compliance every year, for example the last one was carried out on January 2, 2023, which has evaluated the latest regulations such as Government Regulation in Lieu of Law no. 2 of 2022 concerning job creation. Apart from the company internally, the company also periodically evaluates the legal compliance of contractors working with the company and this is explained in more detail in indicator 2.2.2.

2.1.3

The company has a HGU Mark Maintenance procedure which is stated in document number SOP/SMART/CERS-EHSD/SADV/II/004 dated 1 July 2014. In this procedure it is explained that maintenance of the HGU mark is carried out periodically every 3 months by monitoring and check the physical condition of the boundary marks by officers appointed by the plantation management.

The company shows HGU benchmark monitoring documents which are carried out every 3 months. The last monitoring of HGU stakes was carried out for example on July 31, 2023, in Batu Ampar Estate and Batu Mulya Estate. The boundary marker inspection and maintenance report provide complete information regarding the stake number, stake condition, stake location, stake coordinates and corrective actions as well as repair time targets if there are damaged or missing stakes. In the monitoring report, it is known that

all HGU stakes are available, with details in Batu Ampar Estate as many as 184 stakes (50 stakes in the mining area) and Batu Mulia Estate as many as 103 stakes.

Based on field observations of several samples of HGU stakes determined by the auditor, namely Batu Ampar Estate (No. 178 Block C06, No. 179 Block 06 and No. 181 Block B07) and Batu Mulia Estate (No. 21 block H39, No. 23 block H 23, No. 26 Block I 41, No. 36 Block I 36/I35 and No. 106 Block E 53), it was concluded that all HGU stakes were in place according to their coordinate points and were well maintained.

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 unit of certification has shown a list of contractors and FFB Supplier for the 2023 period, for example as follows:

- PT Satrindo Jaya Agropalma, Cooperation in the transportation of FFB and CPO.
- PT Sarana Lintas Bersama, Cooperation in transportation of PK.
- PT Sinar Bintang Albar, Cooperation in transportation of hazardous toxic and waste.

The unit of certification has also shown a list of FFB suppliers for the 2023 period consisting of 7 FFB suppliers, as an example:

- CV Joya Anugrah Jaya
- CV Bamega Perkasa
- Reyvel Victor Bella
- CV Borneo Sakti Artamaran
- CV Karya Sari
- *Gabungan Kelompok Tani (Gapoktan) Karya Tani*
- Kelompok Tani Telagasari

2.2.2

The unit of certification shows the work agreement document with the contractor/FFB supplier, for example, Cooperation Agreement Letter Number BAME/EST/01/23/001-Akt.TBS between PT Tapan Nadenggan and PT Satrindo Jaya Agropalma for transportation of FFB. The agreement is valid from January 5th, 2023, to January 4th, 2024. In the cooperation contract it is explained that there is an article which stipulates that the contractor is obliged to follow the labor laws that apply in Indonesia. In the work agreement document, explains that the second party must comply with applicable labor regulations, such as wages for contractor workers, prohibition on the use of underage workers, provision of work facilities, compensation for work accidents, etc.

The unit of certification also shows the implementation of compliance with labor regulations by contractors, here's an example:

- FFB contractor/supplier worker agreement:
Decree Number 027/SDHOPRTRP/BAMT-OPS/IX/2014 between workers with the initials IS and PT Satrindo Jaya Agropalma. The worker was designated as a production clerk from contract worker (*PKWT*) status to permanent worker (*PT*). The decision letter explains the rights and obligations of workers and employers, work duties and responsibilities, salary, and others.
- Proof of payment of *BPJS* program for contractor/supplier worker:
 - Proof of *BPJS Ketenagakerjaan* payment for 127 PT SJA workers for the period August 2023 on August 24th, 2023.
 - Proof of *BPJS Kesehatan* payment for 127 PT SJA workers and 216 dependents of workers for the period August 2023 on August 7th, 2023.
- Proof of salary slip for contractor/supplier worker:
 - Salary slips of a PT SJA worker with the initials TWS who received wages in August 2023 amounting to Ro 8,024,791 which consists of a basic wage component of IDR 3,249,371, employment premium IDR 5,064,281, absence incentive IDR 100,000, BPJS allowances and deductions, *Pph21*, etc.
 - Proof of TBS payment from the *Kelompok Tani Telagasari* to the farmer/dump truck owner with police number DA 8159 GH on August 19th, 2023, amounting to IDR 18,923,660.
- Evaluation of contractor/supplier work
Evaluation of FFB suppliers (CV Bamega Perkasa) with Cooperation Agreement Letter number 020/TBS/PT.SKIP-KTTX/VI/2023 for the period July 28th, 2023, with a note that FFB suppliers are expected to improve and comply with regulations in accordance

with the applicable work agreement letter.

Based on the results of interviews with contractors (PT SJA, PT SLB and PT Roswell Karya Abadi) and FFB suppliers (CV Bamega Perkasa and Kelompok Tani Telagasari), information was obtained that once a year the certification unit has carried out socialization related to OHS, compliance with labor regulations, environmental management, etc. to contractors and contractor workers. As a form of compliance with applicable policies, the unit of certification also conducts work evaluations for contractors in the company's operational area regarding compliance with applicable laws and regulations in Indonesia.

Based on the description above, the unit of certification has its own clause regarding the fulfilment of relevant legal obligations and can be proven by the third party concerned.

2.2.3

In the work agreement document with the contractor, it has been explained regarding compliance with applicable labor laws. For example, the second party (contractor) must comply with applicable labor regulations, especially those relating to the payment of wages and the age of the worker, which must be over 18 years of age. Then, based on interviews with the contractor, it is known that the contractor's representative can explain some of the prohibitions in accordance with labor laws such as the prohibition on the use of underage labor, forced labor and human trafficking.

As a form of compliance with the implementation of the clause contained in the work agreement, the certification unit evaluates the performance of the contractor once a month as indicated in the Contractor Inspection Form Number F/SMART/UMUM/SADV/006/001 and the Contractor Evaluation and Recommendation Form Number F /SMART/GENERAL/SADV/006/002. The criteria assessed in the evaluation are work environment, emergency response, work equipment, work in hazardous areas (height, confined space and heat), business ethics, contractor quality and performance criteria, timely completion of work, compliance with labor regulations, compliance implementation of OHS, housekeeping (5R) and compliance with environmental regulations. For example, the FFB supplier (CV Bamega Perkasa) evaluation form document with work agreement letter Number 020/TBS/PT.SKIP-KTTX/VI/2023 for the assessment period of July 28th, 2022, received a good score so that the unit of certification recommended that it be included again in the next work.

From the explanation above, it can be concluded that all contracts have their own clauses that prohibit practices involving child labor, forced labor, and workers from human trafficking.

Status: Comply

2.3

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

2.3.1

Based on document verification, it is known that the company receives FFB directly from core plantations and Sinarmas Group companies, namely:

- Batu Ampar Estate is RSPO certified
- Batu Mulia Estate is RSPO certified
- Sungai Panci Estate which is part of the Sinarmas group and is RSPO certified
- Sungai Panci Plasma which is part of the Sinarmas group and is RSPO certified

As well as TBS directly outside the Sinarmas Group, namely PT. Mitranusa Permata and has been able to show information such as geolocation 2 46' 43,791" LS 116 96' 49,098" E, land rights in the form of HGU with No. 00081 is valid from April 30 2015 – January 30 2050.

2.3.2

Based on document verification, it is known that the company also receives FFB indirectly from agents and Independent Farmer groups around the company. The FFB sources come from:

- CV Joya Anugrah Jaya
- Telagasari Farmers Group
- Gapoktan Karya Tani
- Gapoktan Sinar Kencana
- Reyvel Victor Bella

- CV Karya Sari
- CV. Bamega Perkasa
- CV. Borneo Sakti Antambaran
- PT. Borneo Palm Plantation

Companies can show geolocation information and proof of land ownership from FFB suppliers, for example as follows:

- Sinar Kencana Farmers Group Association (GSKX) consisting of 24 farmers with a land area of 138.5 Ha with proof of land ownership in the form of the entire SKT. For example, the geolocation information for farmers with the initials MS is 3 4' 52.906" South Latitude and 115 59' 7.984" East Longitude.
- Revel Victor Bella (REVS) consists of 11 farmers with a land area of 163 ha with proof of land ownership in the form of the entire SKT. For example, the geolocation information for farmers with the initials AS is 2 58' 33.675 South Latitude and 115 52' 41.342" East Longitude.
- CV Borneo Sakti Artambaran (CBSX) which consists of 9 farmers with a land area of 171 Ha with proof of land ownership in the form of SKT. For example, the geolocation information for farmers with the initials PD is 2 59' 25.619" South Latitude and 115 53' 17.819" East Longitude.

Based on the results of interviews with CV Bamega Perkasa and the Telagasari Farmers Group, it is known that the company has taken the coordinates of the member farmers' plantations.

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 the Long-Term Plan contained in the PT Profitability document. Nadenggan Tapian in 2022-2027 for each plantation and factory. The document contains information regarding plantation businesses, including maintenance costs, fertilizer costs, harvest costs, transportation costs, depreciation, FFB production, OER, KER, CPO production, kernel production, production prices, CPO prices, company profits, Farmer Plasma Purchases, etc. The annual plan is also evaluated every year and compared with its realization. Annual plans can be adjusted based on field conditions, financial conditions or other reasons. The plantation and factory management unit states that the long-term plans mentioned above can be changed and reviewed annually by management by taking into account actual trends and dynamic situations that are expected to change in the future.

Description	Unit	2022	2023	2024	2025	2026	2027
Produksi TBS							
BMLE	Ton	15.502	38.414	46.631	52.472	61.685	64.057
BAME	Ton	49.191	58.306	63.150	57.602	60.107	64.799
SPNE	Ton	34.984	38.255	33.984	37.224	43.243	48.946
SPNA	Ton	30.964	26.265	17.082	19.172	22.812	24.343
OER	%	20	20	20	20	20	20
KER	%	5	5	5	5	5	5
Production CPO	Ton	29.135	31.848	32.169	33.294	37.569	40.429
Production PK	Ton	7.284	7.962	8.042	8.324	9.392	10.107

3.1.2

The company already has a replanting plan as stated in the 2019 - 2025 Long Term Replanting Projection document. The document explains that the replanting plan that the company will carry out will be carried out in 2019 -2025 for the planned replanting.

The company shows a replanting plan, including:

Year	BMLE (Ha)	BAME (Ha)
2019	276.42	388.91
2020	486.85	582.61
2021	620.62	228.47
2022	-	-
2023	-	-
2024	-	345.32
2025	-	278.75

Replanting Review

Based on the results of a review of the BAPP Replanting document from PT. Roswell Karya Abadi dated 17 October 2022 regarding SPK No. BAME/JKTO/10/22/008-LP and Trenches, it is known that replanting activities include uprooting and chipping trees, making eradication holes, making planting holes in flat areas and making trenches. Based on the review of these documents, it is known that the work progress is 100%.

Based on the results of the review of the Minutes of Work Completion Replanting document from PT Lingkar Orbit Nusantara dated June 2, 2022, on Work Agreement No. BAME/JKTO/02/19/003-LP (Roads, Trenches and Soil Conservation), it is known that replanting activities include felling and chipping, eradication holes, planting holes and trenching, and soil conservation in the form of double terraces.

3.1.3

Companies can show evidence of having carried out regular management reviews, for example:

- Record of BAMB and Supply Base management review activities on July 31 2023 which briefly discusses ISV Reports and Internal and External Communication Evaluation (Customer Feedback), Evaluation of Corrective and Preventive Actions, Evaluation of goals, targets, programs & system performance, changes in planning scope systems, changes in activities, processes, products and services, changes in and compliance with laws and regulations and other requirements, changes in organizational policies, training needs, follow-up to previous management, recommendations for improvement.
- Notes on BMLE management review activities on March 3, 2022, which briefly discuss ICV and External Audit Reports, Customer Input, Evaluation of Corrective and Preventive Action Requests, Evaluation of goals, targets, programs & system performance, changes to the scope of system planning, changes to activities, processes, products and services, changes to and compliance with laws and regulations and other requirements, changes in organizational policies, training needs.

Notes on BAMB management review activities on April 29, 2022, which briefly discuss ICV and External Audit Reports, Customer Input, Evaluation of Requests for Corrective and Preventive Actions, Evaluation of goals, targets, programs & system performance, changes to the scope of system planning, changes to activities, processes, products and services, changes to and compliance with laws and regulations and other requirements, changes in organizational policies, training needs.

Status: Comply

3.2

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

3.2.1

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

- The company no longer uses pesticides containing 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 which provides benefits to the community.

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	: Golden Agri-Resources Ltd
RSPO Membership Number	: 1-0096-11-000-00
Name of Certified Unit	: PT Tapian Nadenggan Batu Ampar Mill
Name of Certification Body	: PT Mutuagung Lestari
RSPO Palm Trace ID Number	: RSPO_PO1000001151
Supply Chain Model	: Mass Balance (MB)
Number of Mills	: 1
Number of Estates	: 2
Production Area (ha) - Estate	: 5,604
Certified Area (ha) - Estate	: 6,900
High Conservation Value (HCV) Area (ha)	: 505
Peatlands - Planted (ha)	: 0
Peatlands - Unplanted (ha)	: 0
Additional side aside river buffer (ha) that are not part of the above HCV areas	: 0
Freshwater Usage per PO produced tonne	: 3.60

Based on the results of verification and comparison of the matrix template with several other documents, it shows that the area data is in accordance with the basic information and results of the HCV study. Other data related to employment, production, supply chain is also in accordance with related documents.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Based on the results of interviews with management, it is known that there have been no changes to the procedures in force at the company. The company has procedures including:

- Technical SOP-IK for Palm Oil Cultivation from land preparation to harvesting was prepared by the MCAR (Agronomy and Research Management Committee) team in 2020.
- Processing and Supply Chain SOP

The company also has complete SOPs regarding the processing of palm oil into CPO and PK at the Palm Oil Factory. SOP/SMART/MCMD/I/TM-PKS 7th revision dated 3 January 2022. This SOP covers standard operational procedures at PKS including: FFB receiving place, sterilization activities, threshing place, press place, clarification place (clarification), place of clarification; Oil recovery tank substations, nut and kernel stations, boiler and machine rooms, water treatment, final waste, storage tank washing. •SOP Certified Product Identification and Traceability (SOP/SMART/CERS-EHSD/SADV/I/001) which was approved by the Head of Upstream Section on July 1, 2014.

The company can show that the procedures have been understood by the workers, for example based on the results of field observations in the harvesting activities of Block F46 Division 3 Batu Mulia Estate it is known that the workers have understood good harvesting procedures and harvesting criteria, in addition, based on the results of field observations of the activities sorting at the Batu Ampar PKS, it is known that workers already know the sorting criteria and work using appropriate PPE.

3.3.2

Based on the results of interviews with management, it is known that there have been no changes to the procedures in force at the company. The company has procedures including Internal Audit procedure Number SOP/SMART/UMUM/SADV/I/009 dated 5 December 2012. The company routinely checks plantation and factory operations, for example:

- Internal Operational Audit (OIA) is carried out twice a year with the scope of monitoring bank cash and memorials, administration of debts and receivables as well as current accounts, non-plant fixed assets, maintenance of plants and plantation areas, wage crop production and personnel.
- ISPO Internal Audit of all plantation and factory units on 19 – 23 June 2023 was prepared by Anria, I Gede Yuda Marta Diputra and Asri Indraswari with the results of no discrepancies.

- RSPO Internal Audit of all plantation and factory units on 19 – 23 June 2023 was prepared by Anria, I Gede Yuda Marta Diputra and Asri Indraswari with the results of no discrepancies.
- Internal audit activities are carried out by OSDV (Operational Sustainability Division).
- Checking the suitability of the procedures for the work carried out by the contractor is carried out at the time of handing over the payment stages.

3.3.3

Companies can demonstrate documented monitoring and follow-up records, some of which are contained in the following documents:

- SPO Internal Audit Report dated 19 – 23 June 2023 prepared by Anria, I Gede Yuda Marta Diputra and Asri Indraswari with results of no discrepancies.
- The ISPO Internal Audit Report dated 19 – 23 June 2023 was prepared by Anria, I Gede Yuda Marta Diputra and Asri Indraswari with the results of no discrepancies.
- Batu Ampar Estate Internal Operations Audit Report No. 11/III-BAME/06/23 examination date 10 – 21 March 2023.
- OIA Report Document - Details of Finding Batu Ampar Estate for Semester 1 2023 period with the scope of examination of Bank and Memorial Cash Administration, Goods Inventory, Maintenance of Plants and Plantation Areas, Plant Production as well as Wages and Personnel.
- OIA Report Document No. 05/III-BMLE/05/2023 inspection date 26 February – 09 March 2023 with inspection coverage of Bank and Memorial Cash Administration, Goods Inventory, Maintenance of Plants and Plantation Areas, Plant Production as well as Wages and Personnel.
- OIA Report Document - Details of Finding Batu Mulia Estate for the 1st Semester 2023 period with the scope of examination of Bank and Memorial Cash Administration, Goods Inventory, Maintenance of Plants and Plantation Areas, Plant Production as well as Wages and Personnel.
- OIA Report Document No. 06/III-BAMM/05/2022 inspection date 25 – 05 April 2023 with inspection coverage of Bank and Memorial Cash Administration, Goods Inventory, Plant Product Processing.

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 company has carried out an independent and participatory environmental and social impact assessment by involving the stakeholders listed in several documents, namely:

Environmental Aspect

The Company already has Environmental Documents listed in the AMDAL Document (Andal, RKL and RPL) for Hybrid Coconut, Oil Palm and Rubber Plantations as well as Hybrid Coconut and Oil Palm Processing Factory PT Inti Gerak Maju in Batu Licin and Kelumpang Selatan Districts (IGM I), Kelumpang Hulu and Kelumpang Tengah Subdistricts (IGM II), Kotabaru District, Kalimantan Selatan Province. The AMDAL document has been approved in accordance with the Decree of the Minister of Agriculture of the Republic of Indonesia Number 15/ANDAL/RKL-RPL/BA/IV/1998 on April 30, 1998. Batu Ampar POM, Batu Ampar Estate, and Batu Mulya Estate are included in IGM I. Scope the AMDAL study covers an area of 30,000 Ha, with an area of 10,000 Ha for IGM I and 20,000 Ha for IGM II.

In 2013, the company made changes to PT Tapan Nadenggan RKL-RPL and submitted it to the Kotabaru District Environmental Agency on 22 April 2013. On 29 April 2013 there was a letter of recommendation from the Kotabaru District Regional Environment Agency with Number 660/ 20/TA-AMDAL/BLHD/2013 which states that the revision of the AMDAL document is only carried out in the RKL-RPL document in order to adjust the implementation of the RKL-RPL with current activities, without changing the ANDAL Document. The revision of the approved RKL-RPL document is a reference for the initiator in carrying out environmental management and monitoring in their activities.

Social Aspect

PT SMART Tbk. has conducted a survey and Social Impact Assessment (SIA) in 2010 by the SMART Research Institute and was listed in the SIA Report – Study of Social Impact Assessment in Palm Oil Plantation (Report of the Study on Identification of the Impact

of Social Oil Palm Plantations) by SMART Research Institute Jakarta. The villages covered around the plantation are Serongga Village, Langadai Village, Pantai Village, and Batu Ampar Village. This refers to the Decree of BAPEDAL No. 299/III/1996 concerning Technical Guidelines for Social Aspects in the Preparation of AMDAL Documents. The assessment was carried out using several methods including FGD, interviews and surveys. SIA includes several factors, including:

- Demography, education, livelihood, income, health, facilities and infrastructure, custom, and culture of the company around communities
- Management effort to social, economic, and culture.

The company has identified high conservation value areas listed in the PT Tapian Nadenggan HCV identification report for the Batu Ampar Estate unit conducted in November 2011 by the Biodiversity and Conservation Section Certification Department Policy and Compliance Division. Based on the results of the identification in 2011, there were 393.47 hectares of HCV in the company's area. In 2017 there was a change in the area of the HCV area caused by the area being controlled by the Mine. Based on this, the company determined the HCV area to be 249.39 Ha.

For the Batu Mulia Estate unit, the Company has identified a high conservation value area listed in the PT Tapian Nadenggan HCV identification report for the Batu Mulia Estate unit conducted in November 2011 by the Biodiversity and Conservation Section Certification Department Policy and Compliance Division. Based on the results of the identification in 2011 there are HCV areas in the company area of 255.20 Ha.

Based on document verification, it is known that the company does not develop new land after 15 November 2018 so that the HCS assessment is not mandatory for the Company.

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.

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 (Serongga Village and Pantai Village), it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, 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 the entire village and has involved internal workers

3.4.2

Environment Aspect

The environmental management and monitoring plan in accordance with the Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) has been revised based on the Recommendation Letter from the BLHD Kotabaru District No. 660/20/TA AMDAL/BLHD/2013 dated 29 April 2013, namely:

- Land acquisition is carried out during the pre-construction stage and during land acquisition activities.
- Soil erosion on sloping land 8-25% is carried out at the Construction stage and at the time of replanting
- Soil erosion on the road body is carried out once a year
- Disturbance to the presence of wildlife
- The continuity of the wallet bird's nest business is carried out at the Construction stage
- The continuity of shifting cultivation is carried out from land clearing up to 3 years after the factory/estate operates
- Pig pests are carried out from the land clearing stage until the wild boar is no longer disturbing
- Public health
- Absorption of labor and increase in income
- Decreased water quality
- Decreased groundwater quality due to Land Application activities

- Decrease in soil quality due to Land Application activities
- Decreasing air quality
- Hazardous and toxic waste generation

Job loss for plantation and factory workers is carried out in the post-operation period.

Social Aspect

The company has a SIA management and monitoring plan for the 2022 – 2023 period which is carried out based on the results of consultations with stakeholders such as the local community and employees as evidenced by the attendance list for SIA monitoring activities carried out:

1. Pantai Village Social Impact Activity, July 5 2023, attended by 9 participants (Village head, Head of Village Representative Body, hamlet head and community leaders).
2. Social Impact Monitoring Activity, Langadai Village, Tuesday 4 July 2023, attended by 7 people.
3. BAME Social Impact Monitoring Activity, July 4 2023, gender committee, chairman of Union Labour.
4. BMLE Social Impact Monitoring Activity, July 5 2023, gender committee, chairman of Union Labour.

The SIA management and monitoring plan for 2022-2023 is as follows:

- Labor recruitment
- Maintenance of productive plants
- Presence of local contractors to transport FFB
- Road and bridge maintenance
- Replanting
- Improving the quality of life of the surrounding community
- CSR planning
- Providing road repair assistance to the village.

The SIA management plan which was prepared based on the results of consultations with stakeholders such as the surrounding community and employees has covered all of the company's operational activities. This is evidenced by the SIA management plan which contains the social impacts of the company's operations on the affected stakeholders.

Based on interviews with surrounding villages (Serongga Village and Pantai Village), it is known that the social impact of the existence of companies such as partnerships by trying to provide work opportunities to the community, as well as CSR. Both impacts have been covered in the SIA study document.

3.4.3

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

Environmental Aspects:

The Company has implemented an environmental management and monitoring plan in semester 2 of 2022 and semester 1 of 2023. The environmental management and monitoring plan is in accordance with the environmental documents it has. The results of verification of the implementation of the environmental management and monitoring plan for semester 2 of 2022 and semester 1 of 2023 are in accordance with the directions of the environmental documents held. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also carried out evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. The company has submitted a report on the implementation of environmental management and monitoring to government agencies with detailed evidence in indicator 1.1.2.

Social Aspects:

The company showed the Review Report on the Management Plan and Monitoring of Social Impacts for Palm Oil Plantations and Factories, Tanah Bumbu in July 2023. In this document there is some information:

Community proposals for CSR: request for assistance with iron poles to install safety nets around the Volleyball field in Serongga Village, request for skills training for the community tailored to the company's needs for Batu Ampar and Serongga villages, assistance with heavy equipment for digging a clean water reservoir in Langadai village, assistance with stationery for calligraphy training in Langadai Village, request for assistance with heavy equipment for access to community estate roads which have not yet been realized in Pantai Village.

Community economic development potential:

- Langadai Village: Home-scale Amplang Crackers, need to develop marketing and packaging
- Batu Ampar Village: production of bottled drinking water from BUMDES, constrained by permits
- Pantai Village: there are 10 heads of families producing milkfish crackers, on a home scale, raw materials depend on local fishermen, marketing is still within the village and there are no permits yet.

Main issues for the 2022-2023 period: providing routine social assistance to surrounding communities, improving the quality of road access by the Company, with the status of having been well managed in the form of realization of CSR assistance and road repairs.

Evidence of SIA's participation:

- Beach Village Social Impact Activity, July 5, 2023, attended by 9 participants (Village head, Head of Village Representative Body, hamlet head and community leaders)
- Social Impact Monitoring Activity, Langadai Village, Tuesday 4 July 2023, attended by 7 people,
- BAME Social Impact Monitoring Activity, 4 July 2023, gender committee, chairman of Union Labour
- BMLE Social Impact Monitoring Activity, July 5, 2023, gender committee, chairman of Union Labour.

The Company has established a Social Management and Monitoring Activity Plan 2023 – 2024,

- Preparation of CSR plans and implementation of annual CSR
- Improving the quality of village access roads: providing assistance to repair village roads
- Increasing the local economy: with opportunities for contractors, local purchasing and assistance.

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The unit of certification has procedures for recruitment, promotion, retirement and termination of workers as stipulated in the "Work Environment and Industrial Relations Policy" which was ratified on August 1st, 2017, by MD HR, MD Operations and MD Sustainability. The document contains 21 policies that apply to the company, for example:

- Manpower Recruitment No. KHI-smart/001-00
- Employment Agreement/Contract No. KHI-smart/002-00
- Work Performance Assessment No. KHI-smart/009.00
- Promotion and Transfer No. KHI-smart/010-00
- Industrial Relations Dispute Settlement No. KHI-smart/021-00

In addition, the unit of certification has a CLA for the 2018 – 2020 period. This document explains all regulatory aspects related to employment, such as: requirements for recruitment, promotion, retirement, termination of employment, and other provisions. The company regulation document above is available in Indonesian. The company showed several documents regarding the end of the CLA for the 2018 - 2020 period, for example the Minutes of the South Kalimantan CLA Discussion Meeting on June 24th, 2023, which was attended by 8 company representatives and 8 workers' union representatives. Based on the results of interviews with labor unions and management representatives, it is known that both parties agreed to state that the CLA for the 2018 - 2020 period is still valid until the latest CLA is issued. The representative of the Manpower and Transmigration Office of Kotabaru Regency also stated that until now the labor union and the company were still negotiating several articles in preparing the CLA draft.

The unit of certification also owns the GAR Social and Environmental Policy (GSEP) which was endorsed on September 8th, 2015, by the Head of Upstream, CEO Down Stream & Commercial, Executive Director & CFO and MD of Sustainability & SSE. In point 3 of the policy, it is explained regarding the work environment and industrial relations. In responsible employment practices, companies prohibit the practice of imposing recruitment fees and withholding identity documents, provide work contracts in languages that all workers can understand, and provide equal opportunities for all workers without discrimination at all stages of the employment relationship.

3.5.2

The unit of certification always documents all labor procedures that have been carried out properly such as recruitment, promotion, performance appraisal, and others. Following are some examples of labor procedures that have been implemented and well documented by the company, for example:

- Recruitment of workers:
Workers with the initials DZ were accepted to work as upkeep worker on February 20th, 2023, with work agreement letter Number 021/BMLE/SK-PKWT/II/2023. The work agreement is valid for one year from February 20th, 2023 – February 19th, 2024. These workers have gone through the stages of recruitment according to the applicable procedures, namely administrative selection, medical examinations and interviews. At the worker recruitment stage, the certification unit also shows supporting evidence documents that have provided 1 (one) copy of the work agreement document to the worker. This is indicated in the receipt document for submission of a copy of the work agreement letter. Based on the results of interviews with sampling workers in the plantation and factory units, information was obtained that the certification unit had provided copies of the work agreement letter documents and did not withhold documents or collect fees during the worker recruitment process.
- Employee promotion and performance appraisal:
Memo number 001/VPA3-INT/BNJO/03/2023 dated 14 March 2023 concerning Approval of the Appointment of Permanent Workers (PT) in BAME unit. It is known that there were 21 harvest workers who were promoted/appointed from contract worker (PKWT) status to permanent worker (PT) status. The company shows the results of the performance appraisal for the 2022 period with the criteria of discipline, work quantity, work quality, cooperation, work attitude and responsibility.
- Termination of employee:
Memorandum Number 021/0769/MO/KPST/XII/2022 dated 8 December 2022 concerning the calculation of pension benefits for workers with the initials ANH who are entering retirement age. The payment of termination funds has been in accordance with the applicable laws and regulations.

The explanation above proves that the unit of certification has implemented work procedures properly and documented for each employee.

Status: Comply

3.6

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

3.6.1

The company already has an Occupational Health and Safety Policy. The company's OHS policy is listed in the Policy on sustainability and business ethics which includes:

- Ensure compliance with all laws and regulations relating to OHS.
- Ensuring a safe work system or pattern has been formulated and implemented properly and correctly.
- Ensure the implementation of training and supervision regarding OHS.
- Ensure the provision of good safety instructions or instructions in all aspects of operational activities.

Ensure safe work procedures and emergency procedures are in place and implemented in all aspects of operational activities, outlined in the Hazard Identification and Risk Assessment document for the period January – December 2023 with number F/SMART/HESS-EHSD/SADV/002/002 for the Batu Ampar Estate, Batu Mulia Estate and Batu Ampar Mill work units prepared by the OHS Committee secretary. This document, among other things, describes Stations/Activities, Routine/Non-Routine, Identification of Potential Hazards (Source/Event), Impact), Existing Controls, Initial Risk Analysis (Possibility Level, Severity Level, Risk Level) and Accepted Risks. / Not acceptable for all stations/activities in Factories and Plantations. One of the foundations for preparing this document is to pay attention to all OHS-related problems that arise during 2022.

Based on interviews with management, it is known that HIRAC will always update whenever there are problems that occur, including work accidents and carry out socialization regarding ISBPR, GSEP and SOP IK on May 18, 2023.

The company can show that the HIRAC document has been understood by the workers, for example based on the results of field observations in the spraying activities in Block E7 Division 4 Batu Mulia Estate and in Block F34 Division 1 Batu Mulia Estate, it is known that the workers have understood the correct harvesting procedures and use of PPE. Apart from that, based on the results of field observations on the activities of St. It is known that the boilers and sorters at BAMB know how to operate the machines and use appropriate PPE.

3.6.2

The company has monitored the effectiveness of its OHS plan, one of which is through regular P2K3 meetings for all units every month. P2K3 meeting recordings for example:

- The minutes of the P2K3 meeting on 12 April 2023 and 10 May 2023 in the Batu Ampar Mill meeting room briefly discuss:

- Report accident work
- Monitoring PPE
- readiness of the village fire team
- SIO training
- Implementation of 5R+Safety
- Minutes of the second quarter P2K3 meeting, April 10, 2023, in the Large Office Meeting Room (Batu Ampar Estate) which briefly relates to forest and land firefighting training, first aid equipment, hazardous waste and P2K3 reports.
- Minutes of the second quarter P2K3 meeting on 05 June 2023 in the Batu Mulia Estate Meeting Room which briefly discussed refilling APAR, administration related to employee work accidents, monitoring discipline in the use of PPE.
- Minutes of the P2K3 meeting on 08 May 2023 in the Batu Mulia Estate Meeting Room which briefly discussed work accidents, changes to the P2K3 structure, use of P3K drugs.

Apart from that, the company also monitors OHS aspects of the machines and equipment used, for example OHS Testing and Inspection according to the Minutes of Machine Inspection and Testing by PJK3 dated June and August 2023 for machines including:

- Diesel Generator Motor No. 5 (Weichai)
- Steam Turbine No. 1 and No. 2
- Deaerator Steam Vessel
- BPV Steam Vessel
- Sterilize Steam Vessel No. 1, No. 2, no. 3 and No. 4
- Overhead Traveling Crane
- Electrical installation
- Wheel Loaders
- Steam Boiler No. 1 and No. 2
- Installation of Lightning Distributors in the Workplace
- Conveyors
- Hydrant Installation
- Diesel Generator Motor
- Lightning Dealer
- Diesel Storage Tank

The company shows a Hyperkes certificate in the name of Dr. Edmoson D Walanda who already has a Hyperkes certificate who attended training from 19 to 23 April 2010 by the Sudjoko Kuswandji Foundation with number: 22.833/DH-I/10 and shows related memorandum No. 011/TM/RCKS1/06/2019 containing the appointment of a doctor for Sinarmas Plantation Company 3, South Kalimantan 1 region with doctor's permission number: 503/1297/SIPD-DPMP2TSP/2019, set on June 1 2019. The latest Kotabaru Regent's decision regarding the extension of the doctor's license with number: 503/1297/SIPD-DPMP2TSP/2019 with a validity period until 19 August 2025.

The company shows records of the last health examination carried out by a company doctor who has a hyperkes certificate, including:

- Audiometry and spirometry examinations have not yet been carried out on Batu Ampar Mill, Batu Ampar Estate and Batu Mulia Estate in 2023.
- Records of special Cholinesterase examinations of 21 Batu Ampar mill workers (process, laboratory, warehouse and WTP) on 12 August 2023 with all results normal.
- Records of health examinations of Batu Ampar Mill employees (111 workers) on 12 August 2023 with the results of all being fit for work.
- Records of special Cholinesterase examinations on 76 Batu Ampar estate workers (sprayers, fertilizers and warehouse workers) on January 2 2023 with all results being normal and eligible for work.
- Results of periodic health examinations for all Batu Ampar Estate employees (600 people) carried out by the Company Doctor on 23 August 2023 with the results that all were healthy and recommended that they be able to work.
- Results of a special Cholinesterase health examination for spray, fertilizer and warehouse workers (105 workers) at the Batu Mulia Estate which was carried out by the Company Doctor on 09 August 2023 with the results that all of them were able to carry out work related to agrochemical materials.

- Results of periodic health examinations of 112 Batu Mulia Estate workers on August 24, 2023, with the results that all were healthy and fit to work.

Status: Comply

3.7

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

3.7.1

The unit of certification has identified and developed a training program related to aspects of the RSPO P&C for all staff, workers, smallholders and local stakeholders in 2023. The following is the result of identification and training program plans listed in the Personal Competency Identification Matrix document as well as the 2023 Training Program and Realization Activities, including:

- Certification-related training includes understanding RSPO, ISPO, ISCC, and understanding of company policies (Procedures and GSEP).
- Training related to the environment includes identifying environmental aspects, HCV, hazardous toxic and material and hazardous toxic waste management as well as environmental management and monitoring.
- Training related to work procedures including work technical training based on the type of work. For example, training on harvesting, spraying, fertilizer, IPM, etc.
- OHS-related training includes first aid training, SIO certification training, chemical handling (MSDS), MSDS, HIRAC, procedures and use of emergency response and fire training.
- Social-related training includes socialization of complaints handling, social conflict, sexual harassment, etc.

3.7.2

The unit of certification shows the minutes document for the realization of the training program in 2023, for example:

- Operational License (SIO) training for wheel loader operators with the initials BH which was carried out on April 11th – 14th, 2023. The company presented a training certificate for the operator with number 5/0047090523/AS.01.04/V/2023 and a OHS license for loader operators with number 0047090523/A- OABT/31/V/2023 which is valid until May 9th, 2028.
- Socialization of GSEP and human rights policies carried out on March 11th, 2023, and attended by 40 workers at the BAMB unit
- Socialization of HIRAC which was held on May 18th, 2023, and attended by 36 workers at the BAMB unit
- South Kalimantan Regional Forestry and Fire Protection Training and Alert Calls 1 and 2 which were held on May 22nd – 25th, 2023, and were attended by 45 participants which consists of the firefighting team, staff and workers, the community, and other external stakeholders.
- Socialization of HCV and policies for the protection of rare and endangered wildlife, which was held on February 11th, 2023, and attended by 16 participants.
- Socialization on chemical poisoning, handling chemical spills and spray simulations which were held on January 20th, 2023, and attended by 6 spray workers at the BMLE unit.

Based on the results of interviews with workers and representatives of third parties such as contractors and community leaders, it is known that every year the company organizes training and outreach programs to all parties around the company. Implementation of GSEP socialization to contractors, for example, has been understood and implemented, such as involving contractor workers in the BPJS program, providing PPE, not using child labor and applying the minimum wage that applies in Jambi Province.

Based on the description above, the unit of certification has proven that there are training activities for all staff, workers, plasma smallholders and stakeholders. Records of the training activities have been maintained in the minutes document.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conduct on 4 May 2023, which was attended by 9 people. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

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

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

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

3.8.3

Certified product estimates are recorded in the final Assessment and Certificate Report and updated in RSPO Palm Trace. Certified products are verified during this assessment. Estimated certified production for the next permit period has also been established, at a reasonable amount considering last year's production. The data is displayed in the following table:

Product	Estimate Production period of 26 Nov 2022 – 25 Nov 2023 + Ext Volume	Actual Production (MT) of Sep 22 – Aug 23	Estimate Production for 12 months (MT)
FFB	146,362	150,180.75	84,500
CSPO	30,937	29,988.01	16,630
CSPK	7,729	7,125.55	3,910

**Although FFB exceeded estimates, the actual production of CSPO and CSPK had not exceeded the quota*

3.8.4

The Mill has registered as RSPO member under GAR (No. 1-0096-11-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtree.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: Batu Ampar Palm Oil Mill - PT Tapan Nadenggan
- License ID: CB138627
- Member ID: RSPO_PO1000001151
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

Reporting requirements within the previous 12 months have been audited by the factory through RSPO Palm Trace, such as product sales announcements and confirmation from buyers.

3.8.5

The company has procedures related to the supply chain, such as:

- RSPO Supply Chain Model of Mass Balance SOP with No. PT.TN.BAMM/SOP/24
- FFB Processing SOP with No. SOP/SMART/MCMD //TM-PKS
- Certified Product Reporting SOP with No. SOP-SMART/CERS-EHSD/SADV/003
- Document and Records Control SOP with No. SOP/SMART/GENERAL/SADV// 001

These procedures refer to the latest RSPO Supply Chain System and cover all aspects of the SCCS MB model, such as receipt and recording identifying traceability of RSPO certified and non-certified sources and products, FFB processing, announcements on RSPO Palm trace, key persons such as security, weighbridge officers, delivery/core officers, production officers, heads of administration, and training departments.

Based on interviews with public service officers and weigh bridge officers, it is known that personnel can explain the supply chain management system. It is also known that supply chain management system training and refreshment (awareness) is carried out every year, for example on May 4, 2023, which was attended by 9 people.

3.8.6

SCCS internal audit procedures are listed in the RSPO Supply Chain Model of Mass Balance procedure with No. PT.TN.BAMM/SOP/24 which explains that internal audits are carried out at least once a year. Based on the RSPO internal audit, the

company showed evidence records regarding the SCCS audit carried out on 19 – 23 June 2023 with the result that there were no discrepancies in the SSCS indicators.

Apart from that, the company also showed the results of a management review conducted on July 31, 2023, which discussed input from internal audit results, corrections and corrective actions, process performance and product compliance, follow-up to previous management reviews, and recommendations for improvement.

3.8.7

The mill has verified and documented the certified and non-certified FFB volumes received. Certified and non-certified FFB are accepted within 12 months before the audit, namely September 2022 – August 2023:

Product	Estimate Production period of 26 Nov 2022 – 25 Nov 2023 + Ext Volume	Actual Production (MT) of Sep 22 – Aug 23
FFB	146,362	150,180.75
CSPO	30,937	29,988.01
CSPK	7,729	7,125.55

Based on the table above, it is known that the company has submitted a certified volume production extension on 23 February 2023 to CB to increase the certified volume of FFB of 90,362.62 MT, CSPO of 19,737.27 MT and PK of 4,929.52 MT. The company also records certified FFB consisting of 2 units of PT TN and 2 units of PT SKIP (Group GAR) as well as non-certified FFB from 10 third party suppliers. The mill has verified and documents the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is September 2022 – August 2023:

MONTH	FFB (TON)			TOTAL
	Certified (Scope)	Certified (Scope)	(Non- Non- Certified)	
Sep-22	7,950.28	6,382.89	12,432.92	14,333.17
Oct-22	8,770.08	7,559.54	8,116.83	16,329.62
Nov-22	6,688.29	7,031.60	8,232.48	13,719.89
Dec-22	6,826.97	7,060.82	3,541.43	13,887.79
Jan-23	5,241.48	4,032.81	1,951.77	9,274.29
Feb-23	4,607.66	3,966.08	1,795.64	8,573.74
Mar-23	5,185.39	5,240.50	3,923.84	10,425.89
Apr-23	5,673.31	4,697.08	3,257.22	10,370.39
May-23	7,684.38	6,156.14	7,735.19	13,840.52
Jun-23	7,656.06	6,448.36	8,455.37	14,104.42
Jul-23	7,068.99	5,449.42	8,817.50	12,518.41
Aug-23	7,902.64	4,899.98	6,200.19	12,802.62
TOTAL	81,255.53	68,925.22	74,460.38	150,180.75

Based on data during the certification period, there is still no excess production in CPO and PK. The company also has a mechanism for handling non-compliant palm oil products as stated in the SOP for Handling Complaints and Dissatisfaction of the Directorate of Sustainability and Strategic Stakeholder Engagement with No. SOP/SMART/GIMS-SCMD/USDV/1/001 revision 2 which explains the handling of complaints and product nonconformities from customers/buyers. During the audit, there were no written complaints from stakeholders regarding non-conforming products.

3.8.8

Based on document verification, information obtained during the permit period can determine whether certified products are being sold as described in the table below:

**Despatch period (MT)
Sept 22 – Aug 23**

CSPO sold under RSPO Scheme	29,681.43
CSPO sold under other scheme	
CSPO sold as conventional	
CSPK sold under RSPO Scheme	6,956.64
CSPK sold under other scheme	
CSPK sold as conventional	

*Opening stock CSPO 420.05 MT (certified)

*Opening stock CSPK 88.31 MT (certified)

Product	Actual Production (MT) of Sep 22 – Aug 23
FFB	150,180.75
CSPO	29,988.01
CSPK	7,125.55

Based on the data, there are no over sales of certified products or non-certified products which are claimed to be certified products. Examples of sales documents displayed include transactions with No. TR-f3a8de1f-bd8e which provides the following information:

- Buyer's name: PT SMART Tbk. (PT Sinar Mas Agro Resources and Technology Tbk.) Tarjun Refinery
- Seller name: Batu Ampar POM, PT. Tapian Nadenggan
- Loading or shipping/delivery date: 14-06-2023
- Date of issue of the document: 28-06-2023
- RSPO certificate number: Batu Ampar POM PT. Tapian Nadenggan (member ID : RSPO_PO1000001151) and PT SMART Tbk. (PT Sinar Mas Agro Resources and Technology Tbk.) Tarjun Refinery (member ID : RSPO_PO1000001622)
- Product description, including the applicable supply chain model (Identity Protection or Mass Balance or approved abbreviations): Supply Chain Model, namely Mass Balance
- Quantity of product sent: 294.45 MT
- All related transport documentation: Seller Contract Number: DIC/3051/070623/0009; Seller Reference Number: 3051/CPO/1461/23/T025; and Buyer Reference Number: 4800071681.

3.8.9

The company has agreements with third parties regarding the transportation of CPO & PK that guarantee SCCS RSPO compliance and certification bodies in verifying to contractors or outsourcing operations if an audit is deemed necessary. An example of such a contract is a cooperation agreement letter with No. 002/SP/TN/BAMM/06/2022-PK dated 21 June 2022 cooperation between PT TN and PT BSA Logistics Indonesia for the transportation of CPO and PK, where PT BSA Logistics also collaborates with another party (PT Satrindo Jaya Agropalma) in fulfilment of CPO and PK transport units, for example as shown in:

- Work agreement with No. 107/PKS/BLI-SJA/VI/2022 dated 21 June 2022, cooperation between PT BSA and SJA in the field of CPO transportation.
- Work agreement with No. 119/PKS/BLI-SJA/VI/2022 dated 21 June 2022, cooperation between PT BSA and SJA in the field of PK transportation.

To ensure the contractor complies with the RSPO Supply Chain, in the agreement there is a clause that regulates the contractor's obligation to comply with supply chain regulations. For example, the responsibility to ship products only from the Batu Ampar Factory, as well as a willingness to be monitored by a Certification Body to verify compliance. Apart from that, the Factory has a Contractor Control SOP with No. SOP/SMART/UMUM/SADV/II/006 dated 1 July 2014.

Based on interviews with CPO transporters (PT Satrindo Jaya Agropalma) and PK transporters (PT Sarana Lintas Bersama), it was stated that the company has provided regular socialization regarding company policies, OHS, supply chains, for example, which was carried out on April 5 2023, which was attended by 7 people.

3.8.10 and 3.8.11

The Mill maintains a record of contractor details, including the contractor's company profile, address, contact person, email and telephone number, agreement and contract term, as well as a list of vehicles. At PT Tapian Nadenggan there are contractors/transporters, namely PT Satrindo Jaya Agropalma for CPO and PK transporters and PT Sarana Lintas Bersama for PK transporters. There are no new contractors from the previous assessment.

3.8.12

The company has current records and reports stored at the factory office, complete, accurate and up to date. All records are accessible to the auditor, such as certified product delivery records, sales contracts, delivery orders/invoices, production and product sales reports. Based on document verification on supply chain procedures, the retention time for all records and reports regarding the supply chain is kept for 2 years.

For example, records of all volumes of certified palm oil/palm kernel oil purchased (input) and claimed (output) during the 12-month period prior to the audit (September 2022 – August 2023):

- FFB**

September 2022 – August 2023 : 150,180.75 MT

- CSPO**

Period	CPO Production (MT)		Total
	Cert	Non Cert	
Opening Stock	420.05	136.87	556.92
Sep 22 – Aug 23	29,567.96	14,618.65	44,186.61
Total	29,988.01	14,755.52	44,743.53

Period	Cert CPO Dispatch (MT)			Total
	RSPO	Other scheme	Non Cert	
Sep 22 – Aug 23	29,681.43	-	-	29,681.43

- CSPK**

Period	CSPK production (MT)		Total
	Cert	Non-Cert	
Opening Stock	88.31	90.48	178.79
Sep 22 – Aug 23	7,037.24	3,553.22	10,590.45
Total	7,125.55	3,643.69	10,769.24

Period	Cert PK Dispatch (MT)			Total
	RSPO	Other scheme	Non Cert	
Sep 22 – Aug 23	6,956.64	-	-	6,956.64

Based on mass balance calculations, it is known that production, sales, and certification production stock are:

- CSPO production was 29,567.96 MT, Sold with RSPO certificate 29,681.43 MT, opening stock in August 2022 was 420.05 MT so CSPO stock was 306.58 MT.
- CSPK production was 7,037.24 MT, sold as RSPO product was 6,956.64 MT, Opening Stock in August 2022 was 88.31 MT, so CSPK stock was 168.91 MT.

3.8.13 and 3.8.14

CPO (OER) and PK (KER) production conversion rates are based on actual daily, monthly and annual production. The extraction rate follows actual data for the 12-month period September 2022 to August 2023, namely OER 19.67% and KER 4.62%. Periodic extraction updates are actual extractions.

3.8.15

Batu Ampar POM applied SCCS – Mass Balance (MB) since its received and processing the FFB from certified and uncertified sources, verification is done through field observation and interview to security and weigh-bridge operator as well as management representative. The mill claims only the volume of oil palm products produced from certified FFB as MB.

3.8.16

Based on mass balance calculations, it is known that production, sales and certification production stock are:

- CSPO production was 29,567.96 MT, Sold with RSPO certificate 29,681.43 MT, opening stock in August 2022 was 420.05 MT so CSPO stock was 306.58 MT.
- CSPK production was 7,037.24 MT, sold as RSPO product was 6,956.64 MT, Opening Stock in August 2022 was 88.31 MT, so CSPK stock was 168.91 MT.

Document verification and interviews during the audit revealed that RSPO products were claimed to be CSPO and CSPK no later than 3 months after the product was handed over, for example, transaction with No. TR-f3a8de1f-bd8e with Loading or shipping/delivery date on June 14, 2023 which was reported on June 28, 2023.

The certification unit can present supporting documents in the form of contract agreements, delivery letters, delivery tickets, loading reports, weighing minutes, weighing cards and delivery notes. The document includes information on delivery date, product description and supply chain model, product quantity, certificate number, sender's name, and seller's address. Furthermore, the Company sells all CSPO and CSPK as RSPO Certified products.

3.8.17

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

Status: Comply

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

4.1

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

4.1.1

The unit of certification has made a policy to respect human rights which is indicated in the document:

- The GAR Social and Environmental Policy (GAR Social and Environmental Policy/GSEP) which was endorsed on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement.
- Sinarmas Agribusiness and Food's Business and Human Rights Policy which was ratified on December 12th, 2019, by the Head of Policy and Compliance Division.

In the two policies it is stated that the unit of certification is realized for human rights for all workers, post offices, indigenous peoples, surrounding communities in all operational companies. This policy is publicly available on the unit of certification website in two languages (Indonesian and English) and has been communicated to all workers and local stakeholders. As proof of implementation, when the auditors conducted interviews and field visits to all workers in the plantation and factory units, they already understood the human rights policies that apply in the company. The policy has also been disseminated to external stakeholders, for example when making/renewing/signing work contracts.

Based on the results of interviews with representatives of labor unions, the gender committee and representatives of the Pantai Village and Serongga Village, it is known that there were no incidents of human rights violations in the certification unit, no employees were intimidated and/or subjected to violence by the certification unit.

4.1.2

The unit of certification does not have records related to the use of force/mercenaries/paramilitary in resolving conflicts/problems that exist between the unit of certification and related stakeholders (local community, workers, or others). This has been stated in the GAR Social and Environmental Policy (GSEP) which was approved on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. Point 2.1.2 explains the achievement of responsible conflict resolution. The policy also states that companies refuse to use violence in disputes with any party.

Based on the results of interviews with representatives of labor unions and representatives of the gender committee as well as with external stakeholders, it is known that the certification unit does not use paramilitaries or mercenaries in the company's operational areas. If there are problems, they will be resolved by way of deliberation without using violence. Solving conflicts/problems using this deliberation has been quite effective. In addition, during the interview process to resolve the problem it was discovered that there were no indications of violence or coercion.

Status: Comply

4.2

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

4.2.1

The unit of certification has SOP for Handling Complaints and Dissatisfaction No. SOP/SMART/SUST/IV/003 which was ratified on February 14th, 2022, by the Head of Upstream. In Chapter 4 point 4.6.1, it is stated that "The company guarantees the anonymity of the complainant and whistleblower with the aim of reducing the risk of retaliation". The procedure explains that the steps for submitting complaints verbally and/or in writing are addressed to the management leadership. Maximum response to workers is 2 weeks if the verification of complaints and conflicts submitted takes more than 14 working days from the time the complainant submits the complaint and conflict, the Estate Manager/Mill Manager can provide an initial notification letter as a response to the trial and conflict. The SOP also states that the identity of the reporter and reporter will be kept confidential if necessary.

The certification unit has recapitulated all complaints and conflicts submitted by all affected parties around the certification unit in the Complaint and Conflict Handling Recapitulation Form Number F/SMART/SUST/IV/003/004. Based on the results of the document review, it is known that during 2022-2023 there were no complaints or conflicts reported to PT Tapian Nadenggan.

The results of interviews with harvest workers at the BAME unit, process station operators, contractors (PT SJA), FFB Supplier (CV Bamega Perkasa) and representatives of the Pantai Village and Serongga Village community, it is known that procedures related to complaints and conflicts have been periodically submitted to all parties. Socialization related to handling complaints is also usually conveyed during the morning assembly to all workers. Meanwhile, based on statements from external stakeholders around the company, it is known that socialization related to routine complaint handling is carried out at least once a year.

The unit of certification also has a GAR Policy SOP Grievance which explains that if a complaint arises in the RSPO complaint process, GAR will handle the complaint in accordance with the RSPO process. From the description above, it can be concluded that the company has a system that regulates complaints and complaints to all parties.

4.2.2

The unit of certification has established a system for handling complaints for all affected parties, which is documented in SOP for Handling Complaints and Dissatisfaction Number SOP/SMART/SUST/IV/003 which was ratified on February 14th, 2022, by the Head of Upstream. The procedure explains how to convey complaints or suggestions to all parties, including those who cannot read or write, which can be conveyed orally through superiors. The unit of certification through labor unions and gender committees routinely holds meetings with workers, one of the agendas of which is to accommodate issues and complaints directed at the company. The certification unit also regularly holds meetings with external stakeholders such as local contractors, community representatives and related agencies, one of the agendas of which is to accommodate issues and complaints directed at the certification unit.

4.2.3

Records of complaints from workers or stakeholders have been recorded by the unit of certification. This can be shown in the Grievance and Dissatisfaction Recording Form (Internal and External) Number F/SMART/SIGS-CSR/SADV003/001, it is known that

during the last one-year period there were no complaints from external stakeholders to the certification unit and there were several complaints from workers regarding damage to housing facilities or worker welfare facilities and infrastructure. The company shows responses to complaints from workers, for example, a complaint from a worker with the initials MRNT regarding damage to the bathroom door and was repaired by the company on February 21st, 2023.

Based on the results of interviews with workers in estate and mill units, internal stakeholders (labor unions, gender committees and employee cooperatives), transporter contractors (PT SJA), FFB supplier (Koperasi Tani Telagasari) that they understand the flow of submission if they have a complaint to the unit of certification. They also stated that the unit of certification quickly responds to complaints submitted.

The unit of certification has also informed the progress of complaint handling to the parties, carried out in several ways such as through the Complaint and Dissatisfaction Recording Form (Internal/External) or with a representative of the unit of certification appointed as a liaison between the two parties who can conduct formal and informal meetings as well as communication in person or by telephone.

4.2.4

In the SOP for Handling Complaints and Dissatisfaction Number SOP/SMART/SUST/IV/003 which was ratified on February 14th, 2022, by the Head of Upstream. The procedure explains that the unit of certification is committed to actively promoting and supporting the responsible resolution of any conflict involving GAR's operations with the competent authorities in the event of a conflict. The reporter can choose a third party/mediator in conflict resolution. The system will include mapping all conflicts within GAR's operations, development of action plans to address identified conflicts, transparent monitoring and reporting.

Status: Comply

4.3

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

4.3.1

The company has a PT Tapian Nadenggan CSR Program for the 2022-2023 period which was prepared based on the results of consultations with the surrounding community which were carried out in conjunction with the company's SIA Program consultations. For example, the realization of CSR carried out by the company is as follows:

- In the education sector, such as providing incentive premiums for SDN 3 Lagadai Desa Serongga (BAME) teachers and Aisyah Puspa Mulia Kindergarten (BMLE) teachers.
- Social sector such as distribution of basic necessities to Serongga Village (BAME) and Pantai Village (BMLE).
- Infrastructure sector such as heavy equipment assistance for Serongga Village and Tarjun Village.

The company has also reported a CSR report, for example for the 2022 period, which was sent to the Kalimantan Selatan Province Plantation and Livestock Service on April 3, 2023.

Based on the results of interviews with village representatives (Pantai Village and Serongga Village), it is known that so far the company has implemented CSR for the surrounding community and was considered quite good by the village head.

Status: Comply

4.4

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

4.4.1

The company has a Plantation Business License in the form of:

1. Plantation Business Registration Letter (SPUP) No. 464/Menhutbun-VII/2000, dated April 25, 2000, issued by the Minister of Forestry and Plantation, with details:
 - Company Name: PT Inti Gerak Maju
 - Area: 7,648.71 Ha (for Batu Mulia Estate and Batu Ampar Estate)
 - Plant Type: Palm Oil, Hybrid Coconut
 - Location: Batulicin and South Kelumpang Districts, Kotabaru Regency, South Kalimantan Province.

Based on the Approval of the Deed of Amendment to the Limited Liability Company's Articles of Association dated November 30, 2004, PT Inti Gerak Maju merged with PT Tapan Nadenggan to become PT Tapan Nadenggan.

2. Kotabaru Regent's Decree, No. 188.45/348/KUM/2011 dated 11 October 2011, concerning the Granting of a Plantation Business License covering an area of 1,747 Ha to PT Tapan Nadenggan I in Kotabaru Regency. This IUP is an inseparable part of the Plantation Business Registration Letter No. 464/Menhutbun-VII/2000 covering an area of 7,648.71 Ha with oil palm plantation commodities and plantation industry (Process Processing Unit) Capacity of 60 tons of TBS/hour.

PT Tapan Nadenggan (formerly PT Inti Gerak Maju) already has a HGU area of 7,648.71 Ha in accordance with the decree of the State Minister of Agrarian Affairs/Head of the National Land Agency Number: 52/HGU/BPN/98 dated 30 June 1998 located in Kotabaru District, Province of Kalimantan Selatan with a validity period of 35 years from the date of stipulation. Then 2 HGU certificates were issued, namely:

- HGU Certificate No. 23 dated July 28, 2000 with an area of 4,719,673 Ha from the Land Office of Kotabaru District. Expiration of rights: September 24, 2034. On the Registration page for Transfer of Rights, Encumbrances and Other Records, it is informed that there has been a merger between PT Inti Gerak Maju and PT Tapan Nadenggan to become PT Tapan Nadenggan based on the Deed of Merger of PT Tapan Nadenggan No. 6 dated November 26, 2004.
- HGU Certificate No. 24 dated July 28, 2000 with an area of 2,929,037 Ha from the Land Office of Kotabaru District. Expiration of rights: September 24, 2034. On the Registration page for Transfer of Rights, Encumbrances and Other Records, it is informed that there has been a merger between PT Inti Gerak Maju and PT Tapan Nadenggan to become PT Tapan Nadenggan based on the Deed of Merger of PT Tapan Nadenggan No. 6 dated November 26, 2004.

Then there is the HGB of PT Tapan Nadenggan (formerly PT SMART) with a total area of 27.0126 Ha with the following details:

- Decree of the Head of the Regional Office of the National Land Agency of Kalimantan Selatan Province No. 21-550.2-43-2000 dated September 21, 2000 which granted PT SMART building rights for a period of 30 years on a plot of land located in Serongga Village, Kelumpang Selatan District, Kotabaru District, Kalimantan Selatan Province covering an area of 128,170 M2. Then the HGB Certificate No. 03 was issued dated October 23, 2000 with an area of 12,8170 Ha from the Land Office of Kotabaru District. The expiry of rights, which is September 24, 2030. On the Registration page for Transfer of Rights, Encumbrances and Other Records, it is informed that there has been a sale and purchase of HGB from PT SMART to PT Tapan Nadenggan based on the Sale and Purchase Deed No. 018/2019 on 27 February 2019.
- Decree of the Head of the Regional Office of the National Land Agency of Kalimantan Selatan Province No. 22-550.2-43-2000 dated September 21, 2000 which granted PT SMART building rights for a period of 30 years on a plot of land located in Serongga Village, Kelumpang Selatan District, Kotabaru District, Kalimantan Selatan Province covering an area of 141,956 M2. Then the HGB Certificate No. 04 was issued dated October 23, 2000 with an area of 14.1956 Ha from the Land Office of Kotabaru District. The expiry of rights, which is September 24, 2030. On the Registration page for Transfer of Rights, Encumbrances and Other Records, it is informed that there has been a sale and purchase of HGB from PT SMART to PT Tapan Nadenggan based on the Sale and Purchase Deed No. 019/2019 on 27 February 2019.

Based on the description above, it is known that the total land rights (HGU and HGB) owned by PT Tapan Nadenggan are 7,675.72 Ha. However, based on the Statement Letter issued by the Director and Deputy President Director of PT Tapan Nadenggan on August 23, 2018, that the company removed an area of 775.60 Ha from the scope of certification because it overlaps with the mining area. Thus, the scope of PT Tapan Nadenggan's certification is **6,900.12 Ha**.

4.4.2

Unit of certification is one of long-established plantations company. During stakeholder consultation with surrounding villages (Pantai Village and Serongga Village) stated there is no customary right within the plantation area and there is no new land acquisition process.

The company showed 2 copies of the Decree of the Minister of Forestry (No. 151/Kpts-II/1993 dated 18 April 1994 and No. 115/Kpts-II/1995 dated 27 March 1996) which explained that the area of PT Tapan Nadenggan (formerly PT Inti Gerak Maju) comes from the release of part of the forest area. However, the company also acquired land in the form of compensation to the land owners in the HGU area. The company can show a recapitulation of the list of recipients of land compensation which was carried out in the period 1992 to 1995.

Companies can also show examples of documentation of land acquisition or land compensation, for example on behalf of Kamberani,

Kaspul, Kadul, Marimah, Kamariah, Made, and Laila. The documentation includes a certificate of land tenure, a map of the location of the land, minutes of compensation, a statement of release of rights, until evidence of payment in the form of a receipt or money receipt. The compensation process is carried out directly to the land owner who is compensated where this is evidenced by the signature on stamp duty between the land owner and company representatives. The compensation documentation was also known by witnesses such as the village head and the local sub-district head.

4.4.3

Companies can show maps showing legal rights in the form of a 1:50,000 scale HGU map contained in the HGU certificate issued by the Land Office which was developed through participatory mapping.

In addition, in each compensation document there is a map made in a participatory manner showing the location of the area to be compensated which is signed by the land owner and known to the local government. Based on public consultations with village representatives from Pantai Village and Serongga Village, it is known that they know the legal boundaries owned by PT Tapian Nadenggan.

Based on field observations of several samples of HGU stakes determined by the auditor, namely Batu Ampar Estate (No. 178 Block C06, No. 179 Block 06 and No. 181 Block B07) and Batu Mulia Estate (No. 21 block H39, No. 23 block H 23, No. 26 Block I 41, No. 36 Block I 36/I35 and No. 106 Block E 53), it was concluded that all HGU stakes were in place according to their coordinate points and were well maintained. Land boundaries with outside parties are clear, such as large road boundaries and ditches that border the HGU area. There is no indication of land use outside the HGU.

4.4.4

As explained in indicator 4.4.2, it is known that the land release negotiation process has been carried out fairly, openly and transparently and based on the agreement of both parties without any coercion from either party. The community represents itself in the process. All relevant information regarding land acquisition is available in the appropriate form and language.

4.4.5

Based on the recapitulation of land compensation documents shown, it is known that the land compensation process was carried out in the period 1992 - 1995. At the time of the audit, no previous land owners could be contacted because the compensation process had taken a long time. took a long time, but based on information from the certification unit manager and based on public consultation with village representatives from Pantai Village and Serongga Village, they were informed that compensation documents had also been provided to parties who received compensation during the compensation process. This is also proven by the existence of a compensation document where the person signing the document is the land owner witnessed directly by the village head and sub-district head.

4.4.6

Based on the results of interviews with stakeholders (Pantai Village and Serongga Village), it is known that the company has provided positive impacts such as employee recruitment and CSR assistance. The company regularly holds meetings with community representatives and absorbs community aspirations which are implemented in company policies such as CSR or other assistance, for example in June 2023. Communication with the community is no problem, every request for information is always responded to. by the company. In addition, the implementation of FPIC is demonstrated in social impact assessments and HCV assessments.

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 no new planting activity during this audit. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.

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 a Land Compensation procedure, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014 relates to the identification of legal rights, customary rights or user rights, and to identify communities entitled to compensation.

Based on public consultations with village representatives from Pantai Village and Serongga Village, it is known that they are aware of the procedures through the socialization provided and they agree with these procedures as well as information that is known that there are no negotiations carried out by the certification unit with any party regarding compensation due to loss of legal rights, customary rights or user rights since the last monitoring.

4.6.2

The company has a Land Compensation procedure, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014. This procedure explains how to calculate and distribute fair and gender-equal compensation in all land-related activities. compensation process for land rights cultivated by the Company, the aim of which is to ensure that the plantation area is free from the rights of other people.

Based on public consultations with village representatives from Pantai Village and Serongga Village, it is known that they are aware of the procedures through the socialization provided and they agree with the procedures and compensation processes carried out aimed at land owners.

4.6.3

PT Tapan Nadenggan does not yet have a plasma or small farmer scheme for local communities.

4.6.4

Evidence of the land acquisition process consists of a list of participants and the land compensation process was carried out at the start of land clearing and all recorded evidence of the land compensation process consists of land identification and inventory documents, land location maps, release statements. land rights by the owner, Proof of Payment, Minutes of handover of compensation/compensation and witnesses, are kept in each estate according to the location of the land.

At the time of the audit, the previous land owner could not be contacted because the compensation process took a long time but based on information from the certification unit manager and based on public consultation with village representatives from Pantai Village and Serongga Village, they were informed that compensation documents had also been provided to the parties. who received compensation during the compensation process. This is also proven by the existence of a compensation document where the person signing the document is the land owner witnessed directly by the village head and sub-district head.

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 procedures to identify people and/or community groups who are entitled to compensation as stated in document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014. This procedure explains how to identify people and/or community groups who are entitled to compensation.

Based on public consultations with previous land owners and village representatives from Pantai Village and Serongga Village, it is known that they are aware of the procedures through the socialization provided and they agree with the compensation procedures and processes carried out aimed at land owners and land owners are given the freedom to release their land without coercion.

4.7.2

The company has a Land Compensation procedure, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014. This

procedure explains how to calculate and distribute fair and gender-equal compensation in all land-related activities. compensation process for land rights cultivated by the Company, the aim of which is to ensure that the plantation area is free from the rights of other people.

Based on public consultations with village representatives from Pantai Village and Serongga Village, it is known that they are aware of the procedures through the socialization provided and they agree with the procedures, and they can access these procedures through company management representatives if they need them.

4.7.3

The company has a Land Compensation procedure, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014. This procedure explains how to calculate and distribute fair and gender-equal compensation in all land-related activities. compensation process for land rights cultivated by the Company, the aim of which is to ensure that the plantation area is free from the rights of other people.

Based on public consultations with village representatives from Pantai Village and Serongga Village, it is known that they are aware of the procedures through the socialization provided and they agree with the procedures, and they can access these procedures through company management representatives if they need them.

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

Based on public consultations with relevant government agencies in Kotabaru Regency and village representatives (Pantai Village and Serongga Village), it is known that there have been no cases of land disputes for the last 2 years until this assessment was carried out within the scope of regional certification. Based on interviews with certification unit management and auditor search results in online media, there are no historical or current land disputes in unit certification.

4.8.2 and 4.8.4

The company has established a mechanism for resolving conflicts and land disputes in procedure No. SOP/NP/SMART/VII/D&L002 dated 1 July 2010. Based on public consultations with relevant government agencies in Kotabaru Regency and village representatives (Pantai Village and Serongga Village), it is known that there have been no cases of land disputes for the last 2 years until an assessment was carried out on the scope of regional certification.

4.8.3

There is no evidence to suggest that there was an acquisition process through confiscation or forced release. Based on public consultations with relevant government agencies in Kotabaru Regency and village representatives from Pantai Village and Serongga Village, it is known that all land acquisition between local communities and company representatives is carried out based on mutual agreement and the compensation process is carried out aimed at land owners and does not eliminate legal/customary rights, land owners are given the freedom to release their land without any 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

Based on the results of document verification, it is known that the company received TBS from core plantations and also received TBS from the Gajah Mada Plasma Cooperative which is plasma from PT Sinar Kencana Inti Perkasa (one of the Sinarmas Group). The FFB price given to the Cooperative is the price set by the South Kalimantan Provincial Plantation Service. Companies can show the FFB price set by the South Kalimantan Province Plantation Service for the period June, July and August 2023. For example, below, the FFB price for August 2023 is set at the lowest price of IDR. 1,599.08 for 3 years old and the highest price is Rp. 2,224.19

for plants aged 13 years.

Apart from receiving FFB from the Plasma Cooperative, the Company also receives FFB from Independent Farmers around the company and TBS Agents whose FFB comes from Independent Farmers around the company. The FFB price given to Independent Farmers and Agents is based on the price set by the company. Pricing is based on CPO prices, OER and KER estimates from outside TBS, as well as market prices of other companies around the company.

Based on the results of interviews with representatives of the Gajah Mada cooperative, it is known that the FFB prices set by the company are based on prices from the South Kalimantan Province Plantation Service. Information regarding FFB prices will be conveyed by the company via WhatsApp message.

Based on the results of interviews with FFB suppliers from the Karya Tani Farmers' Association and CV Bamega Perkasa, it is known that the FFB prices set by the company are considered reasonable by the suppliers due to tight price competition in other companies. So far there have been no complaints regarding the FFB prices set by the Company.

5.1.2

The price of FFB to farmers is determined by the South Kalimantan Province Plantation Service. In determining the price of FFB, farmers are also involved. The Gajah Mada Cooperative always knows about the FFB price determination because every time there is an update on the FFB price, the company always provides information to the cooperative leadership to inform all its members. This is in line with the results of consultations with cooperative administrators who stated that information regarding FFB prices is known every week via WhatsApp messages.

For FFB prices set by the company, if there is a price change, the company will inform the FFB Supplier via telephone and WhatsApp message. This is in line with the results of consultations with cooperative administrators and other suppliers which stated that information regarding FFB prices is known every week via WhatsApp messages. The pricing mechanism for external FFB suppliers is also outlined in the cooperation agreement and has been agreed upon by both parties. Examples of providing price information to external suppliers include:

1. September 1, 2023, to CV Jaya Anugerah Jaya
2. September 5, 2023, to CV Borneo Sakti

5.1.3

As explained in indicator 5.1.2, the price of FFB at the farmer level is determined by the South Kalimantan Provincial Plantation Service and external FFB suppliers are determined by the company. In determining the price of FFB, farmers are also involved. The FFB price determination is always known by the Gajah Mada Cooperative. The price agreement has also been explained in the cooperation agreement between the company and farmers where the FFB price is based on the price set by the Plantation Service and for external FFB the price is set by the Company. To determine the premium value, according to the company's statement, up to now there has been no agreed determination of the premium amount.

5.1.4

Based on the results of interviews with the Chair of the Gajah Mada Cooperative, CV Bamega Perkasa and the Telagasari Farmers Group, it is known that the cooperative and external FFB suppliers already understand the contract/MoU with the company and there is no coercion. from the company. So far, the collaboration with the company has gone well and the cooperative has the authority to make decisions.

5.1.5

In terms of cooperation agreements with FFB Suppliers, the company cooperates with PT Sinar Kencana Inti Perkasa. FFB suppliers such as the Karya Tani Farmer Group, the Sungai Kupang Plasma Farmers Group Association, Sungai Panci Plasma and other agents have a partnership with PT Sinar Kencana Inti Perkasa. PT Tapan Nadenggan cooperates with PT Sinar Kencana Inti Perkasa in terms of FFB processing. The company can show the cooperation agreement between PT Tapan Nadenggan and PT Sinar Kencana Inti Perkasa, namely:

- FFB processing agreement dated 27 February 2019 between PT Tapan Nadenggan and PT Sinar Kencana Inti Perkasa with a validity period of up to 28 February 2024.

- The company can also show a cooperation agreement between PT Sinar Kencana Inti Perkasa and the Karya Tani Farmer Group with the number 016/TBS/PT.SKIP-GKTX/VI/2022 on 7 June 2022 with a validity period of up to 7 June 2023.

Based on document verification, it is known that the agreement has complied with the provisions, as evidenced by the agreement between the two parties, has a time period, and is transparent.

5.1.6

Companies can show proof of TBS payments to TBS Suppliers made by PT Sinar Kencana Inti Perkasa to several TBS suppliers, namely:

- Proof of payment from PT SKIP to Vendor CV Bamega Perkasa, via BRI Bank transfer on August 21 2023
- Proof of payment from PT SKIP to CV Karya Sari vendor, via BRI bank transfer on August 18 2023
- Proof of payment from PT SKIP to CV Jaya Agung Jaya vendor, via BRI Bank transfer on August 21 2023

Based on the results of interviews with representatives of the CV Bamega Perkasa and the Telagasari Farmers Group, it is known that so far there have been no complaints regarding the price or payment for FFB made by the Company. Collaboration with the Company is going quite well.

5.1.7

The company shows the weighing results as follows:

- Test result information Number: 510.3/056-MET/DISKOPERINDAG/VII/2023, dated 05 July 2023, Brand/Type: Avery Weight-Tronix/ZM510-SD4, Serial Number: 221951706, capacity 40,000 kg/10 kg, and must be recalibrated no later than July 4, 2024, published by the Legal Meteorology Unit, Metrology and Trade Supervision Sector. Kotabaru Regency Cooperatives, Industry and Trade Service
- Test result information Number: 510.3/057-MET/DISKOPERINDAG/VII/2023, dated 05 July 2023, Brand/Type: Avery Weight-Tronix/ZM510-SD4, Serial Number: 182050107, capacity 40,000 kg/10 kg, and must be recalibrated no later than July 4, 2024, published by the Legal Meteorology Unit, Metrology and Trade Supervision Sector. Kotabaru Regency Cooperatives, Industry and Trade Service

Regarding OFI in the previous assessment, the company has been able to show the results of the scale calibration for the 2023 period.

5.1.8

The company has carried out outreach regarding RSPO to Independent Farmers around the company. This is proven by the results interview with CV Bamega Perkasa and the Telagasari Farmers Group. Apart from that, the company has also taken the coordinates of member farmers to ensure that the farmers' land is not in a forest area. Until now, the Farmer Group is still discussing with management regarding future plans to take part in RSPO certification.

5.1.9

The Company has a Grievance and Grievance mechanism, namely SOP/SMART/SIGS/SADV/II/003 dated 1 July 2014 concerning Handling Complaints and Dissatisfaction. The SOP explains the methods for resolving complaints based on the type of complaint which considers the impact of dissatisfaction based on the number of people submitting complaints, Organizational Level, Threat Level and involvement of external parties to consider which method is effective for resolving it. complaint. (Whistleblower) Incoming aspiration data is recorded in the form of recording complaints and dissatisfaction.

Based on interviews with the administrators of the Gajah Mada Cooperative, CV Bamega Perkasa and the Telagasari Farmers Group, it is known that all farmer complaints will be conveyed to the company. So far, complaints submitted have been submitted directly to the company's PIC and the company has always responded to them.

Status: Comply

5.2

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

5.2.1

The company has carried out outreach regarding RSPO to Independent Farmers around the company. This is proven from the results

of interviews with CV Bamega Perkasa and the Telagasari Farmers Group. Apart from that, the company has also taken the coordinates of member farmers to ensure that the farmers' land is not in a forest area. Until now, the Farmer Group is still discussing with management regarding future plans to take part in RSPO certification.

5.2.2

As explained in indicator 5.2.1, currently the Company has carried out outreach regarding RSPO to Independent Farmers around the company. This is proven from the results of interviews with CV Bamega Perkasa and the Telagasari Farmers Group that the company has carried out outreach regarding RSPO certification to representatives of joint farmer groups. The program to improve farmers' livelihoods carried out by the company only takes the coordinates of farmers' land from members of farmer groups, this aims to ensure that the FFB from farmer groups can be accepted by the company. with the hope of improving the livelihoods of member farmers

5.2.3

The support provided by the company to encourage the legality of FFB production is by taking the coordinates of FFB suppliers. This aims to ensure that the FFB source from the FFB supplier comes from a legal source and is not located in a forest area. Apart from the results of surveys conducted by the company, FFB suppliers whose FFB comes from farmers have land legality in the form of SHM and SKT

5.2.4

Based on the results of document review and interviews, it is known that there is no plasma at PT Tapian Nadenggan – Batu Ampar POM so this indicator is not relevant.

5.2.5

The company has reported the progress of the farmer's program in the Plantation Business Development Report and the CSR report which was reported to the Kotabaru District government.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

The unit of certification already has a non-discrimination and equal opportunity policy as indicated in the Sinarmas Agribusiness and Food Business and Human Rights Policy document which was approved on December 12th, 2019, by the Head of Policy and Compliance Division. The policy states that the unit of certification provides equal opportunities for all workers and embraces diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or labor union membership and ensures workers are protected from acts of discrimination at all stages of the employment relationship. This policy has been disseminated in each plantation unit and factory to workers. For example, socialization in BAMB unit, which was held on March 11th, 2023, and attended by 40 workers. As proof of implementation, when the auditors conducted interviews and field visits, they already understood the human rights policies that apply in the company. This socialization has also been carried out to external stakeholders, for example when making/renewing/signing work contracts.

The unit of certification does not discriminate and treats all workers fairly, the following is evidence that can be shown by companies listed in several employee demographic documents, sample documents for employee recruitment and identification documents and realization of worker training:

- Composition of workers consisting of various ethnic groups, religions, genders, and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers.
- Placement and training of workers is carried out according to their expertise/type of work, such as prospective harvest workers are placed as harvest workers and receive routine harvest training.
- Women workers are given reproductive leave rights, wages and the same opportunities for promotion as male workers in the same type of work.

The results of interviews with daycare workers, representatives of labor unions and the gender committee also obtained information that there was no indication of discrimination against religion, ethnicity, sex, and regional origin in the process of accepting a job.

Based on the explanation above, it can be concluded that the unit of certification has treated all workers fairly without discrimination based on gender, ethnicity, religion, health condition or other.

6.1.2

Based on the results of verification of worker recruitment documents, it is known that worker recruitment is based on expertise, ability and records of medical examination results. Likewise, promotion, in accordance with the results of the employee's assessment/evaluation. The unit of certification has a non-discrimination and equal opportunity policy as indicated in the GAR Social and Environmental Policy (GSEP) document, which was endorsed on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. It states that in the ethical recruitment process, companies prohibit the practice of charging workers a fee in recruiting and withholding identity documents.

The unit of certification shows job vacancy documents for the types of jobs for harvest worker at the BAME and BMLE units in 2023. There are no conditions in the document that indicate discrimination. In addition, the unit of certification also shows documents for recruiting workers, which contain documents such as job applications, photocopies of identity cards, family cards, results of health checks, and others.

Based on the results of interviews with workers, labor union representatives and representatives of the gender committee, information was obtained that there were no issues related to discrimination. PT Tapian Nadenggan workers come from various regions in Indonesia. Both local and migrant workers are given the same opportunity to get a job and promotion as well. The unit of certification also does not retain identity documents during the worker recruitment process.

6.1.3

The unit of certification shows documentation of selection, recruitment, employment, access to training, and promotions for its workers. For example, the performance appraisal document of production administration workers in the BAME unit for the 2022 assessment period which provides information regarding the assessment criteria (discipline, work quantity, work quality, cooperation, work attitude and responsibility), the results of the assessment and the follow-up of the results of the assessment. Then the certification unit shows Memo number 001/VPA3-INT/BNJO/03/2023 dated March 14th, 2023, concerning Approval of the Appointment of Permanent Workers (*PT*) in BAME unit. It is known that there were 21 harvest workers who were promoted/appointed from contract worker (*PKWT*) status to permanent worker (*PT*) status.

Based on the results of interviews with HR and personnel staff, information was obtained that the recruitment process for all employees was carried out through the same process where prospective employees must meet requirements in the form of administrative selection (application letter, graduation letter, photocopy of identity and family), psychological test (for certain positions), interviews and results of medical examinations. To increase the career path, responsibility, authority and scope of an employee, the unit of certification provides promotions based on skills, abilities, leadership, honesty, discipline, loyalty, attendance, etc. Employee performance appraisal is carried out through the stages of performance evaluation.

6.1.4

Pregnancy tests for workers are carried out only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a job that is safer but remains the same in terms of wages and other benefits, so there is no discriminatory action. This was clarified by the results of interviews with female spray workers and representatives of the gender committee in each plantation unit and factory which stated that female workers are required to carry out monthly pregnancy tests at the clinic to ensure that no pregnant/breastfeeding female workers are exposed to chemical material. Pregnancy testing is not a discriminatory measure provided by the company.

Then from the results of a review of the latest employee recruitment documents and interviews with female workers, it was found that there was no obligation for prospective female workers to take a pregnancy test when recruiting workers. They explained that at the time of recruitment, there was no pregnancy test, but only physical health tests, administration and interviews with prospective leaders.

6.1.5

The certification unit has established a gender committee in each unit which has the function of being a forum that can accommodate aspirations or complaints from workers regarding gender equality, protection of workers' reproductive rights, protection from incidents

of harassment, and others. Furthermore, the Unit of Certification shows the document establishing the Organizational Structure of the Gender Committee in each estate units and mill unit for the 2023 period consisting of representatives of each gender, namely men and women. The organizational structure consists of a Protector/Counsellor/Advisor, Chairperson, Deputy Chairperson, Secretary, Treasurer, Head of Division and Members.

The 2023 gender committee work program for all plantation and factory units at PT Tapan Nadenggan, includes:

- Assistance in the implementation of posyandu for breastfeeding mothers, pregnant mothers and toddlers carried out by the clinic.
- Socialization of reporting, prevention and handling of sexual harassment
- Socialization of gender equality
- Socialization of women's reproductive rights
- Celebration of Mother's Day and Kartini's Day
- Cleanliness of employee cottages

The unit of certification shows the realization of the program and the results of the gender committee meeting listed in the work program document and the realization of the PT Tapan Nadenggan gender committee in 2023, for example as follows:

- Implementation of integrated healthcare centre programs in all units (BAMM, BAME and BMLE units) which are held every month.
- News of the socialization event regarding the prohibition on spray work for pregnant and breastfeeding workers, the obligation to wear PPE when working and the flow of submitting sexual harassment complaints on March 10, 2023, which was attended by female workers and wives of employees at the BMLE unit.

Based on interviews with all sampling workers in the plantation and factory units, it was found that they knew the functions, work programs, and mechanisms for submitting complaints through the gender committee. Then, based on the results of interviews with representatives of the gender committee it is known that until now the work program of the gender committee has prioritized women workers. However, it is possible that cases of sexual harassment or violence against male workers can also be submitted through the gender committee.

6.1.6

The unit of certification does not discriminate against workers' rights, including wages. The certification unit has a non-discrimination policy as indicated in the GAR Social and Environmental Policy (GSEP) document, which was approved on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. It is stated that the unit of certification ensures that all workers receive wages that are equal to or exceed the legally stipulated minimum wage. Workers receive wages in accordance with South Kalimantan Governor Decree Number 188.44/0842/KUM/2022 concerning Determination of the Minimum Wage for Kotabaru Regency in 2023, namely IDR 3,293,371.

Payment of fair wages has been properly carried out by the unit of certification, taking into account ability, performance, expertise, length of service, and other factors as the basis for remuneration. So that the payment of wages given is in accordance with the burden, duties and type of work of each. This was stated in the Decree Number 001/CEO of PSM 3/01/2023 concerning the Structure and Scale of Wages for Permanent Employees of PT Tapan Nadenggan in Kotabaru Regency, South Kalimantan Province in 2023 which states that there are 100 different wage categories for all workers with PT1 – PT4 status, namely group 1 -5 and group A-T, for example the lowest group is PT4-T1 and the highest group is PT1-A5.

Status: Comply

6.2

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

6.2.1

The unit of certification demonstrates the procedures/policies related to wages and work requirements in accordance with the provisions on manpower that have been published in the national language (Indonesian) listed in several documents, namely:

- Wage SOP with Number KHI-smart/007-00 effective August 1st, 2017, which was approved by the HR Managing Director.
- South Kalimantan Governor Decree Number 188.44/0842/KUM/2022 concerning Determination of the Minimum Wage for Kotabaru Regency in 2023, namely IDR 3,293,371.
- Decree Number 001/CEO PSM 3 /01/2023 concerning the Structure and Scale of Wages for Permanent Workers of PT Tapan

Nadenggan in Kotabaru Regency, South Kalimantan Province in 2023 which states that there are 100 different wage groups for all workers with PT1 – PT4 status, namely groups 1- 5 and group A-T, examples are as follows:

- The lowest group is in the PT4-T1 group, namely IDR 3,248,871
- The highest group is in the PT1-A5 group, namely IDR 3,639,371
- Wages are not paid to workers who are absent in the amount of 1 month's wages divided by 25 working days
- Decree Number 003/CEO PSM 3/01/2023 concerning Wages for Workers Based on a Specific Time Work Agreement (*PKWT*) of PT Tapian Nadenggan in Kotabaru Regency, South Kalimantan Province in 2023 which states that:
 - Wages for *PKWT* worker, period <1 year is IDR 3,248,371 plus a rice allowance of IDR 75,000
 - Wages for *PKWT* worker, period =>1 year is IDR 3,249,371 plus a rice allowance of IDR 75,000

The unit of certification can show documentation of payment of wages for all workers shown in the payroll and salary slip which include components such as basic wages, premiums, overtime, benefits (*BPJS*, electricity subsidies, etc.), and deductions (*BPJS*, loans, labor union, etc). Based on the interview results, workers can explain the basic wages and benefits as well as the deductions received every month. Following are some examples of wage documents in June/July 2023 for workers, including:

- Press operator with initial ZKL received basic wages in June 2023 of IDR 3,288,371 (class PT2-J5).
- Daycare worker with initial LR received basic wages in July 2023 of IDR 3,249,371 (class PT4-T2).

Based on the description above, it can be concluded that the unit of certification already has documentation of wages and work conditions in accordance with the labor regulations (*PP* Number 36 of 2021) that apply to workers in the national language, along with an explanation for workers in a language they understand.

6.2.2

The unit of certification can show examples of work agreement documents (*SPK*), for example as follows, Work Agreement Letter Number 007/BAME/PKWT/06/2023 on May 13th, 2023. In article 1 it is explained that workers with the initials SS are accepted as FFB harvesters in BAME units. The agreement is valid from 14 June 2023 to 13 June 2024 (1 year). As for the work agreement/decreed document shown, it contains information including the name acting as management representative and company address, employee information in the form of name and other personal information, employee position, employee work location, reporting, work duties and responsibilities, work agreement period, probationary period, salary and other benefits. The work agreement/decreed document has been signed by representatives of management and workers.

As a form of implementation of the work agreement letter, the unit of certification shows payroll documents in each estate and mill unit. For example, harvester with initial SMN who received wages in June 2023 amounting to IDR 2,428,334 (class PT2-I4) consisting of a basic wage component of IDR 3,307,571, harvest premium IDR 778,501, pruning premium IDR 160,042, attendance incentive IDR 100,000, *BPJS* allowances, mandatory savings contributions and shopping discounts at employee cooperatives, and others.

Work agreements along with related documents that stipulate detailed wages and work conditions (work hours, deductions, overtime, sick leave, leave, maternity leave, etc.) have also been stated in the CLA period of 2018 – 2020. Based on the results of interviews with labor unions, management representatives and the District Manpower and Transmigration Office, it is known that the unit of certification does not have a new CLA because until now the labor union and the company are still discussing several articles in the preparation of the CLA draft. The company showed several CLA negotiation documents as follows, Minutes of meeting discussion regarding of the CLA in South Kalimantan on June 24th, 2023, and which was attended by 8 company representatives and 8 labor union representatives.

Then based on the results of field visits to workshop in each estate unit and mill unit, information was obtained that workers had understood the job description, the wages they received, and other matters related to work requirements.

Based on the description above, it can be concluded that the unit of certification has a work agreement along with related documents that regulate details of wages and working conditions.

6.2.3

The company shows evidence of legal compliance regarding the fulfilment of labor rights to workers, for example:

- Engine room operator with initial AN received wages in July 2023 amounting to IDR 3,728,511 which consists of a basic wage component of IDR 3,269,371 (class PT3-M1), overtime pay of IDR 918,246, attendance incentive IDR 100,000 as well as *BPJS*

allowances and deductions, trade union membership, etc. The worker received 28.5 hours of overtime hours with an overtime wage per hour of IDR 18,898. The company also shows an example of an overtime order on July 7th, 2023, for work operating turbine engines and generators.

- Harvester with initial JN received wages in June 2023 amounting to IDR 3,473,754 consisting of a basic wage component of IDR 3,249,371 (class PT4-T2), harvest premium IDR 529,960, pruning premium IDR 250,470, other premiums (for work empty salary application) IDR 533,659, attendance incentive IDR 100,000, BPJS allowances and discounts, mandatory savings contributions and shopping discounts in employee cooperatives, and others
- The employee's annual leave with initial ZA who applied for 1 day of annual leave from the remaining 2 days of leave entitlement. The application was submitted and approved by *KTU*, Personnel and Estate Manager on August 28th, 2023.
- Maternity leave for employee with initial NF who applied for maternity leave for 90 days or 45 days before giving birth and 45 days after giving birth based on a doctor's examination letter at the company clinic
- The certification unit has deductions/fines that apply if workers commit irregularities/negligence in their work. For example, deductions from workday pay if workers are absent from work without reason. Apart from that, there are also fines for negligence at work, for example in harvesting work such as harvesting unripe fruit, a deduction of IDR 12,000 per fruit will be imposed.

It can be concluded that the implementation of working hours, minimum wages, overtime wages, leave entitlements, and others are in accordance with the provisions of applicable labor laws.

6.2.4

The certification unit has a list of worker welfare infrastructure facilities updated year of 2023 for each estate and mill unit, where there are staff and employee housing facilities, religious facilities (houses of worship), sports facilities, health facilities in the form of clinics, clean water facilities, electricity facilities in the form State Electricity Company (*PLN*), day care centres, school buses and others. Currently, all welfare facilities provided in general are in proper condition and can be used by workers and their families. The document also contains a monitoring and maintenance program for workers' welfare infrastructure for the 2023 period made by the SPO Officer and approved by the Estate/Mill Manager. The document describes conditions for workers' welfare facilities currently in good condition.

Based on the results of field observations in employee housing areas, for example in the housing units BAMB, BAME and BMLE it is known that the welfare facilities provided are in proper/good condition, the worker's house consists of 2 bedrooms, 1 bathroom and kitchen. Clean water is provided every day. Electricity is in the form of *PLN* and workers receive electricity subsidy allowances every month. There are also prayer facilities in the form of mosques and churches, sports facilities (football fields, volleyball courts and badminton courts), educational facilities (kindergartens and elementary schools), transportation facilities in the form of school buses, and other facilities. Clinics are available as worker health facilities that can be accessed by workers and their families.

When the auditor carried out visits to workers' homes in the BAME unit, it was discovered that some of the workers' houses had damaged roofs. The BAME management representative shows the Employee Housing Improvement Program documents planned for year 2023. This is supported by the results of interviews with housing residents who stated that the housing facilities provided were in decent condition. If there is damage to the condition of the house, the unit of certification representative will respond and make gradual repairs as soon as possible.

In accordance with the description above, it can be concluded that the certification unit already has facilities and infrastructure for the welfare of workers in proper conditions and accessible to workers and their families.

6.2.5

Based on the results of field visits, it is known that the Estate and Mill locations are also close to traditional markets and villages, so workers' access to food and clothing or household goods is very easy to reach. The unit of certification also has an employee cooperative which is engaged in buying and selling daily necessities. The employee cooperatives are located in employee housing in each estate (BAME and BMLE) and mill (BAMB) units.

Then, from the results of interviews with estate and mill workers as well as residents of houses in employee housing, it is known that they do not experience difficulties in obtaining food sources because they can shop at employee cooperative or stalls in the surrounding villages.

6.2.6

Currently the company uses a living wages calculation based on South Kalimantan Governor Decree Number 188.44/0842/KUM/2022 concerning Determination of the Minimum Wage for Kotabaru Regency in 2023, namely IDR 3,293,371. In addition, the company also refers to actual and rational prices around the company's operations.

The calculation of a living wages and in-kind benefits is shown in PT Tapan Nadenggan Prevailing Wage Calculation document for Fiscal Year 2023 which was stipulated on 25 May 2023 and has been approved by the CEO of PSM 3. Applicable wages include basic minimum wage of Kotabaru Regency, allowances such as THR, rice, electricity, house and water, facilities such as; school, polyclinic services and child care centres. This calculation has a difference of 15% – 57% or IDR 482,100 – IDR 1,867,944 from the applicable minimum wage of Kotabaru Regency. The calculation of applicable wages & benefits varies depending on the status of the worker (PKWT, PT 4A, PT 4B, PT3, PT2 and PT1), starting from IDR 4,814,773 – IDR 5,268,523/month.

6.2.7

The unit of certification shows manpower documents/labor requirements and a list of workers for the period August 2023 for each plantation unit, where there are harvest workers with PKWT status, namely as follows:

- The BAME unit has a harvesting requirement of 126 people with actual workers of 140 people consisting of 117 permanent workers (PT) and 23 PKWT workers. So there is a shortage of 9 people from the workforce requirements.
- The BMLE unit has a harvesting requirement of 102 people with actual workers of 96 people consisting of 51 permanent workers (PT) and 45 PKWT workers. So there is a shortage of 51 people from the workforce requirements.

The unit of certification also shows a Specific Time Work Agreement Letter, for example

- Work Agreement Letter Number 007/BAME/PKWT/06/2023 on May 13th, 2023. In article 1 it is explained that workers with the initials SS are accepted as FFB harvesters in BAME units. The agreement is valid from 14 June 2023 to 13 June 2024 (1 year).
- Work Agreement Letter Number 076/BMLE/SK-PKWT/X/2022 on October 25th, 2022. In article 1 it is explained that workers with the initials SS are accepted as FFB harvesters in the BMLE unit. The agreement is valid from 26 October 2022 to 25 October 2023 (1 year)

The results of interviews with management representatives revealed that the company had identified types of permanent work where harvest work was permanent work. The use of PKWT workers in harvest work is due to replanting activities in BAME units and post-replanting activities in BMLE units.

Representatives from the Manpower and Transmigration Office of Kota Baru Regency stated that the use of PKWT workers is only permitted for temporary work and harvest work is not included in these criteria.

The company has not been able to prove that the implementation of PKWT is in accordance with government regulations regarding the types of work that can use PKWT (seasonal or temporary work). **This becomes Non-conformity Number 2023.01 with minor category.**

6.2.7

Status: Non-conformity Number 2023.01 with minor category

6.3

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

6.3.1

The unit of certification has a policy regarding the formation of labor unions listed in the GAR Social and Environmental Policy (GSEP) document, which was ratified on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. The policy explains the unit's commitment to giving freedom to workers to form collective bargaining and join labor unions. The GSEP policy is written in Indonesian so that workers can understand it.

The certification unit has an independent workers union (SPM) as a forum for workers to convey their complaints or aspirations to the certification unit. The following is an example of a labor union founding document:

- Proof of recording changes in the management of *SPM* in BAMB unit PT Tapan Nadenggan's at the Manpower and Transmigration Office of Kotabaru Regency with number 568/03/SP/II/08/Disnakertrans dated 23 October 2017.
- Proof of recording the management of *SPM* in BAME unit PT Tapan Nadenggan's at the Manpower and Transmigration Office of Kotabaru Regency with number 568/05/SP/II/08/Disnakertrans on 26 June 2018.

Based on the results of interviews with representatives of labor unions, it is known that labor unions hold regular meetings to discuss complaints and aspirations expressed by workers. Then, based on the results of interviews with sampling workers in plantation units and factories, information was obtained that workers can submit complaints or grievances through the labor union. If there is a dispute in terms of unfinished industrial relations between the worker and the unit of certification, the labor union will be responsible for accompanying the worker until the problem is resolved.

6.3.2

The unit of certification also shows documents of the minutes of internal labor union meetings or bipartite meetings written in the national language, for example:

- Minutes of the monthly meeting of *SPM* and for the South Kalimantan region which was held on June 17th, 2023. This activity discussed plans for CLA negotiations, damage to the finger print attendance machine and the status of contract workers (*PKWT*) whose work period was more than 5 years.
- The joint meeting of *SPM* and *SPSI* for the South Kalimantan region was held on July 11th, 2023, and was attended by 30 participants. This activity discussed plans for CLA negotiations, employee bonuses and the status of contract workers (*PKWT*) whose contracts expire and are proposed to be appointed as permanent workers (*PT*) before their work contracts end.

6.3.3

Based on the verification of the organizational structure of the labor unions in each estate and factory unit, it is known that the workers' union officials in all estates and mills are not representatives of management/company staff. Then, based on the results of interviews with labor union representatives and union members, it is known that there is no intervention from the unit of certification in selecting or organizing labor union activities. This is in line with the GAR Social and Environmental Policy (GSEP) which was ratified on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. It is stated that the unit of certification will not interfere with the activities of workers' organizations or labor union representatives.

Based on the results of interviews with workers, it is known that the company has given them the freedom to form and join labor unions. Then, union membership is voluntary without coercion. Of the several workers interviewed, some were members of a labor union, and some were not members of a labor union.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

The certification unit has a policy prohibiting the employment of minors contained in the GAR Social and Environmental Policy (GSEP) document, which was approved on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. As this policy is known, the company prohibits the employment of children and will take action to prevent the use of child labor in all line of operations activities.

Based on the employee list for the July and August 2023 period, it is known that none of the employees were younger than 18 years old when they first started working. Then, based on the results of verification of the updated contractor workforce list document for the August 2023 period, for example the contractor PT SJA, it is known that all contractor workers are over 18 years old.

Based on the results of interviews with representatives of labor unions and external stakeholders around the company (suppliers, contractors and community leaders), information was obtained that there had never been any issues regarding child labour. In addition, around the company area there are warnings informing the prohibition for children to be in the work location.

6.4.2

The unit of certification shows the labor list documents for the July and August 2023 period for estates unit and mill unit where there are no children under 18 years of age employed. For example, the youngest worker in the BAME unit is born in 2003, with the initials

AMS and GDP who was hired on November 22nd, 2022, or when he was 19 years old.

In addition, the company has also shown Recruitment SOP document No. KHI-smart/001-00 which was approved on August 1st, 2017, by the HR Managing Director. The SOP explains that in the labor recruitment process, the company does not accept prospective workers who are under 18 years of age. This is in line with job vacancies information documents, for example, for harvest worker position in BAME and BMLE unit of 2023 period, which state the requirements for prospective workers who must be ≥ 18 years old.

Based on interviews with HR staff, it was explained that in the process of recruiting employees, age screening will be carried out before going through identity checks (e-KTP or Birth Certificate) to ensure that the age requirements of workers are met and not violated.

6.4.3

Based on a review of the employee list document, the list of students who took part in field work practices and the results of interviews with management representatives, information was obtained that there were no young workers working in the certification unit. Then, from the results of a study of the list of students who took part in internships or field work practices, it is known that there is one student who is doing field work/internship practice at BAMB unit during 2023. The student was assigned to help with work in the factory office, namely in the production administration section.

Based on the results of interviews with union representatives and management representatives, it is known that if there are students who do practical work in the field, they will be placed in non-hazardous jobs or as observers of plantation and factory activities. Because the goal is only to meet the needs of fulfilling the learning curriculum.

6.4.4

Socialization regarding child protection policies and the prohibition of child labor has been carried out in each plantation unit and factory. For example, socialization in BAMB unit, which was held on March 11th, 2023 and attended by 40 workers. Socialization also held in estate and mill unit every morning assembly before starting work. The company has also conducted outreach to workers and external stakeholders around the company (suppliers, contractors and community leaders) which was held at the time of renewal/signing of the cooperation contract. As proof of implementation, when the auditors conducted interviews and field visits to all workers in the estate/mill units and contractor worker, they already understood the code of conduct policies that apply in the company.

Based on the results of field observations in the plantation and factory areas, it is known that the company has a warning regarding the prohibition of child labor and the prohibition of children being in the company's operational areas.

Status: Comply

6.5

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

6.5.1

The company already has a policy on guaranteeing that workers are free from all forms of harassment, threats, persecution contained in the GAR Social and Environmental Policy (GSEP) which was ratified on September 8th, 2015, by the Head of Upstream, CEO – Downstream & Commercial, Executive Director & CFO and Managing Director of Sustainability & Strategic Stakeholder Engagement. To ensure that this policy is implemented, the company has a reporting mechanism in place when there is harassment in the workplace.

The policy has been socialized to workers in plantation units and factories. For example, socialization in BAMB unit, which was held on March 11th, 2023, and attended by 40 workers. This is in line with the results of interviews and field visits to workers who already know the flow of complaints if they do experience incidents of harassment at work. The workers stated that complaints related to sexual harassment could be submitted to the gender committee or to the direct supervisor at the workplace.

Based on the results of interviews with workers and gender committee officials, information was obtained that workers can submit complaints through their direct superiors or through the gender committee. In addition, during the past year there were no cases of sexual harassment. This is supported by the absence of complaints regarding sexual harassment in the minutes of gender committee meetings in all plantation and factory units during 2022 – 2023.

6.5.2

The company has a policy related to pregnant women workers listed in the CLA period of 2018 – 2020. The document explains that companies are prohibited from employing pregnant women workers who according to doctors endanger the health and safety of women and themselves if they work between 23.00 and 07.00 (referring to the provisions of Employment Law Number 13 of 2003). This policy has been socialized to all workers in plantation and factory units, for example, socialization in BAMM unit, which was held on March 11th, 2023 and attended by 40 workers.

One proof of the implementation of this policy is in the example of menstrual leave and maternity leave for female workers. For example, maternity leave for workers with the initials NF who apply for maternity leave for 90 days or 45 days before giving birth and 45 days after giving birth based on a doctor's examination letter at the company clinic. The certification unit has also formed a gender committee, one of whose functions is to accommodate female workers in reporting sexual harassment or violence that occurs in company operations.

Based on the results of interviews with the management of the gender committee, information was obtained that female workers have the right to leave for menstruation and maternity leave. The mechanism for granting menstrual leave is carried out by means of an examination first at the clinic by the company doctor, then the worker who applies for a menstrual leave permit must rest at the clinic until returning from work. In addition, the source also stated that pregnant and newly born women workers should not do spray work or other work that is directly related to the management of chemicals.

6.5.3

The unit of certification has identified and carried out activities related to assessing the needs of young mothers listed in the document Identifying the Needs of Young Mothers for the 2023 period and has been approved by the Estate and Mill Manager. The document describes the needs and facilities for young mothers with the following details:

Needs	Amount (Unit)	Information
Time off after giving birth	According to the needs	According to the women's reproductive policy to go on maternity leave
Treatment after delivery	According to the needs	Health inspection and monitoring by estate midwives
Mother and baby care information including immunizations	Every Month	The estate integrated healthcare centre program
Time to breastfeed (breastfeeding)	1-2 hours a day	If possible, young mothers can breastfeed their children during working hours at the daycare
A place/room for breastfeeding/a place for storing breast milk	Enough	Provides a good place to breastfeed the child and a place to store breast milk
Caregivers more care for newborns	-	Daycare workers prioritize the needs of infants or children at younger ages
Work in proportion	-	Giving a job that is not hard on young mothers
Slings, swaddles, clothes, baby oil	Enough	Necessity for newborns

Based on the results of interviews with the management of the gender committee in each unit, information was obtained that young mothers were given special rest periods so they could breastfeed their children, pre and postnatal health check facilities at *posyandu* activities and were kept away from work that used chemicals when pregnant or just gave birth.

6.5.4

The company has SOP for Handling Complaints and Dissatisfaction number SOP/SMART/SUST/IV/003 which was ratified on February 14th, 2022, by the Head of Upstream. In Chapter 4 point 4.6.1, it is stated that "The company guarantees the anonymity of the complainant and whistleblower with the aim of reducing the risk of retaliation". The procedure explains that the steps for submitting complaints verbally and/or in writing are addressed to the management leadership. Maximum response to workers is 2 weeks if approval from the department head is not required and 1 month if approval is required.

The company also has a Sinarmas Agribusiness and Food Business and Human Rights Policy which was ratified on December 12th, 2019, by the Head of Policy and Compliance Division. In point 9 of the policy, it is explained that "Respect and protect the rights of whistleblowers and human rights defenders". These procedures and policies have been socialized in each plantation unit and factory. As proof of implementation, when the auditors conducted interviews and field visits, all understood the human rights policies that apply in the company.

In addition, based on the results of interviews with child care workers, it was stated that complaints could be submitted to the direct supervisor, to the labor union or to the gender committee (specific complaints on women's issues) and the identity of the complainant would be kept confidential. This aims to provide space for all workers or stakeholders to be able to submit complaints comfortably if there are practices that are not in accordance with the ethical practice policy.

Status: Comply

6.6

No forms of forced or trafficked labour are used.

6.6.1

The unit of certification shows the Sinarmas Agribusiness and Food Business and Human Rights Policy document which was approved on December 12th, 2019, by the Head of Policy and Compliance Division. The document states that the company is committed to preventing the practice of forced labor or slavery and not using workers who are the result of human trafficking in all operational activities. This policy has been disseminated to workers in each plantation unit and factory. For example, socialization in BAMB unit, which was held on March 11th, 2023 and attended by 40 workers. As proof of implementation, when the auditors conducted interviews and field visits, all understood the human rights policies that apply in the company. This policy has also been socialized to external stakeholders, for example when making/renewing/signing work contracts.

Then, based on the results of interviews with representatives of the labor unions, the following information was obtained:

- There were no acts of forced labor carried out by the company. For example, for harvesters who work every day for 7 hours of work. The unit of certification provides an output target (base) that can be obtained in less than 7 working hours. If the harvester obtains more base, he will receive a harvest premium payment. But if they don't get results due to natural factors such as rain, they will not get a penalty. Then, based on the list of payments, harvesters have earned wages above the minimum wage.
- There is no retention of identity documents during the worker recruitment process.
- Every worker who works overtime always signs an overtime order.
- Payment of wages to workers is never late. Salary is given every 7th at the beginning of the month.

6.6.2

Based on the results of a review of worker list documents for the July and August 2023 period, it is known that there is no use of foreign workers at PT Tapian Nadenggan. The workforce in the company includes permanent workers (*PT*) and contract worker (*PKWT*) who come from various regions in Indonesia. Then from the results of interviews with representatives of labor unions and company representatives, it is known that there are no foreign workers in the company. The resource person also added information that all procedures related to human resource management have been implemented in the company's operational areas. Each worker has a work agreement that describes a specific job description and there is no replacement of the contract without prior consultation and approval of the worker.

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 company formed an Occupational Safety and Health Committee (P2K3) to be in charge of the OHS program, with details as follows:

P2K3 Approval Decree

- Batu Ampar Estate

Decree Ratifying Changes to the Occupational Safety and Health Advisory Committee of PT Tapian Nadenggan Batu Ampar Estate No. 566/197/Was-NKT/2020 July 2020 with Secretary an. Muhammad Irfan with SKP No 5/1435/AS.02.04/VII/2019 dated 24 July 2019 valid for 3 years. At the time of the audit activity, the personnel concerned had been transferred to another unit so that the

company showed proof of sending the Request for Changes in the Structure of the Chair and Secretary of P2K3 to the Manpower and Transmigration Service of South Kalimantan Province on April 26, 2022. Meanwhile, the P2K3 secretary became an. Enggar Kartiko with SKP No. 5/690/AS.01.03/II/2022 dated 17 February 2022 valid for 3 years.

- **Batu Mulia Estate**

Decree Ratifying Changes to the Occupational Safety and Health Advisory Committee of PT Tapan Nadenggan Batu Mulia Estate No. 566/38/Was-NKT/2022 in May 2022 with Secretary an. Asep Royadhy with SKP No. 5/7645/AS.02.04/VIII/2020 dated 27 August 2020 valid for 3 years.

At the time of the audit activity, the personnel concerned had been transferred to another unit so that the company showed proof of sending the Request for Changes in the Structure of the Chair and Secretary of P2K3 to the Manpower and Transmigration Service of South Kalimantan Province on 03 July 2023 and the changes had been approved on 07 July 2023 with the Latest Attestation Number : 566/lwas-NKT/2023 Meanwhile, the P2K3 secretary becomes an. Enggar Kartiko with SKP No. 5/690/AS.01.03/II/2022 dated 17 February 2022 valid for 3 years.

- **Batu Ampar Mill**

Decree Ratifying Changes to the Occupational Safety and Health Advisory Committee of PT Tapan Nadenggan Batu Ampar Mill No. 566/186/Was-NKT/2023 dated 15 May 2023 with Secretary an. Kardiato Novika with SKP No. 5/10469/AS.02.04/XII/2019 dated 16 December 2019 valid for 3 years. SKP has ended, from the results of the interview.

Companies routinely send quarterly P2K3 reports to the South Kalimantan provincial Labor Inspection Unit for example:

- 2023 Quarter II P2K3 Report to the South Kalimantan Province Manpower and Transmigration Service on 08 August 2023. (Batu Ampar Mill)
- Quarter II 2023 P2K3 Report to the South Kalimantan Province Manpower and Transmigration Service on August 21, 2023. (Batu Ampar Estate)

2023 Quarter II P2K3 Report to the South Kalimantan Province Manpower and Transmigration Service on July 29, 2023 (Batu Mulia Estate)

Meeting Minutes

- The minutes of the P2K3 meeting on 12 April 2023 in the Batu Ampar Mill meeting room briefly discussed:
 - Monitoring the validity period of competency certificates
 - Report accident work
 - KTD team preparedness
 - Monitoring the validity period of equipment permits
- The minutes of the P2K3 meeting on 10 May 2023 in the Batu Ampar Mill meeting room briefly discussed:
 - Occupational illness
 - Report accident work
 - Monitoring Fire Extinguisher
- Minutes of the second quarter P2K3 meeting, April 10, 2023, in the Large Office Meeting Room (Batu Ampar Estate) which briefly relates to forest and land firefighting training, first aid equipment, hazardous waste and P2K3 reports.
- Minutes of the second quarter P2K3 meeting on 05 June 2023 in the Batu Mulia Estate Meeting Room which briefly discussed refilling APAR, administration related to employee work accidents, monitoring discipline in the use of PPE
- Minutes of the P2K3 meeting on 08 May 2023 in the Batu Mulia Estate Meeting Room which briefly discussed work accidents, changes to the P2K3 structure, use of P3K drugs.

Based on the explanation above, it is concluded that the company has an K3 organization with an adequate number of personnel in accordance with statutory regulations.

6.7.2

The unit of certification shows emergency and work accident response procedures which are documented in Indonesian and are listed in:

- SOP for handling accidents and occupational diseases (SOP/SMART/HESS-EHSD-10).
- SOP for Emergency Preparedness and Response (SOP/SMART/General/SADV/II/005).

The company also has personnel who have taken first aid officer training. For example:

- No. Ser.3596/PK3-P3K/VI/2019 an. M. Ridlo Zulhan
- No. Ser.3600/PK3-P3K/VI/2019 an. Kasmito
- No. Ser.3597/PK3-P3K/VI/2019 an. Mustakim
- No. Ser.3599/PK3-P3K/VI/2019 an. Dodik Abdullah
- No. Ser.3598/PK3-P3K/VI/2019 an. Christina Meti Nuhan
- No: 566/2211/Was-NKT/2019 an. Slamet Riyanto
- No: 566/2210/Was-NKT/2019 an. Sumananto
- No: 566/2212/Was-NKT/2019 an. Ujang Sartono

The company also showed recordings of first aid training on 26 June 2022 at Batu Ampar estate which was attended by 26 nurses, SPO officers and first aid officers. Apart from that, based on the results of the field visit, it was discovered that the company had equipped first aid kits for workers in the field by providing first aid bags carried by the foreman. Based on the results of interviews, the workers concerned could briefly explain the function of the first aid equipment they brought.

Based on the results of the document review, it is known that there are several personnel whose certificates have expired, and an extension process is underway which has been submitted on September 1, 2023, to PT. Tranindo Pratama Mulia with 11 people from Estate and Mill.

6.7.3

The company shows the SOP regarding the use of PPE for each job along with recommendations, contained in SOP/SMART/SUST/III/010. Personal Protective Equipment Matrix Document for Plantations and Factories. This document explains the type of PPE that must be worn for each type of work. For example, in harvesting work, the PPE that must be used is a helmet, goggles, combination gloves and boots.

Based on the results of field observations in Batu Mulia Estate Block F46 Division 3 and Batu Ampar Estate in Block E14 Division 1, it is known that workers have used PPE according to company standards. Apart from that, the worker also explained that if the PPE is damaged, the worker can report it to the foreman to ask for the PPE to be replaced free of charge and it is known that there is storage for PPE and spray equipment as well as sanitation facilities for employees when they finish work.

Based on the results of interviews with spray workers in block F34 Division 1 and harvest workers, it is known that workers have used PPE completely and company management always regularly monitors workers regarding proper and correct use of PPE through socialization and daily morning circles.

6.7.4

The unit of certification already has a list of workers which also includes participant numbers for *BPJS Ketenagakerjaan* and *BPJS Kesehatan* for all workers (including workers with *PT* and *PKWT* status) in each estate units and mill unit. As one example, based on a review of the July and August 2023 worker list documents and proof of *BPJS* payments for the same period, it is known that companies have registered and paid all their workers in the *BPJS Ketenagakerjaan* program, which consists of work accident benefits, death benefits, old age security and pension benefits as well as *BPJS Kesehatan* via Bank Transfer with the following details:

BAMM

- The BAMB workforce list for the July 2023 period is 142 workers.
- Proof of payment for *BPJS Ketenagakerjaan* for the July 2023 period for 142 workers on August 28th, 2023.
- Proof of payment for *BPJS Kesehatan* for the July 2023 period for 142 workers and 284 dependents of workers on August 8th, 2023.

BAME

- The BAME workforce list for the August 2023 period is 594 workers.
- Proof of payment for *BPJS Ketenagakerjaan* for the August 2023 period for 594 workers on August 28th, 2023.
- Proof of payment for *BPJS Kesehatan* for the August 2023 period for 594 workers and 622 dependents of workers on August 8th, 2023.

BMLE

- The BMLE workforce list for the August 2023 period is 318 workers.
- Proof of payment for *BPJS Ketenagakerjaan* for the August 2023 period for 318 workers on August 28th, 2023.
- Proof of payments for *BPJS Kesehatan* for the August 2023 period for 309 workers and 402 dependents of workers on August 7th, 2023. There is a difference of 9 people from the list of workers who have not been included in the BPJS Health program. Management representatives stated that the 9 workers were newly recruited workers in August 2023 and were in the registration stage for the BPJS Kesehatan program.

Based on the results of interviews with plantation and factory workers, it is known that the company has provided employment guarantees to all workers and health insurance to workers and their families (wife and children). The workers have held the *BPJS* card and know the registration number. The worker also added information that the *BPJS Kesehatan* card can be used for treatment when a family member is sick.

Then, from the results of the document review and interviews with management representatives, information was obtained that there was a work accident that caused the loss of working days. Then the unit of certification shows the case handling documents, for example as follows:

- The chronology of events in the document F/SMART/HESS-EHSD/SADV/005/001 dated 8 January 2023 which explains that the workshop worker with the initials AT had a work accident while carrying out work to replace the hopper door at the loading ramp station. The worker fell and hit his head on the inside of the lorry.
- A statement signed by the BAMB Mill Manager on January 8th, 2023 stating that the company is willing to assist the health facility designated as the *BPJS Ketenagakerjaan* Trauma Center and is willing to reimburse workers for their care and treatment costs.
- The case has been reported to *BPJS Ketenagakerjaan* which is listed in the Work Accident Case Reports Stage 1 and Stage 2 which were reported on 8 January 2023 and 20 January 2023 respectively. The work accident resulted in a loss of 29 working days and the worker still receives wages while not coming to work.
- Letter from *BPJS Ketenagakerjaan* number B/350/012023 dated 11 January 2023 regarding Guarantee Information (Trauma Centre) Inpatient and Outpatient Care explaining the acceptance of BPJS claims for work accidents for workers with the initials AT.

From the description above, it can be concluded that all workers are provided with health services and are protected by occupational accident insurance.

6.7.5

The company has recorded work accidents using Lost Time Accident (LTA) for each unit, for example the results of LTA recording for 2023 are as follows:

Unit	FR	SR	LTA
Batu Ampar Mill	0	0	29
Batu Ampar Estate	0	0	14
Batu Mulia Estate	0	0	0

Based on interviews with workers (harvesters, pesticide users and factory operators) and labor unions, it is known that work accidents rarely occur that result in special treatment, while work accidents in 2023 occurred not while working.

Status: Comply

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

7.1

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

7.1.1

The company has demonstrated an integrated pest control plan contained in SOP/SMART/MCAR/VII/TA-HPT) which aims to serve as a guideline for Integrated Pest Management activities as one of the activities in the oil palm plant care process. The job description

explains the stages of Pest and Disease Control work which are presented briefly as follows:

- The Early Warning System stages consist of Detection and Census
- Detection aims to find out as early as possible the occurrence of pest attacks, including insects and vertebrates. If a pest or disease attack is found, a census is carried out.
- Detection activities are carried out regularly every 2 months.

The company shows the implementation of the Integrated Pest Management plan, for example as follows:

- Recapitulating census data on rat attacks and monitoring rodenticide applications for Batu Ampar Estate in January, April and July 2023, it is known that there were no rat attacks that exceeded the threshold, so there was no application of rodenticide, and it was still below the threshold, namely 5%.
- The results of the leaf eating caterpillars detection of Batu Ampar Estate, for example, Division 4 Block D - 08 in June 2023, found no signs of pest attack.
- The results of the detection of rat pests in Batu Ampar estate, for example, Division 2 Block G-07 on 17 July 2023, did not reveal any signs of pest attack.
- Recapitulation of census data on rat attacks and monitoring of rodenticide applications for the Batu Mulia Estate in January, April and July 2023 shows that there were no rat attacks that exceeded the threshold so there was no application of rodenticide, and it was still below the threshold of 5%.
- The results of the leaf eating caterpillars detection of Batu Ampar Estate, for example, Division 4 Block D - 08 in June 2023, found no signs of pest attack.
- The results of the detection of rat pests in Batu Ampar estate, for example, Division 2 Block G-07 on 17 July 2023, did not reveal any signs of pest attack.

Based on the results of field visits, for example E14 Division 3 Batu Ampar estate, there were no indications of rat attacks on the plants. This is in accordance with the company's rat pest census recording where rat pest attacks are still below the threshold.

7.1.2

Based on the results of document review and field observations, it was found that the company had used *tyto alba* as a natural enemy of pests and beneficial plants including *turnera subulata* and *antigonon*. All of these species are not classified as invasive species according to the Minister of Environment and Forestry No. P.94/MENLHK/SETJEN/KUM.1/12/2016, so it can be concluded that there is no use of invasive species for pest control.

7.1.3

Based on document review, field observation, as well as interview with the workers and external stakeholders, it is known that the company did not use fire for pest control.

Status: Comply

7.2

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

7.2.1

Based on the results of a review of the pesticide use list document, for example in 2023, it is known that the company has used pesticides selectively to deal with targeted pests and weeds or diseases. The pesticides used for example as follows:

Merk	Active Ingredients	Target	Permit Number	WHO	LD50
Erkafuron 20 WG	Metsulfuron-Methyl 20%	Broad-Leafed Weeds	RI.032012277	U	2000
Garlon 670 EC	Triclopyr butoxy ethyl ester: 670 g/l	Broadleaf weeds and woody weeds	RI.010301198469 5	III	5000

Starane 290 EC	<i>Fluroxypyr 295 g/l</i>	Broad-Leafed Weeds, Narrow-Leafed Weeds	RI.0103011988854	U	2000
Rolifos 150 SL	<i>Ammonium Glufosinate 150 g/l</i>	Broad-Leafed Weeds, Narrow-Leafed Weeds	RI.0103012013683	III	4000
Garlon 306 EC	<i>Triclopyr butoxy ethyl ester: 306 g/l</i>	Broadleaf weeds and woody weeds	RI.031998104	III	5000
Roll Up 480 SL	<i>Glyphosate Isopropylammonium 480 g/l</i>	Broad-Leafed Weeds, Narrow-Leafed Weeds	RI.032012283	III	5000

7.2.2

The company has records of all pesticide use, for example pesticide use in Batu Ampar Estate in 2023 as follows:

Roll Up

- Active Ingredient: Isopropylamine Glyphosate 480 g/l
- LD50 : 5,000
- Application area: 167.25 Ha
- Active Ingredient/Ha: 480 g/Ha
- Total Application : 167.25 L

Erkafuron 20 Wg

Active Ingredient: Metsulfuron-Methyl 20%

- LD50 : 2,000
- Application area: 420.54 Ha
- Active Ingredient/Ha: 380 g/Ha
- Total Application: 259.64 L

7.2.3

As part of reducing the use of pesticides, the company has integrated biological control into pest control, for example by using beneficial plants intended to control palm leaf-eating caterpillar pests and tyto alba to control rat pests. Based on the results of field observations in Block E15 Division 3 Batu Ampar Estate, it is known that the Company controls it by using owls and Block D30 Division 1 Batu Ampar Estate controls caterpillars using turnera subulata. It is known that these beneficial plants are well maintained and planted on the side of the road.

7.2.4

Based on the results of the review of pesticide use documents, it is known that there is no use of pesticides for the purpose of controlling animal pests, which is in line with the review of pest detection and census documents that there are no pest attacks that exceed the economic threshold, namely 5% of the attack level. In accordance with the results of interviews with harvest officers at Batu Mulia Estate and Batu Ampar Estate who said that there were no high levels of pest attacks. it can be concluded that there is no use of pesticides for prophylactic purposes in the company.

7.2.5

Based on the results of the document review, field observation of the warehouse area, it is known that there is no use of pesticides that are included in the World Health Organization (WHO) Class 1A or 1B list or included in the Stockholm or Rotterdam Conventions, as well as paraquat.

7.2.6

Based on field observations and interviews with workers in Block E15, Division 3, Batu Ampar Estate, and Block F46, Division I, Batu

Mulia Estate as well as interviews with management, it can be conveyed to the certification unit that the application of pesticides is carried out by trained people and in accordance with the guidelines set out. applies to the product label. and storage, as evidenced by:

- Workers are equipped with PPE such as shoes, helmets with face shields, aprons, shirts and trousers, masks and gloves. Type of PPE in accordance with MSDS recommendations for Roll up.
- Workers are able to explain and demonstrate work according to procedures, such as justifying the use of pesticides, considering wind flow when spraying, mixing pesticides, pesticides and targets, as well as areas prohibited for spraying (for example HCV areas and river borders).
- The pesticide solution is mixed in the pesticide warehouse and transported by special vehicles for safety aspects and to reduce environmental pollution.
- use the laundry house as a place to wash PPE and change clothes as part of mitigating the dangers of pesticides if they are brought home.
- Spraying activities are carried out selectively with a knapsack sprayer whose nozzle is calibrated periodically. After the work is complete, the knapsack sprayer and PPE are stored in a special warehouse on the Estate.
- Minutes of pesticide handling training held on January 16, 2023, which was attended by 9 spraying officers and also a spray foreman in the Batu Ampar estate area.
- Minutes of pesticide handling training held on January 11, 2023, which was attended by 6 spray officers at the Batu Mulia Estate.

7.2.7

The results of field observations of chemical storage warehouses at Batu Mulia Estate and Batu Ampar Estate show that chemical storage warehouses are in accordance with Government Regulation number 74 of 2001 concerning Management of Hazardous and Toxic Materials. Among them are equipped with danger symbols, ventilation, adequate lighting, emergency response facilities and infrastructure, process flow for receiving and dispensing chemicals, MSDS, pesticide storage grouped by type and availability of clean secondary containers as well as warnings and prohibitions on dangerous signs.

7.2.8

Based on field observations at the Batu Ampar Estate and Batu Mulia Estate Chemical Warehouses, as well as interviews with operators at each Plantation and Factory, it is known that used pesticide containers will be stored in temporary B3 waste shelters which are built taking into account K3 and environmental aspects used for rinsing will be reused as mixing water for chemical activities.

Based on the results of field visits to the residential areas for Batu Ampar Estate and Batu Ampar Estate employees, no traces of pesticide packaging were found, for example as water reservoirs or flower pots or other uses.

7.2.9

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

7.2.10

Worker Health Examination Procedure No. SOP/SMART/HESS-EHSD/SADV/II/012 dated 1 July 2014 which was approved by the Head of Upstream in this procedure briefly explains the health check program, pre-work Health check, periodic Health check, special Health check. Special health checks for spray officers and chemical storage warehouses include Cholinesterase and Spirometry checks.

The company can show records of the implementation of special health examinations for spray personnel and chemical storage warehouse personnel in semester 1 of 2023 which were carried out by company doctors which included Cholinesterase examinations, while Spirometry examinations cannot yet be carried out on Batu Ampar Estate, Batu Mulia Estate and Batu Ampar Mill because they are still in the Covid situation and will be carried out in the 2nd semester of 2023. Based on a review of the results of the special employee health examination documents which have been carried out number F/SMART/HESS-EHSD/SADV/012/001 in August 2023, it is known that the company has carried out a special examination with Cholinesterase parameters. Furthermore, companies have the opportunity to carry out special health checks with spirometry parameters in accordance with established procedures.

7.2.11

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 breast-feeding.		
	Status: Comply	
7.3		
Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.		
7.3.1		
The company shows the identification of waste sources for the 2023 period with details: used fertilizer sacks, plastic inside fertilizer sacks, used generator oil, used neon/lamps, waste water, empty baskets, shells, fiber, household waste, paper.		
Emission sources include:		
<ul style="list-style-type: none"> CO2 Gas: Transportation of FFB, Delivery of CPO, Operation of heavy equipment, operation of generators & electric pumps, management of WTP, boilers, laboratory activities, waste pools and factory processes. NO2 & SO2 gas: Activities in the laboratory. CH4 gas: Fertilization activities and WWTP ponds 		
Hazardous and Toxic Waste:		
It was explained by the Company that in managing Toxic Hazardous Material Waste produced by Plantations and Factories it will be stored in the Temporary Storage Place for Toxic Hazardous Material Waste it owns, then it will be transported by a licensed third party which will then be handed over to the Licensed Toxic Hazardous Waste Manager with proof. as follows :		
<ul style="list-style-type: none"> Temporary storage permit for B3 waste in accordance with Kota Baru Regent's Permit Number 503/0832/PSLB3-P-DPMPTSP/2020 concerning permit for temporary storage of hazardous and toxic waste (B3) of PT Tapian Nadenggan in Tegal Rejo Subdistrict/Village, Kelumpang Hilir District, Regency Kotabaru, South Kalimantan Province on September 29 2020 with a validity period of 5 years, namely until September 28 2025. Cooperation Agreement No. 17/PWK-UM/SPK/VII/2023, between PT Tapian Nadenggan and PT Sinar Bintang Albar, for the period 17 July 2023 to 17 July 2028, with types of Hazardous Toxic Waste, namely: Used Oil, Filters and used rags, used batteries, medical waste, packaging contaminated with toxic hazardous materials, TL lamps, used toner and used ink packaging PT Sinar Bintang Albar has a complete permit for managing hazardous and toxic waste materials, as follows: <ol style="list-style-type: none"> Technical Approval in the Sector of B3 Waste Management for PT Sinar Bintang Albar's Hazardous and Toxic Waste Collection Activities, Number: S-231/PSLB3/PLB3/PLB.3/4/2023, April 4 2023, issued by the Directorate General of Waste Management , Hazardous and Toxic Waste and Materials, effective from signing The Hazardous Waste Management Permit for the Provincial Scale Hazardous Waste Collection Services Business in the name of PT Sinar Bintang Albar has been available based on the Decree of the Head of the South Kalimantan Province Investment and One-Stop Integrated Services Service No. 503/2-ILB3/DSDPMPTSP/IV/V/2019 dated 9 May 2019 which is valid for 5 (five) years Operational Feasibility Letter in the Sector of Hazardous and Toxic Waste Management for PT Sinar Bintang Albar's hazardous and toxic waste collection activities, Number: S.535/PSLB3/PLB3/PLB.3/8/2023, dated 30 August 2023, issued by Directorate General of Waste, Hazardous and Toxic Waste and Materials Management, effective from signing Decree of the Director General of Land Transportation Number: SK.00302/AJ.309/1/DJPD/2018, concerning License to Operate Special Goods Transport for Transporting Dangerous Toxic Goods, dated 21 July 2022, valid until 21 July 2027, issued by the Directorate Land Transportation, Ministry of Transportation of the Republic of Indonesia 		
<ul style="list-style-type: none"> Handover of Toxic Hazardous Waste <ol style="list-style-type: none"> Log Book for August 2023 Period: <ul style="list-style-type: none"> 1200 Liter Used Oil, remaining 0, transported on August 23 2023 37 used batteries, 0 remaining, transported on August 23 2023 Used Majun cloth 12 kg, 0, remaining, transported on August 23 2023 Used oil filter 1 drum, remaining 0, transported on August 23 2023 Used B3 packaging; 16 drums, remaining 0, transported on August 23, 2023 Manifestation of Toxic Hazardous Waste: <ul style="list-style-type: none"> Manifest Number KLHK-1698743906, Type of Waste: Used Battery, volume 0.37 tons, dated 23 August 2023, transport vehicle Number DA 8085 JD, Manifest Number KLHK-1698756152, Waste Type: Used Filters, volume 0.26 tons, dated 23 August 2023, transport vehicle Number DA 8087 JD 		

- Manifest Number KLHK-1698743840, Type of Waste: used packaging, volume 0.8 tons, date 23 August 2023, transport vehicle Number DA 8807 JD
- Manifest Number KLHK-1698744030, Waste Type: Used Majun, volume 0.012 tons, dated 23 August 2023, transport vehicle Number DA 8807 JD
- Manifest Number KLHK-1699113985, Waste Type: Used Oil, volume 1.08 tons, dated 23 August 2023, transport vehicle Number DA 8085 JD

Solid waste

The solid waste produced by the company is in the form of shells, fiber and empty shells. 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 empty bamboo shoots are used for land application as organic fertilizer. This is proven from the results of field visits during audit activities that the company has used shells and fiber for boiler fuel, while empty hearths are used for plantation land, with details of utilization as follows:

- 2022 period (January – December) = processed FFB 207,812,420 kg, shell utilization: 11,321.92 tonnes, fiber utilization: 25,976.56 tonnes, empty hearth 43,640 tonnes
- 2023 period (January – June) = processed FFB 93580 tonnes, shell utilization: 5381 tonnes, fiber utilization: 11697 tonnes, empty culms 19652 tonnes

POME

POME produced from the factory is reused for Land Applications. Before being distributed to LA, POME is first managed at the WWTP with the aim of ensuring that the quality of POME channelled to LA complies with regulations. This is proven from the results of field visits at the IPAL, it is known that before being distributed to LA, POME is first at the WWTP, apart from that there is no indication of environmental pollution by the company. And waste water quality tests are carried out once a month.

The company also has Waste Management SOP with Number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2 2014 explains that waste management is carried out in accordance with the internal provisions of the Sinar Mas plantation and the applicable laws and regulations refer to a clean production mechanism approach that applies several principles , among others:

1. Reduce, Reuse and Recycle (3R)
2. Zero Burning or no burning
3. Disposal or stockpiling

As well as explaining the identification and management of waste generated from company operational activities, including Hazardous waste generated by operational activities such as used packaging contaminated with Hazardous Waste such as used oil drums, used paint buckets, used buckets, used hoses contaminated with Hazardous Waste, used grease buckets and spray equipment. Used pesticides are stored at temporary storage Hazardous waste and handled according to their type and characteristics

- GESP Policy 8 September 2015: 1. Environmental management, 1.7 Improve Waste Management, Identify, reduce, reuse, recycle and dispose of waste in an environmentally responsible manner
- Documents at the time of audit:
 - a. Schedule and realization of Batu Ampar Mill residential waste transportation, 2023 (TPSA Block H-07 location), September 6 2023
 - b. Decree No. 01/MGR-BAMM/07/2023, concerning the Appointment of Person in Charge of the Batu Ampar Mill Employee Cottage, dated July 1 2023, with duties, implementation and socialization of environmental cleanliness of employee huts related to waste management and prohibition of burning waste, ensuring and coordinating the implementation of mutual cooperation, Patrol the cleanliness of the employee's cottage environment
 - c. Waste Transport Order dated 23 August 2023
 - d. Recap of Trash Cans at BAMM Employees' Official Homes
 - e. Minutes dated June 13 2023, socialization prohibits burning of waste in open residential areas located in process and workshop areas,
 - f. The results of the field visit to the BAMMN Employee Cottage Area found:
 1. There is inadequate waste management behind the hut at 1 point, at the front of the hut at 4 points, and in the ditch at 1 point,
 2. There is a scattering of inorganic waste around the hut and the flow of the hut ditch
 3. There is disposal of used spray paint cans around the hut, use of 20 L jerry cans used for chemical packaging as a water

- reservoir, storage of used oil packaging and 20 L jerry cans used for pesticides in the workers' hut
- g. Socialization on the management of used chemical waste containers on March 15 2023, BMLE,
 - h. Socialization on waste management and LB3, March 15 2023, BMLE
 - i. Minutes dated 8 September 2023, BAMB, regarding socialization on handling of B3 and B3 Waste in the MSDS Chemical Handling Factory area, to Warehouse officers
 - j. Minutes of socialization regarding the prohibition of burning waste and storing B3 packaging in open residential areas, July 18 2023
 - k. Circular No.001/UH/BAMB-INT/IX/2023 Use and Use of Hazardous and Toxic Materials and Their Waste, 06 September 2023
 - l. Recording of waste resulting from removal from the used goods warehouse on September 6 2023

Based on evidence from field visits, the Company has not been able to show that waste reduction and disposal has been carried out according to procedures and implemented consistently, including the establishment of mitigation measures to prevent repeat incidents, this is a **non-conformity 2023.03 with category Minor**.

7.3.2

Based on interviews with company management, BAME and BMLE Managers as well as the Head of the POM and Plantation Hazardous Material and Toxic Waste Warehouse, it is known that they understand the handling of waste disposal, especially hazardous and toxic waste as well as non-hazardous and toxic waste in the company environment. in accordance with the procedures owned by the management unit.

7.3.3

The company also has Waste Management SOP with Number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014, explains that waste management is carried out in accordance with the internal provisions of the Sinar Mas plantation and the applicable laws and regulations refer to a clean production mechanism approach that applies several principles, among others:

1. Reduce, Reuse and Recycle (3R)
2. Zero Burning or no burning
3. Disposal or stockpiling

Based on OFI's previous assessment, the auditor team conducted a field visit to the company's housing complex and found that the company had provided 2 types of rubbish bins, namely organic and inorganic. Furthermore, the company will periodically send domestic waste from each residence to the landfill.

7.3.1 Status: nonconformity 2023.03 with category Minor

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

In accordance with the results of the previous audit, the company still has procedures related to planting fertility management which are listed in the Technical SOP-IK for Palm Oil Cultivation starting from land preparation to harvesting which was prepared by the MCAR (Agronomy and Research Management Committee) team in 2020. This SOP discusses procedures for implementing fertilization in nurseries, fertilizing leguminous plants, inorganic fertilization in immature plants, empty bunch fruits, collecting LSU and SSU, fertilizer quality control, manual fertilization, airplane fertilization, compost fertilization, POME at the Producing Factory, POME quality control.

Based on field visits in block H37 Division 3 Batu Ampar Estate and Block E33 Division 1 Batu Mulia Estate, it is known that the company uses empty trees as natural fertilizer and the company also applies POME to the land, for example based on field observations in the LA area in Block J27 Division 3 Batu Ampar Estate.

7.4.2

Soil and leaf sampling was analysed regularly by SMARTRI to determine the nutritional status of soil and leaf, and to be guided in the preparation of annual manuring program recommendations. Soil is analysed when the age of the plant is 3, 5, 8 years and continues once every 5 years and 1 year before replanting. Leaf was analysed annually. Soil and leaf sampling was taken from each estate. Organization has defined work instructions for LSU (Leaf sampling unit) IK/SMART/MCAR/IX/TA- PPK/05-LSU retrieval and for SSU (Soil Sampling Unit) IK/SMART/MCAR/IX/TA-PPK/06- Taking SSU. Last LSU and SSU taken by SMARTRI in all estate. Evidence of periodic leaf sample analysis in Memorandum of Laboratory Analysis Results. For example:

Results of analysis of Batu Mulia Estate leaves and Batu Ampar Estate

- Laboratory Analysis Results (BAME) No. 0141/DAUN/LAB-SMARTRI/III/2023 dated 05 March 2023 on 33 samples with the parameters analyze including: N, P, K, Mg, Ca, B, Cl.
- Laboratory Analysis Results (BMLE) No. 0156/DAUN/LAB-SMARTRI/III/2023 dated 11 March 2023 on 9 samples with the parameters analyze including: N, P, K, Mg, Ca, B, Cl.

Results of Land Analysis for Batu Mulia Estate and Batu Ampar Estate

- Laboratory Analysis Results (BAME) No. 126/TANAH/AL/ANLZ/05/20 dated 11 May 2020 on 48 samples with parameters analyze including: Texture, pH, Organic C, Total N, P, K, Mg Cad, Exchange Base, P-Bray, CEC, H-AI Swap.
- Laboratory Analysis Results (BMLE) No. 043/TANAH/AL/ANLZ/02/22 dated 17 February 2022 on 63 samples with parameters analyze including: Texture, pH, Organic C, Total N, P, K, Mg Cad, Exchange Base, P-Bray, CEC, H-AI Swap.

The results of the laboratory analysis are used as a consideration in calculating the annual fertilizer recommendation.

7.4.3

The company shows its nutrient recycling strategy as an alternative nutrient source by using POME and EFB on land, for example in Batu Ampar Estate and Batu Mulia Estate in 2023 as follows:

Batu Ampar Estate

Month	POME		EFB	
	M3	Ha	Ton	Ha
January	14,183.87	472.80	3,263.53	108.78
February	12,331.77	411.06	2,895.50	96.52
March	13,121.83	437.39	3,695.48	123.18
April	13,782.43	459.41	3,672.23	122.41
May	14,563.34	485.44	4,002.41	133.41
June	13,827.15	460.91	4,167.69	138.92
July	16,227.97	540.93	2,593.78	86.46
August	13,970.12	465.67	0.00	0.00

Batu Ampar Estate

Month	POME		EFB	
	M3	Ha	Ton	Ha
January	-	-	-	-
February	-	-	-	-
March	-	-	-	-
April	-	-	-	-
May	-	-	218.82	7.29
June	-	-	536.89	17.90
July	-	-	736.51	24.55
August	-	-	3,554.97	118.50

7.4.4

The unit of certification shows fertilizer application records for the period January to Agustus 2023 (Semester 1). For example, a

summary of fertilizer applications in 2023:

Batu Ampar Estate

No	Fertilizer Type	Recommendation	Realization
		Ton	Ton
1	Borate	14,502	14,502
2	Kieserite	19,850	19,850
3	MOP	555,800	555,80
4	RP	403,550	403,550
5	Urea	224,200	224,200
6	TSP	38,800	38,80
7	S.Dolomite	160,750	160,750

Batu Mulia Estate

No	Fertilizer Type	Recommendation	Realization
		Ton	Ton
1	HGFB	20,78	20,78
2	KAPTAN	445,95	392,40
3	MOP	611,900	611,830
4	SP - 36	476,50	481,80
5	S.Dolomite	68,05	62,35
6	Urea GRA	517,20	517,20

Based on the table above, it is known that fertilization has been well recorded by the Estate manager. Based on document review and interviews with staff, fertilization realization in each Estate reached 100%.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

The company already has maps that identify marginal and fragile land, including land with steep slopes such as Semi-Detailed Soil Map No. RPMNP/21/07/214/011 (BMLE) Scale 1 : 50,000 and Semi Detailed Land Map No. RPMNP/22/07/214/021 (BAME) Scale 1 : 50,000. Based on the study of the map document, it is known that the soil types include aquic hapludults, typic hapludults, sulfic endoaquepts, and typic sulfaquepts with slopes of 0 – 16% (BMLE) and 0 – 40% (BAME) with land suitability S2 (Quite Suitable), S3 (Marginally Appropriate) and N (Not Appropriate).

7.5.2

Based on the results of field visits in replanting areas, for example Block J17 Planting Year 2023 Batu Ampar Estate, no replanting of steep sloped land was found.

7.5.3

As a result of reviewing the area statement documents, it was discovered that the company did not carry out new planting activities and only carried out replanting activities on batu Ampar estate.

Status: Comply

7.6

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

7.6.1

The company already has maps that identify marginal and fragile land, including land with steep slopes such as Semi-Detailed Soil Map No. RPMNP/21/07/214/011 (BMLE) Scale 1 : 50,000 and Semi Detailed Land Map No. RPMNP/22/07/214/021 (BAME) Scale 1 : 50,000. Based on the study of the map document, it is known that the soil types include aquic hapludults, typic hapludults, sulfic endoaquepts, and typic sulfaquepts with slopes of 0 – 16% (BMLE) and 0 – 40% (BAME) with land suitability S2 (Quite Suitable), S3

(Marginally Appropriate) and N (Not Appropriate).

Based on the results of the review of the area statement document, it is known that the company does not carry out new plantation development activities and only carries out replanting activities.

7.6.2 & 7.6.3

As a result of reviewing the area statement documents, it was discovered that the company did not carry out new planting activities and only carried out replanting activities on batu Ampar estate.

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

Based on the results of a review of the Semi-Detailed Land Map Document No. RPMNP/21/07/214/011 (BMLE) Scale 1 : 50,000 and Semi Detailed Land Map No. RPMNP/22/07/214/021 (BAME) Scale 1 : 50,000. It is known that there are no types of peat soil, the soil types include: aquic hapldults, typic hapldults, sulfic endoaquepts, and typic sulfaquepts.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has implemented a water management plan consisting of:

- Do not use chemicals in river border areas.
- Do not throw POME into rivers but reuse it on plantation land. Before being used, POME is first managed at the IPAL so that its quality meets the standards set by the government.
- Utilize water for factory processing in accordance with standards set by the company.
- Conduct river water quality testing.

Based on field observations in the HCV River Border area of Block F06 Batu Ampar Estate, it can be seen that the company has managed water sources by installing HCV area name boards, installing HCV boundary markers and painting oil palm trees as spray boundaries.

The company has a surface water quality monitoring program as outlined in the Environmental Management and Monitoring Plan Matrix, with a monitoring plan every 6 months.

The company showed the results of water quality monitoring carried out by the testing laboratory, KAN LP-001-IDN Accreditation on April 5, with reference to PP RI 2022 2021 Appendix VI (class II), the number of parameters is 39 parameters. With example results:

1. Upper Serongga River: TDS 136 mg/L (quality standard 1000 mg/L), TSS 45 mg/L (quality standard 50 mg/L), BOD 2.13 mg/L (quality standard 3 mg/L), COD 14, 6 mg/L (quality standard 25 mg/L), Nitrate 0.60 mg/L (quality standard 10 mg/L), Nitrite 0.0015 mg/L (quality standard 0.06 mg/L), Ammonia 0, 0030 mg/L (quality standard 0.2 mg/L), Fat Oil 0.40 mg/L (quality standard 1 mg/L), Detergent 0.0031 mg/L (quality standard 0.2 mg/L), Fecal coliform 240 MPN/100 ml (quality standard 1000 MPN/100ml) total coliform 350 MPN/100 ml (quality standard 5000 MP/100mL),
2. Lower Serongga River: TDS 148 mg/L (quality standard 1000 mg/L), TSS 48 mg/L (quality standard 50 mg/L), BOD 2.60 mg/L (quality standard 3 mg/L), COD 17, 1 mg/L (quality standard 25 mg/L), Nitrate 0.60 mg/L (quality standard 10 mg/L), Nitrite 0.0015 mg/L (quality standard 0.06 mg/L), Ammonia 0, 0030 mg/L (quality standard 0.2 mg/L), Fat Oil 0.50 mg/L (quality standard 1 mg/L), Detergent 0.019 mg/L (quality standard 0.2 mg/L), Fecal coliform 350 MPN/100 ml (quality standard 1000 MPN/100ml) total coliform 920 MPN/100 ml (quality standard 5000 MP/100mL).

The test results are then reported to the relevant Department through the RKL-RPL Report every semester. In general, all parameters tested are in accordance with the provisions of PP RI Number 22 of 2021.

The results of observations and interviews with workers show that the company has also provided access to clean water for workers by providing hygienic water for drinking and water for daily needs.

7.8.2

Wet streams in the company area are protected by the company. This is evidenced by the results of field observations in the area of the Serongga river border in the Batu Ampar Estate, it is known that the river border is protected by the company. Some of the activities carried out by the company are placing red signs as limits for chemical application and planting *Pulai*, *Mato*, *Cempedak* plants, etc. In addition, there are no traces of chemical application in the tributary border.

7.8.3

Companies can show documents on the results of measuring the quality of liquid waste applied to land, namely documents on liquid waste testing results for the period August 2022 – July 2023. Testing is carried out by accredited laboratory KAN (LP-448-IDN) using quality standards that refer to the Decree of the Minister of the Environment No. 28 of 2003, the number of test parameters is 8 parameters, with example results:

- May period, May 15 2023: pH 7.69 (quality standard 6-9), BOD 1726 mg/L (quality standard 5000 mg/L)
- June period, June 12 2023: pH 7.38 (quality standard 6-9), BOD 1732.9 mg/L (quality standard 5000 mg/L)
- July period, July 20 2023: pH 7.68 (quality standard 6-9), BOD 2858.9 mg/L (quality standard 5000 mg/L)

The company has a liquid waste management permit as follows:

- Letter Number 660.3.4/680/DLH-PPKL/VIII/2022, dated 16 August 2022, concerning technical approval for quality standards for the use of waste water on land at PT Tapan Nadenggan-PKS Batu Ampar, issued by the Kotabaru Regency Environmental Service:
 - Wastewater discharge is around 367.6 m³/day, and sludge is around 1.57 m³/year, the water source is Senggari River water with the use of a processing process of 11,044 m³/month (water requirement is 0.6 m³/ton FFB) standard 5,000 mg/L, Monitoring wells reference to Minister of Health 32 of 2017 concerning environmental health quality standards and water health requirements
 - Application land area 295.65 Ha, consisting of 18 blocks (H29 – H 38, I19-20, I29-32, J17-J18)
 - Monitoring wells in 3 locations, namely: SP 1 Block J16, SP2 J18, SP3 I07
 - Monitoring points for surface water on the downstream and upstream of the Seringa River
- PT Tapan Nadenggan Operational Feasibility Letter Number 660.3.4/1157/DLH-PPKL/XII/2022, dated 12 December 2022, Operational Feasibility Letter for waste water processing systems and utilization of waste water on land, processing systems: anaerobic pond, transfer pond and drainage on the application land, the WWTP capacity is 20,100 m³/month or 67 m³/day, the maximum capacity that can be accommodated in the WWTP pond is 80,000 m³

Based on the results of interviews with the Kotabaru Regency Environmental Service regarding liquid waste management at the IPAL, there were no problems related to environmental pollution, the results of interviews with village communities around the company also stated that there was no pollution from the liquid waste produced. by the company.

Based on the results of field observations in the land application area of Block H09 Division 3 Estate BAME, it is known that the location of liquid waste application on the land is in accordance with the location stated in the Land Application permit, apart from that there is no indication of an overflow of the liquid waste flowing. From the results of observations at the Batu Ampar Mill WWTP, it can be seen that liquid waste has been managed at the WWTP, there is a pool to manage liquid waste, there are no indications of leaks or overflows in the WWTP pool and there is a flow meter to calculate the amount of liquid waste which is functioning properly. there is a flow pipe to the application area, and it functions well

7.8.4

The company has a surface water use permit, in the form of a Surface Water Utilization Permit (SIPA) Number: 503/2.5.17/DPMTSP/VI/2023, dated 19 June 2026, valid until 01 August 2026, issued by the Investment and Services Service One Stop Integrated Service for South Kalimantan Province, intended for Industry and Household Services. There is no information on permitted water discharge.

Recapitulation of surface water utilization:

Period January – July 2023: Processed FFB 114,947 tonnes, water usage 80,463 M3

Period January – December 2023: TBS Processed 207,812 Tons, water usage 145,469 M3

Proof of payment for surface water usage,

- i. June 2023 Tax Period, Regional Tax Payment Letter, payment via bank transfer to Bank Kalsel- UPPD Kotabaru, August 2 2023
- ii. May 2023 Tax Period, Regional Tax Payment Letter, payment via bank transfer to Bank Kalsel- UPPD Kotabaru, July 4 2023
- iii. April 2023 Tax Period, Regional Tax Payment Letter, payment via bank transfer to Bank Kalsel- UPPD Kotabaru, June 7 2023

For the July tax period,

Regional tax assessment letter Number 0908230014, tax period July 2023, due date 09 September 2023.

Status: Comply

7.9

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

7.9.1

The company explained that the company's plan to increase the efficiency of using fossil fuels and optimize the use of renewable energy is to use shells and fiber as boiler fuel which is used to drive turbines to produce electricity. The use of energy produced from the turbine is monitored every day.

The company shows a data document on the use of shells and fibers to replace fossil fuels in 2022 and 2023, with the following details:

1. 2022 period (January – December): FFB processed 207812 tonnes, Fiber utilized 25976 tonnes, Shell 11049 tonnes, with energy produced: 9,938,789,681.60 KCAL, and energy utilized 4,199,486,940 KCAL or equivalent to 488403 kWh,
2. 2023 period (January – July): FFB processed 93580 tons, Fiber used 11697 tons, Shell 5381 tons, with energy produced 52934498769 KCAL or equivalent to 61562822 kWh.

Status: Comply

7.10

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

7.10.1

The company also has conducted GHG emission calculations period 2022 (January-December) use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emission per product	tCO ₂ e/tProduct
CPO	0.53
PK	0.53

Production	t/yr
FFB processed	207,812.42
CPO produced	40930.20
PK produced	10053.95

Extraction	%
OER	19.44
KER	4.84

Land use	Ha
Planted area on mineral	5891.79
Planted on peat	0
Total area planted	5891.79
Conservation Area (Forested)	0
Conservation Area (Non-Forested)	504.59

FFB Production per hectare 17.36

Summary of field emission and Sinks

Description	Own crop		Group	
Emissions Sources	tCO ₂ e	tCO ₂ e / tFFB	tCO ₂ e	tCO ₂ e/ tFFB
Land conversion	18789.10	0.29	18094.12	0.27
CO ₂ emissions from fertilizer	6296.15	0.10	2956.56	0.04
NO ₂ emissions from peat	0	0.00	0	0.00
NO ₂ from Fertilizer	5940.50	0.09	3011.51	0.05
Fuel consumption	311.48	0.00	372.55	0.01
Peat oxidation	0	0.00	0	0.00
Sinks				
Crop sequestration	-51889.92	-0.80	-32152.31	-0.49
Sequestration in Conservation area	0.00	0.00	0.00	0.00
Total	-20552.68	-0.32	-7717.57	-0.12

Description	3rd Party	Total
Emissions Sources	tCO ₂ e	
Land conversion	0.00	36883.22
CO ₂ emissions from fertilizer	0.00	9252.71
NO ₂ emissions from peat	0.00	0.00
NO ₂ from Fertilizer	0.00	8952.01
Fuel consumption	0.00	684.03
Peat oxidation	0.00	0.00
Sinks		
Crop sequestration	0.00	-84042.23
Sequestration in Conservation area	0.00	0.00
Total	13890.83	-14379.42

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	40734.75	0.20
Fuel consumption	413.96	0.00
Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	41148.72	0.20

Palm Oil Mill Effluent (POME) Treatment

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

POME Divert to Anaerobic Digestion

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

The auditor team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production from the Batu Ampar Estate, Batu Mulia Estate, planted area of the Batu Ampar Estate and Batu Mulia Estate and the distribution of planting years, as well as the area of HCV. GHG emissions in 2021 will be higher than in 2022.

7.10.2

No new planting activities after 2014, the company did not conduct new land clearing activities or development of operational areas.

7.10.3

Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified the source of pollution in the mill and estate, the document informs the source (station/activity), source of pollution and emission, impact (human, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by the company include:

- Monitoring air quality and emissions from boilers and generators
- Carry out liquid waste management in WWTPs before being used in plantations.
- Perform regular machine maintenance.
- Optimizing the use of fertilizers according to recommendations
- Use of fibre and shells in mills to reduce diesel fuel.

The Company has carried out boiler and generator emission tests, as well as ambient air quality, which were carried out in semester 2 of 2022 and semester 1 of 2023, by a KAN accredited laboratory (LP-001-IDN). with of test results as follows:

1. Ambien, Quality standard reference for Republic of Indonesia Government Regulation No. 22 of 2021 Appendix VII, the number of test parameters is 9 parameters, carried out on March 31, 2023
2. Odorant, Quality standard reference Decree of the Minister of Environment No. 50 of 1996, number of test parameters 5 parameters, 31 March 2023
3. Air emissions:
 - Generator, Quality standard reference for Regulation of the Minister of Environment and Forestry no. 11 of 2021 attachment I (fuel oil), dated March 31, 2023, the number of test parameters is 7 parameters.
 - Boilers: Quality standard reference for Minister of the Environment Regulation no. 7 of 2007, attachment I Quality standard for stationary source emissions, dated 31 March 2023, the number of test parameters is 14 parameters

Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions stipulated by the Government.

Status: Comply

7.11

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

7.11.1

The company has a no burning policy which is contained in the SOP for no burning operational activities with no. document PI/SOP/Uum-03 revision 00 with effective date 2 May 2011. This SOP covers all operational activities, whether land clearing or other operations. And applies to waste/waste management without burning both in the field and in homes and offices. Apart from that, the company also has SOP No. PI/SOP/Uum-34 dated January 2, 2017, concerning Fire Prevention and Handling where the procedure explains firefighting.

Based on the results of a review of the BAPP Replanting document from PT. Roswell Karya Abadi dated 17 October 2022 regarding SPK No. BAME/JKTO/10/22/008-LP and Trenches, it is known that replanting activities include uprooting and chipping trees, making eradication holes, making planting holes in flat areas and making trenches. Based on the review of these documents, it is known that the work progress is 100%.

So it can be concluded that the company does not prepare land for replanting without burning.

7.11.2

The certification unit has established fire prevention and control measures on the land it manages directly by showing evidence of land fire prevention and control activities, which include;

- Existence of land fire control procedure documents
- There is a trained firefighting team, which is stated in the Organizational Structure of the Emergency Response Team for each unit (Batu Ampar Estate and Batu Mulia Estate)
- Socialization of land fire prevention to workers and local communities.
- Patrolling/monitoring fire-prone areas (hotspots).
- Implement water management.
- The company has carried out an emergency and fire simulation, which was attended by a firefighting team, on March 8, 2023.
- Monitoring the list of facilities and infrastructure owned by referring to equipment standardization in Ministerial Regulation 5 of 2018 which is listed in the List of Fire Fighting Equipment with the last update in June 2023. The Company also has a budget plan to continue to complete the team personnel needs listed in the year's budget 2023. For example, it includes budgets related to the procurement, repair of monitoring towers and maintenance of firefighting facilities and infrastructure in each plantation (Batu Ampar Estate and Batu Mulia Estate)
- Land Fire Prevention and Management Report Semester 1 2023 on August 21, 2023, to the Kotabaru Regency Plantation Service, South Kalimantan (Batu Ampar Estate)
- Report on Prevention and Management of Land Fires Semester 1 2023 on July 29, 2023, to the Kotabaru Regency Plantation Service (Batu Mulia Estate).

Based on the results of field observations in firefighting warehouses in all plantation units, it is known that the fire control facilities and infrastructure are in accordance with the list shown consisting of individual firefighting equipment, teams, hand tools, water pumps and their supports, data processing and communication facilities, as well as means of transportation. Based on the fire simulation results shown, it is known that the fire control facilities and infrastructure owned are in good condition and suitable for use.

7.11.3

The Certification Unit also involves the community in monitoring fire prevention as a preventive and control effort by conducting land fire prevention outreach to the community around Batu Mulia Estate and Batu Ampar Estate. Through this outreach, the community is advised not to clear land by burning around the company and immediately inform to the company if you know of a fire spot in the company area and/or in the village area around the company by calling the company Emergency Response Team number.

Fire prevention and extinguishing efforts carried out by the company to prevent, monitor and deal with fire incidents include;

- There is an SOP for controlling land fires.
- There is a firefighting team.
- Socialization of land fires to employees.
- Regular monitoring of fire-prone areas. This is indicated by monitoring recordings with the hot spot system and immediately checking the hot spot points.
- Carry out firefighting team simulations, for example the simulation will be carried out on March 8, 2023
- Routinely check equipment every month.

Based on interviews with the Kotabaru district plantation service and the Serongga village head, it is known that there have been no fire incidents in the last three years. Fire spot identification is carried out routinely by the company by patrolling and monitoring fire spots. The company also provides assistance, training and socialization regarding the prohibition of land burning activities to minimize the risk of larger fires.

Status: Comply	
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7.12

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

7.12.1

Based on document verification, it is known that the company carried out land clearing in 2005-2007. The company has prepared a Land Use Change Analysis (LUCA) for PT Tapian Nadenggan and has sent it to the RSPO. Companies can show an email from the RSPO (khing.suli@rspo.org) on 22 August 2019. The email explains that several companies under GAR include Batu Ampar Mill with Batu Ampar Estate and Batu Mulia Estate having a total riparian zone affected area of 0 Ha and the total remediation area is 0 Ha.

7.12.2

The company has identified high conservation value areas listed in the PT Tapian Nadenggan HCV identification report for the Batu Ampar Estate unit conducted in November 2011 by the Biodiversity and Conservation Section Certification Department Policy and Compliance Division. Based on the results of the identification in 2011, there were 393.47 hectares of HCV in the company's area. In 2017 there was a change in the area of the HCV area due to the area being controlled by the Mine. Based on this, the company determined the HCV area to be 249.39 Ha. The details of the HCV areas are:

- HCV 1.1 and 4.1 *Setangga* River Border Covering an Area of 76.7 Ha
- HCV 1.2 and 1.3 *Bekantan* Habitat covering an area of 78.36 Ha
- HCV 4.1 and 4.3 *Rawa Pasang Surut* covering an area of 94.33 Ha.

For the Batu Mulia Estate unit, the Company has identified a high conservation value area listed in the PT Tapian Nadenggan HCV identification report for the Batu Mulia Estate unit conducted in November 2011 by the Biodiversity and Conservation Section Certification Department Policy and Compliance Division. Based on the results of the identification in 2011 there are HCV areas in the company's area of 255.20 Ha. The details of the HCV areas in Batu Mulia Estate are:

- HCV 1.1 and 1.2 Buffer Area Nature Reserve Area of 172.48 Ha
- HCV 4.1 and 4.3 *Area Rawa Pasang Surut* of 82.72 Ha
- HCV 6 Grave/Sacred area.

Both reports have been conducted by Peer Review by Ir. Nyoto Santoso and the HCV identification assessment team are RSPO-approved HCV assessors (Norman Faried M., Kusuma Widya R., and Bambang Setiaji).

Based on document verification, it is known that the company did not develop new land after 15 November 2018 so that the HCS assessment is not mandatory for the Company.

7.12.3

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

7.12.4

The company identified the High Conservation Value area of the Batu Mulia Estate unit in 2011. Based on the results of this identification, there is an HCV 1.1 area in the form of a Nature Reserve buffer area covering an area of 172.48 Ha. The Nature Reserve buffer area was designated as an HCV area because there is a Nature Reserve area around the plantation area and the environmental conditions in this area have been in the form of oil palm plantations and residential areas since 1984. The determination of this area as an HCV area took into account the precautionary aspect.

Based on the results of a field visit to the HCV 1.1 Buffer Nature Reserve area in Block I41 Division 2 Batu Mulia Estate, it is known that the area has been planted with oil palm with the 2017 planting year and no HCV attributes have been found. And in Block I36/I37, it is known that the area covered is in the form of secondary forest with the installation of HCV attributes (admonition boards, HCV type name displays and buffer zone boundary signs on the last oil palm tree bordering secondary forest.

Companies can show justification in the form of a statement letter from VPA PSM 3 which explains several things, including:

- In 2016 the company monitored massive encroachment activities on nature reserve areas by the community. Seeing these conditions, the company has taken an approach to outreach to the public about the importance of protecting protected areas or nature reserves.

- Seeing that the condition of the nature reserve is no longer in a protected condition and has the potential to become a threat to the Buffer Zone area if management and utilization is not carried out by the company, based on these considerations it was decided to carry out replanting with the aim that the buffer zone area is always maintained and managed according to the following principles. conservation principles.
- Utilizing the Nature Reserve buffer area by planting oil palm plants/replanting does not violate regulations based on PP No. 28 of 2011 concerning the management of nature reserve areas and nature conservation areas in Article 45 Paragraph 3 and Article 46.

The company can also show a report document on the implementation of HCV management and monitoring for the 2022 period which explains that based on the results of field monitoring, in terms of land cover, most of the Batu Mulia Estate area is generally dominated by oil palm plants that have experienced low crop and have reached 1 oil palm plantation cycle. so that several blocks will be ready for replanting in each unit. Apart from that, around the Batu Mulia Estate area there are also oil palm plantations owned by the local community as well as coal mining activities. It is feared that this could be a threat to the sustainability of the HCVs in Batu Mulia Estate and management and monitoring activities for the HCV Buffer zone area at the buffer zone location with oil palm vegetation have not been included.

Based on the results of interviews with company representatives, it is known that the Nature Reserve buffer area that has been replanted is still designated as an HCV area by the company while continuing to manage and monitor the area.(OFI Previous Audit)

Companies have the opportunity to ensure that the implementation of HCV management and monitoring plans in Nature Reserve buffer areas, especially in areas with oil palm cover, is maintained and managed in accordance with conservation principles, including preparing plans for managing and monitoring HCV areas in the buffer zone, implementing BMP without chemicals and inorganic fertilizers, installing HCV attributes (name boards, spray limits, buffer limits), as a whole, as well as carrying out management and monitoring activities in the HCV Buffer zone area blocks I-41 to F-29.

7.12.5

Based on the study of documents in the 2009 HCV identification report document, field observations and the results of consultations with relevant agencies and interviews with surrounding communities, it is known that there is no community arable land that is used as a conservation area. However, the company has received support from the community around the company (Desa Pantai and Desa Langadai) for the management of the HCV area of PT Tapan Nadenggan on December 9, 2021. The agreement contains community support for the company's HCV area management program.

7.12.6

The company has a program to educate the workforce about the status of RTE species. This program is also included in the Company's HCV management plan. The program includes activities to increase knowledge and skills (for all plantation staff and employees, especially special officers tasked with managing HCV/HCV and monitoring important species, especially endangered species.

The company routinely carries out outreach to the community and company workers regarding the existence of rare plants and animals which is carried out in conjunction with outreach on HCV areas, for example:

1. Socialization of HCV, Plants and Animals, on February 18 2023, to employees, attended by 43 participants
2. Socialization of HCV, Plants and Animals, on March 3 2023, to the community, attended by 6 people from Batu Ampar Village
3. Socialization of HCV, Plants and Animals, on February 11 2023, to employees, attended by 16 participants.

Based on interviews with harvesting and spraying officers at the Batu Ampar Estate and Batu Mulia Estate, it is known that the company prohibits workers from keeping protected animals and plants and prohibits catching, hunting and killing animals and prohibits the destruction of HCV areas

7.12.7

The status of HCV and HCS forests, other natural ecosystems, peatland conservation areas and RTE species has been monitored by the company. The monitoring activities carried out by the company are listed in the 2022 HCV management and monitoring implementation document. The results of the activities carried out by the company are as follows:

- Monitoring of flora and fauna is carried out in accordance with applicable SOPs and there are still several types of protected

animals (fauna) in the PT Tapan Nadenggan area.

- The results of monitoring and patrolling the presence of HCV at PT Tapan Nadenggan did not show any disturbance during the 2022 monitoring period.
- Outreach activities regarding the HCV area have been carried out well with employees and the surrounding community of PT Tapan Nadenggan.
- Monitoring and felling of invasive species in HCV areas has been carried out manually.

The follow-up to the results of the monitoring carried out is as follows:

- It is important to complete documentation of warning sign maintenance activities, boundary marking, invasive species removal and other activities.
- Increase outreach activities to staff, employees and the community by adding information regarding rehabilitation activities that have been carried out in HCV areas.

Based on the evaluation results, it is known that the implementation of HCV area management is going quite well. Follow-up evaluation results are used as input for the management and monitoring of HCV areas in the following period. The results of interviews with the company's PIC, the results of the evaluation carried out will be used as input for implementing HCV Species and RTE monitoring for the next period.

7.12.8

Based on document verification, it is known that the company carried out land clearing in 2005-2007. The company has prepared a Land Use Change Analysis (LUCA) for PT Tapan Nadenggan and has sent it to the RSPO. Companies can show an email from the RSPO (kling.suli@rspo.org) on 22 August 2019. The email explains that several companies under GAR include Batu Ampar Mill with Batu Ampar Estate and Batu Mulia Estate having a total riparian zone affected area of 0 Ha and the total remediation area is 0 Ha.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product.	X or√
ASA-2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-2.1	The Mill does not use RSPO Trademark on its product (on-product) and non-product (off-product). PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Golden Agri-Resources, Ltd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 5.5.3. A summary of findings is as stated below.

Golden Agri-Resources, Ltd Time Bound Plan (TBP) is explained in table 1.5. Golden Agri-Resources run forty-nine (49) mills and one hundred and eighty (180) estates (own and smallholders) in Indonesia and has achieved RSPO certified for thirty-one (31) mills and supply base in Indonesia. Golden Agri-Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri-Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri-Resources, Ltd on 27 January 2023 made by Head of Operations Sustainability.

MUTU has verified partial certification for uncertified unit's subsidiary of Golden Agri-Resources, Ltd based on their Time Bound Plan. There are eighteen (18) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from other sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul – Sawita Mill: Pre Audit 2015, Compliance Audit 24 - 31 May 2021 2. PT Smart Tbk – Bukit Kapur Mill: Pre Audit 2015, Compliance Audit 15 November 2021 3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre Audit 2015, Compliance Audit 11 October 2021 4. PT Agrolestari Mandiri – Pekawai Mill: Pre Audit 2015, Compliance Audit 01 March 2021 5. PT Binasawit Abadi Pratama – Perdana Mill: 14 June 2021 6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre Audit 2014, Compliance Audit 13 September 2021 7. PT Mitrakarya Agroindo – Tangar Mill: Pre Audit 2015, Compliance Audit 27 September 2021 8. PT Paramita Internusa Pratama – Belian Mill: Pre Audit 2015, Compliance Audit 28 June 2021 9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 01 November 2021 10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 15 February 2021

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>11. PT Sawit Mas Sejahtera – Sungai Kikim Mill: <i>Setup System</i>. Compliance Audit 20 September 2021</p> <p>12. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 25 October 2021.</p> <p>13. PT Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 6 December 2021</p> <p>14. PT Bangun Nusa Mandiri – Kenari Mill: Compliance Audit 4 October 2021.</p> <p>15. PT Agrolestari Sentosa – Jalemo Mill: Compliance Audit 11 October 2021</p> <p>16. PT Adi Tunggal Mahajaya – Sako Mill: Compliance Audit 8 November 2021.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT Sawitakarya Manunggul (Sawita Mill and supply base) compliance audit on 24 - 31 May 2021. 2. PT SMART (Bukit Kapur Mill and supply base) compliance audit on 15 November 2021. 3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on 11 October 2021. 4. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on 01 March 2021. 5. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on 14 June 2021. 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on 13 September 2021. 7. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on 27 September 2021. 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on 28 June 2021. 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on 01 November 2021. 10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on 15 February 2021. 11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on 20 September 2021. 12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on 25 October 2021. 13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) compliance audit on 6 December 2021. 14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) compliance audit on 4 October 2021. 15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on 11 October 2021. 16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) compliance audit on 8 November 2021. <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR and the internal audit plan to be carried out on these units can be shown, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit plan on 17 May 2022. 2. PT Harapan Rimba Raya: Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit plan on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit plan on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit plan on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit plan on 8 August 2022. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit plan on 7 November 2022. <p><i>Notes:</i> <i>Verification of the realization of the internal audit carried out on the newly acquired units will be carried out at the nearest RSPO surveillance audit activity with the internal audit schedule that has been set.</i></p> <p>The company has carried out a Compliance Audit / Internal Compliance Verification (ICV) to see compliance with RSPO standards and also the Set up System in the Company's units to be certified.</p> <p>There are Compliance Audit (ICV) reports for each company including:</p> <ol style="list-style-type: none"> 1. PT. Agrolestari Mandiri – Pekawai Mill: Compliance Audit 07 February 2022 2. PT. Kresna Duta Agrindo – Gunung Kombeng Mill: Compliance Audit 21 February 2022 3. PT. Harapan Rimba Raya – Sungai Kedang Mill: Compliance Audit 17 May 2022 4. PT. Kruing Lestari Jaya – Sungai Perak Mill: Compliance Audit 23 May 2022 5. PT. Kresna Duta Agrindo – Rantau Panjang Mill: Compliance Audit 06 June 2022 6. PT. Sawitakarya Manunggul – Sawita Mill: Compliance Audit 13 June 2022 7. PT. Binawit Abadi Pratama – Perdana Mill: Compliance Audit 20 June 2022

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 8. PT. Paramitra Internusa Pratama – Belian Mill: Compliance Audit 26 June 2022 9. PT. Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 03 October 2022 10. PT. Sawit Mas Sejahtera – Sungai Kikim Mill: Compliance Audit 03 October 2022 11. PT. Sinar Kencana Inti Perkasa – Kasuari Mill: Compliance Audit 03 October 2022 12. PT. Sinar Kencana Inti Perkasa – Demta Bulking: Compliance Audit 06 October 2022 13. PT. Aditunggal Mahajaya - Sako Mill: Compliance Audit 14 November 2022 14. PT. Agrolestari Sentosa – Jalemo Mill: Compliance Audit 21 November 2022 15. PT. Mitrakarya Agroindo – Tangar Mill: Compliance Audit 05 December 2022 16. PT. Agrokarya Prima Lestari – Kuayan Mill: Compliance Audit 05 December 2022 17. PT. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 12 December 2022 18. PT. SMART - Bukit Kapur Mill: Compliance Audit 12 December 2022 <p>3.0</p> <p><i>Auditor Verification:</i></p> <p>4.0 Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> 1. PT. SMART - Bukit Kapur Mill: Compliance Audit 12 December 2022 2. PT. Agrolestari Sentosa – Jalemo Mill: Compliance Audit 21 November 2022 3. PT. Binasawit Abadi Pratama – Perdana Mill: Compliance Audit 20 June 2022 4. PT. Aditunggal Mahajaya - Sako Mill: Compliance Audit 14 November 2022 5. PT. Mitrakarya Agroindo – Tangar Mill: Compliance Audit 05 December 2022 6. PT. Kruing Lestari Jaya – Sungai Perak Mill: Compliance Audit 23 May 2022 7. PT. Bangun Nusa Persada – Kenari Mill: Compliance Audit 19 September 2022 <p>In 2022, GAR has made additional units by acquiring 4 factories namely Sungai Perak Mill, Sungai Kedang Mill, Bukit Perak Mill, Bumi Palma Mill and 15 plantations (11 own plantations namely Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate, Bukit Permai Estate, Bukit Lestari Estate, Kharisma Estate and 4 plasma plantations/KKPA namely Sungai Pikan Plasma, Sungai Tohan Plasma, Sungai Pahu Plasma, Kharisma Plasma).</p> <p>Internal audit activities have been carried out, as follows:</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit on 17 May 2022. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit on 8 August 2022. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit on 7 November 2022.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.12	<p>Company Group/Holding Statement: Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries carried out a Remediation and Compensation (RaCP) procedure beginning with Disclosure and Zero Liability reporting to the RSPO via email on 29 August 2014.</p> <p>From 25 companies, 7 of them are certified units, the remaining 18 companies are uncertified units. The following is an update on the RaCP progress as of 11 January 2022 for uncertified units:</p> <p>a) 4 companies have received Concept Note approval from RSPO dated 27 July 2020, namely:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat 2. PT Agrolestari Sentosa – Kalimantan Tengah 3. PT Sumber Indah Perkasa – Papua 4. PT Kresna Duta Agroindo – Kalimantan Timur <p>The company submitted a new Concept Note in collaboration with a third party (PT Lestari Capital). Concept Note Batch 1 includes companies:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat 2. PT Sumber Indah Perkasa – Papua 3. PT Kresna Duta Agroindo – Kalimantan Timur <p>The latest progress on the revised Concept Note was submitted on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel.</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>The company also made the Concept Note Project Batu Menangis for PT Agrolestari Sentosa – Kalimantan Tengah, was submitted on 16 December 2021 to RSPO Compensation Panel.</p> <p>b) The LUCA (Land Use Change Analysis) report which is still in the RSPO review process:</p> <ol style="list-style-type: none"> 1. PT Kartika Prima Cipta – Kalimantan Barat 2. PT Agrolestari Mandiri – Kalimantan Barat <p>c) The LUCA (Land Use Change Analysis) report is in the process of being revised and will be sent to the RSPO:</p> <ol style="list-style-type: none"> 1. PT Cahaya Nusa Gemilang – Kalimantan Barat 2. PT Paramitra Internusa Pratama – Kalimantan Barat 3. PT Bangun Nusa Mandiri – Kalimantan Barat 4. PT Persada Graha Mandiri – Kalimantan Barat 5. PT Satya Kisma Usaha (Medan Sari Estate) – Kalimantan Tengah 6. PT Binasawit Abadi Pratama – Kalimantan Tengah 7. PT Aditunggal Mahajaya – Kalimantan Tengah 8. PT Mitrakarya Agroindo – Kalimantan Tengah 9. PT Agrokarya Primaestari – Kalimantan Tengah 10. PT Buana Adhitama – Kalimantan Tengah 11. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan 12. PT Sawita Karya Manunggul – Kalimantan Selatan <p>d) The LUCA (Land Use Change Analysis) report has been approved is PT Satya Kisma Usaha (Batang Gading Estate) – Jambi.</p> <p>The LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN, is PT Sawit Mas Sejahtera – Sumatera Selatan (2 reports).</p> <p>HCV assessments for 17 reports was conducted in the period of 2010 to 2018 by external (consultant) and internal parties. The HCV assessment is carried out by a team assessor with a Team Leader who has been approved by the RSPO. The reference for the HCV assessment using the HCV Toolkit 2008. The peer review is carried out by an independent consultant who has also been approved by the RSPO.</p> <p>Assessment of PT Sawit Mas Sejahtera – Sumatera Selatan has used Integrated HCV-HCS with the consultants who have been licensed in HCVN and HCSA</p> <p>The company continues to follow up on the RaCP process, so that the RSPO timebound for uncertified units can be realized immediately.</p> <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated 04 August 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata <p>The company is still collecting information and documentation regarding the fulfillment of RaCP obligations for the newly acquired company. The timeline that has been prepared for the fulfillment of this RaCP is:</p> <ul style="list-style-type: none"> • Submission of Disclosure and LUCA on semester 1 of 2022 • Submission of Concept Notes on Semester 2 of 2022 • Approval RaCP Proposal on Semester 1 of 2023 <p>For the RaCP process, smallholders scheme will be adjusted to the 2023 timebound along with the new acquisition company.</p> <p>Auditor Verification:</p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Kencana Graha Permai - Kalimantan Barat (Delima Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. 2. PT Agrolestari Sentosa – Kalimantan Tengah (Jalemo Estate, Manuhing Estate, Kajui Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted the Concept Note Project Batu Menangis on 14 January 2022 and is currently still being reviewed by the RSPO Compensation Panel. 3. PT Sumber Indah Perkasa – Papua (Mambruk Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel. 4. PT Kresna Duta Agroindo – Kalimantan Timur (Gunung Kombeng Mill, Rantau Panjang Estate) concept note get approval from RSPO on 27 July 2020. However, the company submitted a new Concept Note in collaboration with PT Lestari Capital on 14 January 2022, and is currently still being reviewed by the RSPO Compensation Panel 5. PT Kartika Prima Cipta – Kalimantan Barat (Muara Tawang Estate), the LUCA report which is still in the RSPO review process. 6. PT Agrolestari Mandiri – Kalimantan Barat (Pekawai Mill and supply bases), the LUCA report which is still in the RSPO review process. 7. PT Cahaya Nusa Gemilang – Kalimantan Barat (Kenanga Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 8. PT Paramitra Internusa Pratama – Kalimantan Barat (Belian Mill, Belian Estate and Tengkwang Estate), LUCA report is in the process of being revised and will be sent to the RSPO. 9. PT Bangun Nusa Mandiri – Kalimantan Barat (Kenari Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>10. PT Persada Graha Mandiri – Kalimantan Barat (Kapuas Hulu Estate and Sungai Beran Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>11. PT Satya Kisma Usaha – Kalimantan Tengah (Medan Sari Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>12. PT Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>13. PT Aditunggal Mahajaya – Kalimantan Tengah (Sungai Ayawan Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>14. PT Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>15. PT Agrokarya Primaestari – Kalimantan Tengah (Kuayan Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>16. PT Buana Adhitama – Kalimantan Tengah (Sa'jiri Estate and Bukit Dua Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>17. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan (Sungai Magalau Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>18. PT Sawita Karya Manunggul – Kalimantan Selatan (Sawita Mill and supply bases), LUCA report is in the process of being revised and will be sent to the RSPO.</p> <p>19. PT Satya Kisma Usaha – Jambi (Batang Gading Estate), the LUCA report has been approved in 12 November 2021.</p> <p>20. PT Sawit Mas Sejahtera – Sumatera Selatan, the LUCA report proposed to be hold/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN.</p> <p>21. The companies were acquired by GAR on 2021 are PT Kruing Lestari Jaya (Sungai Perak Mill and supply bases), PT Harapan Rimba Raya (Sungai Kedang Mill and supply bases), PT Rimbaraya Tamajaya (Sungai Pahu Estate), PT Agrolestari Subur Sejahtera (Bukit Permai Estate), PT Agrolestari Hijau Sentosa (Bukit Lestari Estate), PT Kharisma Riau Sentosa Prima (Kharisma Estate), PT Mitranusa Permata (Sungai Manunggul Estate). The company is still collecting information and documentation regarding the fulfillment of RaCP obligations.</p> <p>22. PT. Agrolestari Sentosa – Kalimantan Tengah (Jalemo Mill and supply bases). The concept note was submitted on 22 September 2022 and is currently being reviewed by the RSPO</p> <p>23. PT. Binasawit Abadi Pratama – Kalimantan Tengah (Perdana Mill and Supply Bases). LUCA was submitted to the RSPO on 18 April 2018, feedback from RSPO on October 14 2021 and is currently still in the process of land cover verification by the company.</p> <p>24. PT. Aditunggal Mahajaya – Kalimantan Tengah (Sako Mill and supply bases). LUCA report PT. Agrokarya Prima Lestari and PT. Aditunggal Mahajaya is still in the review process and is currently preparing its</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>clarification for resubmission (2nd resubmission). As for the status of the LUCA report of PT. Mitrakarya Agroindo with Pass status on 10 June 2022.</p> <p>25. PT. Mitrakarya Agroindo – Kalimantan Tengah (Tangar Mill dan supply bases), stages in the RaCP process have not been fully completed</p> <p>26. PT. Kruing Lestari Jaya – Kalimantan Timur (Sungai Perak Mill dan supply bases), RaCP disclosure has not been made to the RSPO.</p> <p>27. PT Sumber Indah Perkasa – Lampung (Sungai Buaya Estate, Sungai Merah Estate), HGU has been issued and HCV study has been carried out but is still in the process of HCVRN review.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement:</p> <p>GAR and its subsidiaries planted after January 2010. There are companies that had conducted the RSPO New Planting Procedure (NPP) and have gone through a 30-day public consultation process in April 2014. These companies include:</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha – Jambi 2. PT Kresna Duta Agroindo – Kalimantan Timur 3. PT Mitra Karya Agroindo – Kalimantan Tengah 4. PT Binasawit Abadipratama – Kalimantan Tengah 5. PT Aditunggal Mahajaya – Kalimantan Tengah 6. PT Agrolestari Sentosa – Kalimantan Tengah 7. PT Agrokarya Primalestari – Kalimantan Tengah 8. PT Buana Adhitama – Kalimantan Tengah 9. PT Agrolestari Mandiri – Kalimantan Barat 10. PT Paramitra Internusa Persada – Kalimantan Barat 11. PT Persada Graha Mandiri – Kalimantan Barat 12. PT Bangun Nusa Mandiri – Kalimantan Barat 13. PT Kartika Prima Cipta – Kalimantan Barat 14. PT Kencana Graha Permai – Kalimantan Barat 15. PT Cahaya Nusagemilang – Kalimantan Barat <p>Auditor Verification:</p> <p>Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010 2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014 3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014 4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014. 5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014 6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 and PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. This is become subject of sanction. For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014.</p> <p>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010.</p> <p>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014</p> <p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014.</p> <p>11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010.</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014.</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014.</p> <p>14. PT Sawitakarya Manunggul (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KKPA and company not conduct NPP. This is become subject of sanction.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8	<p>Company Group/Holding Statement:</p> <p>No land conflicts. The company has a land conflict resolution mechanism in accordance with the RSPO criteria 4.2, 4.6, 4.7 and 4.8. This procedure is contained in the SOP for handling social conflicts with the registration number SOP/SMART/SCRD/NSDV/I/002 revision 1 dated 18 May 2016 and SOP for Handling Complaints and Dissatisfaction no SOP/SMART/GIMSSCMD/USDV/I/001 revision 2 dates April 11, 2017. This procedure regulates mutually agreed upon social conflict resolution. Conflict resolution can be done in a participatory manner and can also be done with a third party (mediator).</p> <p>The company also has a procedure for handling complaints before they develop into conflict. The process in question is SOP/SMART/GIMS-SCMD/USDV/I/001 revision 2 dated 11 April 2017, handling complaints appropriately and quickly. GAR has initiated to become a member of the RSPO DSF as a "Grower" category.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <p>1. Complaint dated July 11, 2021 to PT SMART Tbk (West Kalimantan Region) regarding the alleged purchase/supply of fresh fruit bunches (FFB) and crude palm oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of the Kencana Group (not members of the RSPO), who have committed a series of violations against workers and indigenous peoples in the district. Last Status RSPO Complaints Panel has issued a decision letter regarding the complaint on 17 January 2022 in which it was decided to terminate the entire complaint. The decision letter has been submitted to both parties, and time is given if anyone</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>wishes to appeal until April 11, 2022. (RSPO Complaint Panel Decision is attached).</p> <ol style="list-style-type: none"> Complaint on 2 March 2020 to GAR (Central Kalimantan Region) from Forest Peoples Program & Elk Hills Research regarding alleged land legality and bribery cases. On the part of GAR itself, GIS-2 analysis for land clearance alerts after November 2014 from discussions with RSPO GIS manager on 21 May 2021 has agreed on the sampling method. GAR's clarification report was sent on September 8, 2021. As for the legal review on anti-bribery policies & practices, the company rejected the ToR for Legal Review on March 26, 2021. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 15, 2021, the RSPO is waiting for the results of a review from the consultant. Complaint on 19 October 2018 to GAR (Kapuas Hulu Region, West Kalimantan) from the Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding legality. On 26 August 2021, the RSPO Complaint Panel decided to proceed with further investigations. The investigation carried out will be fully funded by the RSPO, and carried out by PROFUNDO Parties. Until now the company is still waiting for a further decision from the RSPO. The latest status is as of December 6, 2021, the RSPO is waiting for the results of a review from the consultant. Complaint on 13 October 2014 to PT Kartika Prima Cipta (West Kalimantan) from Forest Peoples Program (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the FPIC process and 6 other issues. RSPO with the approval of GAR and FPP divides the conflict resolution verification process into 5 phases (phase 1 related to NPP, maximum land holding and new land development, phase 2 related to legality, phase 3 related to smallholders, phase 4 related to FPIC and phase 5 related to HCV), where GAR has responded to phase 5 on 26 August 2021. The information submitted has responded to all stages and GAR is currently waiting for a decision from the RSPO Complaint Panel. The latest status as of 15 December 2021, the RSPO Complaint Panel has reached a decision for phase 2 and is awaiting discussion of phases 3 and 4. The results of the Compliance Audit conducted for the 2021 period in the uncertified unit that there was no land conflict and the unit had disseminated the SOP for Handling Complaints and Dissatisfaction, Human Rights Policy and SOP for Handling Social Conflicts both internally and externally, in general the FPIC process has been carried out according to procedures, so that there are no land or social conflicts. <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is no land conflicts in the following uncertified management unit:</p> <ol style="list-style-type: none"> PT Sawitakarya Manunggul (Sawita Mill and supply base) PT SMART (Bukit Kapur Mill and supply base) PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) PT Agrolestari Mandiri (Pekawai Mill and supply base) PT Binasawit Abadi Pratama (Perdana Mill and supply base)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ol style="list-style-type: none"> 6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) 7. PT Mitra Karya Agroindo (Tangar Mill and supply base). 8. PT Paramitra Internusa Pratama (Belian Mill and supply base) 9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base). 10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base). 11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) 12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) 13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base) 14. PT Bangun Nusa Mandiri (Kenari Mill and supply base) 15. PT Agro Lestari Sentosa (Jalemo Mill and supply base) 16. PT Adi Tunggal Mahajaya (Sako Mill and supply base) 17. PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA) 18. PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA). 19. PT Rimbaraya Tamajaya (Sungai Pahu Estate and Sungai Pahu KKPA), which will be supply base for Sungai Kedang Mill. 20. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill that has been certified 21. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill that has been certified 22. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill that has been certified 23. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa). <p>Based on the auditor's search through news from the internet, no information on land conflicts was found in the above uncertified management unit. However, on the RSPO website (Complaint Panel) there is information about complaints from various stakeholders against GAR and this has been explained by the company regarding the progress of the settlement as described above.</p> <p>Auditor Verification:</p> <p>Auditor has verified the supporting evidence of above the company statement.</p> <p>Based on information from electronic media on March 1, 2022, there was information that PT. Agro Lestari Sentosa for not building plasma plantations for the community. Based on confirmation with representatives of PT. Agro Lestari, it is known that the plasma area is still in the NPP process and the target is to complete the NPP by the end of the 2023 quarter.</p> <p>In addition, based on electronic media on December 13, 2022, there is information on problems between Koperasi Perkebunan Bataduh Raya and PT. Bangun Nusa Mandiri. Based on confirmation with representatives of PT. Bangun Nusa Mandiri is known that there have been 15 agreements between cooperatives and companies, including PT. BNM is committed to building a plasma of 557.47 Ha and developing an area of 180 Ha for partnerships. Regarding overlapping land, the solution is <i>Vaicias Data</i>,</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		namely the handover of land in PT. BNM with the Head of the Village and Koperasi Perkebunan Bataduh Raya.
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2	<p>Company Group/Holding Statement: The company has a procedure for handling employee complaints before becoming into conflicts. The procedure is SOP/SMART/SCRD/NSDV/II/002 revision 1 dated 18 May 2016.</p> <p>Procedures related to employee complaints are regulated in the internal flow of form because employees are included in the category of internal stakeholders. The media of complaint used is an official letter submitted through the worker union or put in the suggestion box provided in strategic locations.</p> <p>During 2021, there were no new complaints regarding employment through the RSPO website, as for the progress of previous complaints, they have closed status.</p> <p>Auditor Verification: There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p> <p>Auditor Verification: There is information from electronic media on November 24, 2021, it is known that there was mediation by the Head of the Central Seruyan Sector Police regarding the termination of employment of one of the employees of PT. Adi Tunggal Mahajaya. As for the demands submitted, namely the issue of compensation for work termination that was not provided by the company and the 2014 CSR agreement, namely related to clean water, local workers, agriculture, fish ponds, health, transportation cooperation agreements and receipt of FFB from the community, as well as CPO transport SPK from the community.</p> <p>Based on confirmation with PT. Adi Tunggal Mahajaya, it is known that the employee has the status of a contract employee/PKWT for 1 year and is not renewed because he does not meet the competency requirements. In addition, based on labor regulations after the UUCK was issued, companies are no longer obliged to provide compensation to workers whose contracts have been terminated. The realization of CSR is carried out in stages and this demand is the program of the previous Village Head.</p> <p>In addition, there was an issue in the electronic news on September 30 2022 that there was an employee who had died who had been abandoned by PT. Kruing Lestari Jaya and their rights are not fulfilled. However, there is information from the management of the Ikentim organization that there was no abandonment of the corpse. This is in accordance with confirmation from the management representative of PT. Kruing Lestari Jaya that the company has facilitated the corpse to be delivered and buried in Resak according to the wishes of the family.</p>
2.1.6	Legal non-compliance, if any, is being addressed through measures	Company Group/Holding Statement:

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
	consistent with the requirements of RSPO P&C criterion 2.1	<p>Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/II/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> 1. PT Djuandasawit Lestari (Muara Kandis Estate & Muara Tawas Estate) 2. PT Sawit Mas Sejahtera (Sawit Mas Estate) 3. PT Bumi Sawit Permai (Bumi Sawit Estate) 4. PT Forestralestari Dwikarya (Tanjung Rusa Estate) 5. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate) 6. PT Ivo Mas Tunggal (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, Nenggala Estate) 7. PT Buana Wiralestari Mas (Kijang Estate, Nagamas Estate, Nagasaki Estate) 8. PT Ramajaya Pramukti (Ramarama Estate) 9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate) 10. PT Agrokarya Prima Lestari (Muara Tawang Estate, Kuayan Estate, Bukit Sentuhai Estate, Tajur Beras Estate, Seranau Estate) 11. PT Buana Adhitama (Sapiri Estate) 12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate) 13. PT Mitra Karya Agroindo (Sungai Nusa Estate) 14. PT Aditunggal Mahajaya (Sungai Ayawan Estate) 15. PT Satya Kisma Usaha (Medang Sari Estate) 16. PT Buana Adhitama (Bukit Dua Estate) 17. PT Agrolestari Sentosa (Jalemo Estate) 18. PT Binasawit Abadipratama (Perdana Mill) 19. PT Agrokarya Prima Lestari (Kuayan Mill) 20. PT Mitrakarya Agroindo (Tangar Mill) 21. PT Agrolestari Sentosa (Jalemo Mill) 22. PT Adi Tunggal Mahajaya (Sako Mill) 23. PT Smart Tbk. (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill) 24. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Kenari Plasma, Gahari Plasma, Kenari Plasma) <p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djuandasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma)

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>9. PT Sawitakarya Manunggul (Sawita Plasma)</p> <p>10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma)</p> <p>11. PT Kresna Duta Agroindo (Rantau Panjang Plasma)</p> <p>12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma)</p> <p>13. PT Paramitra Internusa Pratama (Belian Plasma)</p> <p>14. PT Paramitra Internusa Pratama (Muara Tawang KKPA)</p> <p>15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA)</p> <p>16. PT Mitrakarya Agroindo (Sulin Plasma)</p> <p>17. PT Agrokarya Prima Lestari (Sapiri Plasma)</p> <p>18. PT Adi Tunggal Mahajaya (Sako Plasma)</p> <p>19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma)</p> <p>20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma)</p> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambruk Estate) 3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate) 4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate) <p>In the 2021 period, several companies were acquired by GAR according to the notarial deed of amendment dated August 4, 2021, including:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya 2. PT Harapan Rimba Raya 3. PT Rimbaraya Tamajaya 4. PT Agrolestari Subur Sejahtera 5. PT Agrolestari Hijau Sentosa 6. PT Kharisma Riau Sentosa Prima 7. PT Mitranusa Permata <p>The company is still collecting information and documentation related to compliance with legal documents such as HGU, Environmental Documents and SHM (for plasma).</p> <p>Auditor Verification:</p> <p>Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa. - PT Binasawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill are PT Agrokarya Prima Lestari and PT Buana Adhitama.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<ul style="list-style-type: none"> - PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance. Supply base for Sungai Kikim Mill are PT Sawit Mas Sejahtera and PT Bumi Sawit Permai. The legal non compliance which still on process is EIA revision. - PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill are PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU). - PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is communities plantation. - PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process. - PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha) - PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha) - PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha) - PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha) - PT Sumber Indah Perkasa: there is an area is still in process for HGU in Sungai Buaya Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha) - PT Ivo Mas Tunggal: there is an area still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas: there is area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha) - PT Bumipalma Lestari Persada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha) - PT Kruing Lestari Jaya (Sungai Perak Mill and supply base), doesn't have land use title (HGU), the HGU is still on process <p>In 2022, GAR has made additional units by acquiring 4 factories namely Sungai Perak Mill, Sungai Kedang Mill, Bukit Perak Mill, Bumi Palma Mill and 15 plantations (11 own plantations namely Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Pahu Estate, Bukit Permai Estate, Bukit Lestari Estate, Kharisma Estate and 4 plasma</p>

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>plantations/KKPA namely Sungai Pikan Plasma, Sungai Tohan Plasma, Sungai Pahu Plasma, Kharisma Plasma).</p> <p>Internal audit activities have been carried out, as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA with an internal audit on 17 May 2022. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA with an internal audit on 17 May 2022. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit on 17 May 2022. 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill (PT Bumi Permai Lestari) that has been certified with an internal audit on 28 March 2022. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestari Persada) that has been certified with an internal audit on 8 August 2022. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa) with an internal audit on 7 November 2022. <p>Then there will be additional units in 2022 with the acquisition by GAR of 2 mills and 16 Estates (11 own estates and 5 estate plasma/KKPA). Internal audit activities have not yet been carried out, but prior to the acquisition of these units, GAR has carried out a due diligence or internal assessment so that it can be decided to be acquired by GAR, with details as follows:</p> <ol style="list-style-type: none"> 1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA. 2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA. 3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya). 4. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 5. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be supply base for Bukit Perak Mill (PT Bumi Permai Lestari) which has been certified. 6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestari Persada) which has been certified. 7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>The acquisition company already has legality in the form of HGU, but other legalities such as environmental documents and other permits are being collected and will be completed when an internal audit of the acquisition units is carried out.</p> <p>There are 4 companies which still on process to revise EIA document and temporary storage place for hazardous and toxic waste, consist of:</p> <ol style="list-style-type: none"> 1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate) 2. PT Sumber Indah Perkasa (Mambruk Estate) 3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate) 4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate) <p>PT. Agrolestari Sentosa (Jalemo Mill and supply bases), still on process to revise EIA document.</p> <p>There are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> 1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma) 2. PT Ramajaya Pramukti (Ramarama Plasma) 3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma) 4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma) 5. PT Djundasawit Lestari (Pandawa Plasma) 6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma) 7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma) 8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma) 9. PT Sawitakarya Manunggul (Sawita Plasma) 10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma) 11. PT Kresna Duta Agroindo (Rantau Panjang Plasma) 12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma) 13. PT Paramitra Internusa Pratama (Belian Plasma) 14. PT Paramitra Internusa Pratama (Muara Tawang KKPA) 15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA) 16. PT Mitrakarya Agroindo (Sulin Plasma) 17. PT Agrokarya Prima Lestari (Sapiri Plasma) 18. PT Adi Tunggal Mahajaya (Sako Plasma) 19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma) 20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma) <p>Based on auditor verification, there is still progress in obtaining legality documents for the uncertified units so that GAR has included the certification plan for the uncertified units in the timebound plan.</p>

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

3.4.1. Identification of Findings, Corrective Actions and Observations at RC-2 Assessment

NCR No.	:	2022.01	Issued by	:	Rahmat Abdiansyah
Date Issued	:	30 July 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	27 September 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">SOP for Waste Management with Number SOP/SMART/LEMS-EHSD/SADV/II/002 dated July 2, 2014 explains that waste management is carried out with the internal provisions of Sinar Mas plantations and applicable laws and regulations refer to the clean production mechanism approach that applies several principles, among others:<ul style="list-style-type: none">1. Reduce, Reuse, dan Recycle (3R)2. Zero Burning3. DisposalThe results of interviews with company representatives revealed that the company has a policy forbidding the destruction of domestic waste by burning and the policy has been socialized to employees in housing and there has also been a warning board prohibiting the burning of domestic waste.However, based on the results of field observations in the Batu Ampar Mill housing area, it is known that there are 6 points of burning domestic waste.					
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):					
Employees at the cottage tend to burn rubbish, especially leaves and dry grass which pile up quickly, because the rubbish transportation schedule is once every 2 weeks.					
Correction (filled by organization audited):					
<ul style="list-style-type: none">1. Adjust the waste transportation schedule so that it can be carried out once a week to prevent the tendency of employees to burn waste.2. Revise the handover letter for housing placement for workers by including a written clause stating that workers are not to burn rubbish in the residential area					
Corrective Action (filled by organization audited):					
<ul style="list-style-type: none">1. Carry out routine monitoring and patrols by distributing PICs (People in Charge) to each staff in each housing block with a monitoring form whose timing is carried out randomly every 1 month.2. Determination of Persons Responsible for Cottage Cleaning (made per Cottage Block)3. Assistant monitors waste transportation in employee housing every 2 weeks4. Re-initiate workers about the prohibition of burning rubbish during the morning circle and place warnings in residential areas5. Mill Manager Circular and Socialization to hold Clean Fridays at the cottage once a month					
Assessor Evaluation and Conclusion (filled by auditor):					
Auditor Verification Date 27 September 2022					
The company has sent proof of improvements in the form of:					

- Employee Cottage Waste Transportation Schedule signed by the manager. Based on this schedule, waste transportation is carried out once a week.
- Documentation of the socialization of the prohibition on burning waste in residential areas. The socialization will be carried out on August 18 2022.
- Agreement to occupy the company house that has been signed by the employee. The agreement states that it is prohibited to burn rubbish in residential areas.
- Photos of waste transportation documentation and samples of waste transportation orders once a week in August 2022.
- Zero Fire monitoring form documents in housing and PIC Patrols in employee housing by Assistants and its realization in August 2022. Monitoring results show that there are no traces of waste burning in the housing area.
- Memo from the manager appointing the PIC to determine the person responsible for cleaning the employee housing block with Number 02/MGR-BAMM/08/2022 on August 2, 2022.
- Documentation of the installation of warnings in employee housing (lay out of installation of cottage warnings)
- Documentation of no burning and installation of warnings in employee housing (lay out of installation of hut warnings)
- Analysis of root causes, corrections and corrective actions that have been identified by the Company.

Based on the evidence of improvements submitted, non-conformities in this indicator are declared Fulfilled and the consistency of corrective actions will be re-observed in the next assessment.

Verified by	:	Rahmat Abdiansyah
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-2.1 Assessment

NCR No.	: 2023.01	Issued by	: Kiki Fadli
Date Issued	: 8 September 2023	Time Limit	: Next Surveillance
NC Grade	: Minor	Date of Closing	: 29 November 2023
Standard Ref. & Requirement	6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">The company shows manpower documents/labor requirements and a list of workers for the period August 2023 for each plantation unit, where there are harvest workers with PKWT status, namely as follows:<ul style="list-style-type: none">The BAME unit has a harvesting requirement of 126 people with actual workers of 140 people consisting of 117 permanent workers (PT) and 23 PKWT workers. So there is a shortage of 9 people from the workforce requirements.The BMLE unit has a harvesting requirement of 102 people with actual workers of 96 people consisting of 51 permanent workers (PT) and 45 PKWT workers. So there is a shortage of 51 people from the workforce requirements.The company shows a Specific Time Work Agreement Letter, for example<ul style="list-style-type: none">SPK Number 007/BAME/PKWT/06/2023 on 13 May 2023. In article 1 it is explained that workers with the initials SS are accepted as FFB harvesters in BAME units. The agreement is valid from 14 June 2023 to 13 June 2024 (1 year).SPK Number 076/BMLE/SK-PKWT/X/2022 on 25 October 2022. In article 1 it is explained that workers with the initials SS are accepted as FFB harvesters in the BMLE unit. The agreement is valid from 26 October 2022 to 25 October 2023 (1 year).As a result of interviews with management representatives, it is known that the company has identified types of permanent work where harvest work is permanent work. The use of PKWT workers in harvest work is due to replanting activities in BAME units and post-replanting activities in BMLE units.Representatives from the Kota Baru Regency Manpower and Transmigration Service stated that the use of PKWT workers is only permitted for temporary work and harvest work is not included in these criteria.Harvest work is permanent work, this is because the criteria for harvest work are included in the explanation of permanent work in Law no. 13 of 2003 (explanation of article 59 paragraph 2) which states "work that is continuous, not intermittent, not limited by time and is part of a production process in a company or work that is not seasonal."In Government Regulation no. 35 of 2021 in the PKWT section explains that PKWT cannot be held for permanent work and PKWT can be held based on a time period (work that is not completed in too long, seasonal work, work related to new products) or the completion of a certain work (work that once completed and temporary work).Law of the Republic of Indonesia Number 6 of 2023, in Part Two of Employment, article 59 paragraph 2 explains that a fixed-term work agreement cannot be entered into for permanent work.			
Non-Conformance Description (filled by auditor):			
The company has not been able to prove that the application of PKWT is in accordance with government regulations regarding the types of work that can use PKWT (seasonal or temporary work).			
Root Cause Analysis (filled by organization audited):			
<ol style="list-style-type: none">There is a need for additional harvesting power during peak cropThe company needs harvest employees who perform well, and to determine employees who perform well requires a maximum of 1 year. Determining employees who perform well within 3 months is considered insufficient.			
Correction (filled by organization audited):			
<ol style="list-style-type: none">1. The company assesses PKWT (seasonal or temporary work) harvesters with assessment criteria consisting of:<ol style="list-style-type: none">Performance assessment (harvest output)Discipline (90% Attendance)Health			

<p>d. Personal data documents (KTP, etc.) according to requirements.</p> <p>2. Based on the results of the assessment of PKWT harvesters, the company has a program for appointing PKWT Harvesters based on the assessment results, as follows:</p> <p>a. Batu Mulia Estate (BMLE)</p> <ul style="list-style-type: none"> - Appointment of 5 PKWT harvesters as PT employees for the PKWT SPK which will expire in October 2023. - Application for the Appointment of PT Employees from UH BMLE to RC Kalsel 1 on 5 September 2023 and has been forwarded to VPA on 17 November 2023 with a total proposal for the appointment of 40 employees. <p>b. Batu Ampar Estate (BAME)</p> <p>Request for Appointment of PT Employees from UH BAME to RC Kalsel 1 on 29 August 2023 and has been forwarded to VPA on 18 November 2023 with a total of 23 employees proposed to be appointed.</p>
<p>Corrective Action (filled by organization audited):</p> <p>1. The company's commitment to appointing the Harvest PKWT is stated in the VPA SE dated 13 June 2022 with number 001/VPA PSM-3/VI/2022 concerning the employment status of harvest employees.</p> <p>2. SPO Region provides outreach to each Unit Head regarding SE VPA no 001/VPA PSM-3/VI/2022 via email on 18 November 2023</p>
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Auditor Verification on November 29, 2023</p> <p>The company shows proof of improvement in the form of:</p> <ul style="list-style-type: none"> • Proof of the appointment of 5 PKWT harvest workers as PT in the BMLE unit, namely as follows: <ul style="list-style-type: none"> - Decree number 010/BMLE-SK/INT/XI/2023 which informs that workers with the initials AR will be promoted to permanent workers starting from 27 October 2023. - Decree number 008/BMLE-SK/INT/XI/2023 which informs that workers with the initials DKB will be promoted to permanent workers starting from 27 October 2023. - Decree number 009/BMLE-SK/INT/XI/2023 which informs that workers with the initials MNSR will be promoted to permanent workers starting from 27 October 2023. - Decree number 028/BMLE-SK/INT/XI/2023 which informs that the worker with the initials YT will be promoted to permanent worker starting from 19 October 2023 - Decree number 011/BMLE-SK/INT/XI/2023 which informs that workers with the initials YN will be promoted to permanent workers starting from 27 October 2023. • Proof of Email Request for Appointment of PT Employees from KTU BMLE to RC Kalsel 1 dated 5 September 2023 and has been forwarded to VPA on 17 November 2023. It is known that a total of 40 workers are being proposed and processed to be appointed as PT. • Proof of Email Request for Appointment of PT Employees from BAME Manager to RC Kalsel 1 dated 29 August 2023 and has been forwarded to VPA on 18 November 2023. It is known that a total of 23 workers are being proposed and processed to be appointed as PT. • Circular Letter Number 001/VPA PSM-3/VI/2022 concerning the Employment Status of Harvest Employees which was issued on June 13 2022. This document informs about the provisions for the use of PKWTT harvest workers in companies who must pass trials and meet the requirements to be appointed as PKWTT /PT. • Evidence of email socialization of VPA Circular Letter Number 001/VPA PSM-3/VI/2022 on 18 November 2023 from SPO Region addressed to Unit Heads such as managers, KTU and SPO in BMLE and BAME units. <p>From the explanation above, it can be concluded that the discrepancy in this indicator is declared fulfilled and will be observed in the next assessment.</p> <p>Follow up on next audit (filled by auditor):</p>

Verified by	:	Kiki Fadli
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NCR No.	:	2023.02	Issued by	:	Fauzi Prima Sanusi
Date Issued	:	9 September 2023	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	29 November 2023
Standard Ref. & Requirement	:	7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.			

Evidence observed (filled by auditor):

- Waste Management SOP with Number SOP/SMART/LEMS-EHSD/SADVI/002 dated July 2 2014 explains that waste management is carried out in accordance with the internal provisions of the Sinar Mas plantation and the applicable laws and regulations refer to a clean production mechanism approach that applies several principles , among others:
 1. Reduce, Reuse and Recycle (3R)
 2. Zero Burning or no burning
 3. Disposal or stockpiling
 As well as explaining the identification and management of waste generated from company operational activities, including B3 waste generated by operational activities such as used packaging contaminated with B3 such as used oil drums, used paint buckets, used buckets, used hoses contaminated with LB3, used grease buckets and spray equipment. Used pesticides are stored at TPS LB3 and handled according to their type and characteristics.
- GESP Policy dated 8 September 2015 which explains point 1.7, namely improving waste management, identifying, reducing, reusing, recycling and disposing of waste in an environmentally responsible manner
- Decree No. 01/MGR-BAMM/07/2023 dated July 1 2023 concerning the Appointment of Persons in Charge of the Batu Ampar Mill Employee Cottage, with the duties, implementation and socialization of environmental cleanliness of employee huts related to waste management and prohibition of burning waste as well as coordinating the implementation of mutual cooperation and environmental cleanliness patrols of the hut employee
- The results of a field visit to the BAMM Employee Cottage Area found:
 1. There is inadequate waste management behind the hut at 1 point, at the front of the hut at 4 points, and in the ditch at 1 point.
 2. There is a scattering of inorganic waste around the hut and the flow of the hut ditch which has the potential to obstruct the flow of drainage water.
 3. There is disposal of used spray paint cans around the hut, the use of 20 L jerry cans used for chemical packaging as water reservoirs, storage of used oil packaging and 20 L jerry cans used for pesticides in the workers' huts
- As a result of a field visit to the PKS area in the used goods storage warehouse, it was found that there were used computer monitors, used lubricant buckets, 20 L capacity jerry cans used for chemicals and printer ink toner.

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that waste management has been consistent in accordance with company regulations

Root Cause Analysis (filled by organization audited):

1. Employees buy used packaging for toxic materials on the market and do not come from the company's operational activities
2. There are still employees who change vehicle oil independently and paint vehicles using spray paint in residential areas but the waste is not managed
3. Waste cleaning/transportation activities are only carried out in available trash cans, so that waste in the ditch is neglected
4. When storing ex-B3 packaging, employees did not report to the person in charge of OP LB3, so the employee placed the ex-B3

packaging incorrectly.

5. The waste management program with the appointment of a PIC is not running well

Correction (filled by organization audited):

1. Creation of a program for handling waste management with staff responsible for implementing it related to the implementation of Mutual Cooperation Activities / Handling Cottage Cleanliness involving employees and staff in charge.
2. Carrying out mutual cooperation activities / Handling Cottage Cleanliness involving Employees and Staff which were carried out on September 10 2023, September 24 2023 and November 19 2023
3. Providing outreach to employees and providing warnings regarding the management of used toxic materials in employee housing areas not to store toxic material packaging and other toxic material waste in housing and if there is toxic material packaging and toxic material waste produced such as used oil, paint packaging etc to be directly transported/placed in the Temporary Storage Site for toxic waste.
4. Carry out routine waste transportation for inorganic and organic waste to landfill and transporting toxic waste packaging to temporary storage sites for toxic waste.
5. Add trash cans to every housing complex that is still lacking

Corrective Action (filled by organization audited):

1. Create an Implementation Structure for Employee Housing Waste Management
2. Make a Joint Commitment (Head of RT Housing and Company Management) for Management of Employee Cottages
3. Monitoring the Implementation of Waste Transport and Mutual Cooperation Activities for Housing Cleaning
4. The Manager made Circular Letter Number 01/SE-MGR BAMB/IX/2023 for the Management of Waste and B3 Waste in the company area including employee housing and disseminated it to employees.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor verification November 29, 2023:

The company shows proof of improvement as follows:

1. Minutes of handing over of toxic waste bins at BAMB employee housing, November 23 2023, in Block H No.01
2. Documentation of BAMB POM Housing Mutual Cooperation, carried out on September 10 2023, September 24 2023 and November 10 2023, including cleaning the housing environment, cleaning ditches and removing domestic waste
3. Issuance of Circular Letter No.01/SE-MGR BAMB/IX/2023, concerning Management of Garbage and Toxic Waste in the Company Area and Employee Housing of PT Tapian Nadenggan-Batu Ampar Mill, dated 11 September 2023, which has been socialized to staff and the heads of the Batu Ampar Mill housing RT, containing information on the prohibition of burning waste, ensuring that waste is transported according to the schedule, the obligation to dispose of waste in the place provided, specifically for types of toxic waste, must be collected in special waste bins for toxic waste, take part in mutual cooperation activities or scheduled cottage cleaning activities
4. Toxic waste logbook dated 20 November 2023, contains information on recording packaging for toxic waste originating from BAMB housing, namely contaminated packaging, dated 17 October 2023, amounting to 0.25 kg
5. Determination of waste transportation schedules and monitoring of waste transportation for the Batu Ampar Mill housing complex, transportation carried out once a week
6. Minutes of SE Socialization on Waste and B3 Waste Management in BAMB Employee Housing, September 20 2023
7. Installation of an appeal board to residents of PKS Batu Ampar housing complex, regarding the prohibition of storing toxic waste in housing, types of toxic waste, special placement for toxic waste
8. Determination of the PIC in charge of Employee Housing, determined by PIC with division based on housing blocks, based on Decree No.01/MGR-BAMB/07/2023, dated 1 July 2023, by Seior Mill Manager

Based on the evidence presented above, the evidence is acceptable and sufficient, so that the 2023.01 nonconformity in indicator 3.5.1 can be closed	
Follow up on next audit (filled by auditor):	
Verified by	: Fauzi Prima Sanusi

NCR No.	: 2023.03	Issued by	: Kiki Fadli
Date Issued	: 8 September 2023	Time Limit	: 8 December 2023
NC Grade	: Major	Date of Closing	: 29 November 2023
Standard Ref. & Requirement	Certification System Clause 5.5.2 Time Bound Plan		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> RSPO Certification System Clause 5.5.2 in letter (a) explains that all plantations and mills must be certified within five (5) years after obtaining RSPO membership. Every new acquisition must be followed by certification within three (3) years. Any exceptions outside this maximum period must be approved by the RSPO Secretariat. The RSPO announcement on 11 January 2023 regarding the process flow for the time bound plan (TBP) Revision explained that: <ol style="list-style-type: none"> Since the RSPO Certification System document became effective from 1 July 2018, existing RSPO members have 5 years from this date to comply with these requirements. This means that every grower member who has a management unit that has not been certified must ensure that the management unit that has not been certified has been certified no later than 30 June 2023. Changes in TBP due to deviations in the maximum time period. Applications for approval are sent to the RSPO via email using the TBP Revision Template which can be downloaded from the RSPO website. Partial certification of Golden Agri Resources for Un Certified units on January 30 2023, it is known that there are units that have undergone partial certification audits, for example PT Ivomas Tunggal units (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, and Nenggala Estate), Long Buluh Estate and Kintapura Estate with status still in the process of obtaining HGU and being a Non Certified area, for example: <ol style="list-style-type: none"> Kintapura Estate covering an area of 636.33 Ha Sei Rokan Estate covering an area of 102.7 Ha Nenggala Estate covering an area of 419.9 Ha The Certification Unit has reported the GAR Bound Plan Team to the RSPO and has received approval from the RSPO on June 14 2022. However, based on the verification results of the GAR Bound Plan Team documents which have been approved by the RSPO, it is known that the Non Certified area in Long Buluh Estate, Kintapura Estate, Sei Rokan Estate, Nenggala Estate, Samsam Estate and Ujung Tanjung Estate are not yet included in GAR's Time Bound Plan which has been approved by the RSPO. 			
Non-Conformance Description (filled by auditor): The Certification Unit has not been able to show evidence that the Time Bound Plan for several uncertified units has been reported and has received approval from the RSPO.			
Root Cause Analysis Uncertified units that have not been reported to the RSPO are due to differences in CH's interpretation in reporting TBP to the RSPO.			
Correction Revising the Golden Agri-Resources Ltd TBP Document which has been approved by Top Management.			
Corrective Action Sending Revised Golden Agri-Resources Ltd TBP Documents to RSPO.			
Assessor Evaluation and Conclusion Verification Date November 24, 2023 The company has sent proof of improvements in the form of:			

- Golden Agri-Resources Ltd. TBP Revision Document. Based on the results of the document verification, it is known that the Non-Certified Areas in Long Buluh Estate, Kintapura Estate, Sei Rokan Estate, Nenggala Estate, Samsam Estate and Ujung Tanjung Estate have been included in the GAR TBP Document and are planned to be certified in 2025.
- Proof of sending the Revised GAR TBP document to the RSPO which was sent on November 21 2023.
- Proof of Approval of the Revised TBP GAR Document from the RSPO (certification@rspo.org) on 23 November 2023 which explains that Kindly be informed that the RSPO Secretariat agreed with the new proposed date for certification under Golden Agri-Resources Ltd. Please note that this approval is subject to the fulfillment of related Time Bound Plan requirements stated in the RSPO Certification System documents by the RSPO Members. This approval email shall always be made available to the CB for verification purposes, and all supporting evidence for evaluation by the CB is still necessary to be provided by the RSPO Members.

Based on evidence of these improvements, the nonconformities in this certification system are declared to have been **fulfilled**.

Follow up on next audit (filled by auditor):

Verified by	:	Kiki Fadli
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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>The company shows:</p> <ol style="list-style-type: none"> 1. Letter Number 660.3.5/833/DLH-PPKL/II/2023, dated 11 July 2023, regarding Notification of Environmental Compliance Monitoring, to PT Tapan Nadenggan-Batu Ampar, 2. News on How to Supervise Environmental Compliance, Kotabaru Regency Environmental Service, dated July 18 2023, with recommendations: <ol style="list-style-type: none"> a. Closing the pipeline from the pool behind the factory which flows to WWTP pool no. 5, to avoid the perception that there is liquid waste dilution activity d. Placement of medical/clinic waste storage in a separate/isolated place from other B3 waste storage locations, remaining in one B3 waste warehouse e. Prepare and submit an application for technical approval for chimney emission disposal <p>Based on the above, the Company is given 90 days to carry out/fulfil the results of the field visit. Based on the Minister of Environment and Forestry Regulation No. 5 of 2021 CHAPTER III EMISSION DISPOSAL ACTIVITIES Part One, Article 28 Every Business and/or Activity subject to AMDAL or UKL/UPL which carries out Emission Disposal activities is required to have: a. Technical Approval; and b. SLO. Based on the results of interviews with company representatives, it was explained that the company was in the process of preparing documents for technical approval for chimney emissions,</p> <p>Companies have the opportunity to ensure that the emission technical approval application process is immediately completed and submitted to the Kotabaru Regency Environmental Service, according to the deadline given by the Kotabaru Regency Environmental Service</p> <p>OHS</p> <p>The company shows the OHS Committee structure and a list of SIOs (operator licensed) for each unit. Furthermore, the Company has the opportunity to follow up on the management of the Batu Ampar Mill OHS Committee structure as well as several operators permits whose validity period has expired.</p>
2	7.2.10	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>The company has Worker Health Examination Procedure No. SOP/SMART/HESS-EHSD/SADV/II/012 dated 1 July 2014 which explains that the periodic health examination program is carried out once a year for all employees and special health examinations are carried out every 6 months with provisions for inspections for spray officers and chemical storage warehouse officers. including mandatory cholinesterase and spirometry examinations.</p> <p>Based on a review of the documents resulting from the special employee health examination which was carried out number F/SMART/HESS/-EHSD/SADV/012/001 in August 2023, it is known that the company has carried out a special examination with the Cholinesterase parameter. Furthermore, companies have the opportunity to carry out special health checks with spirometry parameters.</p>
3	7.12.4	<p>Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/ or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in</p>

No	Ref. Std.	Description
		<p>consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified)</p> <p>The company identified the High Conservation Value area of the Batu Mulia Estate unit in 2011. Based on the results of this identification, there is an HCV 1.1 area in the form of a Nature Reserve buffer area covering an area of 172.48 Ha. The Nature Reserve buffer area was designated as an HCV area because there is a Nature Reserve area around the plantation area and the environmental conditions in this area have been in the form of oil palm plantations and residential areas since 1984. The determination of this area as an HCV area took into account the precautionary aspect.</p> <p>Based on the results of a field visit to the HCV 1.1 Buffer Nature Reserve area in Block I41 Division 2 Batu Mulia Estate, it is known that the area has been planted with oil palm with the 2017 planting year and no HCV attributes have been found. And in Block I36/I37, it is known that the area covered is in the form of secondary forest with the installation of HCV attributes (admonition boards, HCV type name displays and buffer zone boundary signs on the last oil palm tree bordering secondary forest.</p> <p>Companies can show justification in the form of a statement letter from VPA PSM 3 which explains several things, including:</p> <ul style="list-style-type: none"> • In 2016 the company monitored massive encroachment activities on nature reserve areas by the community. Seeing these conditions, the company has taken an approach to outreach to the public about the importance of protecting protected areas or nature reserves. • Seeing that the condition of the nature reserve is no longer in a protected condition and has the potential to become a threat to the Buffer Zone area if management and utilization is not carried out by the company, based on these considerations it was decided to carry out replanting with the aim that the buffer zone area is always maintained and managed according to the following principles. conservation principles. • Utilizing the Nature Reserve buffer area by planting oil palm plants/replanting does not violate regulations based on PP No. 28 of 2011 concerning the management of nature reserve areas and nature conservation areas in Article 45 Paragraph 3 and Article 46. <p>The company can also show a report document on the implementation of HCV management and monitoring for the 2022 period which explains that based on the results of field monitoring, in terms of land cover, most of the Batu Mulia Estate area is generally dominated by oil palm plants that have experienced low crop and have reached 1 oil palm plantation cycle. so that several blocks will be ready for replanting in each unit. Apart from that, around the Batu Mulia Estate area there are also oil palm plantations owned by the local community as well as coal mining activities. It is feared that this could be a threat to the sustainability of the HCVs in Batu Mulia Estate and management and monitoring activities for the HCV Buffer zone area at the buffer zone location with oil palm vegetation have not been included.</p> <p>Based on the results of interviews with company representatives, it is known that the Nature Reserve buffer area that has been replanted is still designated as an HCV area by the company while continuing to manage and monitor the area.</p> <p>Companies have the opportunity to ensure that the implementation of HCV management and monitoring plans in Nature Reserve buffer areas, especially in areas with oil palm cover, is maintained and managed in accordance with conservation principles, including preparing plans for managing and monitoring HCV areas in the buffer zone, implementing BMP without chemicals and inorganic fertilizers, installing HCV attributes (name boards, spray limits, buffer limits), as a whole, as well as carrying out management and monitoring activities in the HCV Buffer zone area blocks I-41 to F-29.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	The company's commitment to implementing a sustainable palm oil management system.
2	Having competent human resources in each field
3	Has obtained ISPO certificate

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Kotabaru Regency Plantation Service <ul style="list-style-type: none"> The company has carried out routine reporting according to schedule The company has also submitted monitoring reports on preventing forest and land fires The Company has purchased plasma based on the FFB price determination from the Relevant Department The company already has a CSR program and has reported it. 	<p>There are no negative issues that need further verification.</p>
Serongga Village and Pantai Village <ul style="list-style-type: none"> There is no information on environmental pollution. There are no land claims and disputes from the community. Job information is conveyed verbally and in writing (via letters). CSR programs have been realized, including in the fields of education, economy and infrastructure. Village heads and companies work together in controlling and preventing land and forest fires. 	<p>There are no negative issues that need further verification.</p>
Manpower and Transmigration Office of Kotabaru Regency <ul style="list-style-type: none"> The agency routinely visits the certification unit at least once a year to monitor the employment system. The company provides PPE for workers and there have been no fatal work accidents in the last year. The certification unit has paid wages to employees in accordance with applicable regulations, namely the District Minimum Wage of Kotabaru Regency in 2023. The certification unit has provided health and employment guarantees for all workers, namely BPJS Employment and BPJS Health. The certification unit has a CLA, trade union and bipartite organization that have been approved by the institution. The CLA owned by the company is for the 2018 – 2020 period which has expired. Until the audit was carried out, there was no new CLA for the year 2023. There are no issues of discrimination, child labor, forced labor and sexual harassment in the certification unit. There are no reports regarding industrial relations or mediation cases being resolved at the institution. The certification unit has workers with PKWT status for harvest work who are employed at peak harvest time. All workers have been reported to the agency. 	<p>Based on the results of interviews with labor unions, management representatives and the District Manpower and Transmigration Office. It is known that the unit of certification does not have a new CLA because until now the labor union and the company are still discussing several articles in the preparation of the CLA draft. The company showed several CLA negotiation documents as follows, Minutes of meeting discussion regarding of the CLA in South Kalimantan on June 24th, 2023, and which was attended by 8 company representatives and 8 labor union representatives. This has been explained in the related indicator, namely indicator 6.2.2.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
National Land Agency of Kotabaru Regency <ul style="list-style-type: none"> The unit of certification has extended the <i>HGU</i> permit. No complaints of land conflicts from the surrounding community were submitted to the National Land Agency of Kotabaru Regency. The company has submitted periodic reports on the utilization of <i>HGU</i> to the National Land Agency of Kotabaru Regency. Communication between the Agency and the certification unit is well established. 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>
Gender Committee of BAMB, BAME and BMLE units. <ul style="list-style-type: none"> The realization of the 2022/2023 gender committee work program went smoothly without any problems. The work programs implemented include the following: <ul style="list-style-type: none"> Integrated Healthcare Centre for health checks for toddlers, pregnant women and breastfeeding mothers in collaboration with community health centre located in the village around the certification unit. Outreach and recording of cases of sexual harassment, domestic violence and extramarital affairs. Outreach regarding the reproductive rights of women workers Outreach regarding the complaint mechanism. Over the past year, there have been no issues related to gender discrimination, harassment, violence or serious violations of reproductive rights within the unit of certification. At present it is certain that there are no pregnant or lactating women workers who work using chemicals. This is because the certification unit has its own policy regarding the prohibition of pregnant or lactating women workers from working in jobs related to chemicals. In addition, women workers are also entitled to leave for menstruation and maternity leave. 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>
Labor Union (SPM of BAMB, BAME and BMLE units) <ul style="list-style-type: none"> The labor union has been registered with the Manpower Office of Kotabaru Regency Regular internal labor union meetings are held at least once a month or when there are matters that need to be discussed. Likewise, coalition meetings between labor unions are routinely held during bipartite meetings with representatives of certification unit management or during CLA negotiations. All meeting activities have been documented in the minutes document. Payroll is in accordance with the stipulation of the minimum wage in Kotabaru Regency for year of 2023. In addition, salary payments are in accordance with the specified time and via bank transfer. 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Over the past year there have been no complaints regarding forced labor/trafficking, child labor, discrimination or sexual harassment/violence. 	
Employee Cooperative in BAMB, BAME and BMLE units <ul style="list-style-type: none"> The unit of certification has a policy to support the formation of workers' cooperatives to help the welfare of its employees. It is known that employee cooperatives are engaged in the business of providing basic goods/materials for daily needs. The company's support for workers' cooperatives is by providing capital loans, providing transportation to facilitate shopping for goods/material stock needs and providing cooperative buildings. The Annual Member Meeting for the 2022 fiscal year was held in 2023. 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>
PT Satrindo Jaya Agropalma <ul style="list-style-type: none"> The form of cooperation between the contractor and the unit of certification is the transportation of FFB and CPO. The company routinely conducts outreach to contractors regarding compliance with regulations and policies that apply within the company such as the application of OHS at work, fulfilment of workers' rights, environmental management and others. Contractor has provided PPE for workers. Contractors have enrolled their workers in the <i>BPJS</i> Employment and <i>BPJS</i> Health programs. The contractor has also paid wages in accordance with the applicable minimum wage provisions in Kotabaru Regency. While working with the company, the contractor said there were no complaints. The cooperation and communication that has been established so far has been quite good 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>
PT Sarana Lintas Bersama <ul style="list-style-type: none"> The form of cooperation between the contractor and the unit of certification is the transportation of PK. The company routinely conducts outreach to contractors regarding compliance with regulations and policies that apply within the company such as the application of OHS at work, fulfilment of workers' rights, environmental management and others. Contractor has provided PPE for workers. Contractors have enrolled their workers in the <i>BPJS</i> Employment and <i>BPJS</i> Health programs. The contractor has also paid wages in accordance with the applicable minimum wage provisions in Kotabaru Regency. While working with the company, the contractor said there were no complaints. 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The cooperation and communication that has been established so far has been quite good 	
CV Bamega Perkasa <ul style="list-style-type: none"> The form of cooperation between the contractor and the company is the supply of FFB to the mill units. The representative of FFB supplier only provides PPE for dump truck drivers and do not provide harvest workers and FFB loading and unloading workers. The FFB suppliers pay wages to workers in units of output. While working with the company, the representative of FFB supplier said that he had no complaints. The cooperation and communication that has been established so far has been quite good. 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>
Koperasi Tani Telagasari <ul style="list-style-type: none"> The form of cooperation between the contractor and the company is the supply of FFB to the mill units. The representative of FFB supplier only provides PPE for dump truck drivers and do not provide harvest workers and FFB loading and unloading workers. The FFB suppliers pay wages to workers in units of output. While working with the company, the representative of FFB supplier said that he had no complaints. The cooperation and communication that has been established so far has been quite good 	<p>There are no things that need to be verified further, all the information obtained from the interview results has been conveyed to the relevant indicators.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Tapan Nadenggan – Batu Ampar POM Management Representative</p>  <p><u>Yahya Mustakim</u> Wednesday, 29 November 2023</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p><u>Leonada</u> Wednesday, 29 November 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Manpower and Transmigration Office	Kota Baru Regency	-	Direct Interview	4 September 2023	✓	
2	Environmental Service	Kota Baru Regency	-	Direct Interview	4 September 2023	✓	
3	Plantation Agency	Kota Baru Regency	-	Direct Interview	4 September 2023	✓	
4	National Land Agency	Kota Baru Regency	-	Via Phone	7 September 2023	✓	
5	PT Satrindo Jaya Agropalma (FFB and CPO transporter)	Kota Baru Regency	-	Direct Interview	5 September 2023	✓	
6	PT Sarana Lintas Bersama (PK transporter)	Kota Baru Regency	-	Via Phone	6 September 2023	✓	
7	Contractor Replanting	Kota Baru Regency	-	Via Phone	6 September 2023	✓	
8	FFB Suppliers: • CV Bamega Perkasa • Koperasi Tani Telagasari	Kota Baru Regency	-	Via Phone	6 September 2023	✓	
9	Pantai Village and Serongga Village	Kota Baru Regency	-	Direct Interview	5 September 2023	✓	
10	Gender Committee of BAMB, BAME and BMLE units	Kota Baru Regency	-	Direct Interview	5 – 6 September 2023	✓	
11	Labor Union of BAMB, BAME and BMLE units	Kota Baru Regency	-	Direct Interview	5 – 6 September 2023	✓	
12	Employee Cooperative of BAMB, BAME and BMLE units	Kota Baru Regency	-	Direct Interview	5 – 6 September 2023	✓	
13	Batu Ampar Mill (BAMB): • 3 securities • 1 weighbridge operator • 3 sorting operators • 1 WTP operator • 1 workshop operator • 1 Dispatch operator	Kota Baru Regency	-	Direct Interview	5 September 2023	✓	
14	Batu Ampar Estate (BAME): • 1 warehouse foreman • 1 warehouse worker • 2 workshop workers • 1 grader operator • 1 warehouse foreman • 1 warehouse worker • 2 workshop workers • 1 grader operator	Kota Baru Regency	-	Direct Interview	5 September 2023	✓	
15	Batu Mulia Estate (BMLE): • 2 warehouse officers • 1 workshop operator	Kota Baru Regency	-	Direct Interview	6 September 2023	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	• 3 child care workers						
16	Aliansi Masyarakat Adat Nusantara	Jakarta	rumahaman@aman.or.id	Via email	28 August 2023		✓
17	Wahana Lingkungan Hidup Indonesia	Jakarta	informasi@walhi.or.id	Via email	28 August 2023		✓
18	World Wide Fund	Jakarta	wwf-indonesia@wwf.or.id	Via email	28 August 2023		✓
19	Sawit Watch	Bogor	info@sawitwatch.or.id	Via email	28 August 2023		✓

Appendix 2. Assessment Program

DATE	4-9 September 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 4 September 2023		
06.00 – 08.45 09.35 – 10.15	<ul style="list-style-type: none"> Jakarta (CGK) → Banjarmasin (BDJ) / Batik Air ID 6212 Banjarmasin (BDJ) → Kotabaru (KBU) / Wings Air IW 1392 	LEO/KID/FPS/JON/ATP
10.30 – 12.00	Public Consultation : public consultation with stakeholder to relevant agency in Kotabaru Regency by Phone	LEO/KID/FPS/JON/ATP
12.00 – 14.00	Break	LEO/KID/FPS/JON/ATP
14.00 – 16.00	Travel to Site	
16.00 – 17.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	LEO/KID/FPS/JON/ATP
Tuesday, 5 September 2023		
08.00 – 12.00	Public Consultation : <ul style="list-style-type: none"> Public consultation with affected communities around the plantation and previous land owners. (direct interview) Interviews with Gender Committees, Trade Unions, Local contractors, Employee cooperatives, third party suppliers (direct interview or by phone) 	KID
08.00 – 12.00	Field Observation Batu Ampar Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) 	FPS/JON/ATP
12.00 – 14.00	Break	KID/FPS/JON/ATP
14.00 – 16.30	Field observation to Batu Ampar POM <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 	KID/FPS/JON/ATP
16.30 – 17.00	Presentation of daily progress	KID/FPS/JON/ATP
Wednesday, 6 September 2023		

[illegible]