

## *Roundtable on Sustainable Palm Oil Certification* **R S P O**

### [ ✓ ] Surveillance

Name of Management Organisation : **Sungai Rungau Mill, PT Binasawit Abadipratama subsidiary of Golden Agri Resources Ltd.**  
 Plantation Name : **Sungai Rungau Estate, Terawan Estate, Sungai Seruyan Estate, Tangar Estate and Bukit Tiga Estate**  
 Location : **Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia**  
 Certificate Code : **MUTU-RSPO/029**  
 Date of Initial Registration : **26 August 2013**  
 Date of Certificate Issue : **26 August 2018**      Date of License Issue : **26 November 2023**  
 Date of Certificate Expiry : **25 August 2023**      Date of License Expiry : **25 August 2024**

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved By
Re-certification	12 to 16 June 2023	Leonada (Lead Auditor Witnessing), Rindu Galih Rezza Rachmansyah (Lead Auditor Witnessed), Kiki Fadli, Johannes Kapri Pandiangan, Iwan Perala	Harso Yuli Antena	Octo H.P.N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
Re-certification	02 November 2023

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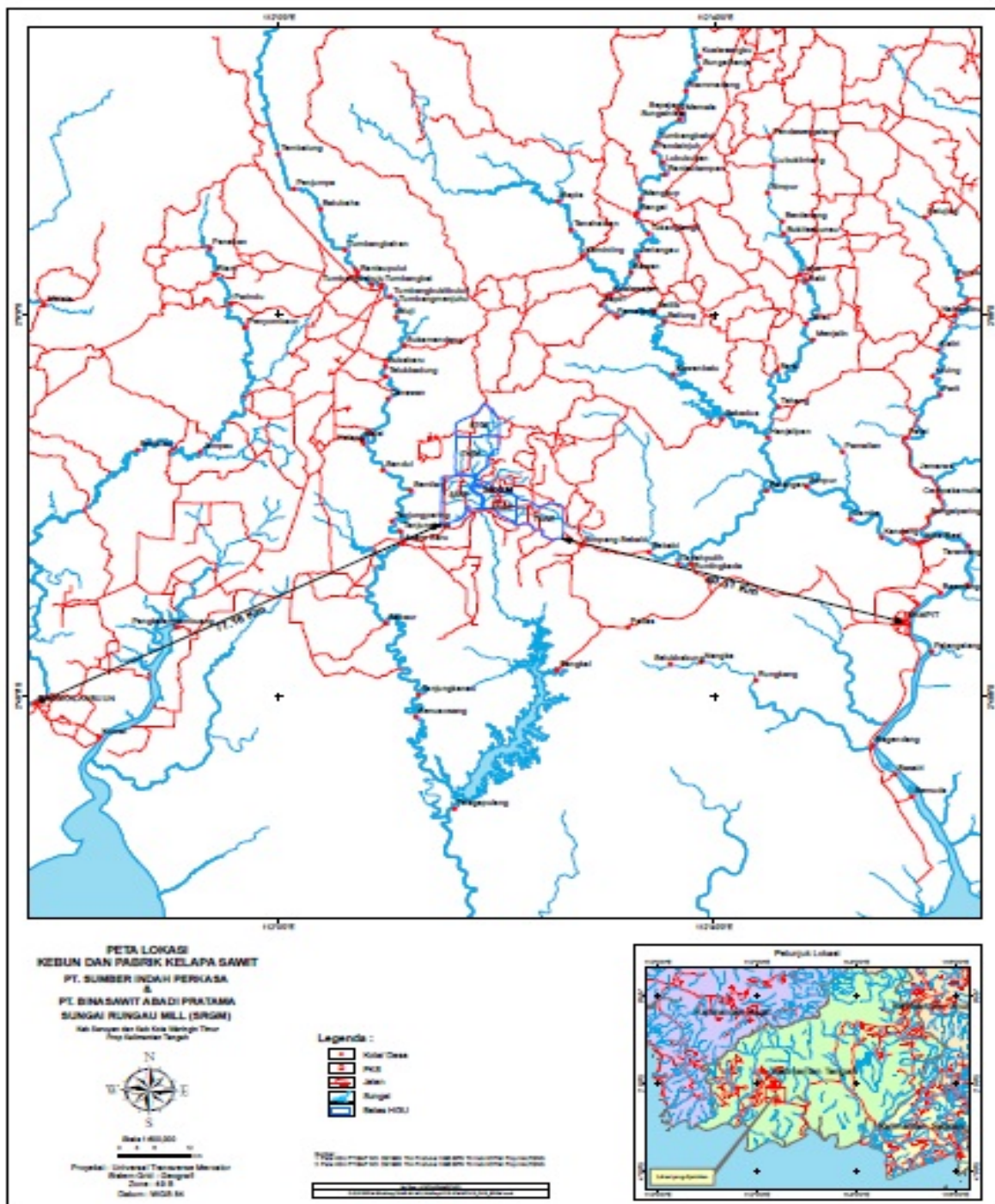
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Figure 1. Location Map of PT Binasawit Abadipratama



**Figure 2. Operational Map of PT Binasawit Abadipratama**

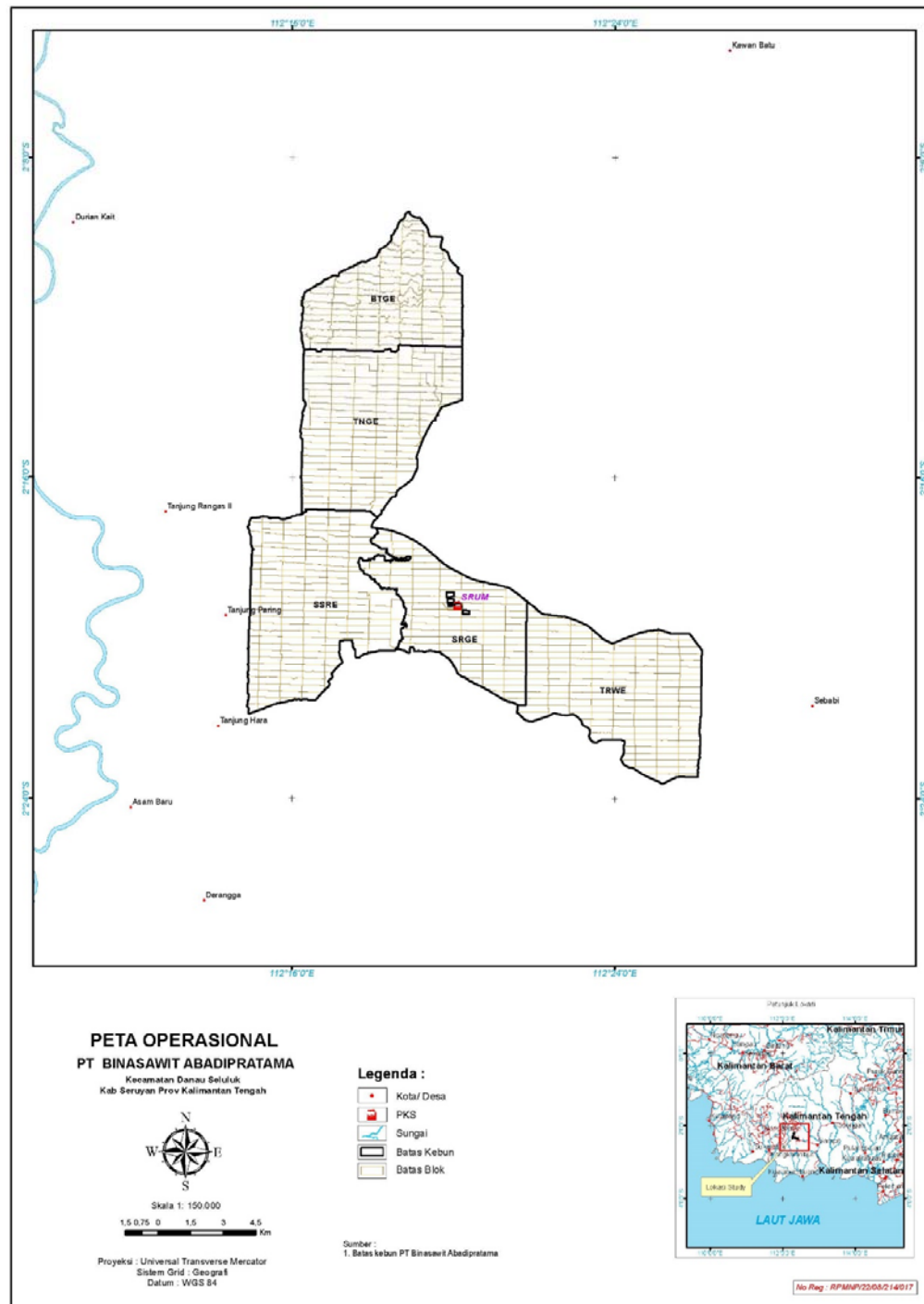


Figure 3. Operational Map PT of Binasawit Abadipratama – Bukit Tiga Estate

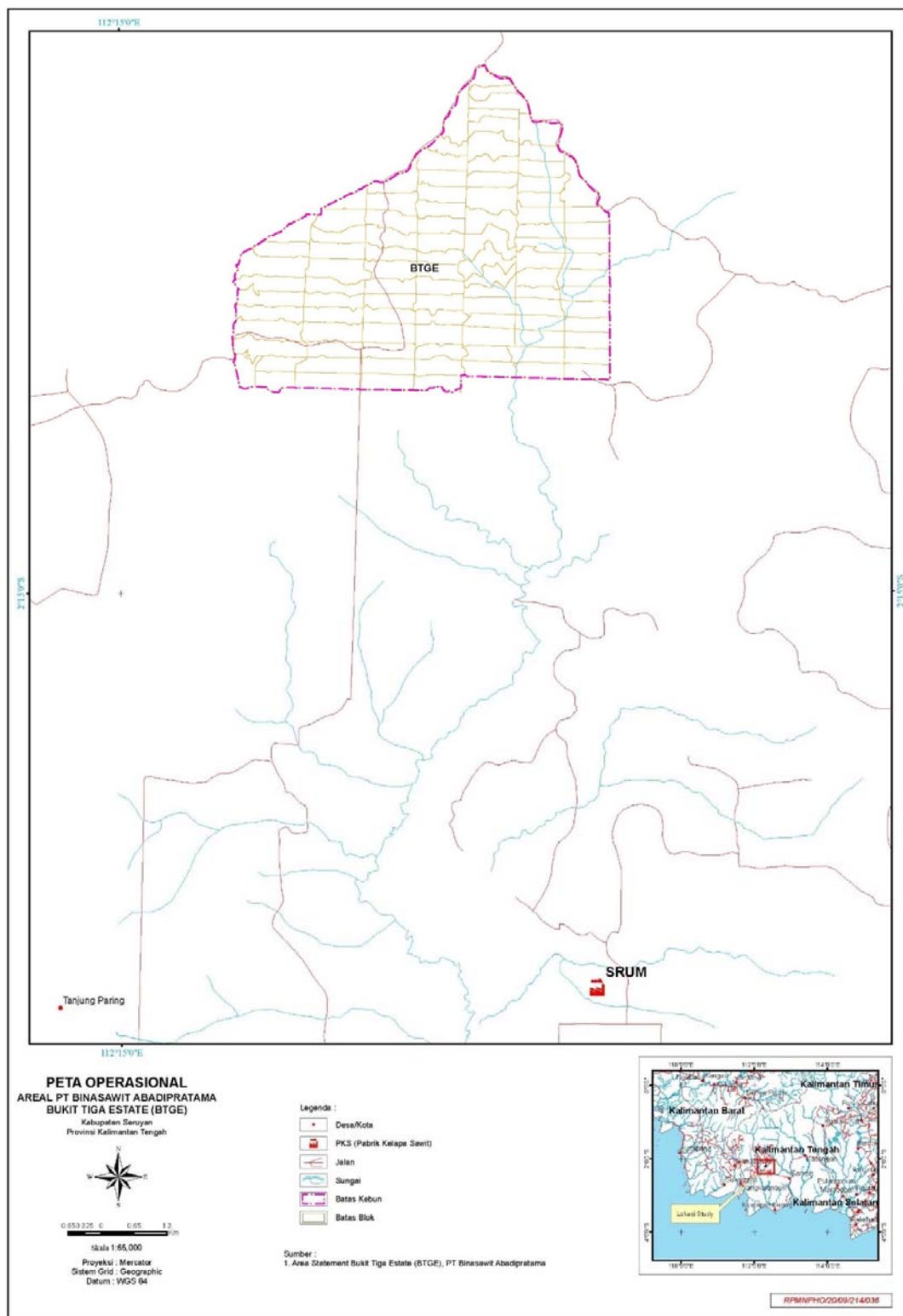




Figure 4. Operational Map PT of Binasawit Abadipratama – Sungai Rungau Estate

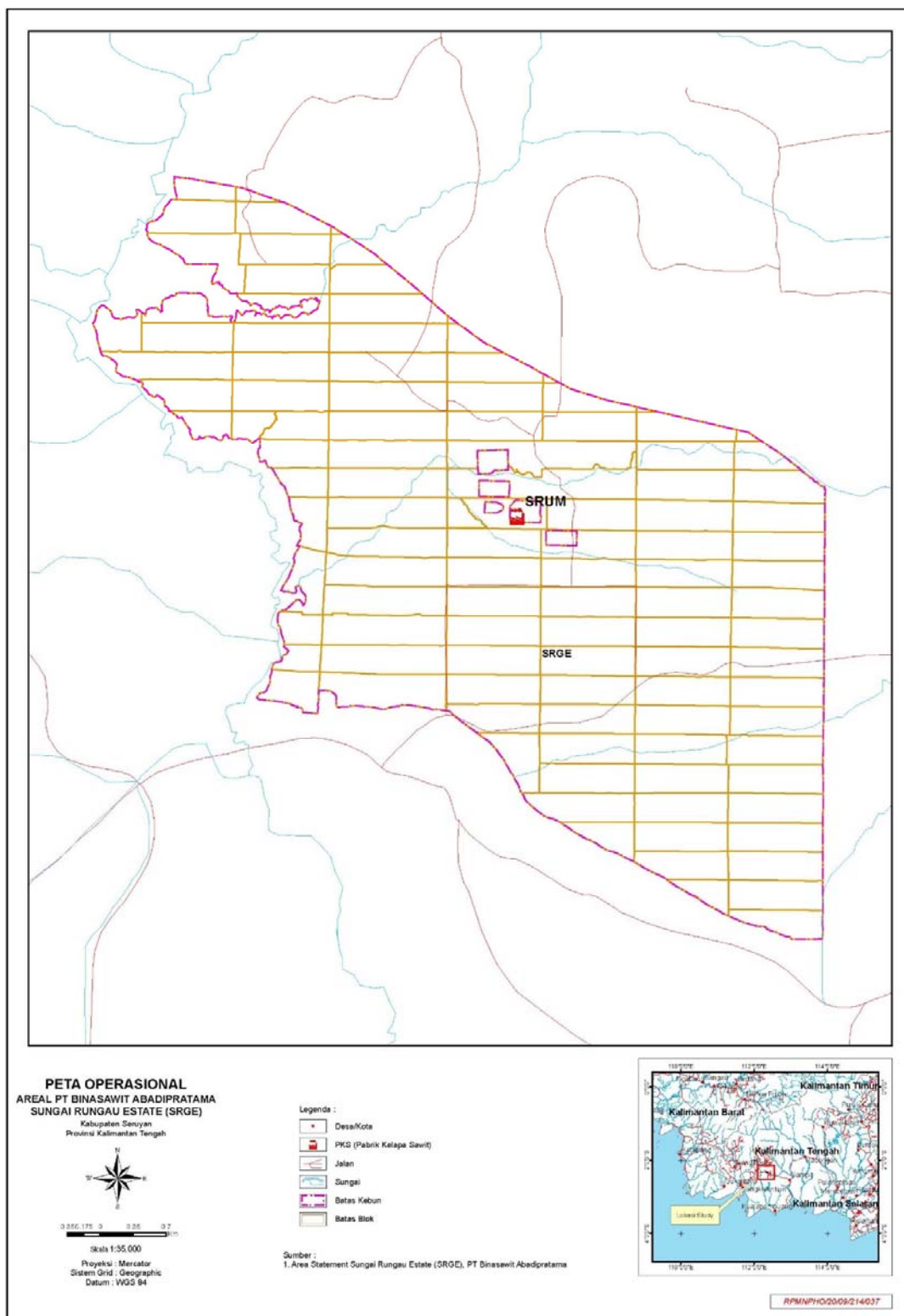


Figure 5. Operational Map PT of Binasawit Abadipratama – Sungai Seruyan Estate

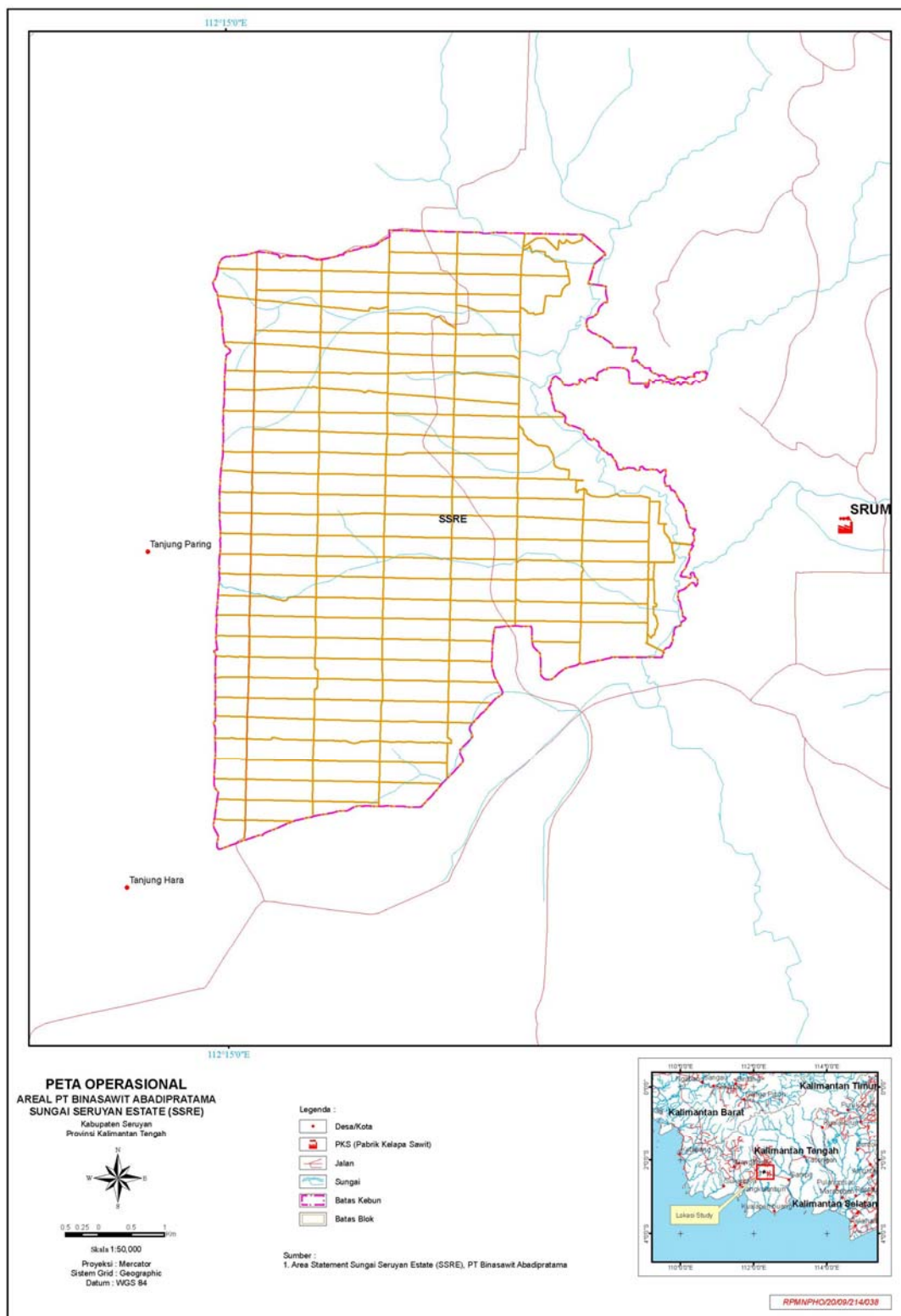


Figure 6. Operational Map PT of Binasawit Abadipratama – Tangar Estate

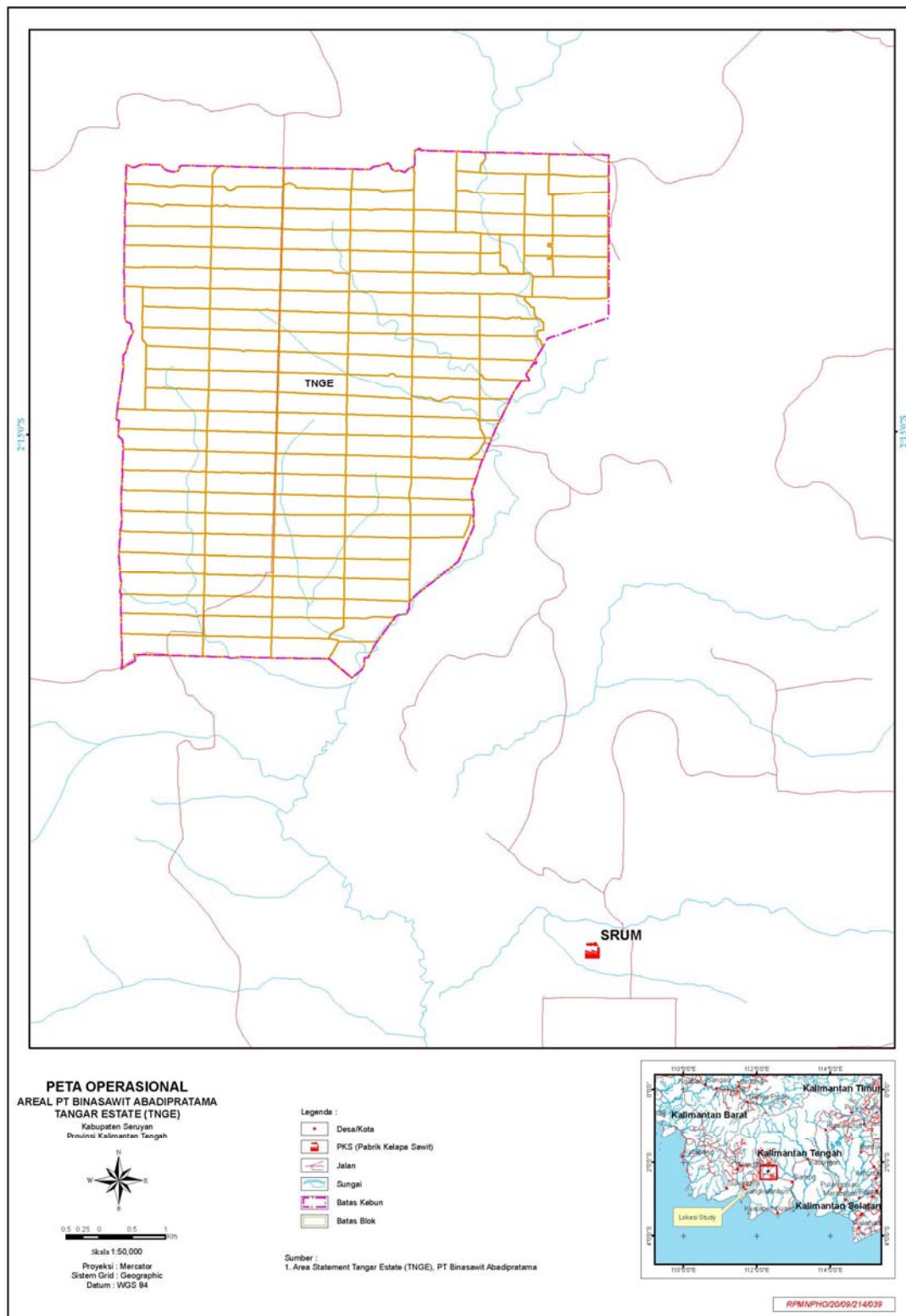
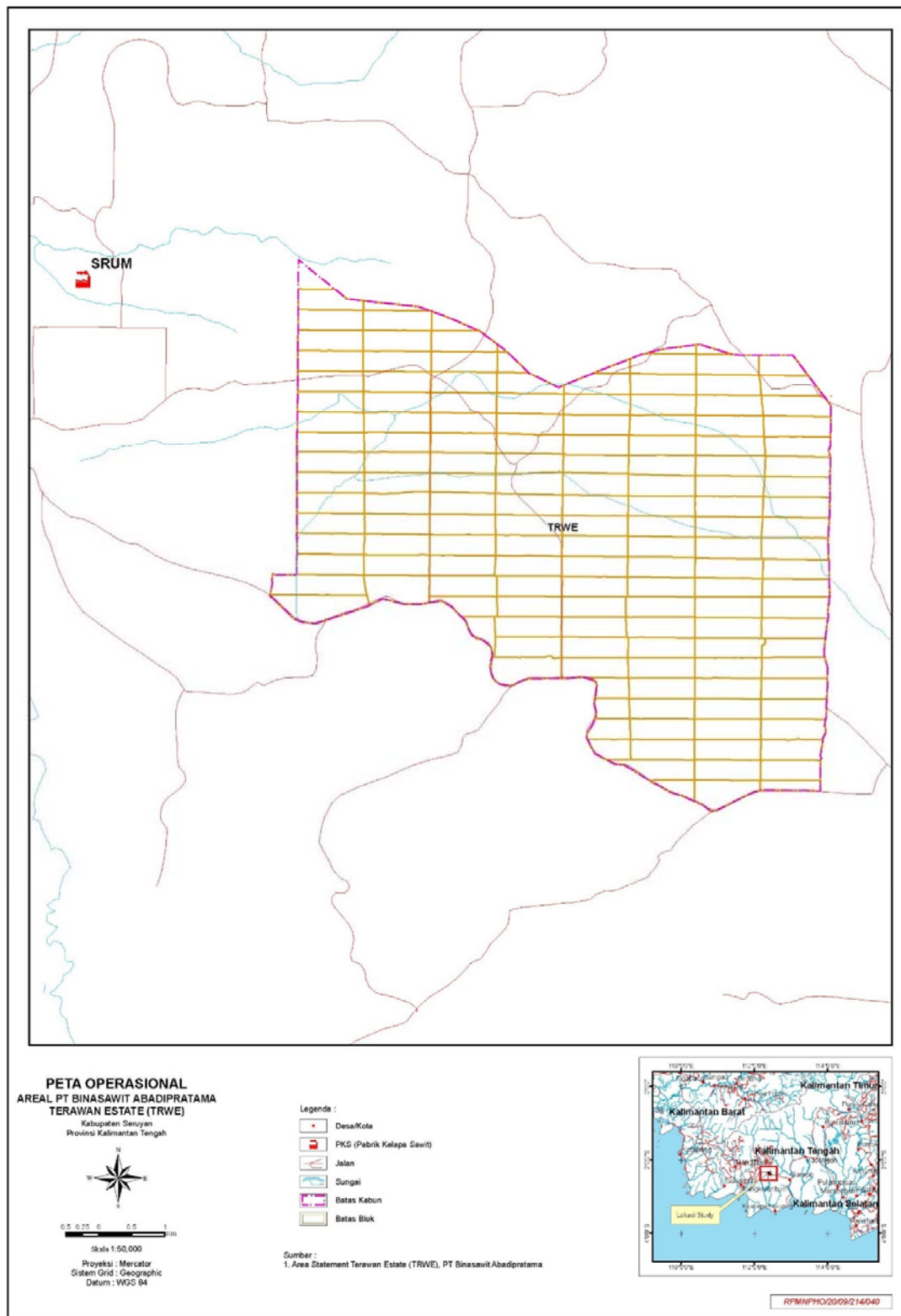




Figure 7. Operational Map PT of Binasawit Abadipratama – Terawan Estate



**Abbreviations Used**

ASA	:	Annual Surveillance Assessment
AKAD	:	<i>Angkatan Kerja Antar Daerah</i>
BAP	:	Binasawit Abadipratama
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Assurance of Labor)
BPJN	:	<i>Badan Pertanahan Nasional</i>
BOD	:	Biological Oxygen Demand
CH	:	Certificate Holder
CLA	:	Collective Labor Agreements
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
CITES	:	Convention on International Trade in Endangered Species of Wild Fauna and Flora
EIA	:	Environment Impact Assessment
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed and Consent
GAR	:	Golden Agri Resources
GHG	:	Greenhouse Gas
GSEP	:	Golden Agri Resources Social Environment Policy
HCV	:	High Conservation Value
HCVF	:	High Conservation Value Forest
HGU	:	<i>Hak Guna Usaha</i> / Land Use Title
HRD	:	Human Resource Division
HIRAC	:	Hazard Identification and Risk Assessment
IDR	:	Indonesian Rupiah
ILO	:	International Labor Organizations
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Operation Licence)
LUCA	:	Land Use Change Analysis
MCAR	:	Management Committee Agronomy and Research
MSDS	:	Material Safety Data Sheets
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OHSMS	:	Occupational Health and Safety Management System
OIA	:	Operational Internal Audit
P2K3	:	<i>Panitia Pelaksana Kesehatan dan Keselamatan Kerja</i> (OHS Committee)
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i>
POME	:	Palm Oil Mill Effluent
PMNP	:	Plantation Monitoring and Planning
PPE	:	Personal protective equipment
PSM	:	<i>Perkebunan Sinarmas</i> (Sinarmas Plantation)
RC	:	Regional Control
RKL/RPL	:	<i>Rencana Pengelolaan Lingkungan / Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RPP	:	<i>Rencana Pemantauan dan Pengelolaan</i> (Management and Monitoring Plan)

RSPO	:	Roundtable Sustainable Palm Oil
RSUD	:	<i>Rumah sakit umum daerah</i> / regional hospital
RTE	:	Rare, Threatened and Endangered
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SMARTRI	:	SMART Research Institute
SMD	:	Senior Managing Director
SOP	:	Standart Operating System
SPO	:	Sustainable Palm Oil
SPM	:	<i>Serikat Pekerja Mandiri</i>
SRGE	:	Sungai Rungau Estate
SRUM	:	Sungai Rungau Mill
SSRE	:	Sungai Seruyan Estate
SIP	:	<i>Sumber Indah Perkasa</i>
TNGE	:	Tangar Estate
TRWE	:	Terawan Estate
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant
VPA	:	Vice President Agronomy
VPM	:	Vice President Mill

1.0	SCOPE OF THE CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used		
		<ul style="list-style-type: none"><li>• RSPO Certification Systems for Principles &amp; Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governor on 12<sup>th</sup> November 2020.</li><li>• Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20<sup>th</sup> April 2020.</li></ul>	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT Binasawit Abadipratama subsidiary of Golden Agri Resources, Ltd	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organization address and site address	Head Office: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535  Indonesia Liaison Office: Sinar Mas Land Plaza, Tower II, 30 <sup>th</sup> Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia	
1.2.4	Telephone	+6221 50338899	
1.2.5	Fax	+6221 50389999	
1.2.6	E-mail	<a href="mailto:yahya.mustakim@sinarmas-agri.com">yahya.mustakim@sinarmas-agri.com</a>	
1.2.7	Web page address	<a href="http://www.goldenagri.com.sg">www.goldenagri.com.sg</a>	
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	31 March 2011 (1-0096-11-000-00)	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Sungai Rungau Mill and its supply bases (Sungai Rungau Estate, Terawan Estate, Sungai Seruyan Estate, Tangar Estate and Bukit Tiga Estate).	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude (S)Longitude I
	Sungai Rungau	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 19' 14"E 112° 20' 02"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (S)Longitude I

	Sungai Estate	Rungau	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia		S 02° 19' 46"	E 112° 18' 58"	
	Sungai Estate	Seruyan	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia		S 02° 18' 32"	E 112° 15' 28"	
	Terawan Estate		Selunuk Village, Seruyan Raya, Seruyan Sub district, Kalimantan Tengah Province, Indonesia		S 02° 20' 43"	E 112° 22' 43"	
	Tangar Estate		Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia		S 02° 13' 45"	E 112° 17' 34"	
	Bukit Tiga Estate		Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia		S 02° 11' 01"	E 112° 19' 20"	
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State HGU HGB				20,152.79 Ha		
	• Community				- Ha		
	Total				20,180.00 Ha		
1.5.2	Area Statement						
	Total area				20,180.00 Ha		
	HGU						
	Mature area				17,885.00 Ha		
	Nursery				46.66 Ha		
	Building				189.64 Ha		
	Road				646.33 Ha		
	River/Trench/Swamp				435.40 Ha		
	Other Areas (Conservation Areas, Power Lines, Greening Areas, Boiler Ash Disposal, Enclave Areas, Ditch Buffers, Graveyards, Steep Areas)*				911.16 Ha		
	Air Strip				38.60 Ha		
	HGB						
	Mill, WWTP, Housing, water reservoir				27.21 Ha		
*The HCV area is 1,636.71 Ha, with details including 788.17 Ha of planted area and 848.54 Ha of non-planted area.							
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Sungai Rungau Estate	Sungai Seruyan Estate	Terawan Estate	Tangar Estate	Bukit Tiga Estate	TOTAL (Ha)
	1996	-	244.00	847.44	-	-	1,091.44
	1997	482.36	1,650.43	874.99	330.44	-	3,338.22
	1998	567.10	1,056.18	1,276.85	1,423.96	456.74	4,780.83
	1999	583.25	1,220.73	355.37	760.72	606.81	3,526.88
	2000	931.01	-	889.91	1,047.43	87.78	2,956.13
	2001	182.02	-	-	86.19	339.11	607.32



	2004	-	-	-	149.15	416.30	565.45
	2005	71.22	-	-	158.79	788.72	1,018.73
	TOTAL	2,816.96	4,171.34	4,244.56	3,956.68	2,695.46	17,885.00
1.6.2	New Planting area after January 2010				- Ha		
1.6.3	Planting Cycle				1 <sup>nd</sup> 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 (%)
	Sungai Rungau Mill	80	401,468.35	78,672.94	19.60	20,870.20	5.20
	*Production data source from June 2022 to May 2023						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (ton/year)	Yield (ton/ha/ year)	Supplied to Mill	
						FFB (ton/year)	%
	Sungai Rungau Estate	3.359,49	2,816.96	80,277.86	28,50	80,277.86	100
	Sungai Seruyan Estate	4.747,29	4,171.34	94,862.02	22,74	94,862.02	100
	Terawan Estate	4.429,67	4,244.56	98,776.25	23,27	98,776.25	100
	Tangar Estate	4.461,17	3,956.68	70,002.46	17,69	70,002.46	100
	Bukit Tiga Estate	3.182,38	2,695.46	56,765.49	21,06	56,765.49	100
	TOTAL	20.180,00	17,885.00	400,684.08	22,40	400,684.08	100
	*Production data source from June 2022 to May 2023						
1.7.3	FFB description from other source						
	Name of sources/Organization (RSPO certified / non- certified)	Type of Organization	Number of Smallholder	Production Area (Ha)	Supplied to Mill		
					FFB (tones/year)		
	-	-	-	-	-		
	TOTAL						
	*Mill doesn't receive FFB from other source						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (June 2022 – May 2023) (MT)	
	FFB Processed			445,000		400,684.08	
	CPO Production			93,400		79,606.42	
	Palm Kernel (PK) Production			24,900		21,844.83	
1.8.2	Product selling						

Type of selling product		Actual selling product for last year (June 2022 – May 2023) (MT)					
CSPO sold under RSPO Scheme		12,564.86					
CSPK sold under RSPO Scheme		21,075.02					
CSPO sold under other scheme		66,112.16					
CSPK sold under other scheme		0					
CSPO sold as conventional		0					
CSPK sold as conventional		0					
* Production of the CSPO/CSPK lower than actual sales CSPO/CSPK that has been sold because there is CSPO & CSPK opening stock remaining since the previous license so that actual sales are higher than CSPO & CSPK production. Opening Stock CSPO and CSPK have been explained in indicator 3.8.12. (Opening stock CSPO is 933.48 MT and CSPK is 974.63 MT).							
1.8.3	Estimate of Certified FFB Claim						
Name of Estate(s)		Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tones/ha/year)		
Sungai Rungau Estate		3,100.36	2,816.96	83,500	29.64		
Sungai Seruyan Estate		4,870.84	4,171.34	99,500	23.85		
Terawan Estate		4,481.87	4,244.56	74,000	18.70		
Tangar Estate		4,445.15	3,956.68	103,000	24.27		
Bukit Tiga Estate		3,281.78	2,695.46	60,000	22.26		
TOTAL		20,180.00	17,885.00	420,000	23.48		
*Projected FFB production for 12 months of certificate							
1.8.4	Estimate of Certified Palm Product Claim						
Name of Mill	Capacity (tones/ hour)	FFB Processed (tones/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tones)	Extraction (%)	Out put (tones)	Extraction (%)	
Sungai Rungau Mill	80	420,000	84,000	20.00	23,000	5.48	IP
*Projected CSPO and CSPK production for 12 months of certificate							
1.9	Other Certifications						
	ISO 9001:2008			-			
	ISO 14001: 2004			-			
	OHSAS 18001:2007			-			
	ISCC			ISCC Certificate from PT Intertek Utama Services (Certificate No. EU-ISCC-Cert-ID218-20220171).			
	Others			<ul style="list-style-type: none"><li>ISPO Certificate from PT Mutuagung Lestari (Certificate No. MUTU-ISPO/063).</li><li>SMK3 Certificate from Manpower Ministry of Indonesia Republic (Certificate No. SMK3.2022.TUV.SK-1299).</li></ul>			
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 Palmindo Biliton Berjaya)	2024		-
		Tanjung Sawit Plasma (PT Palmindo 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 – 99,89 Ha)	2024		-
			2014		Certified

		Smallholder (KKPA Gedung Aji Lama)			
		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)	2023	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 Binasawit Abadi Pratama)	2025	Perdana Estate	2025	Kalimantan Tengah Province	ST-1
		Langgana Estate	2025		ST-1
		Semandau Estate	2025		ST-1
		Muara Dua Estate	2025		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2025	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 Internusa Pratama) * Main Audit December 2022	2022*	Belian Estate * Main Audit December 2022	2022	Kalimantan Barat Province	ST-1
		Tengkawang Estate * Main Audit December 2022	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)	2023	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 Mitrakarya Agroindo)	2025	Sulin Estate	2025	Kalimantan Tengah Province	-
		Sulin Plasma	2025		-
		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)	2025	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)	2025	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 Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		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)	2024	Gunung Kombeng KKPA	2024	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2023	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 Estate	2015		Certified
		Sungai Bengkal KKPA	2015		Certified
		Sungai Bengkal KKPA	2015		Certified
		Muara Kilis Estate	2015		Certified
		Muara Kilis Estate	2015		Certified
		Kilis KKPA	2024		-
Bukit Kapur Mill (PT SMART Tbk)	2025	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		-
		Kandista Estate	2009		Certified
		Kandista 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
		Kandis Sejahtera KKPA	2023		-
		Swadaya Mas Bersama KKPA	2023		-
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2022		-
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
		Berkat Ridho KKPA	2023		-
		Produsen Rama Sawit KKPA	2023		-
		Smallholder (Ramarama KKPA)	2024		-
Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indralestari Estate	2011	Riau Province	Certified
		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Mandiri Jaya Plasma	2022		Certified* 2022
		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		-
Sawita Mill (PT Sawitakarya Manunggul)	2023	Sawita Estate	2023	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2023		ST-1
		Sawita KKPA	2024		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2025	Gaharu Estate (PT Bangun Nusa Mandiri)	2025	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2025		-
		Keranji Estate (PT Bangun Nusa Mandiri)	2025		-
		Smallholder (Gaharu Plasma)	2025		-
		Smallholder (Kenari Plasma)	2025		-
	2023	Sungai Air Jernih Estate	2023	Jambi Province	-

Sungai Air Jernih Mill (PT Bahana Karya Semesta)		Sungai Mentawak Estate	2023		-
		Sungai Mentawak KKPA	2023		
		Sungai Merak Estate	2023		-
		Sungai Badak Estate	2023		-
Sungai Perak Mill (PT Kruing Lestari Jaya)	2024	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)	2024	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		

*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:

- 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

	<p>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/BPN.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.</p> <ul style="list-style-type: none"> <li>• PT SMART Tbk (Kinta Pura Estate)</li> <li>• PT Tapan Nadenggan (Long Buluh Estate and Bukit Subur Estate)</li> <li>• PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);</li> <li>• PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate);</li> <li>• PT Rama Jaya Pramukti (Ramarama Estate);</li> <li>• PT Satya Kisma Usaha (Sungai Bengkal Estate, Kilis Estate and Sungai Bengkal KKPA)</li> <li>• PT Bumipalma Lestari Persada (Bumi Palma Estate)</li> <li>• PT Tapan Nadenggan (Sei Rindu Estate)</li> <li>• PT Kruing Lestari Jaya (Sungai Perak Mill and supply base), doesn't have land use title (HGU), the HGU is still on process</li> </ul>
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>
	Sungai Rungau Mill – PT Binasawit Abadi Pratama has no scheme smallholders, also not received FFB from smallholders or outgrowers. All FFB process supplied from PT Binasawit Abadi Pratama.

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>RC</b>	<p><b>1. Leonada (Lead Auditor Witnessing).</b> 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><b>2. Rindu Galih Rezza Rachmansyah (Lead Auditor Witnessed).</b> Bachelor of Agriculture, Department of Plant Pests and Diseases (Agrotechnology), Padjadjaran University. Has one year experience as a Field Expert in a private pesticide company and three years' experience in the field of Industrial Plantation Forest (HTI), Forest Rehabilitation and Reclamation in an Indonesian BUMN Company as an Assistant. Trainings attended include: Lead Auditor ISO 9001, ISO 14001, ISO 19011, ISO 17021; 17065, SA 8000, ISO 45001, ISPO, RSPO, SCCS, RSPO ISH, RaCP and NPP awareness for RSPO and OHSAS 18001. Has conducted ISPO and RSPO Audit activities since 2017 in the aspects of Legality, Environment, Labor, OHS, Best Management Practices (BMP) and Social. In this audit activity, verification was carried out for Environment, HCV, Labor, and GHG aspect.</p> <p><b>3. Kiki Fadli (Auditor).</b> 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 AOHS, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, SCCS, OHS management system and ISH Lead auditor training organized by RSPO. In this audit activity, an assessment of the legality and supply chain aspect was carried out.</p> <p><b>4. Johannes Kapri Pandiangan (Auditor).</b> 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&amp;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 Best Management Practices and OHS.</p> <p><b>5. Iwan Perala (Auditor Trainee).</b> Indonesian Citizen, Bachelor of Forestry, Department of Silviculture and Master of Science, Soil and Environment Biotechnology Study Program. He has experience as an environmental research assistant at a Southeast Asian regional research institute. The trainings that have been attended are Lead Auditor ISO 9001:2015 QMS certified by IRCA, IHT ISO 9001:2015 QMS, ISO 14001:2015 EMS, ISO 17021:2015, ISO 19011:2018, ISO 45001:2018 awareness, HSE Plan awareness, CSMS awareness, ISO 50001:2018 EnMS awareness, ISCC awareness. In this assessment, an assessment is made of aspects of social, environmental, GHG, HCV under the supervision of the Lead auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>RC</b>	<p>Number of auditors: 3 auditors &amp; 1 auditor trainee</p> <p>Number of days for <b>RC</b> at site: 5 days</p> <p>Number of working days for <b>RC</b>: 15 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>RC</b>	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Binawit Abadi Pratama, Sungai Rungau Mill based on:</p> <ul style="list-style-type: none"> <li>RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation,</li> </ul>

Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020

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

The scope of certification of Sungai Rungau Mill consist of one mill (Sungai Rungau Mill) and five estates (Sungai Rungau Estate, Sungai Seruyan Estate, Terawan Estate, Tangar Estate, and Bukit Tiga Estate).

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

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results RC-2 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-2.1). Improvement of findings from recertification were observed by auditors at this RC-2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of RC-1

Number of units in this certification activity is 1 (one) Mill and 5 (five) estates. The auditor team used the  $(0.8\sqrt{y}) \times (z)$  formula to determine the units sampling to be focused on and also considered the issues raised by stakeholder, (y) is the number of estate and (z) multiplier defined by the risk assessment. The risk for this assessment is low due to the area is geographic locations, distance of estate, complexity of labor, landscape setting, presence of HCV, number of communities/ conflicts and legality. Based on this formula, the auditor team determined that the sampling locations are one palm oil mill (Sungai Rungau Mill) and four estates (Sungai Seruyan Estate, Tangai Estate, Sungai Rungau Estate and Terawan Estate).

The opening meeting was held on 12 June 2023. As for the participants who attended the opening meeting included the Regional Controller, Estate and Mill Managers, Support Team from Jakarta and other staff at Sungai Rungau. Closing meeting was held on 16 June 2023 attended by the same participants as the opening meeting. Management PT Binawit Abadi Pratama accept all the RC-2 audit results.

Stakeholder consultation involved internal and external stakeholders. Discussion was held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each discussion, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates through teleconference. Fieldworkers were interviewed informally in small groups in the field. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III.

Commonly, the audit activities went smoothly with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2.

### 2.2.3

### Locations of Assessment

**RC**

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

**Sungai Rungau POM**

- **Workshops.** Observations and interviews related to workshop operations, completeness of liscence, employment, availability of PPE, first aid, and APAR.
- **Chemical and Oil Warehouse.** Observations and interviews related to warehouse management, completeness and understanding of MSDS, employment, OHS, availability of first aid and APAR, training for warehouse staff.
- **PPE Warehouse.** Observations and interviews related to warehouse management, employment, OHS, availability of first aid and APAR, training for warehouse staff.
- **Fuel Warehouse.** Observations and interviews related to warehouse management, employment, OHS, availability of first aid and APAR, training for warehouse staff.
- **Temporary storage of hazardous and toxic waste materials.** Observations and interviews related to hazardous and toxic waste management, building conditions, emergency equipment, hazardous and toxic waste recording system, completeness of emergency facilities, availability of PPE, first aid and APAR.
- **Security Post.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Weighbridge Station.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **CPO Tank.** Observations related to the capacity of existing CPO tanks to store certified products.
- **Mill Laboratories.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Hydrant No 06 & 07 Simulation.** Observations and interviews with emergency response officers regarding team preparedness, availability of equipment and conditions.
- **Sterilizer Station.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Boiler Station.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Engine Room Station.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Press Station.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Loading Ramp.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Grading Statten.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Engine Room Station.** Observation and Interview related to OHS implementation, employment, work procedure and complaint mechanism.
- **Housing Area.** Observation of the availability of infrastructure such as housing, water and electricity facilities, fire extinguishers, educational facilities, religious facilities, health facilities, domestic waste management, day care facilities, child care and sports facilities.
- **WWTP.** Observation and Interview related to OHS implementation, employment, work procedure and environment
- **Empty Bunch Area.** Observation and Interview related to OHS implementation, employment, work procedure and environment.

**Bukit Tiga Estate**

- **HGU Pole No. 5 at Block Q76 Division 1.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGU Pole No. 6 at Block Q76 Division 1.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.



- **HGU Pole No. 7 at Block P77 Division 2.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGU Pole No. 8 at Block P77 Division 2.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HCV Area (River Riparian) at Block N74 Division 4.** Observations related to conservation area management.
- **HCV Area (Water Catchment Forest) at Block M74/75 Division 4.** Observations related to conservation area management.
- **HCV Area (Forested Valley) at Block O74 Division 2.** Observations related to conservation area management

#### Tangar Estate

- **Temporary storage of hazardous and toxic waste materials.** Field observations related to fulfillment of occupational health and safety attributes, record keeping, shelf life and requirements for implementing hazardous and toxic waste warehouse compliance.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage of hazardous materials, health safety and labor management.
- **Chemical Warehouse.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **PPE Warehouse.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **Firefighting infrastructure.** Observation regarding firefighting equipment, fire emergency response team, all land firefighting equipment in good condition and functioning.
- **Workshop.** Observations and interviews with workers related to the management and implementation of safety, health and welfare of workers.
- **Solar Tank.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **Spray Team Rinse House, Area for Mixing Chemicals and Rinsing Used Sacks.** Observation of the condition of the body shower room and handling of PPE.
- **Pondok 2 and Pondok 3 housing.** Observation of the availability of infrastructure such as housing, water and electricity facilities, fire extinguishers, educational facilities, religious facilities, health facilities, domestic waste management, day care facilities, child care and sports facilities.
- **Clinic.** Observations and interviews with health facilities provided by the company, infectious or medical waste management, housing health conditions and employment aspects.
- **Daycare.** Observations and interviews on child care facilities provided by the company and employment aspects.
- **Agrochemical Warehouse.** Field observations on material handling, related to OHS and environmental aspects.
- **Water Source Conservation Area Block N63 Division 6.** Field observation on the condition of the conservation area.
- **Rinse House, Herbicides Mixing Activity Division 5 and 6.** Field observations on the implementation of OHS and material handling.
- **Harvesting and Lose fruit Picker. Q53-54.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare and complaint mechanism
- **Spraying. Block O55.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare, environment aspect and complaint mechanism
- **Peat Area Block S53.** Observation through peat management.
- **HGU Pole No. 173 and 174.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Place of worship.** Observation related the condition of place of worship.
- **Daycare.** Observation related the condition of daycare.

#### Sungai Rungau Estate

- **Temporary storage of hazardous and toxic waste materials.** Field observations related to fulfillment of occupational health and safety attributes, record keeping, shelf life and requirements for implementing hazardous and toxic waste warehouse compliance.

- **Fertilizer Warehouse.** Observations relating to the implementation of storage of hazardous materials, health safety and labor management.
- **Chemical Warehouse.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **PPE Warehouse.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **Firefighting infrastructure.** Observation regarding firefighting equipment, fire emergency response team, all land firefighting equipment in good condition and functioning.
- **Workshop.** Observations and interviews with workers related to the management and implementation of safety, health and welfare of workers.
- **Solar Tank.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **Spray Team Rinse House, Area for Mixing Chemicals and Rinsing Used Sacks.** Observation of the condition of the body shower room and handling of PPE.
- **Pondok 1 and Pondok 2 housing.** Observation of the availability of infrastructure such as housing, water and electricity facilities, fire extinguishers, educational facilities, religious facilities, health facilities, domestic waste management, day care facilities, child care and sports facilities.
- **Clinic.** Observations and interviews with health facilities provided by the company, infectious or medical waste management, housing health conditions and employment aspects.
- **Daycare.** Observations and interviews on child care facilities provided by the company and employment aspects.
- **HGU Pole No. 119 at Block K16 Division 3.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGU Pole No. 120 at Block K17 Division 3.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGU Pole No. 121 at Block L19 Division 3.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGB Pole No. 1 di Area Training Center PT Binasawit Abadi Pratama.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HCV Area (River Riparian) at Block L19 Division 3.** Observations related to conservation area management.
- **HCV Area (Forest) at Block N21 Division 1.** Observations related to conservation area management.
- **Monitoring Well at Block K19 Division 3.** Observations related to the obligation to monitor water quality from the granting of a company Land Application (LA) Permit.
- **Landfill at Block I16/17 Division 3.** Observations related to domestic waste management.
- **Land Application (LA) at Block J22 Division 4.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Harvesting and Lose fruit Picker. K23.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare and complaint mechanism
- **Spraying. Block M24.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare, environment aspect and complaint mechanism
- **Nursery.** Observation and interviews with workers related to work techniques, employment aspects and complaint handling.
- **Mechanical road maintenance.** Field observations related to road management for FFB transportation
- **Barn Owl and beneficial plant Block K23.** Field observations related to biological pest control

### Terawan Estate

- **Temporary storage of hazardous and toxic waste materials.** Field observations related to fulfillment of occupational health and safety attributes, record keeping, shelf life and requirements for implementing hazardous and toxic waste warehouse compliance.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage of hazardous materials, health safety and labor management.
- **Chemical Warehouse.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.

- **PPE Warehouse.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **Firefighting infrastructure.** Observation regarding firefighting equipment, fire emergency response team, all land firefighting equipment in good condition and functioning.
- **Workshop.** Observations and interviews with workers related to the management and implementation of safety, health and welfare of workers.
- **Solar Tank.** Field observations related to the fulfillment of health safety as well as interviews with warehouse staff about health safety and work safety.
- **Spray Team Rinse House, Area for Mixing Chemicals and Rinsing Used Sacks.** Observation of the condition of the body shower room and handling of PPE.
- **Pondok 1 and Pondok 3 housing.** Observation of the availability of infrastructure such as housing, water and electricity facilities, fire extinguishers, educational facilities, religious facilities, health facilities, domestic waste management, day care facilities, child care and sports facilities.
- **Clinic.** Observations and interviews with health facilities provided by the company, infectious or medical waste management, housing health conditions and employment aspects.
- **Daycare.** Observations and interviews on child care facilities provided by the company and employment aspects.
- **HGU Pole No. 111 at Block K16 Division 6.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGU Pole No. 112 at Block K17 Division 6.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HGU Pole No. 113 at Block L19 Division 6.** Observations related to monitoring of HGU stakes, land boundaries and potential land disputes/conflicts with community/external parties.
- **HCV Area (River Riparian) at Block H11 Division 6.** Observations related to conservation area management.
- **Land Application (LA) at Block G21/22 Division 6.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Manual Road Maintenance Activities at Block G20/21 Division 6.** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Landfill at Block E14/15 Division 5.** Observations related to domestic waste management.
- **Housing Complex 1 (Division 5 dan 6).** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Daycare (BPA) / Daycare Housing Complex 1 (Division 5 dan 6).** Observations and interviews related to work procedures, worker welfare, OSH, environmental aspects and grievance mechanisms.
- **Harvesting and Lose fruit Picker. D18-20.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare and complaint mechanism
- **Spraying. Block F14.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare, environment aspect and complaint mechanism
- **Nursery.** Observation and interviews with workers related to work techniques, employment aspects and complaint handling.
- **Mechanical road maintenance.** Field observations related to road management for FFB transportation
- **Barn Owl and beneficial plant. F14.** Field observations related to biological pest control
- **FFB Transport. D18-20.** Observation and interview with workers related to work procedure, OHS implementation, workers welfare and complaint mechanism

<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.4</b>	<p>Summary of stakeholder consultation process for PT Binasawit Abadi Pratama</p> <ul style="list-style-type: none"> <li>• Public Notification on website on RSPO and MUTU Website on 3 Mei 2023</li> <li>• Public consultation with NGOs (by email) such as WALHI, AMAN, and Sawit Watch on 6 June 2023</li> <li>• Public consultation meeting with government institution (Food Security &amp; Agriculture Agency of Seruyan Regency, Manpower &amp; Transmigration Agency of Seruyan Regency, Environment Agency of Seruyan Regency,</li> </ul>

	<p>National Land Agency of Seruyan Regency) 12-14 June 2023</p> <ul style="list-style-type: none"> <li>Public consultation meeting with communities (Sebab Village, Pantap Village and Rungau Raya Village) on 12-14 June 2023</li> <li>Public consultation meeting with internal stakeholders and contractor 12-14 May 2023</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Binasawit Abadipratama</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	ASA-2.1 will conduct 8 – 12 months after the date certified issued.

### 3.0 ASSESSMENT FINDINGS

#### 3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Sungai Rungau Mill – PT Binasawit Abadi Pratama subsidiary of Golden Agri Resources operation consisting of one (1) mill and five (5) oil palm estates.

During the assessment, there is one (1) Nonconformities were assigned against Minor Compliance Indicator and two (2) opportunity for improvement were identified.

MUTUAGUNG LESTARI found that Sungai Rungau Mill – PT Binasawit Abadi Pratama 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 Governors on 12 November 2020.

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1</b>	<p>The company already has a list of information/documents that can be accessed and/or shared with stakeholders such as government agencies and NGOs which are presented in document number F/SMART/UMUM/SADV/004/003 which was updated as of June 15, 2021. The document contains 15 types of documents that can be accessed by stakeholders, for example:</p> <ul style="list-style-type: none"> <li>• Environmental documents</li> <li>• Proof of ownership of land rights</li> <li>• HCV identification report</li> <li>• SIA identification report</li> <li>• Community empowerment program report</li> <li>• RSPO and ISPO audit report documents</li> <li>• Human Rights policy document</li> <li>• Complaints and dissatisfaction reports</li> <li>• Procedures for handling social conflicts</li> <li>• Minutes of the Bipartite LKS meeting</li> <li>• Occupational health and safety implementation plan document</li> <li>• Number of employees and list of basic wages and proof of payment of <i>BPJS</i></li> <li>• Data on NPWP and Land Building Tax (<i>PBB</i>)</li> <li>• Mandatory Employment Report Documents (<i>WLTK</i>)</li> <li>• Report of the Committee for Occupational Health and Safety</li> <li>• Quarterly Report on Environment and Hazardous Waste (<i>LB3</i>)</li> <li>• Continuous improvement program document.</li> </ul> <p>Based on the results of interviews, for example with the Seruyan District Environmental Service, it is known that companies report documents related to environmental management regularly, for example RKL-RPL every semester and HCV reports.</p>	
<b>1.1.2</b>		

The company has submitted information in Indonesian to stakeholders, for example information regarding mandatory reporting:

- Receipt of the activity report of the second semester of 2022 Bipartite cooperation institution submitted to the Seruyan Regency Manpower and Transmigration Agency on January 9, 2023.
- Compulsory Reporting of Manpower (Mill) with reporting number 74271.20220725.0001 reporting date 25 July 2022 and must report back on 25 July 2023.
- Mandatory Manpower Reporting (Estate) with reporting number 74271.20220725.0002 reporting date 25 July 2022 and must report back on 25 July 2023.
- Reporting of Fixed Period Working Agreement (Terawan Estate) on 16 April 2023 to the Seruyan Regency Manpower and Transmigration Office for 7 people.

#### **Environmental aspect.**

For example on the latest related report, as follows:

- Evidence of reporting on RKL-RPL for plantations, factories, and airstrip activities for semester 1 of 2022 through SIMPEL (ID TTE No. 1659244020-3321) to KLHK and DLH Kalimantan Tengah Province on 31 July 2022.
- Evidence of reporting on RKL-RPL for plantations, factories, and airstrip activities for semester 1 of 2022 through SIMPEL (ID TTE No. 1675070674-3321) to KLHK and DLH Kalimantan Tengah Province on 30 January 2022.
- Report on the Implementation of Management and Monitoring of PT Binasawit Abadi Pratama High Conservation Value Areas in 2021 which was reported to the Natural Resources Conservation Agency (BKSDA) of Kalimantan Tengah Province on 31 May 2023.

#### **OHS**

- Evidence of the OHS Committee report for Bukit Tiga Estate and Sungai rungau estate for the first quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023.
- Evidence of the Rungau Mill River OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023
- Evidence of the Tangar Estate OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023
- Evidence of the Terawan Estate OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023

#### **Legal Aspect:**

- HGU Utilization Report of PT Binasawit Abadi Pratama period of 2022 reported to National Land Agency of Seruyan Regency in 07 March 2023.
- Investment Progress Report of PT Binasawit Abadi Pratama (Plantation) period of 1<sup>st</sup> Quarter 2023 reported online to Investment Minister in 10 April 2023.
- Investment Progress Report of PT Binasawit Abadi Pratama (Palm Oil Mill) period of 1<sup>st</sup> Quarter 2023 reported online to Investment Minister in 10 April 2023.
- Plantation Business Development Report of PT Binasawit Abadi Pratama period of first quarter in 2023 reported to Plantation Agency of Seruyan Regency in 07 April 2023.

#### **1.1.3; 1.1.4**

All complaint forms and periodic requests for information will be collected and recorded. The unit of certification will respond to each complaint within 14 days from the date the complaint was received. In addition, for affected parties who cannot read or write, the company will convey it directly and the company will also issue a warning regarding the complaint mechanism in strategic areas.

The procedure has also been socialized to workers on January 21 2023 which was attended by 51 people as well as contractors and the surrounding community on January 13 2023 which was attended by 5 people.

The certificate unit has also monitored requests for information and complaints from stakeholders in the form of books in incoming and outgoing letters, including the following:



- There was an incoming letter from the Head of Asam Baru Village on April 17 2023 regarding a request for funding for the “manyanggar” mamapas lewu customary event. The company then indicated a response to the letter through documentation providing assistance on May 2, 2023.
- There was an incoming letter from the Head of Seluluk Village on March 20, 2023 regarding the application for a drilled well. The company then indicated its response to the letter by providing drilled well assistance on March 30, 2023.

Based on interviews with representatives of the Sei Babi Village community and the Seruyan District Office, it is known that stakeholders have requested information from the company and the company has responded to the request for information.

Based on the results of interviews with the Seruyan Regency Environmental Service, the Head of Pantap Village, the Head of Sei Babi Village, the Head of Rungau Raya Village, and workers at the Estate and Factory, it is known that they already know the procedures for submitting complaints, complaints and requests for information to the company.

### 1.1.5

The company shows a list of stakeholders which was last updated in June 2023, The document informs the position/agencies, address, telephone number, and PIC, the identified stakeholders include government agencies, village representatives, community leaders, trade unions, gender committees, contractors, laboratories, certification bodies and NGOs. For example Food Security & Agriculture Agency of Seruyan Regency, Head of Sebabi Village, and Gender Committee of Sungai Rungau Estate. Stakeholder contact numbers can be contacted by the auditor team during audit activities.

<b>Status: Comply</b>
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## 1.2

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

### 1.2.1

The company's commitment to ethical behavior has been contained in the “Sinarmas Agribusiness and Food Business and Human Rights Policy” which was signed by the Head of Policy and Compliance Division on December 12, 2019. The policy consists of 11 commitments which include elements such as respecting workers' rights and dignity in accordance with applicable laws/regulations, preventing forced labor and human trafficking, not using child labor, respecting local communities or customary rights, respecting and protecting human rights reporters and defenders, complying with laws related to the prevention of bribery and corruption. In addition, the company also has a GAR Social and Environment Policy/GSEP which was signed by the Head of Upstream in November 2015 which explains the code of integrity and business ethics.

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

- Dissemination of the code of ethics to contractors and community representatives on 13 January 2023 which was attended by 5 people.
- Dissemination of the code of ethics to employees on January 21, 2023 which was attended by 51 people.

Based on interviews with trade unions and gender committees in each unit, it is known that the certification unit has conducted socialization regarding the code of conduct that applies in the operational area of the certification unit.

### 1.2.2

The company ensures a code of ethics policy mechanism, among others through Internal Audit examination and due diligence in the selection of thirdparty contractors/suppliers and also stipulates in the cooperation agreement that the parties must comply with applicable regulations such as no forced labor and child labour. The company also has an SOP on Handling Complaints and Dissatisfaction with No. SOP/SMART/SUST/IV/003 Revision 3 on 8 March 2022.

The company has shown the results of internal operational audits for each Estate and Mill, for example:

- Internal audit report on Sungai Rungau Mill operations which was carried out from 30 March to 1 April 2023
- Terawan Estate operational internal audit report which was carried out on 21 – 29 July 2022

In addition, the company has also shown the RSPO Sungai Rungau POM internal audit report document for the 2022 period which was carried out on March 28 – April 4 2022. Based on this document, it is known that there was no non-conformity, especially in relation to violations of ethical business practices.

Based on field observations and interviews with Estate and Mill workers, it is known that the contractors used by the company are transporters of FFB, CPO, PK, EFB applications, etc. and personnel can explain the code of ethics and there are no complaints or violations of ethical behavior.

**Status: Comply**

## **PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

### **2.1**

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

#### **2.1.1**

##### **Employment Aspects**

- The company has set employee wages as stated in Decree No. 007/HR PSM 6/CEO/01/2023 for units located in Seruyan Regency. This has referred to the Decree of the Governor of Kalimantan Tengah Province with No. 188.44/472/2022 dated 6 December 2022.
- The company has submitted mandatory manpower report documents annually to the Ministry of Manpower of the Republic of Indonesia which has referred to the Minister of Manpower Regulation No. 4 of 2019.

##### **Environmental aspect.**

The Certification unit already has an Environmental Permit with an area of 20,180.21 Ha issued by officials in accordance with applicable laws and regulations, including permit for airstrip activity and methane capture plant.

For example on the latest related report, as follows:

- Evidence of reporting on RKL-RPL for plantations, factories, and airstrip activities for semester 1 of 2022 through SIMPEL (ID TTE No. 1659244020-3321) to KLHK and DLH Kalimantan Tengah Province on 31 July 2022.
- Evidence of reporting on RKL-RPL for plantations, factories, and airstrip activities for semester 1 of 2022 through SIMPEL (ID TTE No. 1675070674-3321) to KLHK and DLH Kalimantan Tengah Province on 30 January 2022.
- Report on the Implementation of Management and Monitoring of PT Binasawit Abadi Pratama High Conservation Value Areas in 2021 which was reported to the Natural Resources Conservation Agency (BKSDA) of Kalimantan Tengah Province on 31 May 2023.

##### **BMP**

In term of best management practices, it was known that estate and mill management has implementing several pursuance with Indonesia laws and regulations, for example has conducting mechanical or zero burning method during land clearing, palms planted were derived from seeds (DxP) producers, recognized by the government of Indonesia. Furthermore, estate (each unit management) has implementing integrated pest management, biological control and only used pesticides listed on government website pesticide.id.

##### **OHS**

- Evidence of the OHS Committee report for Bukit Tiga Estate and Sungai rungau estate for the first quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023.
- Evidence of the Sungai Rungau Mill OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023
- Evidence of the Tangar Estate OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023
- Evidence of the Terawan Estate OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023

##### **Land legality**

In term of legal and permit regulation compliance, company are able to shown several documents, such as Location Permit and Land Tenure or Land Use Right (HGU). Beside that CH also has had business permit consist of

- The company has HGU for an area of 20,152.79 Ha and HGB for an area of 27.21 Ha so that the total area of land rights owned is 20,180 Ha. The company also has an IUP in 2000 for an area of 20,180 ha and a mill processing capacity of 60 tons of FFB / hour. IUP in 2013 for an area of ± 20,180 Ha and mill with a capacity of: 80 Tons FFB/ Hour.

- In addition, there is also information regarding the release of forest areas, namely: Forest area conversion letter dated 29 January 1996 covering an area of 17,780 and for the area of 642.28 Ha still in process with the latest history being the Decree of the Minister of Environment and Forestry of the Republic of Indonesia Number SK.243/MENLHK/SETJEN/PLA.2/3/2022 concerning the determination of the boundaries of the area of limited production forest and permanent production forest dated 21 March 2022

**Explanation Opportunity of Improvement (OFI) for PUP Activity Certificate from Previous Surveillance.**

When the recertification activity was carried out, the company had provided a PT Binasawit Abadipratama PUP Activity Certificate which informed that the company requested information related to the PUP activities that had been carried out in 2022, but until the activity took place the company did not receive any further reply from the relevant agencies. That matter. The results of interviews with the Food Security & Agriculture Agency of Seruyan Regency stated that the company had carried out PUP but the results had not yet been ratified by the relevant parties, so this could not be provided to the company. The company has carried out its obligations to follow up with related parties but there has been no definite answer, so this matter has been returned to the relevant agencies because this is their obligation (does not cause OFI to return, because in fact, if the results of this matter (PUP) are not issued by the agency 3 months after the activity is carried out then the company will automatically get "CLASS 1").

**Explanation Opportunity of Improvement (OFI) for Scheme Smallholders from Previous Surveillance.**

Continuing information from the previous assessment regarding the Plantation Business License owned by the company as stated in Seruyan Regent Decree Number 297 of 2013 dated 15 July 2013 (for an area of  $\pm$  20,180 Ha), it is known that there is an obligation to build a scheme smallholder for the community amounting to 20% of the area of the Plantation Business License. Based on the results of interviews with representatives of the surrounding village community, it is known that up to now there has been no discussion or further information regarding the construction of scheme smallholders, the community has received the latest information that PT Binasawit Abadipratama is not obliged to build scheme smallholders because the first Business License was issued in 2000 (under 2007, so it is not subject to the obligation to develop plasma plantations). The Food Security and Agriculture Agency of Seruyan Regency informed the community about this. Apart from that, based on the results of interviews with this agency, it was stated that this obligation did not apply to PT Binasawit Abadipratama because their business permit had been issued before the obligation to develop plasma plantations was required in regulations in 2007 (Business Permit was issued in 2000).

Based on this, the company has no obligation to develop scheme smallholders.

**2.1.2**

The company has SOP Compliance with regulations & other requirements (SOP/SMART/GENERAL/SADV/I/002, dated July 1, 2014) which discusses: procedures for fulfilling requirements, completeness and flowchart which explain in detail in evaluating compliance with laws and regulations invitation, SPO requirements and others). The officers responsible for updating the list of regulations according to the SOP are: Identification of regulations at the national level and at the regional level by regional SPO Officers and SPO Officer units.

The implementation of this procedure is the issuance of a law register document containing regulations that must be fulfilled and relevant to the company's operational activities, including for third parties working with the company (contractors). The law register is divided into several aspects, namely: Occupational safety and health, the environment, employment, and plantations. To ensure whether there are additions and subtractions to relevant regulations, a review is conducted every once a year. The list of laws/regulations listed has covered several aspects such as land permit and legality, manpower, occupational health and safety, best management practices, and environment. With the latest updated in 27 March 2023.

Evaluation of law registers for contractors which have been implemented on January 2023 Explanation on contractor compliance is explained in more detail in 2.2.2. In the explanation in indicator 2.2.2, it is known that for now the contractor has fully complied with all relevant laws and regulations in Indonesia, and the company has made several efforts to ensure that the contractor remains obedient and has targeted clear timelines for its fulfillment. So that all regulatory compliance has been properly monitored and has a clear timeline for compliance.

**2.1.3**

The company has had SOP of HGU Stakes Installation and Maintenance (No. SOP/SMART/CERS-EHSD/SADV/I/004), set that the poles maintenance will be conducted twice a year. The company has shown the latest documentation of semesterly HGU monitoring,

described that all HGU are well maintained.

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

Field observations to several HGU boundary stakes in Sungai Rungau (No. 119 – 121), Terawan (No. 111 – 114), Tangar (No. 173 & 174) & Bukit Tiga Estate (No. 5-8), show that the poles sampled during the audit were available in the field and in well-maintained conditions. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

**Status: Comply**

## **2.2**

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

### **2.2.1**

The company shows a list of stakeholders for the 2023 period which was ratified on June 2, 2023 which informs a list of contractors along with the name of the person in charge, type of cooperation/work, contact number, address, etc such as:

- Miftahassalam Cooperative for CPO and PK transportation services
- PT Satrindo Jaya Agropalma for CPO and PK transportation services)
- Aladin for FFB Transport
- Bugis Ongo for FFB Transport
- Ponijo for FFB Transportation
- Tunas Raya Cooperative for Maintenance

During the audit process, the auditor verifies third party contact numbers by calling the contacts listed. From this communication, it is known that the contact number provided can be contacted.

### **2.2.2-2.2.3**

The company has a list of contractors included in the list of stakeholders made on June 2, 2023. The list of stakeholders contains the name of the agency, contact name, field of cooperation, address and contact number.

The company also shows an agreement with a contractor that contains a clause regarding legal compliance obligations, for example a work agreement between the company and the contractor (Bugis Ongo) with No. 006/TRWE/LKL/04/23-ATBS dated 1 April 2023. The agreements have explained about:

- Third parties must comply with regulations and use PPE at work.
- Guarantee that there is no child labor, forced labor or the consequences of human trafficking and protection
- Third parties follow PNC RSPO, ISCC, ISPO. Therefore, in carrying out its work, the contractor is obliged to comply with the provisions made by the company regarding PNC RSPO, ISPO and ISCC.

The company also periodically evaluates contractors in terms of complying with regulations and implementing company policies, for example the evaluation was carried out on the PK transport contractor (PT Satrindo Jaya Agropalma) on January 4, 2023, as follows:

- Data on workers' wages for May 2023 is already above the district minimum wage, for example the initial TF with a wage of IDR 3,634,795
- Proof of payment for Social Security Agency on Employment and Health for the May 2023 period that has been paid.
- Documentation of inspection of PPE where workers have used PPE, namely shoes and helmets.

Based on the previous OFI as well as document verification and interviews during recertification, it is known that the third party/contractor has paid Social Security Administrator for the workers used.

<b>Status: Comply</b>	
<b>2.3</b>	
<b>All FFB supplies from outside of the unit of certification are from legal sources.</b>	
<b>2.3.1-2.3.2</b>	
Based on the results of field observations and document review, it is known that currently all FFB received the Sungai Rungau Mill comes from the five Main Estate (Sungai Rungau, Seruyan, Tangar, Terawan & Bukit Tiga Estate) and does not accept FFB originating from the Supplier (Direct or Indirect). All FFB originating from Main Estate is RSPO certified.	
<b>Status: Comply</b>	
<b>PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE</b>	
<b>3.1</b>	
<b>There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</b>	
<b>3.1.1</b>	
The company's long-term plan (5 years) is contained in the PT Binasawit Abadipratama Profitability document for the period 2023 – 2027. The document explains the FFB production projections, CPO and PK projections, Estate and Mill production costs, to profit/loss projections. The production projections for 2024 are:	
<ul style="list-style-type: none"> <li>- FFB production : 350,463 tons</li> <li>- CPO production : 73,597 tons</li> <li>- Production PK: 19,275 tons</li> </ul>	
<b>3.1.2</b>	
The company has shown the 2023-2033 replanting program document. Based on these documents, it is known that the plan for replanting at PT Binasawit Abadipratama is:	
<ul style="list-style-type: none"> <li>• 2023 : 581.58 ha</li> <li>• 2024 : 1,854.42 ha</li> <li>• 2025 : 1,856.47 ha</li> <li>• 2026 : 1,859.34 ha</li> <li>• 2027 : 1,646.76 ha</li> <li>• 2028 : 1698.69 ha</li> <li>• 2029 : 1,193.79 ha</li> <li>• 2030 : 1,717.75 ha</li> <li>• 2031 : 1,799.86 ha</li> <li>• 2032 : 1,773.55 ha</li> <li>• 2033 : 1,116.81 ha</li> </ul>	
Based on the results of interviews with company management, it is known that replanting in 2023 will be carried out in the Sungai Seruyan Estate with an area of 581.58 ha.	
<b>3.1.3</b>	
The company has shown management review documents for each Estate and Mill which was carried out in April 2023. The examples are the management review of the RSPO, ISPO, ISCC, SMOHS, and the Sungai Rungau Mill Operational Internal Audit which was carried out on April 12, 2023. The agenda in This management review meeting includes:	
<ol style="list-style-type: none"> <li>1. Internal audit results include SPO, SMOHS internal audit results, and operational internal audit results.</li> <li>2. Customer feedback</li> <li>3. Product performance and suitability</li> <li>4. Preventive and corrective actions</li> <li>5. Follow up of management review</li> <li>6. Changes that may affect the management system</li> <li>7. Recommendations for improvement</li> </ol>	
This management review activity was attended by 9 participants.	
<b>Status: Comply</b>	

**3.2**

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

**3.2.1**
**Environmental Aspect**

- Using shells, fiber and EFB for boiler fuel substitution
- Using organic fertilizers, land applications and EFB to reduce chemical fertilizers
- Using Biogas to capture methane gas released from the liquid waste treatment process
- Zero burning waste management policy

**Airstrip Permit**

The company already has Airport Register No: 008/RBU.KNP-DBU/XII/2019 issued by the Director General of Civil Aviation on November 22, 2019 valid until March 14, 2022. On March 15, 2022 the company has sent a letter No. 004/CDL/BAP /III/2022 regarding the application for renewal of the airport register and has been received by the Ministry of Transportation on the same date as evidenced by the acceptance stamp. Since the expiry of the permit until now, the airstrip has not been used by the company and the renewal of the register is still in process

**BMP**

The company has demonstrated the implementation of an action plan for continuous improvement as stated in the internal operational audit report for each Estate and Mill, for example:

- Internal audit report on Sungai Rungau Mill operations which was carried out from 30 March to 1 April 2023
- Terawan Estate operational internal audit report which was carried out on 21 – 29 July 2022

The company has shown management review documents for each Estate and Mill which was carried out in April 2023. The examples are the management reviews of the RSPO, ISPO, ISCC, SMOHS, and Sungai Rungau Mill Operational Internal Audit which were carried out on April 12, 2023.

**OHS Aspect**

The company routinely carries out monitoring related to OHS, work accidents, as well as regular briefings to workers regarding compliance with the use of PPE.

**3.2.2**

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

- Name of RSPO Member: PT Binasawit Abadi Pratama – Sungai Rungau Palm Oil Mill
- RSPO Membership Number: 1-0096-11-000-00 (Golden Agri Resources Ltd)
- Name of Certified Audit: Sungai Rungau Palm Oil Mill and Supply Bases
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO\_PO1000001155
- Number of Mill: 1
- Number of Certified Estate: 5

From the results of the auditor's verification of the contents of the matrix template, it is known that all data in general are in accordance with their respective periods, such as the total amount of FFB, CPO, PK and others.

**Status: Comply**

**3.3**

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

**3.3.1**

Unit of certification have procedures related to oil palm agronomy, oil palm processing and safety aspect, summarized as follows:

- The company has documents of SOP Technical of Oil Palm Cultivation starting from land clearing up to harvesting, approved by SMD Ops and entered into force on 15 July 2020. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance



of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa).

- The Oil Mill has SOPs covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa).
- The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.

Based on the results of field visits and interviews with workers both at the Estate and Mill, for example Boiler operators, Engine room, as well as spray and harvest workers in each Estate, it is known that workers have understood the existing work procedures.

### 3.3.2

The company has an Internal Audit SOP (Document No. SOP/SMART/UMUM/SADV/009 which describes work procedures that form the basis for plantation and mill operational activities that refer to SPO principles. The aim is to regulate the SPO internal audit process in order to determine effectiveness and compliance with the requirements of the certification system applied Internal Audit Team prepares audit working papers, collects and reviews basic data and information for conducting audits, collects, provides and reports audit findings evaluates audit findings and prepares audit reports Internal implementation audit includes: Opening Meeting, Submission of Objectives and Scope, Assignment of Auditees, Coordination of Document Preparation, and Audit Implementation.

The company has shown the results of internal operational audits for each Estate and Mill, for example:

- Internal audit report on Sungai Rungau Mill operations which was carried out from 30 March to 1 April 2023
- Terawan Estate operational internal audit report which was carried out on 21 – 29 July 2022

In addition, the company has also shown the RSPO Sungai Rungau POM internal audit report document for the 2022 period which was carried out on March 28 – April 4 2022. Based on these documents it is known that there were no findings of non-compliance.

### 3.3.3

The company has shown the results of internal operational audits for each Estate and Mill, for example:

- Internal audit report on Sungai Rungau Mill operations which was carried out from 30 March to 1 April 2023
- Terawan Estate operational internal audit report which was carried out on 21 – 29 July 2022

The report has been equipped with an action plan for improvement of internal audit findings.

In addition, the company has also shown the RSPO Sungai Rungau POM internal audit report document for the 2022 period which was held on March 28 – April 4 2022. Based on the results of the internal audit, it was found that there were no non-compliance findings.

<b>Status: Comply</b>
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## 3.4

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

### 3.4.1

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

#### Environmental Impact Assessment (EIA)

- AMDAL documents (ANDAL, RKL/RPL) for PT. BINASAWIT ABADIPRATAMA in Danau Sembuluh District, Central Seruyan and Hanau District, East Kotawaringin Regency, Kalimantan Tengah Province. The document has been approved based on the Letter of the Minister of Agriculture of the Republic of Indonesia Number. 015/ANDAL/RKL-RPL/BA/VIII/1997 dated August 7, 1997 with a scope of **17,780 ha** with a factory capacity of 60 tons of FFB/hour. Actually, PT BAP did not build palm oil factory.
- AMDAL documents (ANDAL, RKL/RPL) documents for the construction of the PT. SUMBER INDAH PERKASA (before changing its name to PT Binasawit Abadipratama) with a capacity of 80 Tons/hour in an area of **27.21 Ha** located in Asam Baru Village,

Hanau District, Seruyan Regency, Kalimantan Tengah, which dated on 8 July 2004 and approved by the Head of Bapelda Kotim, Chairman of the Commission for Supervision of AMDAL Kotim No. 42/komisi-Kotim/VII/2004.

- Environmental Evaluation Document/DELH for the Development of Oil Palm Plantation of PT. BINASAWIT ABADIPRATAMA covering an area of **2,373 Ha**. DELH has been approved by the Regent of Seruyan No. 188.45/311/2015 on August 4, 2015.
- Renewal of environmental documents for PT Binasawit Abadipratama Plantation and Factory: Decree of the Regent of Seruyan No. 188.45/401/2017 concerning Environmental Permits for the Development of Oil Palm and Other Supporting Facilities for Changes in Environmental Management and Monitoring by PT Binasawit Abadipratama dated September 14, 2017. The scope is a plantation area of 17,780 Ha and a mill with a capacity of 80 Ton FFB/hour.

#### **Methane Capture Permit**

- Decree of the Regent of Seruyan No.188.45/314/2015 concerning Environmental Permits for Changes in Business Ownership and/or Activities and Development of Methane Capture Plants by PT BINASAWIT ABADIPRATAMA on August 4, 2015 by the Regent of Seruyan. This environmental permit is issued without the need for changes to the existing environmental documents.

#### **Airstrip Permit**

- Environmental Management Document that has been ratified through the Recommendation on Environmental Management Documents (DPLH) for PT Binasawit Abadipratama Airstrip Activities in accordance with the Letter of the Head of the Environment Agency of Seruyan Regency No. 660/688/BLH/X/2011 dated October 3, 2011.

In all of the above documents, each aspect and parameter must be monitored with clear target information and implementation time contained in the environmental document matrix for each unit through environmental management and monitoring documents and reported to the relevant agencies.

#### **HCV**

PT BAP has shown HCV assessment for the entire area of operations which done by the RSPO Approved Assessor on 2011. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008. These identifications indicates there is HCV 1.1, 1.2, 1.3, 4.1 presence on PT BAP total covered areas **1,503 Ha** distributed into five estates as follows: BTGE – 235.07 ha; TNGE – 363.78 ha; SSRE – 574.46 ha; SRGE – 174.49 ha and TRWE – 155.20 ha. All of indicates HCV areas was mapped by 1:50,000 scale and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species. The difference in the area of the HCV area is because there is a more detailed data of the area in the basic info with an explanation of the area in this indicator. The total area of HCV in the unit of certification is 1,503 ha. However, in 2022 a verification will be carried out by the company so that there will be a change in the total area of HCV to 1636.71 Ha of which 788.17 ha will enter the planting area. This was stipulated by the company in the memorandum document "Approval of the HCV Baseline Area Evaluation Results at PT Binasawit Abadi Pratama Region Kalimantan Tengah 2 PSM 6" dated 17 April 2023 No. 02/SSP/MEM/CAD/BAP/III/2023. Based on that document, total covered areas **1,636.71 Ha** distributed into five estates as follows: BTGE – 240,88 ha; TNGE – 304,67 ha; SSRE – 559,42 ha; SRGE – 365,30 ha and TRWE – 166,44 ha.

#### **Social Impact Assessment (SIA)**

The certification unit already conducted a Social Impact Assessment (SIA), carried out in 2012 by PT SMART, Tbk. The scope of the SIA study includes 1 (one) unit mill (Sungai Rungau Mill) and 5 plantation units (Sungai Rungau Estate, Sungai Seruyan Estate, Tangar Estate, Bukit Tiga Estate, and Terawan Estate) and socially impacted to village directly adjacent which are Rungau Raya, Asam Baru Village, and Sebabi Village. In 2017, the company conducted a social impact assessment again, covering the study area in the form of Rungau Raya Village, Sebabi Village, Asam Baru Village, and Pantap Village. The social impact assessment conducted in 2017 explains the impacts arising from plasma activities, including studies on local economic potential, food security, vulnerable groups, company contributions, education, health, religious systems, and local tradition.

Social impact assessment is involved all parties affected by both internal and external stakeholders, including employees, workers unions, village heads around the plantations, and local NGOs. Participatory evidence with affected parties is shown in the form of attendance at FGD meetings, meeting resume held from 1-8 February, 2017 in Rungau Raya Village, Sebabi Village, Asam Baru Village and Pantap Village, and photos during interviews.

Based on the results of interviews with the government of the village of Sebabi, Pantap village, and Rungau Raya village, the communication relationship between the certification unit and the village in the last year has been quite good. The certification unit

has collaborated in the Company's operational activities, namely empowering local contractors. During the last year there have never been any issues/incidents of land claims/disputes between the surrounding community and the certification unit. The certification unit has also collaborated with the company for the company's operational activities and information disclosure regarding labor recruitment is also quite good. Apart from that, land fires, environmental pollution, immoral acts or discrimination have never occurred or become issues during the last year. The certification unit has also provided assistance to villages and their communities in CSR programs which are realized every year.

### **3.4.2**

#### **Environmental Impact Assessment**

Based on the results of document verification, it can be concluded that all management and monitoring parameters requested in environmental documents have been implemented. Certification unit has also evaluated for each significant impact monitoring parameter that is implemented as required in KepmenLH 45 of 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the results of the evaluation, it is known that all parameters are still appropriate by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The certification unit makes RKL-RPL reports base on attachment of Environmental Permit where the matrix is a compilation of all previously owned. The environmental management and monitoring matrix describes the impacts of plantation activities. PT. Binasawit Abadi Pratama and explain the evaluation of the trend level, the evaluation of the critical level and the evaluation of compliance with the results of management and monitoring that have been carried out on the following aspects;

- River water quality
- Air quality
- Aquatic biota; types of abundance and diversity of aquatic biota (benthos and plankton)
- Conservation Area
- Public perception; employment and business opportunities, the economy, potential conflicts, community unrest, etc
- Groundwater quality
- Soil quality
- Public health

#### **HCV**

The company already has SOPs for identification, management and maintenance of water sources and quality in SOP for Management and Monitoring of Water Resources No. SOP/SMART/BCOS-EHSD/SADV/II/004 dated 30 May 2014. Also available in SOP Management and Monitoring of High Conservation Values or Protected Areas No. SOP/SMART/BCOS-EHSD/SADV/II/002 dated 01 July 2014. The procedure has explained the definition of water resources, management and monitoring, flow charts in the management and monitoring of water resources and personnel responsibilities.

Based on the results of interviews with management, information was obtained:

1. When carrying out plant maintenance of 5 (five) oil palm trees in a protected riverbank 50 meters wide to the left and right of the river it is prohibited to use chemicals but it is done manually
2. When fertilizing 5 (five) oil palm trees in a protected riverbank 50 meters wide to the left and right of the river, it is prohibited to use it mechanically (plane or spreader) but do it manually.
3. Plant erosion-preventing plants on riverbanks that are prone to landslides

The company shows minutes and documentation of the signing of a joint commitment to HCV management with stakeholders such as the regional secretary, sub-district head, village head, and community leaders around the plantation, for example the Danau Seluluk sub-district head and the Terawan village head on 22 December 2016. Then, based on the results of interviews, for example with the village head because it is known that the company actively communicates with villages in managing the HCV area.

#### **Social Impact Assessment (SIA)**

The company has carried out social impact management and monitoring in accordance with what has been contained in PT Binasawit Abadipratama's 2021-2022 social impact monitoring report. In general, PT BAP's social impact management activities have been carried out with the aim of reducing the identified negative impacts.

This impact management activity also involves stakeholders, namely the community by paying attention to the aspirations or input from the surrounding villages. Community involvement in social management and monitoring is represented by village government officials as verifiers and several residents as community representatives, namely, Keren Village, Rungau Raya Village, Community RT 02 Desa Pantap Village, PT BAP employees through a field survey program in 2022.

Based on public consultations with village heads in Seluluk Village, Rungau Raya Village, and Asam Baru Village, information was obtained that the company had made efforts to develop the surrounding community through CSR programs, recruiting local workers, local contractors, etc. In addition, it is known that so far the relationship between the company and the community has been running quite well and harmoniously. However, there are plasma development plans that have not been realized. From interviews with management it was confirmed that the land to be used was not available. However, this has not been communicated to the public further.

CSR in the education sector, for example: Kanisius Ungaran Vocational High School scholarship assistance and ETF SD and SMP ETF drilling wells. Causeway, repair of bina bersama roads, social: Mamapas Lewu customary activities and assistance with the costs of the 2021 Raya Rungau village election.

### 3.4.3

The company has documents, the implementation of the results of the environmental permit including reports to agencies in the form of RKL-RPL documents which are conducted every semester and reported to related agency (explain in indicator 3.4.2). The effectiveness of environmental management and monitoring can be seen from the results of environmental management and monitoring analysis, which can also be seen from the suitability between the management and monitoring plans and their implementation in the field. The RKL-RPL document also shows that the company has managed all the critical impacts recommended in Environmental permits. Include impact analysis by trend evaluation, critical level evaluation and compliance evaluation.

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

#### Liquid Waste test results

Parameter	Unit	Quality standards*	January 2023	February 2023	March 2023
pH	-	6 – 9	7.27	7.21	6.58
BOD5	Mg/l	5,000	1,267	3,562	4,835
COD	Mg/l	-	3,263	15,025	18,194
Oil & Grease	Mg/l	-	1.7	2.8	4.2
Pb	Mg/l	-	0.012	0.002	0.0034
Cu	Mg/l	-	0.096	0.13	0.89
Cd	Mg/l	-	0.00043	0.00043	0.00043
Zn	Mg/l	-	0.2	0.26	1.56

The RKL-RPL report for semester 2 of 2022 also explains the test results as follows:

#### Noise

##### Example:

Location	Value	Unit	Quality standards
Office mill (Noise 24 hours)	60.7	dB(A)	70

Location	Value	Unit	Quality standards
Boiler	92	dB(A)	85
Engine Room	100	dB(A)	85

*\*Permenakertrans No 5 / 2018 for area industry (6 hours working time)*

**Vibration**

Location	Value	Unit	Quality standards
Engine room	0.86	mm/second	<2
Boiler	0.57	mm/second	<2

*\*KepMenLH No. 49/1996 (Category A) with sampling time 5-10 minutes*

**Odors**

Location	Amoniac	H <sub>2</sub> S	Unit
Area POME	0.88	0.0028	Ppm
Area Land Application	0.26	0.011	Ppm
<b>Threshold</b>	<b>2.0</b>	<b>0.02</b>	<b>Ppm</b>

*\*KepMenLH No. 50/ 1996*

Based on the data above, it is known that the test parameters for vibration and Odors are still below the threshold values. Meanwhile, the results of noise level measurements show a value that exceeds the threshold value set in Minister of Manpower Regulation No. 5 of 2018, namely at the Boiler Station and Engine Room and the WWTP Pump House. The company has carried out management efforts and mitigation plan to reduce pollution from non-moving disturbances, especially noise, including:

- Use PPE in the form of ear muffs for workers in activities close to sources of pollution that exceed the threshold.
- Provide education to workers about using work safety equipment, especially in rooms with a high risk of exposure.
- Carry out regular checks of the hearing organs of workers in areas with quite high noise levels
- Carry out regular health checks and include all employees in the health insurance service program (BPJS).
- Carry out maintenance and rejuvenation of factory machines and transportation equipment.

**HCV**

The company already has SOPs for identification, management and maintenance of water sources and quality in SOP for Management and Monitoring of Water Resources No. SOP/SMART/BCOS-EHSD/SADV/I/004 dated 30 May 2014. Also available in SOP Management and Monitoring of High Conservation Values or Protected Areas No. SOP/SMART/BCOS-EHSD/SADV/II/002 dated 01 July 2014. The procedure has explained the definition of water resources, management and monitoring, flow charts in the management and monitoring of water resources and personnel responsibilities.

Based on the results of interviews with management, information was obtained:

1. When carrying out plant maintenance of 5 (five) oil palm trees in a protected riverbank 50 meters wide to the left and right of the river it is prohibited to use chemicals but it is done manually
2. When fertilizing 5 (five) oil palm trees in a protected riverbank 50 meters wide to the left and right of the river, it is prohibited to use it mechanically (plane or spreader) but do it manually.
3. Plant erosion-preventing plants on riverbanks that are prone to landslides

Companies can show evidence of the implementation of socialization and safety of protected areas to employees and the community which is carried out every year. Example as follows:

- Outreach to workers and their families at Pondok 2 BTGE on 20 February 2023 which was attended by more than 150 people
- Outreach to the people of Rungau Raya Village by letter on 9 March 2022
- Field observations show that in Terawan Estate there is an HCV area warning board

The material provided is in the form of: HCV types, HCV types, HCV management (warnings, planting of erosion prevention plants, security patrols), prohibition of activities using chemicals at the 50 M spray boundary on either side of the river that are identified as HCV, protection of rare and endangered wildlife, zero tolerance policy towards endangered animal and forest conservation in the PT Binasawit Abadipratama area.



The company has carried out activities in order to maintain protected areas and high conservation values which are submitted to institutions that handle the conservation and protection of wild plants and animals on a regular basis every year as evidenced in the 2022 PT Binasawit Abadi Pratama High Conservation Value Areas Management and Monitoring Implementation Report document which reported to the Kalimantan Tengah Province Natural Resources Conservation Agency (BKSDA) on May 31, 2023.

Based on these documents, the company has carried out management and monitoring activities in the form of:

- HCV boundary markers in the form of 128 boundary markers, 62 units of HCV warnings, 5 units of animal warnings and 38 units of spray markers spread across all PT Binasawit Abadi Pratama units.
- Socialization related to HCV area management which is carried out routinely during the morning circle in all work units of PT. Binasawit Abadi Pratama to workers and the community.
- Monitoring of HCV attributes, animals, plants and water resources.
- Management of HCVs in the form of prohibiting the application of chemical fertilizers and jacking up saplings in riparian areas, planting erosion prevention measures on river banks to avoid areas of high erosion

Based on the results of field observations in the conservation area, Division 6 riverbank Block H11 in Terawan Estate has spray boundary markings.

### **Social Impact Assessment (SIA)**

The company has carried out social impact management and monitoring in accordance with what has been contained in PT Binasawit Abadi Pratama's 2021-2022 social impact monitoring report. In general, PT BAP's social impact management activities have been carried out with the aim of reducing the identified negative impacts.

This impact management activity also involves stakeholders, namely the community by paying attention to the aspirations or input from the surrounding villages. Community involvement in social management and monitoring is represented by village government officials as verifiers and several residents as community representatives, namely, Rungau Raya Village, Community of RT 02 Pantap Village, PT BAP employees through a field survey program for example in 2022.

Based on public consultations with village heads in Sebabi Village, Rungau Raya Village, and Pantap Village, information was obtained that the company had made efforts to develop the surrounding community through CSR programs, recruiting local workers, local contractors, etc. In addition, it is known that so far the relationship between the company and the community has been running quite well and harmoniously

CSR in the education sector, for example: scholarship assistance for Kanisius Ungaran Vocational School and construction of wells for SD and SMP ETFs, Health: health education for pregnant women, breastfeeding and children, provision of posyandu equipment, economy: empowerment of local contractors transporting CPO, TBS, jankos, infrastructure: improvements Cause road, joint road repair, social: Mamapas Lewu traditional activities and assistance with costs for the 2021 Rungau Raya village election.

**Status: Comply**

## **3.5**

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

#### **3.5.1-3.5.2**

The company has procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment as follows:

#### **Employee Recruitment Procedures**

The procedures for recruiting employees are regulated in the Collective Labor Agreement for the 2023-2025 period which is effective March 29 2023 which has been approved by company management, trade unions and the local Manpower and Transmigration Service in Article V of Manpower Procurement, explained as follows:

- Acceptance of new workers at the company is adjusted to the needs and those who can be accepted as workers must meet the skills requirements or qualifications set by the company and the head of the work unit.
- Prospective workers must pass the selection held by the company
- Prospective workers who have passed the selection process are accepted as workers with a probationary period of 3 months from the time the prospective worker is determined to start working at the company and the existence of a probationary period must be notified to the prospective worker. The probationary period is counted as working time.



- Acceptance of workers and/or placement of workers in companies does not differentiate between ethnicity/nationality, religion, race, gender, sexual orientation, disability, caste, union membership and political affiliation.

The procedure explains that the minimum age for workers is 18 years, recruitment information is done openly, recruitment is free of charge, and there is no retention of workers' personal documents.

The company also shows sample documents of the latest employee recruitment starting from a job application letter to a work agreement, for example hiring an employee with the initials MH, who has sent an application letter on May 17, 2023, to then take a written test and medical test on May 19, 2023 After participating in the training period, the personnel are given a promotion to become permanent workers with the PT4 class listed in the approval letter No. 514/VPA-6/06/23 on 26 May 2023.

### **Payroll System**

The payroll system is regulated in the CLA document for the 2023-2025 period with an effective date of March 29, 2023 which was approved by company management, trade unions and the local Manpower and Transmigration Service. The document explains the procedure for paying workers which includes payment of overtime/overtime premiums, and the structure of the pay scale. A more detailed discussion regarding payroll is explained in indicator 4.3.2.

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

The company already has a procedure for promoting monthly SKU employees with No. HRD Document D-014-00 dated October 17, 2000. This procedure, among other things, explains the Work Performance Appraisal Form which consists of the worker's name, section, aspect being assessed, assessment criteria, weight, value, appraiser, etc.

Career path procedures for city/farm staff and non-city staff are regulated in HR document D-010-00 dated 01 September 2005. This policy, among other things, explains the types of promotion, promotion requirements, training that must be followed in the context of promotion and the stages of promotion approval. Career paths and work performance assessments are also included in the CLA which explains work performance assessments, class changes and mutations. Evidence of the implementation of this, the company shows examples of employee promotion documents, for example the promotion of a mill employee with the initials EP from Fixed Period Working Agreement to permanent worker on September 1, 2022 with the results of the assessment namely discipline with a score of 9, quantity of work with a value of 8, quality of work with a score of 8, work equal to a value of 8, work attitude with a value of 8 and responsibility with a value of 7 with Appointment Decree No. 011/BAP-SRUM/SK-PT/09/2022.

The company also regulates employment termination as stated in the CLA, where employee termination can be caused by serious violations of company provisions and government regulations. The company will also carry out several stages before termination of employment, such as providing a warning letter and paying compensation according to the length of service.

### **Training System**

The company has identified training needs for each employee according to their position and type of work. As an example of identification that has been carried out by the company is OSH training for all workers, domestic waste management training for housing residents and riparian protection training for the spray team. After identifying, the company develops a training program for its employees for a year, the following is an example of the realization of a training program in 2023, namely:

- Pesticide training which was held on 27 May 2023 and was attended by 23 participants.
- PPE outreach which was held on 10 February 2023 and was attended by 15 participants.
- Socialization regarding employment procedures was carried out on March 2 2023 and was attended by 31 workers.

The results of interviews with the Seruyan District Manpower and Transmigration Office show that over the past year there have been no issues regarding the employment aspect of the company.

**Status: Comply**

## **3.6**

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

### **3.6.1**

The company has an Occupational Health and Safety Policy which was approved on November 1, 2013 which was approved by the President Director of PT SMART. As a concrete proof of commitment, PT SMART Tbk, determines and will implement the OHS Policy through the following steps:

- Communicate OHSMS policies and procedures to all employees and interested parties to ensure that they understand the obligations related to company activities
- Comply with all applicable laws, regulations and other provisions related to OSH
- Ensuring the implementation of OHSMS as part of the company's operational activities
- Identify, assess and control hazard risks in every activity in the work environment with a continuous improvement approach to prevent accidents and PAK
- Manage and monitor OHSMS indicators and make continuous improvements to improve OHS management performance.

The company also has an annual occupational safety and health work program as a form of implementation of the company's OHS policy. The realization of the work program will be monitored through regular meetings of the Occupational Safety & Health Advisory Committee (P2K3) every month. This work program applies generally to all workers in the workplace. If the plans that have been made are not on target, they will be evaluated in regular meetings to assess their effectiveness.

The company has a procedure for identifying sources of danger, assessing and controlling risks (ISBPR) number SOP/SMART/HESS-EHSD/SAD/II/002 which discusses hazard identification, risk assessment and risk control.

As a form of implementation of its procedures, the Company has presented the PT Binasawit Abadipratama (Estate and Mill) hazard source identification, risk assessment and control (ISBPR) document which was updated in January 2023. Hazard source identification, risk assessment and control includes all activities/work at PT Binasawit Abadipratama.

### 3.6.2

The company has monitored the effectiveness of the OSH plan to address OSH risks to people. Routine monitoring is carried out every month in the regular monthly OHS Committee meetings of each Estate and POM. The monthly meeting discusses the implementation of OHSMS, evaluation of work accidents, application of PPE and so on. An example of the regular monthly OHS I meeting is as follows:

- Monthly OHS Committee SRGE meeting for the April 2023 period which was held on April 12, 2023
- Monthly OHS Committee TNGE meeting for March 2023 period which will be held on April 1, 2023

In addition, OHS guidance is also carried out on a quarterly basis and reported by the OHS Committee management to the Kalimantan Tengah Province Manpower and Transmigration Office through the OHS Committee Quarterly Report for each unit. The quarterly report discusses the implementation of routine monthly OHS Committee management meetings, programs and work realization of OHS Committee management and so on. The reports are:

1. Evidence of the OHS Committee report for the Bukit Tiga Estate and the Sungai Rungau Estate for the first quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023.
2. Evidence of the Sungai Rungau Mill OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023
3. Evidence of the Tangar Estate OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023
4. Evidence of the Terawan Estate OHS Committee report for the 1<sup>st</sup> quarter of 2023 which was reported to the Kalimantan Tengah Prov Manpower Office on April 12, 2023.

The company always monitors occupational safety and health at PT BAP. The company has carried out periodic health checks for all workers and special health checks for workers who have special risks for the 2023 period. Examples are as follows:

Periodic health checks:

1. Tangar Estate March 11 – 14 2023 to 644 workers
2. SRGE March 1 – 3 2023: 638 workers
3. Terawan Estate 4-7 March 2023 678 workers
4. SRUM in March 2023: 156 workers

Special health checks:

1. Tangar Estate in March 2023 to 65 workers (cholinesterase)
2. SRGE in March 2023 to 52 workers (cholinesterase)

Based on the results of the health examination, it is known that all workers are healthy and fit to work.

Status: Comply

### 3.7

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

#### 3.7.1-3.7.2

The company shows a training program for each unit in 2022-2023 covering all aspects of the RSPO P&C. Training also includes those who need training such as staff, workers, smallholders and contractors. The sustainability team and the HR department are responsible for the development of training program scheduling and training implementation. The training program document informs the type of training, plan/schedule and attendance. These training programs include:

- Basic OSH and environment
- First aid training
- Training on hazardous and toxic materials and hazardous and toxic waste management
- MSDS training
- Operator license training
- RSPO-ISPO & SCCS training
- Emergency response training

The company also shows the realization of training, for example:

- Minutes of the hazardous and toxic materials, hazardous and toxic waste, MSDS spill handling training program and the use of APAR which was held on March 15, 2023 which was attended by 31 participants.
- Minutes of OHS training at work which was held on 28 April 2023 for 43 participants.

The results of interviews with representatives of bipartite cooperation institutions and workers such as warehouse officers, harvesters, fertilizer workers, grading officers, boiler officers stated that the company had provided training or socialization on working procedures to each worker verbally and understood by workers. In addition, the results of interviews with boiler officers, it was also stated that these workers had been given boiler officer training. There are training programs that involve contractors, such as socialization of SOPs and training related to OHS. From the results of interviews with workers and contractors, it is known that workers and contractors can explain the training that has been obtained such as work procedures and implementation of OHS.

#### 3.7.3

Company provided an understanding of SCCS to weighbridge operators, sorting, sustainability, security, and laboratory on 18 August 2022. The materials discussed included the definition of RSPO SCCS, new standards for RSPO SCCS, principles for compliance with RSPO SCCS. Based on interviews with weighbridge operators and security, it is known that they understand the supply chain process. Based on interview with PIC for SCCS in mill, it is in accordance with documents review and all the PIC has been understood.

Status: Comply

### 3.8

**Supply Chain Requirements for Mills**

#### 3.8.1-3.8.2

Based on the RSPO Certificate, and previous assessment until current audit the Mill only implement IP module, that only received FFB from certified unit.

#### 3.8.3

Estimated certified product recorded in the last assessment report and certificate, as well as in the RSPO IT Platform. Actual certified produced has been verified during this assessment, and not exceed the estimate. The estimates of certified production for the next license period also have been set, in reasonable amount considering the last year's production. The data are shown in the following table:

Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (June 2022 – May 2023) (MT)	Next Year Projected Certified Volume (12 Months) (MT)
FFB	445,000	400,684.08	420,000

CSPO	93,400	79,606.42	84,000
CSPK	24,900	21,844.83	23,000

Based on table above, there is no overproduction from previous license. Production of the CSPO/CSPK lower than actual sales CSPO/CSPK that has been sold because there is CSPO & CSPK opening stock remaining since the previous license so that actual sales are higher than CSPO & CSPK production. Opening Stock CSPO and CSPK have been explained in indicator 3.8.12. (Opening stock CSPO is 933.48 MT and CSPK is 974.63 MT).

### 3.8.4

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

- Name of RSPO Member: PT Binasawit Abadi Pratama – Sungai Rungau Palm Oil Mill
- RSPO Membership Number: 1-0096-11-000-00 (Golden Agri Resources Ltd)
- Name of Certified Audit: Sungai Rungau Palm Oil Mill and Supply Bases
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO\_PO1000001155
- Type of Business: Oil Mill

All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16. The company has been removed of certified stock for products sold as another scheme.

### 3.8.5

The company has had the SOP Supply Chain of Identity Preserve Module (No. BAP-SRUM/SOP/RP-IP/28 dated 21 February 2023). The procedures established and covering all elements of the supply chain model requirements in the P&C of 2018 such as the announcement in RSPO Palmtrace not later than 3 months after dispatch, receiving and recording that identify the traceability of RSPO certified and uncertified source and products (mass balance record), FFB processing, key persons and job descriptions, internal audit, training, etc. The Mill only has a single processing line. If the Mill want to change the model from IP to MB, and particularly from MB to IP, all the processing line started from loading ramp until clarification will be flushed to ensure the certified products not contaminated with uncertified products, including the storage tank will be separated completely between IP products and MB products.

The regular dissemination and training of the procedures has been conducted on 18 August 2022. Based on field observation, obtained information that key persons for SSCS implementation (such as weighbridge operators, security, and Head of Administration) have understood the supply chain implementation. The Mill has had a system to differentiate FFB from certified and uncertified sources.

### 3.8.6

The procedure to conduct supply chain internal audit already set in the SOP of supply chain. In the SOP mentioned that internal audit will be conducted annually. Internal audit of RSPO SCCS conducted on 20-24 February 2023 (simultaneously with RSPO P&C Internal Audit). All of SCCS indicators has been assessed and complied. Management Review of RSPO SCCS implementation conducted on 12 April 2023. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, and recommendation for improvement.

### 3.8.7

The mill has verified and documented the volumes of certified FFBs received (company used the IP Module). Certified FFB received period of 12 months before audit which is June 2022 – May 2023:

Month	FFB (ton)		Total
	Certified	Non-Certified	
Jun-22	43,648.52	-	43,648.52
Jul-22	35,687.25	-	35,687.25

Aug-22	42,840.31	-	42,840.31
Sep-22	36,192.62	-	36,192.62
Oct-22	26,336.68	-	26,336.68
Nov-22	29,401.84	-	29,401.84
Dec-22	30,624.75	-	30,624.75
Jan-23	30,397.40	-	30,397.40
Feb-23	25,182.20	-	25,182.20
Mar-23	33,555.38	-	33,555.38
Apr-23	24,605.80	-	24,605.80
May-23	42,211.33	-	42,211.33
<b>Total</b>	<b>400,684.08</b>	<b>-</b>	<b>400,684.08</b>

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

<b>Product</b>	<b>Last Year Projected Certified Volume (MT)</b>	<b>Last Year Actual Certified Volume (June 2022 – May 2023) (MT)</b>	<b>Next Year Projected Certified Volume (12 Months) (MT)</b>
FFB	445,000	400,684.08	420,000
CSPO	93,400	79,606.42	84,000
CSPK	24,900	21,844.83	23,000

Based on table above, there is no overproduction from previous license. The Company has a mechanism for handling non-compliant TBS and/or documents that have been included in the SOP of supply chain document which explains the mechanism for resolving and preventing this.

### 3.8.8

Documentation for the Sustainable Certified Product (CSPO and CSPK), consist of daily record of the FFB acceptance, daily record of certified production, which classified as the CSPO and CSPK, certified sales record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

The mill has product information provided in such as document of contract agreement, delivery order, delivery ticket, report of loading, weighbridge ticket and other invoices for CSPO/CSPK. Documents verification and interview during an audit it was known the claimed RSPO product of (CSPO & CSPK), the supplying mill has been ensuring that the following minimum information for RSPO certified products is made available and traced, its evidenced with several supporting documents as follows delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information's of delivery date, description of product and supply chain model, product quantity, unique identification number, certificate number, sender's name, and address of the seller, for example:

- Shipping announcement with transaction id TR-46d5fa1d-2aef volume of CSPO 500 MT, the module of SCCS IP, dated 02 June 2023, the mill can present evidence of delivery of CSPO from Sungai Rungau POM to PT Sumber Indah Perkasa (Contract No. DIC/3253/270423/0001) which was carried out on 23 May – 02 June 2023 with CPO Transporter is PT Satrindo Jaya Agropalma.
- Shipping announcement with transaction id TR-075de126-be9f volume of CSPK 1,383.31 MT, the module of SCCS IP, dated 28 February 2023, the mill can present evidence of delivery of CSPK from Sungai Rungau POM to PT Binasawit Abadi Pratama – Perdana Kernel Crushing Plant (Contract No. 3253/KER/3253/23/L001) which was carried out on 23 January – 28 February 2023 with PK Transporter is PT Satrindo Jaya Agropalma.

### 3.8.9

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of certified products (CPO and PK) is outsourced to the third parties and the company has its listed very well, as shows through several Work Agreement as follows for example:

- Agreement with CPO Transporter of Cooperative Miftahussalam No. 003/BAP/SRUM/01/2023-CPO dated 02 January 2023, valid thru 01 January 2024.

- Agreement with CPO Transporter of PT BSA Logistic Indonesia No. 002/BAP/SRUM/06/2022-CPO dated 21 June 2022, valid thru 20 June 2025.
- Agreement with PK Transporter of PT Satrindo Jaya Agropalma No. 001/BAP/SRUM/02/2021-PK dated 25 February 2021, valid thru 24 February 2025.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Sungai Rungau POM, as well as the willingness to observe by Certification Body and the company internal audit in order to verify the compliance.

In the period from 2022 to April 2023, there were additional new CPO/PK transporters in collaboration with the company (Cooperative Miftahussalam). So that at the time of the audit there were only 3 transporters, namely PT Satrindo Jaya Agropalma, PT BSA Logistic Indoensia & Cooperative Miftahussalam.

### **3.8.10**

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of certified products (CPO and PK) is outsourced to the third parties and the company has its listed very well, as shows through several Work Agreement as follows for example:

- Agreement with CPO Transporter of Cooperative Miftahussalam No. 003/BAP/SRUM/01/2023-CPO dated 02 January 2023, valid thru 01 January 2024.
- Agreement with CPO Transporter of PT BSA Logistic Indonesia No. 002/BAP/SRUM/06/2022-CPO dated 21 June 2022, valid thru 20 June 2025.
- Agreement with PK Transporter of PT Satrindo Jaya Agropalma No. 001/BAP/SRUM/02/2021-PK dated 25 February 2021, valid thru 24 February 2025.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Sungai Rungau POM, as well as the willingness to observe by Certification Body and the company internal audit in order to verify the compliance.

In the period from 2022 to April 2023, there were additional new CPO/PK transporters in collaboration with the company (Cooperative Miftahussalam). So that at the time of the audit there were only 3 transporters, namely PT Satrindo Jaya Agropalma, PT BSA Logistic Indoensia & Cooperative Miftahussalam.

### **3.8.11**

The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of certified products (CPO and PK) is outsourced to the third parties and the company has its listed very well, as shows through several Work Agreement as follows for example:

- Agreement with CPO Transporter of Cooperative Miftahussalam No. 003/BAP/SRUM/01/2023-CPO dated 02 January 2023, valid thru 01 January 2024.
- Agreement with CPO Transporter of PT BSA Logistic Indonesia No. 002/BAP/SRUM/06/2022-CPO dated 21 June 2022, valid thru 20 June 2025.
- Agreement with PK Transporter of PT Satrindo Jaya Agropalma No. 001/BAP/SRUM/02/2021-PK dated 25 February 2021, valid thru 24 February 2025.

To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there were clauses that set obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to deliver products only from Sungai Rungau POM, as well as the willingness to observe by Certification Body and the company internal audit in order to verify the compliance.

In the period from 2022 to April 2023, there were additional new CPO/PK transporters in collaboration with the company (Cooperative Miftahussalam). So that at the time of the audit there were only 3 transporters, namely PT Satrindo Jaya Agropalma, PT BSA Logistic Indoensia & Cooperative Miftahussalam.

### **3.8.12**

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record



can be accessed by the auditor, such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. To the auditors the company can show all the required documents covering all aspects of this RSPO Supply Chain Certification Standard requirements such as record of certified product shipping, sales contract, delivery order/invoice, production report and product sales. Based on document review known that the mill still kept document according to the procedure.

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

**CSPO**

Month	CPO (ton)		Total
	Certified	Non-Certified	
Opening stock	933.48	-	<b>933.48</b>
June 2022 – May 2023	78,672.94	-	<b>78,672.94</b>
<b>Total</b>	<b>79,606.42</b>	-	<b>79,606.42</b>

Month	CSPO Despatch (ton)			Total
	RSPO	Other Scheme (ISCC)	Non-Certified	
June 2022 – May 2023	<b>12,564.86</b>	<b>66,112.16</b>	-	<b>78,677.02</b>

The total CSPO sold as another scheme (ISCC), the company has removed stock during the last 8 months of the license period, namely from September 2022 – April 2023 where the total CSPO that has been removed from stock is 41,815.66 tons (this is in accordance with the actual sales of CSPO products with other schemes during that period). Meanwhile, for CSPO sold under other schemes in the period June – August 2022, stock has been removed from the previous license, namely 24,296.50 tons (according to actual sales in that month).

**CSPK**

Month	PK (ton)		Total
	Certified	Non-Certified	
Opening stock	974.63	-	<b>974.63</b>
June 2022 – May 2023	20,870.20	-	<b>20,870.20</b>
<b>Total</b>	<b>21,844.83</b>	-	<b>21,844.83</b>

Month	CSPK Despatch (ton)			Total
	RSPO	Other Scheme	Non-Certified	
June 2022 – May 2023	<b>21,075.02</b>	-	-	<b>21,075.02</b>

**3.8.13-3.8.14**

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for June 2022 until May 2023 i.e OER 19.59% and KER 5.17%. Periodically update of extraction is actual extraction.

**3.8.15**

The procedure of supply chain IP module has been set the mechanism to ensure the uncertified FFB not mixed with the certified FFB.

The Mill only has one line of processing, and since previous assessment until the audit only implement IP module. In the transporter agreements has been set the obligation to keep the purity of IP certified products. One of the mechanisms, in the vehicle is mounted on a seal that can only be opened at the buyer's location.

### 3.8.16

Documentation for the Sustainable Certified Product (CSPO and CSPK), consist of daily record of the FFB acceptance, daily record of certified production, which classified as the CSPO and CSPK, certified sales record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Based on delivery and transaction document review, it was known that announcement is carried out less than three months after delivery date. The status of announcements has been 'confirmed' by the buyer. The supply chain PIC has known that for P&C 2018 (included supply chain standard) the announcement should be conducted within three months after the delivery date. For example:

- Shipping announcement with transaction id TR-46d5fa1d-2aef volume of CSPO 500 MT, the module of SCCS IP, dated 02 June 2023, the mill can present evidence of delivery of CSPO from Sungai Rungau POM to PT Sumber Indah Perkasa (Contract No. DIC/3253/270423/0001) which was carried out on 23 May – 02 June 2023 with CPO Transporter is PT Satrindo Jaya Agropalma.
- Shipping announcement with transaction id TR-075de126-be9f volume of CSPK 1,383.31 MT, the module of SCCS IP, dated 28 February 2023, the mill can present evidence of delivery of CSPK from Sungai Rungau POM to PT Binasawit Abadi Pratama – Perdana Kernel Crushing Plant (Contract No. 3253/KER/3253/23/L001) which was carried out on 23 January – 28 February 2023 with PK Transporter is PT Satrindo Jaya Agropalma.

The total CSPO sold as another scheme (ISCC), the company has removed stock during the last 8 months of the license period, namely from September 2022 – April 2023 where the total CSPO that has been removed from stock is 41,815.66 tons (this is in accordance with the actual sales of CSPO products with other schemes during that period). Meanwhile, for CSPO sold under other schemes in the period June – August 2022, stock has been removed from the previous license, namely 24,296.50 tons (according to actual sales in that month).

Based on documents verification, it was known that the CSPO and CSPK from the Mill were sold has met the requirements of certified product information and there is no product sold as conventional or other schemes.

### 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 social and environmental policy (No. 047/PD/X/2015 dated 29 October 2015), said that the company will respect general statements about human rights, FPIC for indigenous peoples and local communities, handle complaints and dissatisfaction responsibly. The company will also build economic, social and community positively. The company committed to recognizing, respecting, and strengthening all workers' rights.

The unit of certification policy regarding respect to Human Rights described in the GAR of Social and Environmental Policy (GSEP) in point 2.2.3 which stated that the company committed to stand and promote statement of the human right of UN for all workers, contractor, customary society, the local community in all company operation. Furthermore, on those policy also described about prohibiting retaliation against Human Rights Defenders (HRDs) as well as prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.

During the audit carried out, the team auditor has been trying to ensure this policy has been communicated and implemented through stakeholder consultation.

Based on interviews with workers, the surrounding community (Sebabi, Pantap, & Rungau Raya Village), and contractors

(Cooperative Miftahussalam, Aladin & Ponijo) known that the company has socialized company policies regularly including policies on human rights. Socialization is done by sticking to the policy in offices, socializing in the housing, and socializing with workers during the morning briefing before the activities started.

#### 4.1.2

Observations and interviews with company employees (mill and estate) and worker union representative show that the company has never discriminated against one religion, ethnicity or race in obtaining employment opportunities or in terms of worship. Based on interviews with the head of the worker union, information was also obtained that the company has provided equal employment opportunities for workers. Apart from that, during the audit activities, no use of paramilitaries/mercenaries for security was found by the company (because security was carried out by security personnel who were the company's own employees and not part of the paramilitaries/mercenaries). This is also in accordance with the results of document reviews and interviews with management which stated that since the certification activity was carried out the company had never used paramilitaries/mercenaries.

**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.**

##### 4.2.1-4.2.2

The company has a mechanism for submitting complaints and grievances for workers listed in the SOP document for Handling Complaints and Dissatisfaction, document No. SOP/SMART/GIMS-SCMD/USDV/II/001 (Rev. 02) dated 11 April 2017 which was signed by the Head of PCDV, Head of NSE CSR, Managing Director of SSSE, and President Director of PT SMART Tbk.

The procedure also ensures the anonymity of the complainant and the complainant. It was further explained that if the complaint is not resolved by deliberation and consensus, the certification unit and the party submitting the complaint want a settlement through the Mediation Forum. Mediation Forum meetings must take place at the third party's location or other agreed neutrality venue. In addition, if there is a complaint that does not receive a response or agreement, then the complaint can be submitted to the RSPO Secretariat.

All complaint forms and periodic requests for information will be collected and recorded. The unit of certification will respond to each complaint within 14 days from the date the complaint was received. In addition, for affected parties who cannot read or write, the company will convey it directly and the company will also issue a warning regarding the complaint mechanism in strategic areas.

The procedure has also been socialized to workers on 21 January 2023 which was attended by 51 people as well as contractors and the surrounding community on January 13 2023 which was attended by 5 people.

The certificate unit has also monitored requests for information and complaints from stakeholders in the form of books in incoming and outgoing letters, including the following:

- There was an incoming letter from the Head of Asam Baru Village on April 17 2023 regarding a request for funding for the "manyanggar" mamapas lewu customary event. The company then indicated a response to the letter through documentation providing assistance on May 2, 2023.
- There was an incoming letter from the Head of Seluluk Village on March 20, 2023 regarding the application for a drilled well. The company then indicated its response to the letter by providing drilled well assistance on March 30, 2023.

Based on interviews with representatives of the Sei Babi Village community and the Seruyan District Office, it is known that stakeholders have requested information from the company and the company has responded to the request for information.

#### 4.2.3

The company also has a communication and external information logbook as an implementation of the complaint procedure. Based on the results of a review of logbook documents and social media for 2022-2023, it is known that there have been complaints from external parties/stakeholders to the company, for example regarding the company's provision of facilitating community plantations by as much as 20%.

Based on this, the company has also mediated with the community assisted by the government, as stated by the company that the

company has no obligation to facilitate community plantations as much as 20%.

Based on interviews with representatives of surrounding villages and related agencies, it is known that community complaints are still being processed until an agreement is reached later.

#### 4.2.4

The company has a mechanism for submitting complaints and grievances for workers listed in the SOP document for Handling Complaints and Dissatisfaction, document No. SOP/SMART/GIMS-SCMD/USDV//001 (Rev. 02) dated 11 April 2017 which was signed by the Head of PCDV, Head of NSE CSR, Managing Director of SSSE, and President Director of PT SMART Tbk.

In the conflict resolution process, apart from the mediation method between the company and the affected party and submitting a report to the RSPO secretariat, the affected party also has the option of obtaining legal and technical assistance from an independent party. Affected parties also have the freedom to choose people or groups who can support them and/or act as observers.

Based on interviews with representatives of the Sei Babi Village community and the Seruyan District Office, it was conveyed that stakeholders already know the system related to the company's conflict mechanism and the PIC of the company that handles it.

**Status: Comply**

### 4.3

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

#### 4.3.1

PT Binasawit Abadipratama has a welfare improvement program for the surrounding community which includes all general groups and indigenous communities. This program has been included in the 2022/2023 CSR (Corporate Social Responsibility) Program, in which there are 6 (six) fields, namely Health, Economics, Education, Infrastructure, Environment and Social. This program was created based on the results of social identification which was carried out simultaneously to see the social impacts arising from the company's existence on the surrounding village community, which was then formulated and created into a CSR program as a program to improve the welfare of the surrounding community.

From the results of meetings with the community, a CSR program was prepared in 2022. For the CSR program in 2022/2023, the company arranged a CSR program in the fields of Economy, Environment, Education, and social culture. The company has also shown the CSR realization record to the communities. For example:

- Providing honorarium assistance for kindergarten teachers in Public Elementary School on Sebabi Village.
- Providing assistance to Posyandu activities in Rungau Raya and Sebabi Villages.
- Providing cooperation with local contractors for FFB transportation activities.
- Assistance in repairing village access roads in several surrounding villages (Rungau Raya, Sebabi & Pantap Village)
- Assistance activities for freshwater fish cultivation businesses in Sebabi Village and cooperation in plantation operational activities by utilizing local contractors (FFB transportation).

Based on the results of interviews with surrounding village communities (Sebabi, Pantap, & Rungau Raya Village), it is known that the company has routinely carried out social identification/studies in their villages routinely carried out by the company, where the results will later be used as a reference for compiling CSR program whose target is the welfare of the surrounding community.

**Status: Comply**

### 4.4

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

#### 4.4.1

PT Binasawit Abadipratama has obtained land rights from the government in accordance with the HGU (20,152.79 Ha) and HGB (27.21 Ha) permits with a total area of 20,180.00 Ha with the following details:

- The company has HGU for an area of 20,152.79 Ha and HGB for an area of 27.21 Ha so that the total area of land rights owned is 20,180 Ha. The company also has an IUP in 2000 for an area of 20,180 ha and a mill processing capacity of 60 tons of FFB / hour. IUP in 2013 for an area of ± 20,180 Ha and mill with a capacity of: 80 Tons FFB/ Hour.
- In addition, there is also information regarding the release of forest areas, namely: Forest area conversion letter dated 29 January

1996 covering an area of 17,780 and for the area of 642.28 Ha still in process with the latest history being the Decree of the Minister of Environment and Forestry of the Republic of Indonesia Number SK.243/MENLHK/SETJEN/PLA.2/3/2022 concerning the determination of the boundaries of the area of limited production forest and permanent production forest dated 21 March 2022

The use of HGB is for the Mill and its supporting facilities where the actual position is within the Sungai Rungau Estate, so the company includes this area within the scope of certification and is part of the Sungai Rungau Estate. Due to this, the area in section 1.7.2 HGB/Mill area is included in the Sungai Rungau Estate Area area so that the total is the same as the certification scope, namely 20,180.00 Ha (HGU+HGB).

Based on the explanation above, it can be concluded that the company has legal rights to ownership of land use in accordance with government regulations and that no area of company management falls within customary rights.

#### **4.4.2, 4.4.3, 4.4.3, 4.4.5, 4.4.6**

Based on document verification found information that all land title area comes from state ownership. Furthermore, there was no private or community owned status in those area. Therefore, there was no land acquisition process with surrounding peoples around the concession area. It implied there was no documentation of previous land-owner listed. Hal ini juga sesuai dengan hasil wawancara dengan masyarakat sekitar (Sebabi, Pantap and Rungau Raya Village) yang menyatakan bahwa land title area comes from state ownership. Furthermore, there was no private or community owned status in those area and for land acquisition process with surrounding peoples around the concession area.

However, to anticipate further land acquisition, the company has had a SOP of FPIC (No. SOP/SMART/SENS-CSR/SADV/II/003) revision on 8 November 2017, describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc.

**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**

Since last year and until now there has been no expansion of the company's area. As previously explained in the indicator 4.4.2, all land title area comes from state ownership. Furthermore, there was no private or community owned status in those area. Therefore, there was no land acquisition process with surrounding peoples around the concession area. It implied there was no documentation of previous land-owner listed.

**Status: Comply**

#### **4.6**

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

##### **4.6.1, 4.6.2, 4.6.3, 4.6.4**

As previously explained in the indicator 4.4.2, all land title area comes from state ownership. Furthermore, there was no private or community owned status in those area. Therefore, there was no land acquisition process with surrounding peoples around the concession area. It implied there was no documentation of previous land-owner listed.

However, to anticipate further land acquisition, the company has had a SOP of FPIC (No. SOP/SMART/SENS-CSR/SADV/II/003) revision on 8 November 2017, describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc.

In addition, there is also a SOP with the document code SOP/SPO/SMART/LH-04 dated July 1, 2010 with the aim of ensuring a harmonious communication relationship between the community living around the plantation and the company, especially regarding land ownership and land conflict resolution in accordance with regulations and applicable laws.

**Status: Comply**



**4.7**

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

**4.7.1, 4.7.2, 4.7.3**

As previously explained in the indicator 4.4.2, all land title area comes from state ownership. Furthermore, there was no private or community owned status in those area. Therefore, there was no land acquisition process with surrounding peoples around the concession area. It implied there was no documentation of previous land-owner listed.

However, to anticipate further land acquisition, the company has had a SOP of FPIC (No. SOP/SMART/SENS-CSR/SADV/003) revision on 8 November 2017, describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc. In addition, there is also a SOP with the document code SOP/SPO/SMART/LH-04 dated July 1, 2010 with the aim of ensuring a harmonious communication relationship between the community living around the plantation and the company, especially regarding land ownership and land conflict resolution in accordance with regulations and applicable laws.

**Status: Comply**

**4.8**

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

**4.8.1, 4.8.2, 4.8.3, 4.8.4**

Based on the interviews with representatives of the Agencies in Seruyan Regency (National Land Agency and Food Security & Agriculture Agency), representatives of Surrounding Community (Sebabi, Rungau Raya & Pantap Village), it is known that there has never been a land conflict because the company already existed earlier than the community so that there are no individual ownership rights in the company management area.

**Notes from previous audit.**

However, based on the document review, it is known that there is land occupied by the community in block 020 SSRE covering an area of 20,000M<sup>2</sup> or an area of 2 Ha. The base of rights shown by the occupant is the SKT issued by the Village Head, while the HGU belonging to the company has been issued since 2008. Confirmation of the parties that carried out the occupation has not been carried out because the assessment this time was carried out in full remote so that access was constrained by limited access.

The documents shown related to these problems include the process of mediation efforts and land compensation efforts including field verification with the Rungau Raya Village Head on July 11, 2019. Until now there has been no meeting point related to the negotiation process because a price agreement has not been found. The actual condition of block 020, as the video sent by the company, is in the form of community oil palm land. The occupation area is part of the Rungau River border HCV located in SSRE.

**Verification onsite audit**

In accordance with notes from the previous assessment, there are PT Binasawit Abadipratama certification areas (especially in Block 020 in Seruyan Estate in the conservation area) which are still controlled by the Rungau Raya Village community. From the results of the study of the area statement document, it is known that the area is 9.33 Ha in accordance with measurements from the PMNP (Plantation Monitoring and Planning) Team. The company has carried out routine monitoring every month regarding this area so that it does not increase into the company's managed area which is controlled and designated as a conservation area (the position of the area is within the conservation area). Monitoring will be carried out from January 2022 to May 2023 by the monitoring team at the Seruyan Estate unit. Apart from that, the company has also carried out regular outreach to parties who control this area and can demonstrate communication, including:

- Minutes of HCV Socialization and communications related to discussions on compensation/release/appeal with the parties who control it (PDN and AGS) which was held on 17 June 2022.
- Minutes of HCV Socialization to PDN on 10 June 2022 directly at his home location and also explained that the party being socialized was a Palm Oil Farmer from Rungau Raya Village.
- Minutes of HCV Socialization to AGS on 10 June 2022 directly at his home location and also explained that the party being socialized was a Palm Oil Farmer from Rungau Raya Village.
- Minutes of HCV Socialization to ASL on 10 June 2022 directly at his home location and also explained that the party being socialized was a Rubber Plant Farmer from Asam Baru Village.
- Minutes of HCV Socialization to ARS on 11 June 2022 directly at his home location and also explained that the parties being



socialized were Sengon Farmers from Rungau Raya Village.

- Minutes of HCV Socialization to MKN on 11 June 2022 directly at the location of his house (Rungau Raya Village) and also explained that the party who was socialized stated that the land at that location was an area he was cultivating.
- Minutes of HCV Socialization to IMR on 11 June 2022 directly at his home location and also explained that the party being socialized was a Palm Oil Farmer from Rungau Raya Village.

The result of these meetings was that the parties working on the area did not want compensation for their work area and had agreed not to interfere with each other to expand the work area or carry out activities that were detrimental to each other.

**Status: Comply**

#### **PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

##### **5.1**

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

##### **5.1.1, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6**

The company has no transaction of buying FFB from independent smallholder nor scheme smallholder. All FFB supplied to Sungai Rungau POM originated own estate RSPO certified area.

##### **5.1.7**

The company shows Test Results Certificate No. 510/60/BID.IV/TJ/II/2023 dated 2 February 2023 issued by the Department of Cooperatives, Small and Medium Enterprises, Industry and Trade of Seruyan Regency for Bridge Scales (WB2) brand Avery Weigh-Tronix with a capacity of 60,000 kg and reading power 10 kg which is valid until 17 January 2024

##### **5.1.8**

Currently, the company does not have a scheme smallholder's or there are no other FFB suppliers apart from the main estate it owns because the company only accepts FFB originating from the main estate (RSPO certified). Regarding support for independent smallholders around the company, this has been done by providing socialization regarding RSPO certification to them during annual company policy socialization activities. For example, outreach to the local community was carried out on January 13 2023, where the result was that the community was still not interested in participating in RSPO certification activities.

##### **5.1.9**

Currently the existing complaint mechanism concerns all internal and external stakeholders and this includes farmers as well. This has been explained clearly in criterion 4.2.

**Status: Comply**

##### **5.2**

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

##### **5.2.1; 5.2.2; 5.2.3; 5.2.4 and 5.2.5**

Based on the results of document review and interviews with management, it is known that Sungai Rungau POM does not accept FFB from farmers. Currently, the company does not have a scheme smallholder's or there are no other FFB suppliers apart from the main estate it owns because the company only accepts FFB originating from the main estate (RSPO certified). Regarding support for independent smallholders around the company, this has been done by providing socialization regarding RSPO certification to them during annual company policy socialization activities. For example, outreach to the local community was carried out on January 13 2023, where the result was that the community was still not interested in participating in RSPO certification activities.

**Status: Comply**

#### **PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**

##### **6.1**

**Any form of discrimination is prohibited.**

##### **6.1.1-6.1.2**

The company already has a policy regarding equal opportunities and treatment to get employment opportunities contained in the GAR Social and Environmental Policy (KSLG) to implement policies related to hiring workers in accordance with applicable regulations and has been signed by the Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO; Managing Director of Sustainability & Strategic Stakeholder Engagement, in 2015.

In point 3 Work Environment and Industrial Relations states that the company provides equal opportunities for all workers, and embraces diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or union membership. The company ensures that workers are protected from acts of discrimination at all stages of the employment relationship.

Based on the results of interviews with harvesters and factory workers, as well as representatives of the surrounding community, it is known that so far everyone has had the same treatment in obtaining job opportunities, for example as shown by the disclosure of information when job vacancies are published in a transparent manner. From the list of employees updated for the period of May 2023, it is also known that the current employee demographics are diverse, not limited to religion, ethnicity, and certain groups.

Apart from policies regarding equal opportunities and treatment for obtaining employment opportunities, based on document verification it is known that there have been no complaints regarding discrimination against workers and groups including local communities, women and migrant workers.

### **6.1.3**

#### **Employee Recruitment Procedures**

The procedures for recruiting employees are regulated in the Collective Labor Agreement for the 2023-2025 period which is effective March 29 2023 which has been approved by company management, trade unions and the local Manpower and Transmigration Service in Article V of Manpower Procurement, explained as follows:

- Acceptance of new workers at the company is adjusted to the needs and those who can be accepted as workers must meet the skills requirements or qualifications set by the company and the head of the work unit.
- Prospective workers must pass the selection held by the company
- Prospective workers who have passed the selection process are accepted as workers with a probationary period of 3 months from the time the prospective worker is determined to start working at the company and the existence of a probationary period must be notified to the prospective worker. The probationary period is counted as working time.
- Acceptance of workers and/or placement of workers in companies does not differentiate between ethnicity/nationality, religion, race, gender, sexual orientation, disability, caste, union membership and political affiliation.

The procedure explains that the minimum age for workers is 18 years, recruitment information is done openly, recruitment is free of charge, and there is no retention of workers' personal documents.

The company also shows sample documents of the latest employee recruitment starting from a job application letter to a work agreement, for example hiring an employee with the initials MH, who has sent an application letter on May 17, 2023, to then take a written test and medical test on May 19, 2023 After participating in the training period, the personnel are given a promotion to become permanent workers with the PT4 class listed in the approval letter No. 514/VPA-6/06/23 on 26 May 2023.

#### **Payroll System**

The payroll system is regulated in the CLA document for the 2023-2025 period with an effective date of March 29, 2023 which was approved by company management, trade unions and the local Manpower and Transmigration Service. The document explains the procedure for paying workers which includes payment of overtime/overtime premiums, and the structure of the pay scale. A more detailed discussion regarding payroll is explained in indicator 4.3.2.

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

The company already has a procedure for promoting monthly SKU employees with No. HRD Document D-014-00 dated October 17, 2000. This procedure, among other things, explains the Work Performance Appraisal Form which consists of the worker's name, section, aspect being assessed, assessment criteria, weight, value, appraiser, etc.

Career path procedures for city/farm staff and non-city staff are regulated in HR document D-010-00 dated 01 September 2005. This policy, among other things, explains the types of promotion, promotion requirements, training that must be followed in the context of

promotion and the stages of promotion approval. Career paths and work performance assessments are also included in the CLA which explains work performance assessments, class changes and mutations. Evidence of the implementation of this, the company shows examples of employee promotion documents, for example the promotion of a mill employee with the initials EP from Fixed Period Working Agreement to permanent worker on September 1, 2022 with the results of the assessment namely discipline with a score of 9, quantity of work with a value of 8, quality of work with a score of 8, work equal to a value of 8, work attitude with a value of 8 and responsibility with a value of 7 with Appointment Decree No. 011/BAP-SRUM/SK-PT/09/2022.

### **Training System**

The company has identified training needs for each employee according to their position and type of work. As an example of identification that has been carried out by the company is OSH training for all workers, domestic waste management training for housing residents and riparian protection training for the spray team. After identifying, the company develops a training program for its employees for a year, the following is an example of the realization of a training program in 2023, namely:

- Pesticide training which was held on 27 May 2023 and was attended by 23 participants.
- PPE outreach which was held on 10 February 2023 and was attended by 15 participants.
- Socialization regarding employment procedures was carried out on March 2 2023 and was attended by 31 workers.

The results of interviews with the Seruyan District Manpower and Transmigration Office show that over the past year there have been no issues regarding the employment aspect of the company.

Based on this, the company has shown that selection, recruitment, employment, access to training, and promotions are carried out on the basis of skills, abilities, quality, and medical eligibility as required for available jobs.

#### **6.1.4**

The certification unit does not perform a pregnancy test at the time of employee recruitment. Pregnancy checks are only carried out for spray and fertilizer workers on a monthly basis to find out whether workers are pregnant or not. Pregnancy checks are only carried out for female workers who do not use contraception.

Based on interviews with representatives of the gender committee and female employees in the field, it is known that pregnant workers will be transferred to jobs that do not endanger pregnancy, for example as guard officers in daycare centers or manual care workers.

#### **6.1.5**

The company has a gender committee in each unit consisting of a chairman, secretary, treasurer and members. Based on document verification, the organizational structure of the gender committee shows that the management consists of men and women. The gender committee also has work programs, for example:

- Socialization of the sexual harassment complaint mechanism
- Monitoring administration of H1 and H2
- Posyandu activities

The company also shows the realization of the program, for example on May 23 2023 regarding the socialization of the mechanism of sexual harassment which was attended by 16 people.

Based on interviews with workers such as spraying workers, loose fruit workers and daycare workers, it is known that workers already know the organization of the gender committee and its functions. Employees also know the representatives of the gender committee, if there are complaints or complaints related to problems or issues of harassment. In addition, it was also conveyed that there were no complaints regarding harassment issues in the last 1 year.

#### **6.1.6**

The company has regulations related to minimum wages in accordance with statutory provisions and company regulations. The following are regulations stipulated by the government along with separate stipulations from companies regarding the 2023 minimum wage, namely:

- Decree of the Governor of Kalimantan Tengah No. 188.44/472/2022 dated December 6, 2022 with an UMK for Kotim Regency of Rp. 3,265,859.89 and for Seruyan Regency of Rp. 3,594,095.56.
- Decree No. 007/HR PSM 6/CEO/01/2023 dated January 1, 2023 concerning the structure and scale of wages for permanent

workers in Seruyan Regency with the lowest PT 4 T1 class of Rp. 3,596,596 and the highest PT1 A5 class of Rp. 4,013,298.

Companies can also show proof of payment of equal wages for the same scope of work, including the following:

- Harvester Sungai Rungau Estate with the initials AJ (Group PT3 O1) has received a basic salary of IDR 3,604,096
- Harvesters of Sungai Rungau Estate with the initials AK (Class PT3 O1) have received a basic salary of IDR 3,604,096

Based on this, the company has paid equal wages for the same scope of work.

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

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

### 6.2.1

The company has a CLA for 2023-2025 with an effective date of March 29, 2023 which was ratified by company management, trade unions and the local Manpower and Transmigration Office. The document describes the procedure for paying workers which includes wage components, minimum wages, calculation of overtime, incentives/premiums and other working conditions.

Based on the results of a review of workers' wage documents for May 2023, proof of payment of wages to workers can be shown, including the following:

- Harvester Sungai Rungau Estate with the initials AJ (Group PT3 O1) has received a basic salary of IDR 3,604,096
- Harvesters of Sungai Rungau Estate with the initials AK (Class PT3 O1) have received a basic salary of IDR 3,604,096
- The Sungai Rungau Mill boiler operator with the initials JW (Group PT1 E1) has received a basic salary of IDR 3,677,798

The company also shows compliance regarding Fixed Period Working Agreement workers, for example Fixed Period Working Agreement workers with the initials N who work at Tanggar Estate who have a work agreement letter dated May 2022 which regulates workers' rights and obligations such as wages that refer to the district minimum wage, type of work, namely maintenance, etc.

Based on this, it is known that the payment of wages is in accordance with the decision of the Governor of Kalimantan Tengah and the company's determination of wages in Seruyan Regency for the PT3 O1 group, which is IDR 3,604,096 and the PT1 E1 group, which is IDR 3,677,798.

Based on document verification, field observations, interviews with workers (harvest workers, fertilizing workers, factory workers, etc.), it is known that there is no indication of forced labor and the workers know the terms of work and have been paid according to the stipulated conditions.

### 6.2.2

The company has a CLA for 2023-2025 with an effective date of March 29, 2023 which was ratified by company management, trade unions and the local Manpower and Transmigration Office. The document describes the procedure for paying workers which includes wage components, minimum wages, calculation of overtime, incentives/premiums and other working conditions. The following is a brief explanation regarding the standard payroll system in the company, including:

- Monthly remuneration is given at the beginning of each month, which is provided through a bank transfer payment system to each worker's account.
- The minimum wage for workers is always based on the determination of the minimum wage each year stipulated by the Governor in each Province (explained further in indicator 4.3.1).
- Premiums are additional wages for working beyond the work target which is calculated according to company regulations (explained further in indicator 4.3.7).
- Overtime is work outside official hours on orders from superiors, wages are calculated in accordance with labor laws and regulations. The calculation of overtime must follow the provisions stipulated in the applicable regulations, namely:
  - Overtime must be based on the willingness of workers and cannot be forced by the company.
  - Hourly overtime wages are calculated with the following details, Workers' Wages (Basic wages + Fixed allowances) divided by 173.

- Normal days: for the first hour of overtime you are paid 1.5 times the hourly wage and for each subsequent hour of overtime you are paid 2 times the hourly wage.
- Weekly rest days/statutory holidays: for a working time of 6 working days/40 hours a week: the first 7 hours are paid 2 times the hourly wage, the 8<sup>th</sup> hour is paid 3 times the hourly wage, the 9<sup>th</sup> and 10<sup>th</sup> hours are paid 4 times the hourly wage .
- The company has prepared a wage structure and scale for employees in the operational area of Seruyan Regency in 2022. The wage structure and scale informs the wage scale based on class, level of education and work experience, for example for the PT4 T1 level you receive a basic wage with a value of IDR 3,318,168 while those for level PT1 A5 receives a basic wage with a value of IDR 3,736,870.

Based on the results of a review of workers' wage documents for May 2023, proof of payment of wages to workers can be shown, including the following:

- Harvester Sungai Rungau Estate with the initials AJ (Group PT3 O1) has received a basic salary of IDR 3,604,096
- Harvesters of Sungai Rungau Estate with the initials AK (Class PT3 O1) have received a basic salary of IDR 3,604,096
- The Sungai Rungau Mill boiler operator with the initials JW (Group PT1 E1) has received a basic salary of IDR 3,677,798

Based on this, it is known that the payment of wages is in accordance with the decision of the Governor of Kalimantan Tengah and the company's determination of wages in Seruyan Regency for the PT3 O1 group, which is IDR 3,604,096 and the PT1 E1 group, which is IDR 3,677,798.

Based on the results of interviews with plantation and factory workers, remuneration has complied with the provisions that apply in the company and has referred to laws and regulations such as payment of minimum wages, pay scale structure, provision of premiums, overtime pay and monthly remuneration is carried out on time.

### 6.2.3

The company has a mechanism for calculating and paying overtime as stated in the CLA for the 2023-2025 period which reads "Work overtime that is mutually agreed upon". The company also shows an overtime warrant as an implementation of the statement. The company has a request form for overtime, where this form has been signed by the employee and the management. After all have signed it, the overtime request is declared valid and can be used as the basis for awarding and calculating workers' overtime pay. In addition, the company can show the overtime payment system that is in accordance with statutory provisions. In the Company Regulations that refer to the applicable regulations explaining the calculation of overtime must be calculated with the following conditions:

$$\text{hourly overtime pay} = \frac{\text{month's wages}}{173}$$

With the following conditions:

- Normal days: for the first hour of overtime you are paid 1.5 times the hourly wage and for each subsequent hour of overtime you are paid 2 times the hourly wage.
- Weekly rest days/statutory holidays: for a working time of 6 working days/40 hours a week: the first 7 hours are paid 2 times the hourly wage, the 8<sup>th</sup> hour is paid 3 times the hourly wage, the 9<sup>th</sup> and 10<sup>th</sup> hours are paid 4 times the hourly wage.

Companies can also show proof of workers' overtime warrant documents in May 2023 as follows:

- SPL document for Boiler workers with the initials JW signed by the relevant workers and approved by their superiors.
- SPL documents for Process Shift 2 workers with the initials PS signed by the relevant workers and approved by their superiors.

Based on the results of the SPL document review, it is known that the company has implemented the calculation and payment of overtime wages to workers in accordance with the laws and regulations, for example for workers with the initials JW on May 5 2023 with 1 hour of overtime work which has been paid with a count of 1 .5 multiplied by the hourly wage multiplied by the number of overtime hours so that a total of IDR 31,888 is obtained.

The company shows documents granting leave to workers, for example:

- Menstrual leave application form with the initials SL (Sungai Rungau Estate) with the number of days requested for 2 days on 13 May 2023 which was approved on 13 May 2023.
- Application form for maternity leave with the initials DWP (Terawan Estate) with a total of 3 months leave starting from 7 June 2023 which was approved on 8 June 2023.
- Annual leave application form with Initial L (Terawan Estate) with the number of leaves requested in a total of 11 days on 7 June 2023 which was approved on 8 June 2023.

Based on interviews with the union, it was stated that the company has provided appropriate overtime payments and also provided workers' rights such as leave permits.

#### **6.2.4**

The company has a list of employee welfare infrastructure facilities updated for May 2023, where there are workers' housing facilities, religious facilities (houses of worship), sports facilities, health facilities in the form of clinics, clean water facilities, electricity facilities in the form of generators and Electricity, Daycare and others. Currently, all welfare facilities provided in general are in proper condition and can be used by workers and their families.

The company also has a maintenance program for workers' welfare infrastructure as listed in the Facilities and Infrastructure Maintenance Program document. The document describes the monitoring and improvement plan for existing welfare facilities every year according to the set budget, for example for the Terawan Estate which is being worked on in 2023 as many as 9 coupels.

Based on the results of field observations, for example in the SMLM and SMLE housing areas, 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 provided by the company, prayer facilities are in the form of a mosque, churches and other facilities (clinics) are available as worker health facilities that can be accessed by workers and their families.

Based on interviews with housing residents, it was stated that the housing facilities provided were in decent condition, one house was occupied by 1 head of family and so far if there were complaints from workers regarding housing facilities, the company would respond and make repairs as soon as possible.

In accordance with the description above, it can be concluded that the company already has facilities and infrastructure for the welfare of workers in proper conditions and can be accessed by workers and their families.

#### **6.2.5**

Based on field observations and interviews with estate and mill employees revealed that in the certification unit's environment there are basic food cooperatives, vegetable vendors and stalls in the employees' homes that provide their daily needs at affordable prices.

#### **6.2.6**

Companies in setting wages are based on the 2023 minimum wage in Seruyan Regency based on the Decree of the Governor of Kalimantan Tengah No. 188.44/472/2022 dated December 6, 2022 with the UMK of Seruyan Regency of IDR 3,594,095.56. Related to this, the company also issued a decree for the lowest wage in Seruyan Regency of IDR 3,596,596.

In relation to a decent living wage, the company has assessed the wages paid in accordance with the minimum wage of Seruyan Regency and has also conducted an assessment of the in kind benefits provided with the following details:

- The lowest basic wage is IDR 3,596,596;
- Holiday allowance of IDR 251,269;
- Electricity IDR 236,660;
- House of IDR 368,842;
- Water IDR 17,175;
- School IDR 225,309;
- Polyclinic IDR 66,940;
- Daycare IDR 42,598

So from these data, it is known that the total living wage (wages and in-kind benefits) is IDR 4,805,389.



**6.2.7**

Based on the results of a review of employee list documents for May 2023, there are a total of 2,529 workers in plantation and factory units with the following details:

- Sungai Rungau Mill with 156 permanent employees.
- Sungai Rungau Estate with 485 permanent workers and 188 Fixed Period Working Agreement.
- Terawan Estate with 504 permanent employees and 129 Fixed Period Working Agreement.
- Tangar Estate with 522 permanent employees and 115 Fixed Period Working Agreement.
- Bukit Tiga Estate with 328 permanent workers and 102 Fixed Period Working Agreement.

From these data, it is known that the Fixed Period Working Agreement employed are in the maintenance work section and estate field workers (not permanent jobs). Based on the document review, it is known that all work that is permanent is carried out by permanent workers.

Based on the results of interviews with the Seruyan Regency Manpower and Transmigration Office, it is known that there are no Fixed Period Working Agreement employed in permanent jobs. Fixed Period Working Agreement reporting has also been carried out, for example Fixed Period Working Agreement reporting for the Terawan Estate on April 16 2023 to the Seruyan Regency Manpower and Transmigration Office for 6 people.

The company also shows the appointment of personnel to become permanent employees, for example employees with the initials EP, who have been given promotions to become permanent workers in the Mill unit as stated in SK No. 011/BAP-SRUM/SK-PT/09/2022 on 1 September 2022.

Based on the results of interviews with the Seruyan Regency Manpower and Transmigration Office, it is known that the company has reported the use of Fixed Period Working Agreement regularly. Companies can also show evidence for all work that is permanent not carried out by Fixed Period Working Agreement.

<b>Status: Comply</b>
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**6.3**

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

**6.3.1 and 6.3.3**

The company has a policy related to the existence of Labor Unions through Directors Circular No. 169/HR OPS/08/10 dated 20 August 2010 which explains that companies respect freedom of association within worker/labor organizations which is a basic right of workers/employees as stipulated in the law.

Each unit already has a trade union organization showing documents for the formation of trade unions/registration of trade unions, including:

- The registration of the Sungai Rungau Mill Workers' Union based on the Decree of the Head of the Transmigration and Pariwisata Manpower Office of Seruyan Regency No. 560/516/DISNAKERTRANSPAR/VI/2021 June 2021.
- Registration of the Sungai Rungau Estate Workers' Union based on Decree of the Head of the Seruyan Regency Manpower and Transmigration Office No. 560/176/Disnakertrans/III/2023 dated 1 March 2023.

The company has also conducted outreach regarding freedom of association, for example, which was carried out on January 21, 2023, attended by 51 people. Based on the results of interviews with union representatives, it is known that the company has given freedom to employees to organize. The structural selection of trade union organizations is carried out through the election mechanism of each member and there is no intervention from the company. So far, communication between the company and the union has been good.

**6.3.2**

The company shows documents of internal meetings of the trade union and bipartite meetings, including the following:

- Minutes of meeting results on 21 December 2022 at the Terawan Estate which was attended by 15 participants with an agenda of finger failure and employee septic tank repair.

- Minutes of the meeting on 9 December 2022 at Bukit Tiga Estae which was attended by 13 participants with an agenda for Christmas leave and new wage adjustments.

Based on the results of interviews with trade union representatives, it is known that trade unions hold regular meetings with internal unions or between trade unions and companies and the results of these meetings will be documented in the meeting minutes.

**Status: Comply**

#### 6.4

##### **Children are not employed or exploited.**

##### **6.4.1, 6.4.2, 6.4.3, 6.4.4**

The company already has a Circular regarding the prohibition of child labor as contained in SE number 002/SE-HRDV/03/09 made by the HR Director explaining the implementation of the law. No. 13 of 2003 concerning manpower, article 68 regarding the prohibition of employing children, it is hereby conveyed that in the process of hiring employees, the minimum age limit is set at 18 years.

The company shows a list of workers for the May 2023 period which provides the date of entry and date of birth, from this it was not found that there were any personnel who started work under the age of 18. The company also periodically socializes the prohibition of employing minors to external parties (contractors and the surrounding community), for example on January 13 2023 which was attended by 5 people and to workers on 21 January 2023 which was attended by 51 people.

Based on the results of field visits and interviews with Sungai Rungau & Tangar Estate, it is known that there are no child workers and workers are aware of the policy prohibiting the employment of minors. In addition, warnings were also found which informed the prohibition, including the prohibition for children to be in the work location

Thus it can be concluded that the company has implemented a policy regarding the prohibition of employing underage children.

**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 workers are free from all forms of harassment, threats, abuse contained in the GAR Social and Environmental Policy to carry out policies related to hiring workers in accordance with applicable regulations and has been signed by the Head of Upstream, CEO- Downstream & Commercial, Executive Director & CFO; Managing Director of Sustainability & Strategic Stakeholder Engagement, in 2015. In point 3 Work Environment and Industrial Relations states that companies prohibit the employment of children and take action to prevent the use of child labor in our activities, besides that there is also a statement of zero tolerance against immoral treatment and harassment.

Based on the recapitulation of employee complaints and complaints for the past one-year period, there were no complaints related to harassment/violence/abuse. The company has also socialized regarding the prohibition on preventing sexual harassment and violence and other forms, for example on January 21 2023 which was attended by 51 people.

The results of interviews with the Seruyan District Manpower Office, obtained information that in the past one-year period there has been no information regarding incidents of harassment/violence/abuse submitted.

From the description above it can be concluded that the company has and implements a policy to ensure that workers are free from all forms of harassment, threats, abuse both physically and mentally from fellow workers or plantation business actors.

##### **6.5.2**

The company has a social policy on the protection of reproductive rights, especially for women number 724/TQEM-SPM/09 dated 8 November 2010 which explains that the unit of certification will comply with all applicable regulations related to reproductive rights, including the right to maternity leave, and will give pregnant women and breastfeeding tasks that do not pose a health risk to themselves or their children.

This policy was socialized to all employees on January 21, 2023 which was attended by 51 people and contractors which was carried out on January 13, 2023 which was attended by 5 people.

Based on interviews with women workers in estates and mills, it was stated that the unit of certification had given female workers 2 days menstrual leave and 3 months of maternity leave. It was further explained that so far there have never been any problems in applying for menstruation or maternity leave.

### 6.5.3

The company has conducted a study/assessment of the needs of new mothers who have given birth, which was carried out through interviews with new mothers, for example on January 10 2023, with 3 female workers, with results including the following:

- Maternity leave.
- Postnatal care.
- Breastfeeding time.
- Caring more attention to the baby
- Work time reduction
- Slings, clothes and blankets
- Place for breastfeeding
- Mother and baby care including immunization

Based on this, the company carries out action plans and recommendations such as:

- Provide 3 months maternity leave to employees.
- Provide a special place and time for breastfeeding for 30 minutes during work.
- Provide routine control schedule for mother and child.
- Allocating mothers for non-chemical work.
- Provide special time for mothers for consultations related to baby care.

The company also shows the realization of these recommendations, for example:

- Determination of 3 months maternity leave as stated in the CLA
- Provide a special place in the clinic that employees can use while breastfeeding

### 6.5.4

The company has a mechanism for submitting complaints and grievances for workers listed in the SOP document for Handling Complaints and Dissatisfaction, document No. SOP/SMART/GIMS-SCMD/USDV/I/001 (Rev. 02) dated 11 April 2017 which was signed by the Head of PCDV, Head of NSE CSR, Managing Director of SSSE, and President Director of PT SMART Tbk.

The procedure also ensures the anonymity of the complainant and the complainant. It was further explained that if the complaint is not resolved by deliberation and consensus, the certification unit and the party submitting the complaint want a settlement through the Mediation Forum. Mediation Forum meetings must take place at the third party's location or other agreed neutrality venue. In addition, if there is a complaint that does not receive a response or agreement, then the complaint can be submitted to the RSPO Secretariat via the website: [www.rspo.org](http://www.rspo.org).

All complaint forms and periodic requests for information will be collected and recorded. The unit of certification will respond to each complaint within 14 days from the date the complaint was received. In addition, for affected parties who cannot read or write, the company will convey it directly and the company will also issue a warning regarding the complaint mechanism in strategic areas.

The procedure has also been socialized to contractors and the surrounding community on January 13, 2023, which was attended by 5 people and to workers on 21 January, 2023, which was attended by 51 people.

<b>Status: Comply</b>	
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## 6.6

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

#### 6.6.1

Based on interviews with operational staff revealed that all employees were those who passed the recruitment and selection process according to certification unit procedures and requirements. Certification unit post job vacancies then prospective workers come voluntarily to apply for jobs that are available for free and there is no holding of identity documents. Overtime is monitored by the certification unit and workers are given the freedom to choose overtime. The certification unit also does not force or make it difficult

for employees to resign. There is no penalty for termination if they wish to terminate the contract early.

Based on document verifications and field observation in at Estate and Mill operations activities, there were no forms of forced or trafficked labor are used. Besides that, there are no foreign workers who work at PT BAP.

### 6.6.2

There are no migrant workers who work in the certification unit's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in certification unit regulations, collective labor agreements, and in work agreements. Based on the employee list, it is known that all employees are permanent 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 already has a person in charge of OHS in each Estate and POM which is structured in the OHS Committee organization. The organizations are as follows:

- Sungai Rungau Mill
  - ❖ Decree of the Kalimantan Tengah Prov Kadisnaker number KEP.70.DISNAKERTRANS/V/2023 concerning ratification of OHS Committee and emergency response of PT Binasawit Abadipratama – Sungai Rungau Mill dated May 5 2023 with a validity period of 3 years with OHS I secretary on behalf of Andi Eko M.
  - ❖ Decree of the Minister of Manpower number 5/4567/AS.02.04/V/2020 concerning the appointment of a General OHS expert at PT SMART TBK which is valid until 4 May 2023.
- Sungai Rungau Estate
  - ❖ Decree of the Minister of Manpower number 5/4567/AS.02.04/V/2020 concerning the appointment of a General OHS expert at PT SMART TBK which is valid until 4 May 2023.
  - ❖ Decree of the Kalimantan Tengah Prov Kadisnaker number KEP.13.DISNAKERTRANS/II/2023 concerning ratification of OHS Committee and emergency response of PT Binasawit Abadipratama – Sungai Rungau Estate dated January 26 2023 with a validity period of 3 years with OHS I secretary on behalf of Radaden Yoga
  - ❖ Decree of the Minister of Manpower number 5/18547/AS.02.03/XII/2022 dated 5 December 2022 concerning the appointment of a General OHS expert at PT SMART TBK which is valid until 5 December 2025.
- Terawan Estate
  - ❖ Decree of the Kadisnaker of Kalimantan Tengah Province Number: KEP.262.DISNAKERTRANS/IX/2022 concerning ratification of OHS Committee and emergency response of PT Binasawit Abadipratama – Tangar Estate dated 7 September 2022 with a validity period of 3 years with OHS I secretary on behalf of Amir Hamzah.
  - ❖ Decree of the Minister of Manpower number 5/18543/AS.01.03/XII/2022 dated 5 December 2022 concerning the appointment of a General OHS expert at PT SMART TBK which is valid until 5 December 2025
- Bukit Tiga Estate
  - ❖ Decree of the Kadisnaker of Kalimantan Tengah Province Number: KEP.08.DISNAKERTRANS/II/2023 concerning ratification of OHS Committee and emergency response of PT Binasawit Abadipratama – Bukit Tiga Estate dated 18 January 2023 with a validity period of 3 years with OHS I secretary on behalf of Muhammad Juandi.
  - ❖ Decree of the Minister of Manpower number 5/1619/AS.01.03/II/2022 dated 28 February 2023 concerning the appointment of a General OHS expert at PT SMART TBK which is valid until 28 February 2025
- Tangar Estate
  - ❖ Decree of the Kadisnaker of Kalimantan Tengah Province Number: KEP.157.DISNAKERTRANS/III/2022 concerning ratification of OHS Committee and emergency response of PT Binasawit Abadipratama – Tangar Estate dated March 14 2022 with a validity period of 3 years with OHS I secretary on behalf of Kasmayadi.

The company has also shown Certificate No. 287/SK/TPM/VI/2023 from PT Tranindo Pratama Mulia dated 14 June 2023 which explains that the appointment letter and general OHS expert authority card on behalf of Kasmayadi and Andi Eko Mahendra are still in the process of being extended at the Indonesian Ministry of Manpower.

The company has also shown the minutes of monthly meetings of the OHS Committee management at each Estate and POM, while the examples are as follows:

- Monthly OHS Committee SRGE meeting for the April 2023 period which was held on April 12, 2023
- Monthly OHS Committee TNGE meeting for March 2023 period which will be held on April 1, 2023

The routine OHS Committee meeting discusses reviewing the results of the previous month's meeting, monitoring SMOHS, evaluating work accidents, using PPE and so on.

#### **6.7.2**

Companies can show Emergency Response SOP No. SOP/SMART/UMUM/SADV/II/005 was ratified by the Head of Upstream on 01 July 2014. The procedure explains, Emergency response situations identified include: fire, explosion, pollution, natural disaster, riots, demonstrations, work accidents. Broadly speaking, the SOP contains the definition of an emergency and an emergency response team, the flow of reporting in the event of an emergency, the duties and responsibilities of the emergency response team, planning and handling actions in the event of an emergency, training and simulation of an emergency.

The company has also recorded work accidents that occurred at PT BAP. All work accidents are recorded in the work accident recapitulation document in each estate. All work accidents are discussed at the OHS Committee's regular monthly meetings and reported quarterly to the Kalimantan Tengah Province Manpower and Transmigration Service.

The company has also carried out emergency response simulations in each unit, the examples are:

- The 2023 fire and earthquake simulation at SRUM which was held on February 15, 2023. The simulation activity was attended by 47 participants.
- Fire, earthquake and riot emergency response simulation in the TRWE housing area which was carried out on July 14 2022. The activity was attended by 60 participants.

The company also has or provides first aid kits at work locations, both factories and estates, in accordance with Minister of Manpower and Transmigration Regulation Number 15 of 2008. One first aid kit covers 1-25 workers. For factories, first aid kits are available at several process stations, for example in the engine room and process office. For estates, a first aid kit is carried by each field foreman. Based on the explanation above, it is known that the Company has provided a first aid box/bag at the workplace in accordance with the Regulation of the Minister of Manpower and Transmigration of the Republic of Indonesia number: PER/15/MEN/VIII/2008 concerning First Aid for Accidents at Work.

Based on the results of the field visit to the Mill and Estate it was found that POHS boxes were available at Mill's work location as well as field first aid officers for the Estate unit. Based on the results of interviews with first aid workers in the field, for example at the harvesting site Block Q53-54 Afdeling III Tangar Estate and at the weed spraying location block F14 Afdeling V Terawan Estate, it is known that first aid officers have received internal training from the company, besides that first aid officers have understand the function of each item contained in the first aid kit.

#### **6.7.3**

The company has provided appropriate Personal Protective Equipment (PPE), which is provided free of charge to all workers in the workplace. Provision of PPE to workers has been adjusted to the type of work and the risk of hazards in each workplace. Based on the results of field visits and interviews with both estate and mill workers, information was obtained that the company provides free personal protective equipment. Workers can replace damaged PPE by bringing evidence of the damaged PPE for replacement.

Based on the results of field visits and interviews with spray workers in Block M24 Afdeling I SRGE, block F14 Afdeling V TRWE, and block Q55 Afdeling III TNGE it is known that workers have used the appropriate PPE, namely Respirator Masks, Aprons, Faceshield Helmets, Boots, sleeve shirts long and rubber gloves. From the results of the interviews it is also known that after completing work related to chemicals, workers are not allowed to go straight home. Workers have to clean themselves in the rinsing house available in each Estate. PPE and work tools are also not allowed to be brought home and must be stored in the storage warehouse for work tools and PPE that has been provided.

#### **6.7.4**

The company shows the PKB for the 2023-2025 period which explains that the company is required to enroll all of its employees in the health insurance, work accident, death security, old age security, and pension security programs at the Social Security Administration Agency for Employment and Health in accordance with applicable regulations.



The company already has a list of workers which also includes Social Security Administration Agency for Employment and Health participant numbers. Based on a review of the worker list document and proof of payment for Social Security Administration Agency for Employment and Health for the same period, it is known that companies have registered and paid all their workers in the Social Security Administration Agency for Employment and Health programs, which consist of work accident insurance, death benefits, Old Age Guarantee and Pension Guarantee via Bank Transfer, with proof of payment as follows:

- Social Security Administration Agency for Health for the April 2023 period, which will be paid on 11 April 2023 and Social Security Administration Agency for Employment on 11 April 2023.
- Social Security Administration Agency for Health for the period of May 2023 which will be paid on 12 June 2023 and Social Security Administration Agency for Employment on 10 May 2023.

Based on the results of interviews with plantation and factory workers, it is known that the company has provided health insurance to workers and their families (wives and children) and employment guarantees to all workers.

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

#### 6.7.5

The company has shown work accident recording documents using the Lost Time Accident for each Estate and mill. The company has shown work accident recording documents for each Estate and mill, examples are:

- Work accident data base for 2023 SRGE. Based on these documents, information was obtained that:
  1. January 2023 period with a total of 2 work accidents that caused a loss of working days (on behalf of Pa (initials) lost 3 days and Sa (initials) lost 5 working days).
  2. Period February 2023 with a total of 1 work accident causing a loss of working days (on behalf of En (initials) a loss of 3 working days)
  3. Period March 2023 with a total of 3 work accidents that caused a loss of working days (on behalf of AH (initial) lost 5 working days, Ma (initial) lost 7 working days and Tri (initial) lost 2 working days).
  4. The April 2023 period with a total of 3 work accidents that caused a loss of working days (on behalf of AM (initials) lost 2 working days, Ir (initial) lost 3 working days and AR (initials) lost 3 working days).
- Recapitulation of work accident reports for the first quarter of 2023. Based on this document, it is known that there were 3 work accidents reported in the period January – March 2023, on behalf of:
  1. Pa (initials) with a type of eye injury originating from litter and a moderate type of accident with an estimated loss of 3 working days
  2. Sa (Initial) with a type of eye injury originating from litter and a moderate type of accident with an estimated loss of 5 working days
  3. En (initials) with a type of wound on the leg originating from the frond and a moderate type of accident with an estimated loss of 3 working days

The results of the interview with the related PIC explained that this recap is one of the attachments in the SRGE OHS I Routine report for the first quarter of 2023 which was submitted to the Kalimantan Tengah Province Manpower and Transmigration Office on April 12, 2023.

Based on the Lost Time Accident document for the period January – April 2023 Sungai Rungau Estate, it is known that there were no work accidents and there were days lost due to work accidents with FR and R values of 0.

Based on the results of field visits and interviews with doctors and SRGE clinic clerks, it is known that there was a work accident on behalf of employee Tri (initials) on March 29, 2023 and until now he is still under treatment and has not yet returned to work. Based on the explanation above, it is concluded that the Company has not been able to provide sufficient evidence that work accidents are recorded using Lost Time Accident (LTA). **NCR No. 2023.01 with minor category.**

<b>6.7.5</b>	<b>Status: Non-Conformity No.2023.01 with minor category</b>
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<b>PRINCIPLE #7</b>	<b>PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT</b>
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#### 7.1



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

**7.1.1**

PT BAP has procedures related to integrated pest management which are contained in the following documents:

- SOP No. SOP/SMART/MCAR/VIII/TA-PGM dated 15 July 2020 concerning Weed Control. The procedure describes weed control in seedlings, immature plantations, mature plantations, weed control in the field, weed spray equipment, general instructions regarding the safety of working with pesticides and instructions for using paraquats and pesticide monitoring.
- SOP No. SOP/SMART/MCAR/VII/TA-HPT dated 15 July 2020 concerning Pest and Disease Control. The procedure explains that the pest control process starts from pest detection (early warning system), census, pest control decisions, requests for recommendations to SMARTRI (research), pest management, control recommendations, control implementation and control evaluation. The procedure also describes the threshold for the economic value of attack by each pest.
- SOP for Rat Control (IK/Smart/MCAR/VII/TA-HPT/07) dated 15 July 2020. A census of mature plants is carried out every 3 months, namely January, April, July and October. The critical threshold for rat attack is 5% of the census. Biological control by observing owls. Chemical control using rodenticides.
- SOP for Detection of leaves eater caterpillars (IK/Smart/MCAR/VII/TA-HPT/01) July 15 2020. Caterpillar detection is carried out every 2 months. When an attack occurs, it is not necessary to carry out a detection, but a direct census.
- SOP for Control of Palm Leaf-eating Caterpillars (IK/Smart/MCAR/VII/TA-HPT/03) dated 15 July 2020 by planting beneficial plants, such as *Turnera subulata* and *Cassia* spp. Along Main Road (MR) and Collection Road (CR), as well as *Cassia Tora* on the corner of the block
- IK census and control of *Ganoderma* (IK/Smart/MCAR/VII/TA-HPT/10) on 15 July 2020. A census was conducted on 100% of the plants using a plant census map. In endemic areas, the census begins when the plants are 3 years old and if there is no attack, the census is carried out once a year.

Based on the results of field visits to each estate, it is known that the company has planted beneficial plants such as *Turnera subulata*, *Antigonon leptopus* and *Casia tora* along the main road.

Based on the results of interviews with company management, it is known that the planned activities for observing and controlling pests and diseases at PT Binasawit Abadi Pratama are carried out in accordance with the company's procedures.

The company has shown pest and disease census documents at PT Binasawit Abadi Pratama for the 2022/2023 period which were prepared based on existing procedures. For example, plans and realization of monitoring for rat pests for the period January and April 2023 and observation of leaf caterpillars for the period January, March and May 2023 for each Estate. Based on this document, it is known that there were no pest attacks that exceeded the control threshold. This is also in accordance with data on pesticide use for 2022 and 2023, where there was no use of insecticides, fungicides or rodenticides.

The company has also demonstrated a written commitment regarding reducing pesticides in plantation operational activities. This commitment is stated in GAR's Social and Environmental Policy dated 12 September 2019 which was approved by the Head of Policy and Compliance Division. Point 1.5 explains the company's commitment to continuously increasing productivity to reduce pressure on developing new land without intensifying the use of pesticides and chemical fertilizers.

Apart from that, the company also presented Memorandum number 032/PD/VIII/2016 effective date 13 August 2015 which was signed by the President Director explaining the company's commitment not to use the herbicide active ingredient Paraquat in eradicating weeds.

**7.1.2**

Based on document review and interviews with the company, the company applies several biological control practices to suppress pest and disease attacks such as *Antigonon leptopus* and (*Tyto alba*) and is well managed for example there are intersections at the intersection of the road to grow *Antigonon leptopus*. The results of verification on the cabi.org website are known that the species was declared not invasive in Indonesia.

**7.1.3**

Based on the results of field visits to each estate and interviews with company management, it is known that there is no HPT control using fire. The company's management explained that controlling pests and diseases at PT Binasawit Abadi Pratama uses more

biological controls and if using pesticides to control pests, it must refer to the results of a pest and disease census.

**Status: Comply**

## 7.2

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

### 7.2.1

The company has shown a document listing the pesticides used by the company during the 2023 period. Based on this document, it is known that the type of pesticide used is for weed control. The document explains the trade name, active ingredient, registration number, LD50, distribution permit period, pesticide target and so on. The pesticides used are as follows:

Merk	Active Ingredients	Registration Number	Target
Roll Up 480 SL	Isopropilamina Glifosat 480 g/ltr	RI.01030120042133	Broadleaf weeds and narrowleaf weeds
Rolifos 150 SL	Glufosinate Ammonium 150 g/l	RI.01030120103683	Broadleaf weeds and narrowleaf weeds
Erkafuron 20 WG	Methil Metsulfuron 20%	RI01030120093530	Broad-leaved weeds and narrow-leaved weeds and ferns
Garlon Mix 33/17 EW	Triclopys Butoxy Ethyl Ester 333 g/l	Ri01030120155148	Broadleaf weeds and narrowleaf weeds and woody weeds

Based on the results of interviews with company management, it is known that currently there is no use of pesticides to control pests and diseases. This is in accordance with the results of field visits to chemical storage warehouses in each estate where no pesticides were found to control pests and diseases.

### 7.2.2

The company has shown a document listing the pesticides used by PT Binasawit Abadipratama for the period 2022 – 2023. The document explains the pesticide name, active ingredient, LD50, registration number, area of use and amount of use. One example is the document on the use of TNGE pesticides as follows:

Name Of Pesticide	Active ingredients	LD50 (mg/kg)	2022		2023	
			Total usage (Ltr/Kg)	Area of Use (Ha)	Total usage (Ltr/Kg)	Area of Use (Ha)
Roll Up 480 SL	Isopropilamina Glifosat 480 g/lt (setara glifosat 365 g/l)	5,000	1,382.77	11,001.354	881.778	5,969.88
Erkafuron 20 WG	Methil Metsulfuron 20%	5,000	56.233	16.242	22.177	6.35
Rolifos150 SL	Ammonium glufosinat 150 g/ltr	2,000	74.772	5,085.466	42.57	3,256.99
Garlon Mix 333/17 EW	Triclopyr Butoxy Ethyl Ester 333 g/l	5,000	458.03	4,023.51	204.274	2,135.46
Garlon 670 EC	Triclopyr Butoxy Ethyl Ester 670 g/l	5,000	5.108	29.66	0	0

### 7.2.3

The integrated pest control program is carried out by the unit of certification and is monitored and evaluated every month. This evaluation is in the form of a pest and disease symptom report that describes the type of pest, average attack, attack analysis, level to threshold; conclusions to determine control techniques if needed. Based on 2022 and 2023 census data and summaries at Sungai

Rungau Estate, Terawan Estate, Tangar Estate and Buit Tiga Estate, it is known that there are no pests and diseases that exceed the economic threshold. So, there is no use of pesticides to control pests and diseases. Based on observations and field visits at Sungai Rungau Estate, Terawan Estate, Tangar Estate and Buit Tiga Estate, visually there were no signs of caterpillars attacking the crowns or holding rats in the FFB collected.

As a form of reducing the use of pesticides carried out by the company is by utilizing the natural enemies of potential pests in the estate, such as planting *Turnera subulata*, *Antigonon* and Owls as natural predators of rats.

#### 7.2.4

Based on the results of document review and interviews with company representatives, it is known that there is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control if the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is more selective for locations that have weeds.

Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptopus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

#### 7.2.5

The company has a complete list of Pesticides that are in the category of World Health Organization (group 1A or 1B), or listed in the Stockholm or Rotterdam Conventions shown in the WHO Recommended Classification of Pesticides by Hazards document by the International Programmed on Chemical Safety) and guidelines for classification 2004, and a complete list of pesticides included in IA or IB. Based on the identification documents, the company does not own and use the type of pesticide that is included in the WHO class 1A and 1B list.

Based on the results of the document review regarding policies, procedures or management plans to minimize and eliminate the use of pesticides (WHO groups 1A and 1B) and paraquat, it is known that there is no change from the previous assessment, including Memorandum No: 032 / PD / VIII / 2016 dated August 13, 2016 by the President Director, regarding a ban on the use of paraquat.

Based on the results of the document review (use of pesticides period 2021 – May 2023), it was found that the company did not use paraquat or class IA and IB pesticides. In addition, the company showed other documentation related to efforts to reduce pesticides for rat control, such as periodic census on rat infestation (indicating controlled levels), and biological control efforts by installing and monitoring barn owl boxes.

Based on the results of field visits to chemical storage warehouses in each Estate, for example the Tangar Estate chemical warehouse, it is known that there are no pesticides containing the active ingredient paraquat or WHO class IA or IB pesticides.

#### 7.2.6

The company has mitigation for the use of pesticides for pest spraying activities contained in the Pest and Plant Disease Control procedures with document number SOP/SMART/MCAR/VIII/TA-PGM and Weed Control procedures with document number SOP/SMART/MCAR/VII/TA- The HPT was approved by the chairman of MCAR and the Head of Up Stream, and effective July 15 2020. The procedure explains the handling and management of pesticides, such as;

- Pesticide selection
- Pesticide storage
- Using pesticides
- Address pesticide contamination
- Signs and symptoms of pesticide poisoning
- First aid instructions, as well
- Instructions for medical care

The company has also provided documents on pesticide handling training for workers. An example is the socialization on the management and handling of B3 at Terawan Estate which was held on February 10 2023. This socialization activity was attended by

77 participants.

Based on interviews with employees and pesticide application foremen in each estate, such as block O55 Afdeling III TNGE and block F14 Terawan Estate, it is known that workers are not allowed to use B3 material packaging for household needs. It was also explained that workers are not allowed to wash and store work tools and PPE used to spray pesticides in the homes of each worker. Washing and storage of PPE is carried out in the available rinse houses in each estate.

#### **7.2.7**

The company has a material management and movement procedure (SOP/SMART/LEMS-EHSD/SADV/II/006) which explains the inspection of materials and their characteristics including hazardous chemicals. The control officer is the warehouse clerk, the head of the warehouse has the right to refuse chemicals that have been damaged and expired. Officers periodically monitor the condition of stored materials to determine damage and expiration. If it is known that there are materials and chemicals, they are disposed of at the TPS for hazardous waste, at the final disposal site, or returned to the supplier.

The company has regulated procedures regarding waste management in the Waste Management SOP document (SOP/SMART/LEMS-EHSD/SADV/II/002) which was ratified by the Head of Upstream on 1 July 2014. This procedure regulates waste inventory, management permits waste, approval for processing permits for waste management, preparation of waste management programs, approval for waste management programs, implementation of waste management programs, evaluation and recording of documents.

Based on the results of field visits to the chemical storage warehouses in each estate, it was found that the chemical storage warehouses had been equipped with good air ventilation, pesticide storage based on its type and had been equipped with an MSDS. In addition, symbols of danger and emergency response facilities such as fire extinguishers and first aid kits are also available.

#### **7.2.8**

The certification unit has a Waste Management Procedure document with No. SOP/SMART/LEMS-EHSD/SADV/II/002 which explains handling agrochemical waste including used pesticide packaging. Regarding to the procedure, unit certification applied this step for handling pesticide packaging, such as:

1. The used agrochemical packaging is collected, then rinsed according to the Hazardous Waste Handling work instructions (IK/SMART/LEMS-EHSD/SADV/002/001).
2. Used agrochemical packaging that has been rinsed must be recorded in the Logbook Form of Used Chemical Packaging (F/SMART/LEMS-EHSD/SADV/002/001).
3. The used packaging that has been rinsed is then stored in a certain place that has been determined.
4. The rinsed used packaging can be reused for the same activities and/or buried and/or returned to the supplier and/or in accordance with the MSDS of the material.
5. The residual rinsing water can be used for the next mixing process to optimize the use of agrochemicals.

Based on interviews with warehouse head at SRGE, employee and warehouse head at BTGE, also field observations at temporary collection point for hazardous and toxic waste materials (TPS LB3) at SRGE and BTGE it was found that all pesticide packages are collected in the designated storage area and company coordinated with collectors for recycling and were not used for any other purpose other than pesticide application activities.

#### **7.2.9**

Based on the results of interviews with company management representatives, it is known that the company does not spray through the air.

#### **7.2.10**

The company has carried out a special medical examination for employees who come into contact with chemical pesticides, namely the Cholinesterase examination. The examples are:

- The SRGE Cholinesterase Examination which was carried out on May 22-23 2023 with a total of 52 participants and the results of the examination of all employees were normal.
- The SRGE Cholinesterase Examination which was carried out in May 2023 with a total of 65 workers participating and the results of the examination of all of these employees were normal.

Based on the results of interviews with spray workers in each estate, it was found that all workers who came into contact had undergone a special medical examination in May 2023. It was also explained that the results of the health check had been received by the workers.

### 7.2.11

Based on the results of interviews with spray workers at SRGE, BTGE, TNGE, and TRWE it is known that there are no pregnant or lactating female workers doing pesticide spraying. It was explained that if there were female workers who were pregnant or breastfeeding, the workers would be transferred to jobs that did not touch chemicals.

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

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

### 7.3.1

GAR's Social and Environmental Policy point 1.7 regarding Waste Management states "Identify, reduce, reuse, recycle and dispose of waste in an environmentally responsible manner". The company has a Waste Management SOP (SOP/SMART/LEMS-EHSD/SADV/002) in point 2.2.4.i explaining that:

- Domestic solid waste is separated into organic waste and inorganic waste in housing, offices, workshops and clinics
- Organic waste is disposed of and landfilled in garbage pits or managed by making organic fertilizers.
- Inorganic waste is collected in the bins/trash bins that have been provided for further transport by garbage trucks to the Final Waste Disposal Site (TPSA) in the plantation area to be stockpiled, or managed according to the 3R principle.

Point 2.2.4.b which explains that the company manages domestic waste using a cleaner production mechanism approach that applies the following principles:

- Reduce, Reuse, and Recycle (3R)
- Zero burning or not burning
- Disposal or hoarding

This procedure explains management:

- Factory Waste Management (POME, EFB, fiber, shells, etc)
- Estate Waste Management
- Clinical Waste Management
- Domestic Waste Management (solid and liquid)

For the management of waste, empty fruit bunches are reused as fertilizer, hazardous and toxic waste is managed in accordance with statutory regulations, factory waste water is managed and used as application land. Based on interviews with housing residents, it is known that residents already know how to separate inorganic waste, then throw it into the trash bins that have been provided and transport it to the landfill every 1-2 weeks. In residential areas, signs were also found prohibiting burning of waste in residential areas. However, based on field visits, it was found that several domestic waste points (inorganic waste) were not managed properly in the form of burnt points that were visited, such as SRUM, SRGE and TRWE. So based on this, companies are encouraged to ensure that there is no further burning of domestic waste in accordance with existing procedures. This becomes OFI in indicators 7.3.2 and 7.3.3

The company also has a hazardous and toxic waste management plan as follows:

The types of waste that can be stored in the form of B3 waste from the results of one's own activities include: used lubricating oil/used oil, used rags (used rags, used oil filters, etc.), laboratory waste containing hazardous and toxic materials, used batteries, waste medical/clinical, expired chemicals, packaging used for hazardous and toxic materials, electronic waste and waste contaminated with hazardous and toxic materials. The storage period stated in the permit for the temporary storage of hazardous and toxic waste materials does not exceed the maximum period of 90 days from the time the hazardous and toxic waste materials are generated produced.

The results of field observations through the BTGE and SRGE areas show that all hazardous and toxic waste materials stored comply with the types of hazardous and toxic waste materials listed in the permit. In addition, the company has also completed all the

components required in the permit such as installing information boards with coordinates, constructing irrigation canals around temporary storage areas for hazardous and toxic waste materials and building buildings that are free from flooding, far from water sources and settlements. Based on this explanation, the company already has a permit for a valid temporary storage area for hazardous and toxic waste materials, and implements the management of a temporary storage area for hazardous and toxic waste materials in accordance with the permit granted.

The company already has Cooperation Agreements with third parties to handle hazardous and toxic waste materials. The agreement between PT Binasawit Abadipratama and PT Semesta Langgeng Sentosa for the transportation of hazardous and toxic waste with No.001/BAP-LH-KALTANGSEL/05/2023 made on 30 May 2023 is valid for 3 years from the date of signing. The agreement also explains that the type of hazardous and toxic waste that will be submitted is in the form of the scope of this agreement includes receipt of hazardous and toxic waste with the types of used oil, used batteries, used filters and rags, used B3 packaging, laboratory waste, waste contaminated with hazardous materials. And toxic, fluorescent lamps, medical waste, and expired chemicals from palm oil plantations and mills.

The company has documents for storage and handling of hazardous and toxic waste which are shown in the Hazardous and Toxic Waste Balance Sheet and the Hazardous and Toxic Waste Balance Sheet which are made quarterly. For example, the company has shown a Balance Sheet for Hazardous and Toxic Waste for the first quarter of 2023. Based on this document, there is waste of hazardous and toxic materials in the form of rags, used batteries, used filters, used oil, contaminated packaging stored in the Temporary.

### 7.3.2; 7.3.3

GAR's Social and Environmental Policy point 1.7 regarding Waste Management states "Identify, reduce, reuse, recycle and dispose of waste in an environmentally responsible manner". The company has a Waste Management SOP (SOP/SMART/LEMS-EHSD/SADV/II/002) in point 2.2.4.i explaining that:

- Domestic solid waste is separated into organic waste and inorganic waste in housing, offices, workshops and clinics
- Organic waste is disposed of and landfilled in garbage pits or managed by making organic fertilizers.
- Inorganic waste is collected in the bins/trash bins that have been provided for further transport by garbage trucks to the Final Waste Disposal Site (TPSA) in the plantation area to be stockpiled, or managed according to the 3R principle.

Point 2.2.4.b which explains that the company manages domestic waste using a cleaner production mechanism approach that applies the following principles:

- Reduce, Reuse, and Recycle (3R)
- Zero burning or not burning
- Disposal or hoarding

For the management of waste, empty fruit bunches are reused as fertilizer, hazardous and toxic waste is managed in accordance with statutory regulations, factory waste water is managed and used as application land. Based on interviews with housing residents, it is known that residents already know how to separate inorganic waste, then throw it into the trash bins that have been provided and transport it to the TPSA every 1-2 weeks. In housing areas, signs were also found prohibiting burning of waste in residential areas. However, based on field visits, it was found that several domestic waste points (inorganic waste) were not managed properly in the form of burnt points that were visited, such as SRUM, SRGE and TRWE. So based on this, companies are encouraged to ensure that there is no further burning of domestic waste in accordance with existing procedures. **(OFI)**

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

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

### 7.4.1

The company has implemented practices to optimize production results in accordance with established procedures, including:

1. Regular sampling of soil and leaves by SMARTRI to ensure the elements needed by plants to produce optimally. The results of the soil and leaf analysis tested will be the basis for determining the dose of fertilizer in each Estate.
2. Fertilization activities that prioritize the principles of timely, right target, right dosage and right application. In addition, for marginal (sandy) soils, extra fertilization is given in the form of empty fruit bunches at a dose of 40 tons/ha.
3. Maintenance of ground cover plants to reduce evaporation (maintain soil moisture). For example, planting legumes (Mucuna



bracteata) and maintaining soft ferns (*Nephrolepis bisserata*). To all spraying employees it is always conveyed during the morning assembly not to spray the plants.

4. The company's commitment not to use herbicides with the active ingredient paraquat since 2016. Based on information from managers and staff, this is to show the company's commitment to supporting RSPO guidelines in terms of reducing/not using class 1A and 1B herbicides and paraquat.
5. Monitoring of SOP implementation, among others, is carried out through an internal audit mechanism that is carried out by the OIA Department every semester.

The company has shown POME application implementation documents as a form of utilizing POM waste to increase soil nutrients. The utilization of POME is:

Month	FFB Process (Kg)	Effluent (m <sup>3</sup> )
July	35,525,880	28,973,62
August	42,826,680	19,656,00
September	36,297,850	29,899,99
October	26,043,480	28,533,27
November	29,604,860	31,598,06
December	31,124,380	30,257,00
<b>Total</b>	<b>201,423,130</b>	<b>168,918</b>

#### 7.4.2

The Company has provided documents of regular analysis of tissue (eg leaves) and soil samples to monitor and manage changes in soil fertility and plant health for each Estate. The examples are:

SRGE :

1. LSU number 382/DAUN/LAB\_SMARTTRI/VI/2022 dated 7 June 2022 with a total of 28 samples with test parameters N,P,K,Mg,Ca,B,Cl.
2. SSU Number 097/TANAH/LAB-SMRTTRI/IX/2021 dated 7 August 2021 with a total of 12 samples with test parameters including texture, pH, N, C-organic, Cation Exchange Capacity

TNGE :

1. SSU number 001/TANAH/LAB-SMARTTRI/III/2020 dated 7 March 2020 in a total of 174 samples and parameters tested including Texture, pH, N, C-Organic, P2O5, CEC, Base Exchangeable, Al and H
2. LSU number 518/DAUN/LAB\_SMARTTRI/VII/2022 dated 13 July 2022 with a total of 30 samples with test parameters N,P,K,Mg,Ca,B,Cl.

#### 7.4.3

The company has a nutrient recycling strategy such as utilizing fronds (pruning), application of PKS liquid waste and utilization of plant residues after replanting.

- SOP/SMART/MCAR/XII/TA-PTM – Maintenance of Mature Plants, pruning fronds are arranged on dead logs in the form of an L-Shape (on flat areas) and parallel to the contour (on undulating areas) and cut into 2 parts (on flat areas) Application Lands).
- SOP/SMART/MCAR/II/TA-PRP – Replanting planning, replanting program submission refers to the following considerations: plant age >25 years, average tree height >13 meters, annual production <14 tonnes/ha, number of stands <100 trees/ha.
- SOP/SPO/SMART/LH-09 regarding waste management and IK.SMART/MCAR/IX/TA-PPK/14 concerning fertilization using palm oil mill wastewater.

The company has shown POME application implementation documents as a form of utilizing POM waste to increase soil nutrients. The utilization of POME is:

Month	FFB Process (Kg)	Effluent (m <sup>3</sup> )
July	35,525,880	28,973,62
August	42,826,680	19,656,00
September	36,297,850	29,899,99

October	26,043,480	28,533,27
November	29,604,860	31,598,06
December	31,124,380	30,257,00
<b>Total</b>	<b>201,423,130</b>	<b>168,918</b>

In addition, the company has also shown the recording of the use of empty fruit bunches from POM processing. Recording of applications for vacancies is recapitulated on a monthly basis in each plantation. For example, the application of empty fruit bunches in the period July – December 2022 for the Sungai Rungau Estate with a total application of 9,991,630 kg has been carried out with an area of 333 Ha.

#### 7.4.4

The company has shown PT BAP's fertilizer recommendation documents for the 2022 period. The company has also shown the 2022 fertilization realization documents for each Estate, while the examples are as follows:

<b>Fertilizer</b>	<b>SRGE</b>	<b>TNGE</b>
Egyptian Rock Phosphate (Kg)	814,800	991,950
HGFB (Kg) (borate)	20,905	29,065
Kieserite (Kg)	277,200	227,800
MOP (Kg)	977,450	1,619,000
Super Dolomite (Kg)	33,300	29,150
Urea (Kg)	455,450	1,097,600
CuSO4 (Kg)		4,626

Based on the document review, it is known that the realization of fertilization is in accordance with the recommendations

**Status: Comply**

#### 7.5

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

##### 7.5.1 & 7.5.2

The company has provided semi-detailed land map documents for TRWE, SRGE, TNGE and BTGE with a scale of 1 : 50,000. Based on the map, it is known that the slope class at PT BAP is undulating flat, and there is no land with a slope of more than 40%. Based on these documents it is known that the land suitability classes at PT BAP are Sufficiently Suitable (S2), Suitable Margins (S3), temporarily not suitable (N1). Thus it can be concluded that there are no fragile soils in PT BAP's operational area. The limited land for oil palm cultivation is mainly caused by the predominance of sandy soil texture, very low fertility, hilly areas and drainage problems.

Based on the results of a review of the 2023-2033 replanting plan documents and interviews with company management, it was found that when the recertification audit was taking place, PT BAP was not in any oil palm replanting activities.

##### 7.5.3

Based on the results of a review of PT BAP's 2023 areal statement documents and interviews with company management, it was discovered that at the time the audit activity was taking place it was known that the company was not carrying out new planting activities of oil palm.

**Status: Comply**

#### 7.6

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

##### 7.6.1 7.6.2 7.6.3

Based on the results of a review of the area statement documents and interviews with company management, it was found that the company had not carried out any new oil palm plantation developments

**Status: Comply**

#### 7.7

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

##### 7.7.1

Based on the results of interviews with the management of PT Binasawit Abadipratama, it is known that peat land is only found in the TNGE. The company has shown the Tangar Estate Semi-Detailed Land map document which was updated in May 2023 by the PMNP (Plantation Monitoring and Planning) Division. Based on the map, it is known that the area of peat in Tangar Estate is 93.12 ha with Typic Haplosaprists (84.40 Ha) and Typic Haplohemists (8.72 ha) and a depth of 75 – 100 cm.

Based on a study of the Tangar Estate area statement document, it is known that the planting of peat in Tangar Estate was in 1998.

#### **7.7.2**

The company has shown the PT Binasawit Abadi Pratama Peat Inventory document. Based on this document, it is known that there is peat land in Tangar Estate with an area of 39.24 ha and it has been included in the Peat Inventory report and submitted to the RSPO Secretariat on 15 November 2019.

Based on a study of semi-detailed land map documents with a scale of 1: 50,000 PT BinaSawit Abadipratama found that there is a 93.12 ha peat area in Tangar Estate (2023 update) with Typic Haplosaprists (84.40 Ha) and Typic Haplohemists (8.72 ha) ) and a depth of 75 – 100 cm.

The company has the opportunity to submit changes to PT Binasawit Abadipratama's Peat Inventory to RSPO no later than November 2023 in accordance with the Guidelines on Peat Inventory for RSPO Reporting. **OFI**

#### **7.7.3**

Based on a study of semi-detailed land map documents with a scale of 1: 50,000 PT BinaSawit Abadipratama found that there is a 93.12ha peat area in Tangar Estate (2023 update) with Typic Haplosaprists (84.40 Ha) and Typic Haplohemists (8.72 ha) ) and a depth of 75 – 100 cm.

The company has shown documents monitoring the rate of decline in Peat subsidence in the Tangar Estate for the period 2023 (to date May 2023). Based on this document, it is known that there has been no subsidence of peat based on monitoring at the subsidence stakes during the measurement period of March 2022 – May 2023. The results of measuring peat subsidence for the period of May 2023 are there is no decreased peat subsidence on the last monitoring since previous audit.

#### **7.7.4**

The company already has a peat management plan at Tangar Estate for the 2023 period. The work program on peatlands includes:

- Measurement of peat subsidence every month
- Piezometer measurement every month
- Measurement of the water level in the dam
- Treatment of subsidence stakes every 4 months
- Piezometer maintenance every 4 months
- Dam and pal Scale maintenance every 4 months

In addition to this program, the company also sprayed selectively to maintain the growth of the Nephrolepis bisserata fern, which functions as a peat cover plant. This corresponds to a field visit to the S55 Tangar estate block.

The company has also shown documents monitoring the water level both in the planting area and at the dam. An example of monitoring results is (May 2023):

Piezometer

- In May, Block S55 has an average height of 22 cm
- In May, Block Q53 has an average height of 26 cm

#### **7.7.5**

The company has shown PT Binasawit Abadipratama's replanting plan document for the period 2023 – 2033 and a map of the Tangar Estate Replanting Plan with a Scale of 1:50,000, it is known that the plan for replanting in peat areas will be carried out in 2030 – 2031.

The company has also shown the PT Binasawit Abadipratama Timeline Submit Drainability Assessment document to the RSPO made

by the Head of Land Management. Based on this document, it is known that the Company will start the Drainability Assessment in August 2023.

#### 7.7.6

The company already has a peat management plan at Tangar Estate for the 2023 period. The work program on peatlands includes:

- Measurement of peat subsidence every month
- Piezometer measurement every month
- Measurement of the water level in the dam
- Treatment of subsidence stakes every 4 months
- Piezometer maintenance every 4 months
- Water gate and water level maintenance every 4 months

In addition to this program, the company also sprayed selectively to maintain the growth of the *Nephrolepis bisserata* fern, which functions as a peat cover plant. This corresponds to a field visit at block S53 Tangar estate.

#### 7.7.7

All peat areas in the TNGE are in planting areas and other operational areas. There are no reserved peat areas/peatland conservation areas. The peat area has been managed in accordance with applicable regulations.

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

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

##### 7.8.1

The company already has SOPs for identification, management, and maintenance of water sources and quality in SOPs for Management and Monitoring of Water Resources No. SOP/SMART/BCOS-EHSD/SADV/II/004 dated 30 May 2014. In addition, it is also available in the SOP for Management and Monitoring of High Conservation Values or Protected Areas No. SOP/SMART/BCOS-EHSD/SADV/II/002 dated 01 July 2014. The procedure has explained the definition of water resources, management and monitoring, flow chart in water resources management and monitoring and personnel responsibilities.

In addition, the company has an SOP for river border area management with document number SOP/SPO/SMART/LH-07 which was legalized on July 1, 2010 the types of activities are:

1. When carrying out plant maintenance on 5 (five) oil palm trees located on the protected river border 50 meters wide, the left and right of the river are prohibited from using chemicals but done manually
2. When fertilizing plants for 5 (five) oil palm trees that are protected by a river border that is 50 meters wide to the left and right of the river, it is prohibited to use it mechanically (airplane or spreader) but manually.
3. On riverbanks that are prone to landslides, plants to prevent erosion should be planted

The company has documents for water management and maintenance of water sources for the 2022 period, which include:

1. Report on the Implementation of the Environmental Management Plan (RKL) and Environmental Monitoring Plan (RKL) which contains the management and monitoring of surface water (rivers) in the plantation which is carried out every semester.
2. Report on the Implementation of Management and Monitoring of High Conservation Value Areas which includes river management.

Based on the results of field observations through the conservation area, the border at Terawan Estate Division 6 Block H11 has been equipped with spray boundary signs.

The company already has a surface water quality monitoring program that is carried out every semester by the KAN-accredited Laboratory in August 2022. The monitoring locations are at 6 (six) sample points at upstream and downstream of the river at the company. Currently the company is conducting surface water testing using quality standards that refer to PP No. 22 of 2021. As an example, the following is the result of measuring water quality in the Rungau River in Semester 2 of 2022, at sample points upper Rungau River and downstream of the Rungau River.

Based on the review of water quality test documents, it is known that the quality of river water in the company is still below the set quality standards. Based on the results of a study of the Report on the Implementation of Management and Monitoring of High Conservation Value Areas for 2022, the company has also made efforts to manage the riparian areas by not carrying out cleaning maintenance or uprooting woody and hard plants on the riverbanks, planting local plants and also erosion-preventing plants, namely types of vertiver grass, bamboo, and guatemala grass, and others.

The company also shows reports on the results of river water quality tests near the factory, block L/M 28 (upstream) and block J/K 28 (downstream) for physical, chemical and biological parameters. Based on the document review, it is known that the water quality does not exceed the quality standard.

The company has a list of employee welfare facilities that updated in May 2023, including clean water facilities. Currently, all welfare facilities provided are generally in good condition and can be used by workers and their families. Based on the results of field observations, for example in the SRUM and SRGE housing areas, the welfare facilities provided are in proper/good condition.

### **7.8.2**

The protection of water resources carried out at PT BAP focuses on riverbanks which are also identified as HCV 4 areas. Efforts to protect riverbanks refer to several SOPs related to water management, coupled with an explanation from the company, which aims to:

- Guarantee the quality of river water so that it can be used sustainably
- Keeping high erosion and sedimentation from occurring

The company has documents for water management and maintenance of water sources for the 2022 period, which include:

1. Report on the Implementation of the Environmental Management Plan (RKL) and Environmental Monitoring Plan (RKL) which contains the management and monitoring of surface water (rivers) in the plantation which is carried out every semester.
2. Report on the Implementation of Management and Monitoring of High Conservation Value Areas which includes river management. For example, based on PT BAP's 2022 HCV area management and monitoring report, the following activities have been carried out:
  - Set boundaries with HCV Environmental Services attributes with red crosses on oil palm trees up to 50 meters/ 5<sup>th</sup> palm trees and make boards "sprayed area boundaries".
  - Installing HCV boundary markers in forested valley areas, riparian areas and conservation forests.
  - Prohibition of the application of chemical fertilizers on riverbanks that have been designated as HCV. Oil palms that are within the "spray area boundary" area are maintained manually (chemical-free) or through scratching discs.
  - Prohibition of jacking up natural wood saplings on river banks.
  - Planting erosion-preventing plants on the banks of the river to prevent high erosion
  - Carry out rehabilitation activities for HCV areas on the riparian to return the riparian areas to forested areas, with types of vertiver grass, bamboo, and Guatemala grass, etc.
  - Carry out maintenance of rehabilitation plants that are carried out and reported by the HCV PIC of each plantation.
  - Carry out direct outreach which is carried out periodically once a year to workers and villages around the plantations
  - Installing attributes, warnings and posters in HCV areas, as a means of indirect outreach.
  - Involve the community if there is an environmental conservation program that requires the attention of the local community.

Based on the results of field observations through the conservation area, the border at Terawan Estate Division 6 Block H11 has been equipped with spray boundary signs.

Based on the above information, it can be concluded that the company already has all water management documents, and performs maintenance of water sources and performs required water quality measurements and meets all established standards and quality standards.

### **7.8.3**

Based on the results of interviews and document verification, information was obtained that the company did not discharge liquid waste into water bodies. The company utilizes liquid waste from the processing of palm oil to become a substitute for fertilizer which is distributed to Land Application (LA).

The company already has a Liquid Waste Utilization Permit for Land Application (LA) based on the Letter of Approval for the Fulfillment of Commitments in the Context of Issuing Commercial/Operational Permits for Land Application Permit for Wastewater Disposal to PT Binasawit Abadipratama Number 503-H.C/08.004/DPMPSTSP/ V/2020 dated 4 May 2020. With due observance of the Letter of the Head of the Seruyan Regency Environmental Service Number 660/20/DLH.II/I/2020 dated 16 January 2020 regarding the recommendation for Extension of Permit for Disposal of Waste by Application to the Land of PT Binasawit Abadipratama with a permit period of 5 year.

Permit Liquid waste is used to irrigate 1,213.7 hectares of plantation land in blocks H16, H17, H18, H19, H20, I20, I21, I22, I23, I24, I25, I26, I27, I28, J21, J22, J23, J24, J25, J26, J27, J28, K20, K21, K22, K23, K24, K25, K26, L20, L21, L22, L23, L24, L25, L26, G21, G22, G23, G24, G25, G26 which is located in Sungau Raya Village, Danau Seluluk District, Seruyan Regency with control land in Block K19 covering an area of 30.72 Ha. The maximum limit for the quality of waste that comes out of the WWTP is BOD 5,000 mg/L and pH 6 – 9.

Based on the results of field observations, the WWTP located at the PKS has been equipped with flow meters at the inlet and outlet which show the discharge of wastewater flowing towards the WWTP and the LA land. The condition of the WWTP shows that there are no leaks or runoff of wastewater from the pond. In addition, based on the results of field observations, the location of Land Application Division 6 Block G21 and G22 Terawan Estate has been listed in the liquid waste utilization permit for the Land Application owned by the company.

SOP for Land Application Management SOP/SMART/MCAR/IX/TA-PPK Fertilization of Oil Palm Liquid Waste on Mature Plants I explains that dredging of mineral soil is carried out once a year, for sandy loam soil 2 times per year Based on document review It is known that the last LA monitoring was carried out in December 2022.

The company shows the results of liquid waste monitoring in 2023, for example as follows:

Parameter	Unit	Quality standards*	January	February
pH	-	6 – 9	7.27	7.21
BOD	Mg/l	5,000	1,267	3,562
COD	Mg/l	-	3,263	15,025

Based on the table above, it can be concluded that the company has met the quality standards for waste water that is disposed of and/or utilized according to the quality standards for waste water used for application to land (Land Application) and does not cause pollution to the environment.

#### 7.8.4

The company already has a water use permit for the palm oil processing unit based on the Decree of the Head of Investment and One Stop Services Office (BKPM) of Kalimantan Tengah Province No. 570/6/PU-AIR/I/DPMPSTSP-2021 concerning Surface Water Concession Permits for the Rungau River in Rungau Raya Village, Danau Seluluk District, Seruyan Regency, Kalimantan Tengah Province by PT Binasawit Abadipratama – Sungai Rungau Mill dated January 4, 2021 and is valid for 3 (three) three years. Permissible water withdrawal discharge may not exceed 0.024 m3/second.

The company can also show the recapitulation of water use for the January-April 2022 period, based on these data it can be obtained that the average water use for the FFB processing process is 20,103.33 m3/month while for the total water use (process, domestic, factory washing) which is 0.936 m3/month. The data shows that the company uses surface water that is in accordance with the quota specified in the permit owned by the company.

The company already has proof of surface water levy/tax payments for the January-December 2022 period to the Regional Revenue Agency for Kalimantan Tengah Province. Example: November-December 2022 surface water tax payment of 41,606 m3 on 27 February 2023.

**Status: Comply**

#### 7.9

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



**7.9.1**

The Certification Unit utilizes waste to increase the efficiency of the use of fossil fuels and optimize renewable energy which can be proven by PT BSA's record of using waste and liquid for the period 2021:

- Use of factory effluent (POME) for land applications.
- The use of shells and fiber from the rest of the Sungai Rungau Mill production process as renewable fuel for boiler purposes.
- Use of EFB as a substitute fertilizer by applying it to the land.
- Use of methane gas (biogas) for boiler combustion

For example, the company utilized 25,147,892 kg of fiber solid waste and 11,581,829 kg of shells for processing fresh fruit bunches in July – December 2022. Unit Certification also has made efforts to improve the efficiency of the use of fossil fuels in the transportation area (use of vehicles), including by periodic maintenance to reduce incomplete combustion and analyze fuel usage by selection of efficient transportation routes.

**Status: Comply**

**7.10**

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

**7.10.1.**

The company conduct GHG calculation using RSPO palm GHG calculator 4.0 (period of January to December 2022). Summary of GHG emission for Sungai Rungau POM and its supply base are listed as follows :

**Summary Emission**

Emmission per product	tCO2e/tProduct
CPO	0.49
PK	0.49

Production	t/yr
FFB processed	418,056.00
CPO produced	83,085.01
PK produced	22,276.06

Extraction	%
OER	19.87
KER	5.33

Land use	Ha
Planted area on mineral soil	17,791.88
Planted area on peat	93.12
Total planted area	17,885.00
Conservation Area (Forested)	125.81
Conservation Area (non forested)	1,510.90

**Summary of field emission and Sinks**

Description	Own crop			Total
	tCO2e	tCO2e/ha	tCO2e/tFFB	
Land conversion	82,135.07	4.59	0.20	82,135.07
CO2 emmisions from fertilizer	13,252.06	0.74	0.03	13,252.06
N2O emissions from Peat	16.64	0.00	0.00	16.64
N2O emissions from Fertilizer	11,077.87	0.62	0.03	11,077.87

Fuel consumption	2,538.12	0.14	0.01	2,538.12
Peat oxidation	121.39	0.01	0.00	121.39
<b>Sinks</b>				
Crop sequestration	-69,827.91	-3.90	-0.17	-69,827.91
Sequestration in Conservation area	-3,874.52	-0.22	-0.01	-3,874.52
<b>Total</b>	<b>35,438.72</b>	<b>1.98</b>	<b>0.08</b>	<b>35,438.72</b>

**Summary Oil Mill Emissions and Credits**

Description	tCO <sub>2</sub>	tCO <sub>2</sub> e/t FFB
Emission Sources		
POME	15,487.80	0.04
Fuel Consumption	579.22	0.00
Grid Electricity Utilisation	0.00	0.00
Credits		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sale of PKS	0.00	0.00
Sale of EFB	0.00	0.00
<b>Total</b>	<b>16,067.02</b>	<b>0.04</b>

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

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

**POME Divert to Anaerobic Digestion**

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

Based on the GHG verification results, it is known that there are no significant changes compared to the previous audit

Emission per product	tCO <sub>2</sub> e/tProduct	
	2022	2023
CPO	0.39	0.49
PK	0.39	0.49

**7.10.2**

Based on the results of the document review, it was found that there were no new plantings at PT Binasawit Abadipratama and that only replanting activities had been carried out since 2015.

**7.10.3**

The company has identified source of waste pollution and emissions from Estate and Mill activities for the period 2022. Sighted the result of identification of emissions and pollution as well as its sources, such as in estate emissions sources are from fossil fuel usage for transportation and generator, emission from fertilizer usage, pesticide usage and electricity usage. Identified the sources of emission and pollution from mill such as fossil fuel usage, electricity usage and WWTP.

Fossil fuel reducing have been implemented on Sungai Rungau POM by fiber and shell usage, and biogas plant. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Monitoring for emission and pollutants (air emission, air ambient, odor, noise, and vibration) from Estate and Mill was done periodically and comply with the standards quality, its covered on RKL/RPL implementation report and reported to Environmental Agency of Kalimantan Tengah Province.

**Status: Comply**

**7.11**
**Fire is not used for preparing land and is prevented in the managed area.**
**7.11.1**

The certification unit can show the SOP for preventing and overcoming land fires in the SOP Emergency Response document Number SOP/SMART/UMUM/SADV/I/005 approved by the Head of Upstream on July 1, 2014. The scope of the SOP includes planning, prevention, mitigation, post-fire management and reporting and coordination of firefighting and land preparation work, where the procedure explains that land clearing is carried out by mechanical means and Zero Burning. The land clearing procedure is carried out by not burning but doing it mechanically.

The company also has a SOP for New Land Clearing Number SOP/SMART/MCAR/IV/TA-PLB dated 26 March 2012 at point 2.2.4 which shows the work process on land preparation by not burning in land clearing activities. In addition, Golder Agri Recourses (GAR) also has a policy on social and environmental which was ratified on September 8, 2015 by the Head of Upstream which in point 1.4 explains that the company will implement Zero Burning in all plantation development activities including preparation new planting, replanting, or other development activities. Based on interviews with Pantap Village, Rungau Raya Village and Sebabi Village, it is known that in the last 1 year there have been no incidents of land fires at PT BAP.

**7.11.2**

The company already has procedures related to fire prevention and control. Based on the review of the document, it is known that the fire control techniques owned by the company have referred to the prevailing laws and regulations in Indonesia, including Law Number 18 of 2004, Law Number 32 of 2009, Minister of Environment and Forestry Regulation Number 32 of 2016 and Minister of Agriculture Number 5 of 2018.

Fire prevention measures taken by the company include monitoring/patrolling fire-prone areas and monitoring fire prevention and control facilities and infrastructure.

**7.11.3**

The company show the document record of involving stakeholders in efforts to prevent and control fires, for example fire fighting training with 51 workers, Person in charge of the village head of Sebabi, secretary of the village council of Sebabi, village consultative body (BPD), and Mobile Brigade 10 June 2022 at Pondok 1 Seruyan Estate

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

The Unit Certification do not conduct any new development since November 2005. PT Binasawit Abadi Pratama are subsidiaries of Golden Agri Resources and has been submit Disclosure of Liability to RSPO on 29 August 2014 with Zero Liability. Based communication between CB and RSPO by email on June 21 2017 its confirmed that PT BAP has zero liability status.

**7.12.2**

PT BAP has shown HCV assessment for the entire area of operations which done by the RSPO Approved Assessor on 2011. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008. These identifications indicates there is HCV 1.1, 1.2, 1.3, 4.1 presence on PT BAP total covered areas **1,503 Ha** distributed into five estates as follows: BTGE – 235.07 ha; TNGE – 363.78 ha; SSRE – 574.46 ha; SRGE – 174.49 ha and TRWE – 155.20 ha. All of indicates HCV areas was mapped by 1:50000 scale and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species. The difference in the area of the HCV area is because there is a more detailed data of the area in the basic info with an explanation of the area in this indicator. The total area of HCV in the unit of certification is 1,503 ha. However, in 2022 a verification will be carried out by the company so that there will be a change in the total area of HCV to 1636.71 Ha of which 788.17 ha will enter the planting area. This was stipulated by the company in the memorandum document "Approval of the HCV Baseline Area Evaluation Results at PT Binasawit Abadi Pratama Region Kalimantan Tengah 2 PSM 6" dated 17 April 2023 No. 02/SSP/MEM/CAD/BAP/III/2023. Based on that document, total covered areas **1,636.71 Ha** distributed into five estates as follows: BTGE – 240,88 ha; TNGE – 304,67 ha; SSRE – 559,42 ha; SRGE – 365,30 ha and TRWE – 166,44 ha.

Based on the results of the document review and interview with management, it was found that there were no new clearing at PT Binasawit Abadipratama since 15 November 2018, so HCS is not applicable.

### 7.12.3

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

### 7.12.4

The company already has SOPs for identification, management and maintenance of water sources and quality in SOP for Management and Monitoring of Water Resources No. SOP/SMART/BCOS-EHSD/SADV/II/004 dated 30 May 2014. Also available in SOP Management and Monitoring of High Conservation Values or Protected Areas No. SOP/SMART/BCOS-EHSD/SADV/II/002 dated 01 July 2014. The procedure has explained the definition of water resources, management and monitoring, flow charts in the management and monitoring of water resources and personnel responsibilities.

Based on the results of interviews with management, information was obtained:

1. When carrying out plant maintenance of 5 (five) oil palm trees in a protected riverbank 50 meters wide to the left and right of the river it is prohibited to use chemicals but it is done manually
2. When fertilizing 5 (five) oil palm trees in a protected riverbank 50 meters wide to the left and right of the river, it is prohibited to use it mechanically (plane or spreader) but do it manually.
3. Plant erosion-preventing plants on riverbanks that are prone to landslides

Companies can show evidence of the implementation of socialization and safety of protected areas to employees and the community which is carried out every year. Example as follows:

- Outreach to workers and their families at Pondok 2 BTGE on 20 February 2023 which was attended by more than 150 people
- Outreach to the people of Rungau Raya Village by letter on 9 March 2022
- Field observations show that in Terawan Estate there is an HCV area warning board

The material provided is in the form of: HCV types, HCV types, HCV management (warnings, planting of erosion prevention plants, security patrols), prohibition of activities using chemicals at the 50 M spray boundary on either side of the river that are identified as HCV, protection of rare and endangered wildlife, zero tolerance policy towards endangered animal and forest conservation in the PT Binasawit Abadipratama area.

The company has carried out activities in order to maintain protected areas and high conservation values which are submitted to institutions that handle the conservation and protection of wild plants and animals on a regular basis every year as evidenced in the 2022 PT Binasawit Abadi Pratama High Conservation Value Areas Management and Monitoring Implementation Report document which reported to the Kalimantan Tengah Province Natural Resources Conservation Agency (BKSDA) on May 31, 2023.

Based on these documents, the company has carried out management and monitoring activities in the form of:

- HCV boundary markers in the form of 128 boundary markers, 62 units of HCV warnings, 5 units of animal warnings and 38 units of spray markers spread across all PT Binasawit Abadipratama units.
- Socialization related to HCV area management which is carried out routinely during the morning circle in all work units of PT. Binasawit Abadipratama to workers and the community.
- Monitoring of HCV attributes, animals, plants and water resources.
- Management of HCVs in the form of prohibiting the application of chemical fertilizers and jacking up saplings in riparian areas, planting erosion prevention measures on river banks to avoid areas of high erosion

Based on the results of field observations in the conservation area, Division 6 riverbank Block H11 in Terawan Estate has spray boundary markings.

The company shows minutes and documentation of the signing of a joint commitment to HCV management with stakeholders such as the regional secretary, sub-district head, village head, and community leaders around the plantation, for example the Danau Seluluk sub-district head and the Terawan village head on 22 December 2016. Then, based on the results of interviews, for example with the village head because it is known that the company actively communicates with villages in managing the HCV area.

### 7.12.5

From the results of the study of documents and previous reports on surveillance 1.1, as well as completed with management interviews it is known that there is an HCV area in the form of the Rungau River border which is being worked on by the community on behalf of the Muslims (occupational area) in Block O20 covering an area of 20,000 m<sup>2</sup>. Document review shows that the land cultivator has a land certificate issued by the Village Head of Rungau Raya with the number SKT 140/708/Pem-RR/V/2014 dated 5 May 2014, and it is known that land clearing was carried out at the end of 2015

Since the initial clearing of the HCV border in 2015 the company has conducted socialization of HCV to land owners and efforts to compensate for land by the company have been carried out. The existence of community fields in the HCV area commensurate with the Rungau river in SSRE block O20 and controlled by the community by showing proof of ownership certificate / SKT from the field. This causes the company to be unable to manage HCV in the community's farm area. Negotiation efforts from the company through the Document & License team to the community who cultivate the HCV area have been carried out but have not found an agreement in the compensation process (the area price / ha requested is too high).

The company identified the HCV area that was encroached and conducted socialization to land owners and village communities. The HCV PIC makes a land clearing patrol report in the HCV area. As well as scheduling patrols at the HCV encroachment location, monitoring changes in the situation in the HCV area and making efforts to negotiate compensation for the cultivated area in the HCV area. Include information on the existence of clearings in the HCV area in the 2019 HCV monitoring management report. Efforts that have been made by the company in 2018 include identifying HCV, conducting socialization, and conducting patrols and reporting it in HCV management and monitoring documents.

#### **7.12.6**

The company has a internal policy regarding the protection of rare, threatened, or endangered species related to the prohibition of capturing, harming or collecting RTE species which is stated in several documents, including:

- Internal Office Memo from MD Services & Project No. 1231/M-Int/MDSP-VIC/XI/11 dated November 25, 2011 regarding the Zero Tolerance Policy towards Endangered Animals.
- Circular Letter from SMD Operations No. 002/SE-SMD OPS/IX/2010 dated 20 September 2010 regarding protected animals.
- GAR's social and environmental policy dated September 8, 2015 which explains that the company will conserve and protect riparian areas, water catchment areas, and other environmental services. In addition, this policy also explains that the company will investigate any violation of this policy such as hunting, keeping, injuring, torturing and killing endangered species and taking disciplinary action including termination of employment.

Companies can show evidence of the implementation of socialization and safety of protected areas to employees and the community which is carried out every year. Example as follows:

- Outreach to workers and their families at Pondok 2 BTGE on 20 February 2023 which was attended by more than 150 people
- Outreach to the people of Rungau Raya Village by letter on 9 March 2022
- Field observations show that in Terawan Estate there is an HCV area warning board

The material provided is in the form of: HCV types, HCV types, HCV management (warnings, planting of erosion prevention plants, security patrols), prohibition of activities using chemicals at the 50 M spray boundary on either side of the river that are identified as HCV, protection of rare and endangered wildlife, zero tolerance policy towards endangered animal and forest conservation in the PT Binasawit Abadipratama area.

The company has carried out activities in order to maintain protected areas and high conservation values which are submitted to institutions that handle the conservation and protection of wild plants and animals on a regular basis every year as evidenced in the 2022 PT Binasawit Abadi Pratama High Conservation Value Areas Management and Monitoring Implementation Report document which reported to the Kalimantan Tengah Province Natural Resources Conservation Agency (BKSDA) on May 31, 2023.

#### **7.12.7**

The company has carried out activities in order to maintain protected areas and high conservation values which are submitted to institutions that handle the conservation and protection of wild plants and animals on a regular basis every year as evidenced in the document on the Implementation Report on the Management and Monitoring of High Conservation Value Areas of PT Binasawit Abadi Pratama in 2021 which reported to the *Badan Konservasi Sumber Daya Alam* (BKSDA) of Kalimantan Tengah Province on 21 May 2022.

Based on these documents, the company has carried out management and monitoring activities in the form of:

- Marking of HCV boundaries in the form of 128 units of boundary markers, 62 units of HCV warnings, 5 units of animal warnings and 38 units of spray markers spread across all units of PT Binasawit Abadipratama.
- Socialization related to the management of the HCV area which is carried out routinely during the morning circle in all work units of PT. Binasawit Abadipratama to workers and the community.
- Monitoring of attributes of HCV, animals, plants, and water resources.
- Management of HCVs in the form of prohibiting the application of chemical fertilizers and sapling of wood saplings in river border areas, planting erosion prevention plants on riverbanks to avoid areas of high erosion

Monitoring of protected areas in 2021 is carried out regularly every week to ensure the security of the area. Monitoring activities were carried out at several river border locations. This monitoring is carried out to see the progress of the results of HCV management from the initial stage to the current condition. Routine monitoring of HCV areas is carried out by several personnel appointed by the company. All evaluation results will be reviewed and will be adjusted to the HCV management program in the 2023 period.

Based on the results of field observations in the conservation area, Division 6 riverbank Block H11 in Terawan Estate has spray boundary markings.

#### **7.12.8**

Certificate holder do not conduct any new development since November 2005. PT Binasawit Abadi Pratama are subsidiaries of Golden Agri Resources and has been submit Disclosure of Liability to RSPO on 29 August 2014 with Zero Liability. Based communication between CB and RSPO by email on June 21 2017 its confirmed that PT BAP has zero liability status.

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

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or √</b>
<b>ASA-1.4</b>	PT. BAP were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or √</b>
<b>ASA-1.4</b>	PT. BAP were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or √</b>
<b>ASA-1.4</b>	PT. BAP were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or √</b>
<b>ASA-1.4</b>	PT. BAP were not use the certificate and trademark whether on-product or off-product	√
	<b>Status: Comply</b>	

### 3.06 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 others 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><b>Company Group/Holding Statement:</b> 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"> <li>1. PT Sawitakarya Manunggul – Sawita Mill : Pre Audit 2015, Compliance Audit 24 – 31 May 2021</li> <li>2. PT Smart Tbk – Bukit Kapur Mill: Pre Audit 2015, Compliance Audit 15 November 2021</li> <li>3. PT Sinar Kencana Inti Perkasa – Kasuari Mill: Pre Audit 2015, Compliance Audit 11 October 2021</li> <li>4. PT Agrolestari Mandiri – Pekawai Mill: Pre Audit 2015, Compliance Audit 01 March 2021</li> <li>5. PT Binasawit Abadi Pratama – Perdana Mill: 14 June 2021</li> <li>6. PT Agrokarya Prima Lestari – Kuayan Mill: Pre Audit 2014, Compliance Audit 13 September 2021</li> <li>7. PT Mitrakarya Agroindo – Tangar Mill: Pre Audit 2015, Compliance Audit 27 September 2021</li> <li>8. PT Paramita Internusa Pratama – Belian Mill: Pre Audit 2015, Compliance Audit 28 June 2021</li> <li>9. PT Kresna Duta Agroindo – Rantau Panjang Mill: Compliance Audit 01 November 2021</li> <li>10. PT Kresna Duta Agroindo – Gunung Kombeng Mill: Compliance Audit 15 February 2021</li> </ol>

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

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>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 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"> <li>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.</li> <li>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.</li> <li>3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit plan on 17 May 2022.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <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"> <li>1. PT. Agrolestari Mandiri – Pekawai Mill: Compliance Audit 07 February 2022</li> <li>2. PT. Kresna Duta Agrindo – Gunung Kombeng Mill: Compliance Audit 21 February 2022</li> <li>3. PT. Harapan Rimba Raya – Sungai Kedang Mill: Compliance Audit 17 May 2022</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<ol style="list-style-type: none"> <li>4. PT. Kruing Lestari Jaya – Sungai Perak Mill: Compliance Audit 23 May 2022</li> <li>5. PT. Kresna Duta Agrindo – Rantau Panjang Mill: Compliance Audit 06 June 2022</li> <li>6. PT. Sawitakarya Manunggal – Sawita Mill: Compliance Audit 13 June 2022</li> <li>7. PT. Binasawit Abadi Pratama – Perdana Mill: Compliance Audit 20 June 2022</li> <li>8. PT. Paramitra Internusa Pratama – Belian Mill: Compliance Audit 26 June 2022</li> <li>9. PT. Bahana Karya Semesta – Sungai Air Jernih Mill: Compliance Audit 03 October 2022</li> <li>10. PT. Sawit Mas Sejahtera – Sungai Kikim Mill: Compliance Audit 03 October 2022</li> <li>11. PT. Sinar Kencana Inti Perkasa – Kasuari Mill: Compliance Audit 03 October 2022</li> <li>12. PT. Sinar Kencana Inti Perkasa – Demta Bulking: Compliance Audit 06 October 2022</li> <li>13. PT. Aditunggal Mahajaya – Sako Mill: Compliance Audit 14 November 2022</li> <li>14. PT. Agrolestari Sentosa – Jalemo Mill: Compliance Audit 21 November 2022</li> <li>15. PT. Mitrakarya Agroindo – Tangar Mill: Compliance Audit 05 December 2022</li> <li>16. PT. Agrokarya Prima Lestari – Kuayan Mill: Compliance Audit 05 December 2022</li> <li>17. PT. Sinar Kencana Inti Perkasa – Sungai Magalau Mill: Compliance Audit 12 December 2022</li> <li>18. PT. SMART – Bukit Kapur Mill: Compliance Audit 12 December 2022</li> </ol> <p><b>3.0</b></p> <p><b>Auditor Verification:</b></p> <p><b>4.0 Internal Audit report available for uncertified management unit:</b></p> <ol style="list-style-type: none"> <li>1. PT. SMART – Bukit Kapur Mill: Compliance Audit 12 December 2022</li> <li>2. PT. Agrolestari Sentosa – Jalemo Mill: Compliance Audit 21 November 2022</li> <li>3. PT. Binasawit Abadi Pratama – Perdana Mill: Compliance Audit 20 June 2022</li> <li>4. PT. Aditunggal Mahajaya – Sako Mill: Compliance Audit 14 November 2022</li> <li>5. PT. Mitrakarya Agroindo – Tangar Mill: Compliance Audit 05 December 2022</li> <li>6. PT. Kruing Lestari Jaya – Sungai Perak Mill: Compliance Audit 23 May 2022</li> <li>7. PT. Bangun Nusa Persada – Kenari Mill: Compliance Audit 19 September 2022</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<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> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit on 17 May 2022.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>
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><b>Company Group/Holding Statement:</b></p> <p>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</p>



<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>RSPO dated 27 July 2020, namely:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat</li> <li>2. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>3. PT Sumber Indah Perkasa – Papua</li> <li>4. PT Kresna Duta Agroindo – Kalimantan Timur</li> </ol> <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"> <li>1. PT Kencana Graha Permai (Delima Estate) – Kalimantan Barat</li> <li>2. PT Sumber Indah Perkasa – Papua</li> <li>3. PT Kresna Duta Agroindo – Kalimantan Timur</li> </ol> <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> <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"> <li>1. PT Kartika Prima Cipta – Kalimantan Barat</li> <li>2. PT Agrolestari Mandiri – Kalimantan Barat</li> </ol> <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"> <li>1. PT Cahaya Nusa Gemilang – Kalimantan Barat</li> <li>2. PT Paramitra Internusa Pratama – Kalimantan Barat</li> <li>3. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>4. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>5. PT Satya Kisma Usaha (Medan Sari Estate) – Kalimantan Tengah</li> <li>6. PT Binasawit Abadi Pratama – Kalimantan Tengah</li> <li>7. PT Aditunggal Mahajaya – Kalimantan Tengah</li> <li>8. PT Mitrakarya Agroindo – Kalimantan Tengah</li> <li>9. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>10. PT Buana Adhitama – Kalimantan Tengah</li> <li>11. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan</li> <li>12. PT Sawita Karya Manunggal – Kalimantan Selatan</li> </ol> <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</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>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"> <li>1. PT Kruing Lestari Jaya</li> <li>2. PT Harapan Rimba Raya</li> <li>3. PT Rimbaraya Tamajaya</li> <li>4. PT Agrolestari Subur Sejahtera</li> <li>5. PT Agrolestari Hijau Sentosa</li> <li>6. PT Kharisma Riau Sentosa Prima</li> <li>7. PT Mitranusa Permata</li> </ol> <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"> <li>• Submission of Disclosure and LUCA on semester 1 of 2022</li> <li>• Submission of Concept Notes on Semester 2 of 2022</li> <li>• Approval RaCP Proposal on Semester 1 of 2023</li> </ul> <p>For the RaCP process, smallholders scheme will be adjusted to the 2023 timebound along with the new acquisition company.</p> <p><b>Auditor Verification:</b></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"> <li>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,</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>and is currently still being reviewed by the RSPO Compensation Panel.</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>5. PT Kartika Prima Cipta – Kalimantan Barat (Muara Tawang Estate), the LUCA report which is still in the RSPO review process.</li> <li>6. PT Agrolestari Mandiri – Kalimantan Barat (Pekawai Mill and supply bases), the LUCA report which is still in the RSPO review process.</li> <li>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.</li> <li>8. PT Paramitra Internusa Pratama – Kalimantan Barat (Belian Mill, Belian Estate and Tengkawang Estate), LUCA report is in the process of being revised and will be sent to the RSPO.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>15. PT Agrokarya Primalestari – 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'iri 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 clarification for resubmission (2<sup>nd</sup> 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</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		HCV study has been carried out but is still in the process of HCVRN review.
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b> 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"> <li>1. PT Satya Kisma Usaha – Jambi</li> <li>2. PT Kresna Duta Agroindo – Kalimantan Timur</li> <li>3. PT Mitra Karya Agroindo – Kalimantan Tengah</li> <li>4. PT Binasawit Abadipratama – Kalimantan Tengah</li> <li>5. PT Aditunggal Mahajaya – Kalimantan Tengah</li> <li>6. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>7. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>8. PT Buana Adhitama – Kalimantan Tengah</li> <li>9. PT Agrolestari Mandiri – Kalimantan Barat</li> <li>10. PT Paramitra Internusa Persada – Kalimantan Barat</li> <li>11. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>12. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>13. PT Kartika Prima Cipta – Kalimantan Barat</li> <li>14. PT Kencana Graha Permai – Kalimantan Barat</li> <li>15. PT Cahaya Nusagemilang – Kalimantan Barat</li> </ol> <p><b>Auditor Verification:</b> 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"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010</li> <li>2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014</li> <li>3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014</li> <li>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.</li> <li>5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014</li> <li>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.</li> <li>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.</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010.</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<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><b>Company Group/Holding Statement:</b></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 wishes</p>



<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>to appeal until April 11, 2022. (RSPO Complaint Panel Decision is attached).</p> <p>2. Complaint on 2 March 2020 to GAR (Kalimantan Tengah Region) from Forest Peoples Program &amp; 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 &amp; 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.</p> <p>3. Complaint on 19 October 2018 to GAR (Kapuas Hulu Region, West Kalimantan) from the Forest Peoples Program (FPP) &amp; 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.</p> <p>4. Complaint on 13 October 2014 to PT Kartika Prima Cipta (West Kalimantan) from Forest Peoples Program (FPP) &amp; 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.</p> <p>5. 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> <p><b>Auditor Verification:</b></p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>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"> <li>1. PT Sawitakarya Manunggul (Sawita Mill and supply base)</li> <li>2. PT SMART (Bukit Kapur Mill and supply base)</li> <li>3. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base)</li> <li>4. PT Agrolestari Mandiri (Pekawai Mill and supply base)</li> <li>5. PT Binasawit Abadi Pratama (Perdana Mill and supply base)</li> <li>6. PT Agrokarya Prima Lestari (Kuayan Mill and supply base)</li> <li>7. PT Mitra Karya Agroindo (Tangar Mill and supply base).</li> <li>8. PT Paramitra Internusa Pratama (Belian Mill and supply base)</li> <li>9. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base).</li> <li>10. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base).</li> <li>11. PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</li> <li>12. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>13. PT Bahana Karya Semesta (Sungai Air Jernih Mill and supply base)</li> <li>14. PT Bangun Nusa Mandiri (Kenari Mill and supply base)</li> <li>15. PT Agro Lestari Sentosa (Jalemo Mill and supply base)</li> <li>16. PT Adi Tunggal Mahajaya (Sako Mill and supply base)</li> <li>17. PT Kruing Lestari Jaya (Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA)</li> <li>18. PT Harapan Rimba Raya (Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA).</li> <li>19. PT Rimbaraya Tamajaya (Sungai Pahu Estate and Sungai Pahu KKPA), which will be supply base for Sungai Kedang Mill.</li> <li>20. PT Agrolestari Subur Sejahtera: Bukit Permai Estate which will be the supply base of Bukit Perak Mill that has been certified</li> <li>21. PT Agrolestari Hijau Sentosa: Bukit Lestari Estate which will be the supply base of Bukit Perak Mill that has been certified</li> <li>22. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill that has been certified</li> <li>23. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be the supply base of Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).</li> </ol> <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</p>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>company regarding the progress of the settlement as described above.</p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. 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</i> Data, namely the handover of land in PT. BNM with the Head of the Village and Koperasi Perkebunan Bataduh Raya.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 4.2	<p><b>Company Group/Holding Statement:</b> 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><b>Auditor Verification:</b> 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><b>Auditor Verification:</b> 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</p>

<b>2.1 Un-Certified Units or Holdings</b>		
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		<p>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 consistent with the requirements of RSPO P&C criterion 2.1	<p><b>Company Group/Holding Statement:</b></p> <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/I/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"> <li>1. PT Djuandasawit Lestari (Muara Kandis Estate &amp; Muara Tawas Estate)</li> <li>2. PT Sawit Mas Sejahtera (Sawit Mas Estate)</li> <li>3. PT Bumi Sawit Permai (Bumi Sawit Estate)</li> <li>4. PT Forestralestari Dwikarya (Tanjung Rusa Estate)</li> <li>5. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate)</li> <li>6. PT Ivo Mas Tunggal (Samsam Estate, Ujung Tanjung Estate, Sei Rokan Estate, Nenggala Estate)</li> <li>7. PT Buana Wiralestari Mas (Kijang Estate, Nagamas Estate, Nagasakti Estate)</li> <li>8. PT Ramajaya Pramukti (Ramarama Estate)</li> <li>9. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate)</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>10. PT Agrokarya Prima Lestari (Muara Tawang Estate, Kuayan Estate, Bukit Sentuhai Estate, Tajur Beras Estate, Seranau Estate)</p> <p>11. PT Buana Adhitama (Sapiri Estate)</p> <p>12. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate)</p> <p>13. PT Mitra Karya Agroindo (Sungai Nusa Estate)</p> <p>14. PT Aditunggal Mahajaya (Sungai Ayawan Estate)</p> <p>15. PT Satya Kisma Usaha (Medang Sari Estate)</p> <p>16. PT Buana Adhitama (Bukit Dua Estate)</p> <p>17. PT Agrolestari Sentosa (Jalemo Estate)</p> <p>18. PT Binasawit Abadipratama (Perdana Mill)</p> <p>19. PT Agrokarya Prima Lestari (Kuayan Mill)</p> <p>20. PT Mitrakarya Agroindo (Tangar Mill)</p> <p>21. PT Agrolestari Sentosa (Jalemo Mill)</p> <p>22. PT Adi Tunggal Mahajaya (Sako Mill)</p> <p>23. PT Smart Tbk. (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill)</p> <p>24. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Kenari Plasma, Gahari Plasma, Kenari Plasma)</p> <p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> <li>1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma)</li> <li>2. PT Ramajaya Pramukti (Ramarama Plasma)</li> <li>3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma)</li> <li>4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma)</li> <li>5. PT Djundasawit Lestari (Pandawa Plasma)</li> <li>6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma)</li> <li>7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma)</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma)</li> <li>9. PT Sawitakarya Manunggul (Sawita Plasma)</li> <li>10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma)</li> <li>11. PT Kresna Duta Agroindo (Rantau Panjang Plasma)</li> <li>12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma)</li> <li>13. PT Paramitra Internusa Pratama (Belian Plasma)</li> <li>14. PT Paramitra Internusa Pratama (Muara Tawang KKPA)</li> <li>15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA)</li> <li>16. PT Mitrakarya Agroindo (Sulin Plasma)</li> <li>17. PT Agrokarya Prima Lestari (Sapiri Plasma)</li> <li>18. PT Adi Tunggal Mahajaya (Sako Plasma)</li> <li>19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma)</li> <li>20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma)</li> </ol> <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>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate)</li> <li>2. PT Sumber Indah Perkasa (Mambruk Estate)</li> <li>3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate)</li> <li>4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate)</li> </ol> <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"> <li>1. PT Kruing Lestari Jaya</li> <li>2. PT Harapan Rimba Raya</li> <li>3. PT Rimbaraya Tamajaya</li> <li>4. PT Agrolestari Subur Sejahtera</li> <li>5. PT Agrolestari Hijau Sentosa</li> <li>6. PT Kharisma Riau Sentosa Prima</li> <li>7. PT Mitranusa Permata</li> </ol> <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><b>Auditor Verification:</b></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"> <li>- 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.</li> <li>- PT Binasawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- 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.</li> <li>- PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process.</li> <li>- 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.</li> <li>- PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> </ul>



<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<ul style="list-style-type: none"> <li>- 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).</li> <li>- PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- 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.</li> <li>- PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Wahau Estate (574.58 Ha)</li> <li>- PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (24,41 Ha)</li> <li>- PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2,291 Ha)</li> <li>- PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha)</li> <li>- 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)</li> <li>- PT Ivomas 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)</li> <li>- 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)</li> <li>- PT Ramajaya Pramukti: there is an area still in process for HGU Rama Rama Estate (318.76 Ha)</li> <li>- PT Bumipalma Lestari persada: there is an area still in process for HGU Bumi Palma Estate (39.21 Ha)</li> <li>- PT Kruing Lestari Jaya (Sungai Perak Mill and supply base), doesn't have land use title (HGU), the HGU is still on process</li> </ul> <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>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA with an internal audit on 17 May 2022.</li> <li>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.</li> <li>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.</li> <li>6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be the supply base of Bumipalma Mill (PT Bumipalma Lestariopersada) that has been certified with an internal audit on 8 August 2022.</li> <li>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.</li> </ol> <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"> <li>1. PT Kruing Lestari Jaya: Sungai Perak Mill, Sungai Perak Estate, Sungai Basung Estate, Sungai Pikan Estate, Sungai Pilos Estate and Sungai Pikan KKPA.</li> <li>2. PT Harapan Rimba Raya : Sungai Kedang Mill, Sungai Kedang Estate, Sungai Tohan Estate, Kedang Pahu Estate, Sungai Tohan KKPA.</li> <li>3. PT Rimbaraya Tamajaya: Sungai Pahu Estate and Sungai Pahu KKPA which will be supply base for Sungai Kedang Mill (PT Harapan Rimba Raya).</li> <li>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.</li> <li>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.</li> <li>6. PT Kharisma Riau Sentosa Prima: Kharisma Estate and Kharisma KKPA which will be supply base for Bumipalma Mill (PT Bumipalma Lestariopersada) which has been certified.</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>7. PT Mitra Nusa Permata: Sungai Manunggul Estate which will be supply base for Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa).</p> <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"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill, Cendrawasih Estate, Nuri Estate, Rajawali Estate)</li> <li>2. PT Sumber Indah Perkasa (Mambruk Estate)</li> <li>3. PT Sawit Mas Sejahtera (Sungai Kikim Mill, Sungai Kikim Estate, Sungai Pangi Estate, Sungai Musi Estate, Sungai Saling Estate)</li> <li>4. PT Bumi Sawit Permai (Sungai Enim Estate, Sungai Lematang Estate)</li> </ol> <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"> <li>1. PT Kresna Duta Agroindo – Gunung Kombeng Mill (Gunung Kombeng Plasma)</li> <li>2. PT Ramajaya Pramukti (Ramarama Plasma)</li> <li>3. PT Satya Kisma Usaha – Sungai Bengkal Mill (Kilis Plasma)</li> <li>4. PT Agrokarya Prima Lestari (Sungai Sambon Plasma)</li> <li>5. PT Djundasawit Lestari (Pandawa Plasma)</li> <li>6. PT Foresta Lestari Dwikarya (Tanjung Rusa Plasma)</li> <li>7. PT Palmindo Biliton Berjaya (Tanjung Sawit Plasma)</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Kupang Plasma)</li> <li>9. PT Sawitakarya Manunggul (Sawita Plasma)</li> <li>10. PT Kresna Duta Agroindo (Jakluay Plasma, Bukit Subur Plasma)</li> <li>11. PT Kresna Duta Agroindo (Rantau Panjang Plasma)</li> <li>12. PT Kencana Graha Permai (Kayung Plasma, Kencana Plasma, Kenanga Plasma)</li> <li>13. PT Paramitra Internusa Pratama (Belian Plasma)</li> <li>14. PT Paramitra Internusa Pratama (Muara Tawang KKPA)</li> <li>15. PT Paramitra Internusa Pratama (Kapuas Hulu KKPA)</li> <li>16. PT Mitrakarya Agroindo (Sulin Plasma)</li> <li>17. PT Agrokarya Prima Lestari (Sapiri Plasma)</li> <li>18. PT Adi Tunggal Mahajaya (Sako Plasma)</li> <li>19. PT Kresna Duta Agroindo – Pelakar Mill (Tiga Serumpun Plasma)</li> </ol>

<b>2.1 Un-Certified Units or Holdings</b>		
<b>Section</b>	<b>Requirement</b>	<b>Concerns to Discuss, if any</b>
		<p>20. PT Kresna Duta Agroindo – Langling Mill (Batang Gading Plasma)</p> <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

<i>NCR No.</i>	: 2023.01	<i>Issued by</i>	: Johannes Kapri Pandiangan
<i>Date Issued</i>	: 16 June 2023	<i>Time Limit</i>	: Next ASA
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 07 August 2023
<i>Standard Ref. &amp; Requirement</i>	: 6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics.		
<b>Evidence observed (filled by auditor):</b> <ul style="list-style-type: none"><li>• Work accident data base for 2023 SRGE. Based on these documents, information was obtained that:<ol style="list-style-type: none"><li>1. January 2023 period with a total of 2 work accidents that caused a loss of working days (on behalf of Pa (initials) lost 3 days and Sa (initials) lost 5 working days).</li><li>2. Period February 2023 with a total of 1 work accident causing a loss of working days (on behalf of En (initials) a loss of 3 working days)</li><li>3. Period March 2023 with a total of 3 work accidents that caused a loss of working days (on behalf of AH (initial) lost 5 working days, Ma (initial) lost 7 working days and Tri (initial) lost 2 working days).</li><li>4. The April 2023 period with a total of 3 work accidents that caused a loss of working days (on behalf of AM (initial) lost 2 working days, Ir (initial) lost 3 working days and AR (initial) lost 3 working days).</li></ol></li><li>• Recapitulation of work accident reports for the first quarter of 2023. Based on this document, it is known that there were 3 work accidents reported in the period January – March 2023, on behalf of:<ol style="list-style-type: none"><li>1. Pa (initials) with a type of eye injury originating from litter and a moderate type of accident with an estimated loss of 3 working days</li><li>2. Sa (Initial) with a type of eye injury originating from litter and a moderate type of accident with an estimated loss of 3 working days</li><li>3. En (initials) with a type of wound on the leg originating from the frond and a moderate type of accident with an estimated loss of 3 working days</li></ol></li><li>• The results of interviews with the relevant PIC explained that this recap is one of the attachments to the SRGE OHS Committee Routine report for the first quarter of 2023 which was submitted to the Kalimantan Tengah Province Manpower and Transmigration Office on April 12, 2023.</li><li>• Lost Time Accident document for the period January – April 2023 Sungai Rungau Estate. Based on these documents it is known that there were no work accidents and there were days lost due to work accidents with FR and R values of 0.</li><li>• Based on the results of interviews with doctors and SRGE clinic clerks, it is known that there was a work accident on behalf of employee Tri (initials) on March 29 2023 and until now he is still under treatment and has not yet returned to work.</li></ul>			
<b>Non-Conformance Description (filled by auditor):</b> <p>The company has not been able to show sufficient evidence that work accidents are recorded using Lost Time Accident (LTA).</p>			
<b>Root Cause Analysis (filled by organization audited):</b> <p>The company already has an SOP for Handling Occupational Accidents and Diseases, however the SPO of the SRGE and PIC AK3 units does not understand the duties and responsibilities related to recording and reporting work accidents so that data on work accidents that occur at the clinic are not updated in the FR SR at GSIS as well as routine P2K3 reporting at Seruyan Manpower Department.</p>			
<b>Correction (filled by organization audited):</b> <ol style="list-style-type: none"><li>1. SPO SRGE inputs all work accidents for the period January – May 2023 into the GSIS FRSR module.</li><li>2. The SRGE Unit attaches work accident data for the March – June 2023 period in the Quarter II P2K3 Report to the 2023</li></ol>			

Seruyan Manpower Office.

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

1. RC Region KT2 issued a confirmation SE regarding the Rules for Confirming Responsibility for Recording and Reporting Work Accidents dated July 15 2023 to all KT2 unit leaders/P2K3 Heads, P2K3 Secretaries and unit SPOs.
2. All P2K3 Chairs in Region KT2 provide coaching and re-socialization regarding affirming the responsibility for recording and reporting work accidents to all staff in each unit.
3. Evaluate every work accident that occurs at the monthly P2K3 meeting by attaching the names of accident victims to the meeting minutes. For LTA work accidents > 2 days, an investigation into the work accident that occurred must be carried out by the PIC AK3 unit.
4. Division Asst, SPO unit and PIC AK3 unit verify work accident monitoring books

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

Verification, August 3, 2023

Observed evidence:

1. Memo of Confirmation regarding the responsibility for recording and reporting work accidents from RC Region KT2 to all KT2 unit leaders/ OHS Committee Leader, OHS Committee Secretary and unit SPO dated July 15 2023.
2. Documentary evidence of providing related outreach 1. Memo of confirmation regarding the responsibility for recording and reporting work accidents from RC Region KT2 from each unit leader/Head of OHS Committee regarding confirmation of responsibility for recording and reporting work accidents for LTA to all staff :
  - Documentation of socialization (minutes, attendance and photos) at the SRGE unit which was carried out on July 15 2023.
  - Documentation of socialization (minutes, attendance and photos) at the BTGE unit which was carried out on 17 July 2023
  - Documentation of socialization (minutes, attendance and photos) at the TNGE unit which was carried out on July 17 2023
  - Documentation of socialization (minutes, attendance and photos) at the TRWE unit which was carried out on July 18 2023
  - Documentation of socialization (minutes, attendance and photos) at the SSRE unit which was carried out on July 20 2023
  - Documentation of socialization (minutes, attendance and photos) at the SRUM unit which was carried out on July 22 2023
3. Minutes of the SRGE unit OHS Committee monthly meeting held on July 3 2023 with a discussion regarding work accident evaluation by attaching the names of work accident victims
4. OHS Committee Report for the Second Quarter of 2023 PT Binasawit Abadi Pratama – Sungai Rungau Estate which was submitted to the Kalimantan Tengah Province Manpower and Transmigration Office on June 30 2023. In this report there is also reporting regarding the recording of work accidents for the period March – June 2023.
5. Work accident monitoring book that has been verified by the division assistant, unit SPO and PIC OHS Expert.
6. Screenshot evidence of the Sungai Rungau Estate LTA Document for the period January – May 2023. Based on this document, it is known that all work accidents have been included in the LTA. For example, the LTA for the period April 2023 with FR: 29.74 and SR: 157.85

**Conclusion**

Based on the verification results of the Root Cause Analysis, corrections and corrective actions as well as evidence of improvements that have been shown, **the nonconformity is declared to have been fulfilled. The consistency of the implementation of corrective actions submitted by the company will be re-observed in the next assessment.**

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

Verified by

:



**3.4.2. Opportunity for Improvement**

No	Ref. Std.	Description
1	7.3.2 dan 7.3.3	<p><b>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</b></p> <p><b>The unit of certification does not use open fire for waste disposal.</b></p> <p>GAR's Social and Environmental Policy point 1.7 regarding Waste Management states "Identify, reduce, reuse, recycle and dispose of waste in an environmentally responsible manner". The company has a Waste Management SOP (SOP/SMART/LEMS-EHSD/SADV/II/002) in point 2.2.4.i explaining that:</p> <ul style="list-style-type: none"> <li>• Domestic solid waste is separated into organic waste and inorganic waste in housing, offices, workshops and clinics</li> <li>• Organic waste is disposed of and landfilled in garbage pits or managed by making organic fertilizers.</li> <li>• Inorganic waste is collected in the bins/trash bins that have been provided for further transport by garbage trucks to the Final Waste Disposal Site (TPSA) in the plantation area to be stockpiled, or managed according to the 3R principle.</li> </ul> <p>Based on interviews with housing residents, it was conveyed that inorganic waste is separated and then disposed of in the trash cans provided and transported to TPSA once every 1-2 weeks. Based on field visits, it was found that poorly managed domestic waste (inorganic waste) was found at several housing locations visited, such as SRUM, SRGE and TRWE. However, at several points in other unit locations it has been well managed.</p> <p>Point 2.2.4.b which explains that the company manages domestic waste using a cleaner production mechanism approach that applies the following principles:</p> <ul style="list-style-type: none"> <li>• Reduce, Reuse, and Recycle (3R)</li> <li>• Zero burning or not burning</li> <li>• Disposal or hoarding</li> </ul> <p>Based on field visits and interviews with housing residents, warnings were found against burning garbage in residential areas and housing residents were aware of the prohibition on burning domestic waste, but there were several burnt spots, namely in SRUM, SRGE and BTGE. However, at several points in other unit locations it has been well managed.</p> <p>However, for other waste management, such as empty fruit bunches which have been reused as fertilizer, hazardous and toxic waste which has been managed according to laws and regulations, factory wastewater which is managed and utilized as land application. Based on this, the Company has the opportunity to ensure that waste management (especially domestic waste) is in accordance with company procedures and is not burned in its management.</p>
2	7.7.2	<p><b>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</b></p> <p>The company has shown the PT Binasawit Abadi Pratama Peat Inventory document. Based on this document, it is known that there is peat land in Tangar Estate with an area of 39.24 ha and it has been included in the Peat Inventory report and submitted to the RSPO Secretariat on 15 November 2019..</p> <p>Based on a study of PT BinaSawit AbadiPratama's semi-detailed soil map document, it is known that there is a 93.12ha peat area in Tangar Estate (update 2023) with Typic Haplosaprists (84.40 Ha) and Typic</p>

No	Ref. Std.	Description
		<p>Haplohemists (8.72 ha) with a depth of 75 – 100cm.</p> <p>The company has the opportunity to submit changes to PT Binasawit Abadipratama's Peat Inventory to RSPO no later than November 2023 in accordance with the Guidelines on Peat Inventory for RSPO Reporting.</p>

### 3.4.3. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable oil palm plantation management.
2	Teamwork and competent human resources in their respective fields.

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Independent Workers' Union (SPM)</b> <ul style="list-style-type: none"> <li>The company recognizes the existence of Labor Unions within the company and there is no intervention in any activity implementation.</li> <li>There is no compulsion on the part of workers to become SPM members.</li> <li>There were no complaints submitted by workers regarding workers' rights.</li> </ul>	<p>There are no issues that require further clarification and this information has been explained in the relevant indicators.</p>
<b>Chair of the gender committee</b> <ul style="list-style-type: none"> <li>The gender committee consists of representatives of men and women</li> <li>There have been no cases of sexual harassment in the last 1 year</li> <li>The company provides break time for new mothers to breastfeed their children</li> <li>Menstrual leave is available with a reporting mechanism to the foreman and will be examined at the clinic.</li> <li>Maternity leave is given 1.5 months before and 1.5 months after giving birth by showing the results of a doctor's examination.</li> <li>There is no difference between male workers and female workers. Every worker has the same rights in terms of employment opportunities as well as protection of anonymity</li> </ul>	<p>There are no issues that require further clarification and this information has been explained in the relevant indicators.</p>
<b>Employee Cooperative</b> <ul style="list-style-type: none"> <li>Cooperatives have been registered with the Office of Cooperatives.</li> <li>The cooperative operates a savings and loan business.</li> <li>Each member makes mandatory contributions at the time of registration as a member and voluntary contributions every month.</li> <li>Year end meeting for 2022 report has been done.</li> </ul>	<p>There are no issues that require further clarification and this information has been explained in the relevant indicators.</p>
<b>Local contractors (Miftahussalam as CPO transporter, Aladin and Ponijo as FFB transporter)</b> <ul style="list-style-type: none"> <li>There are no complaints to the company</li> <li>The company routinely conveys socialization related to OHS, policies and procedures that apply in the company</li> <li>Payments have been made according to the agreement of both parties</li> <li>Wages for contractor workers are in accordance with the applicable minimum wage.</li> <li>Contractor workers have been registered with Social Security Agency</li> </ul>	<p>There are no issues that require further clarification and this information has been explained in the relevant indicators.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Food Security &amp; Agriculture Agency of Seruyan Regency.</b></p> <p>Communication relations between the company and the agency have been quite good over the past year. The company has a Plantation Business License which is still valid today and currently the company has no obligation to develop plasma plantations because the IUP it has was issued before 2007 (the SPUP was issued in 2000). The company's management area is also currently known to be in the APL area and previously received forest area release from the Ministry of Environment and Forestry.</p> <p>The company has also carried out its obligations in implementing CSR every year to the surrounding community. Apart from that, currently there are no customary rights around the area or in the company's management area, during the last year there have been no land disputes/claims that have occurred or been reported to the agency. Mandatory reports are carried out routinely by the company.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Manpower &amp; Transmigration Agency of Seruyan Regency.</b></p> <p>Communication relations between the company and the agency have been quite good over the past year. The agency also stated that the company had carried out its obligations as an employer by providing workers' rights in accordance with statutory regulations and the CLA that had been jointly agreed upon. There were also no industrial disputes that occurred or were reported during the last year on the part of the agency.</p> <p>Implementation of a good employment system starting from implementing minimum wages, wage scale systems, calculating/paying overtime and recruiting workers. Currently, the company has also carried out regular employment reporting online (Mandatory Labor Report). The company has also supported the formation of a labor union which will be a forum for workers' aspirations without any prohibition or coercion.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Environment Agency of Seruyan Regency.</b></p> <p>At the time the audit activity was carried out, the auditor and the Company had attempted to communicate with the agency but along the way the agency was unable to carry out this communication. So public consultation activities cannot be carried out.</p>	<p><i>Not Applicable (NA)</i></p>
<p><b>National Land Agency of Seruyan Regency.</b></p> <p>Communication relations between the company and the agency have been quite good over the past year. There is no information that the company will apply for a new HGU (because it already has an HGU) and has routinely carried out mandatory reporting regarding the use of HGU land. During the last year there were also no incidents of land disputes/land claims that occurred in its</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
management area. Currently the company's HGU permit is still valid until 2033.	
<p><b>Sebabi Village.</b></p> <p>The communication relationship between the certification unit and the village in the last year has been quite good. The certification unit has collaborated in the Company's operational activities, namely empowering local contractors. During the last year there have never been any issues/incidents of land claims/disputes between the surrounding community and the certification unit. The certification unit has also collaborated with the company for the company's operational activities and information disclosure regarding labor recruitment is also quite good.</p> <p>Apart from that, land fires, environmental pollution, immoral acts or discrimination have never occurred or become issues during the last year. The certification unit has also provided assistance to villages and their communities in CSR programs which are realized every year.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Pantap Village.</b></p> <p>The communication relationship between the certification unit and the village in the last year has been quite good. The certification unit has collaborated in the Company's operational activities, namely empowering local contractors. During the last year there have never been any issues/incidents of land claims/disputes between the surrounding community and the certification unit. The certification unit has also collaborated with the company for the company's operational activities and information disclosure regarding labor recruitment is also quite good.</p> <p>Apart from that, land fires, environmental pollution, immoral acts or discrimination have never occurred or become issues during the last year. The certification unit has also provided assistance to villages and their communities in CSR programs which are realized every year.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Rungau Raya Village.</b></p> <p>The communication relationship between the certification unit and the village in the last year has been quite good. The certification unit has collaborated in the Company's operational activities, namely empowering local contractors. During the last year there have never been any issues/incidents of land claims/disputes between the surrounding community and the certification unit. The certification unit has also collaborated with the company for the company's operational activities and information disclosure regarding labor recruitment is also quite good.</p> <p>Apart from that, land fires, environmental pollution, immoral acts</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>or discrimination have never occurred or become issues during the last year. The certification unit has also provided assistance to villages and their communities in CSR programs which are realized every year.</p>	
<p><b>Gender Committee of Sungai Rungau Estate.</b></p> <p>Since the previous assessment until now, the gender committee is still active in organizing in the company. The gender committee management has been officially approved by the leadership and consists of administrators who are male and female workers. Since 2021, there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company environment. Currently, it is certain that none of the workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition of female workers who are pregnant or breastfeeding from working in work related to chemicals.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Gender Committee of Terawan Estate.</b></p> <p>Since the previous assessment until now, the gender committee is still active in organizing in the company. The gender committee management has been officially approved by the leadership and consists of administrators who are male and female workers. Since 2021, there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company environment. Currently, it is certain that none of the workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition of female workers who are pregnant or breastfeeding from working in work related to chemicals.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Gender Committee of Bukit Tiga Estate.</b></p> <p>Since the previous assessment until now, the gender committee is still active in organizing in the company. The gender committee management has been officially approved by the leadership and consists of administrators who are male and female workers. Since 2021, there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company environment. Currently, it is certain that none of the workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition of female workers who are pregnant or breastfeeding from working in work related to chemicals.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Gender Committee of Tangar Estate.</b></p> <p>Since the previous assessment until now, the gender committee is still active in organizing in the company. The gender committee management has been officially approved by the leadership and</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>consists of administrators who are male and female workers. Since 2021, there have been no issues related to gender, harassment, violence or serious violations of reproductive rights in the company environment. Currently, it is certain that none of the workers who work with chemicals are pregnant or breastfeeding women, this is because the company has its own policy regarding the prohibition of female workers who are pregnant or breastfeeding from working in work related to chemicals.</p>	
<p><b>Rungau Mandiri Worker Cooperative – Sungai Rungau Estate.</b></p> <p>The employee cooperative had been formed since the previous assessment and at the time the audit was carried out, it was still actively carrying out its operational activities. The company also supports the formation of employee cooperatives and there is no coercion on workers to join or not. The cooperative has also held Annual Member Meeting (RAT) activities for the 2022 financial year in 2023. This activity was carried out to determine the financial accountability, activities and distribution of SHU (Remaining Business Results) of the cooperative for the financial year as well as planning activities for the next financial year .</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Karya Bersama Worker Cooperative – Terawan Estate.</b></p> <p>The employee cooperative had been formed since the previous assessment and at the time the audit was carried out, it was still actively carrying out its operational activities. The company also supports the formation of employee cooperatives and there is no coercion on workers to join or not. The cooperative has also held Annual Member Meeting (RAT) activities for the 2022 financial year in 2023. This activity was carried out to determine the financial accountability, activities and distribution of SHU (Remaining Business Results) of the cooperative for the financial year as well as planning activities for the next financial year .</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Bukit Mandiri Worker Cooperative – Bukit Tiga Estate.</b></p> <p>The employee cooperative had been formed since the previous assessment and at the time the audit was carried out, it was still actively carrying out its operational activities. The company also supports the formation of employee cooperatives and there is no coercion on workers to join or not. The cooperative has also held Annual Member Meeting (RAT) activities for the 2022 financial year in 2023. This activity was carried out to determine the financial accountability, activities and distribution of SHU (Remaining Business Results) of the cooperative for the financial year as well as planning activities for the next financial year .</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>
<p><b>Prima Worker Cooperative – Tangar Estate.</b></p> <p>The employee cooperative had been formed since the previous assessment and at the time the audit was carried out, it was still actively carrying out its operational activities. The company also</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>supports the formation of employee cooperatives and there is no coercion on workers to join or not. The cooperative has also held Annual Member Meeting (RAT) activities for the 2022 financial year in 2023. This activity was carried out to determine the financial accountability, activities and distribution of SHU (Remaining Business Results) of the cooperative for the financial year as well as planning activities for the next financial year .</p>	
<p><b>Worker Union – Serikat Pekerja Mandiri (SPM) Unit Sungai Rungau Estate</b></p> <p>The workers' party has been formed since the previous assessment and is currently still actively organizing in the Sungai Rungau Estate Unit. Currently, approximately 673 workers have joined and all of them have joined voluntarily. There is no coercion or prohibition on joining a labor union. The company has shown support for the labor union by giving administrators time off when attending trade union events in the District/Province.</p> <p>Regarding workers' rights in general, the company has fully fulfilled them, starting from wages, overtime and other rights. The company also provides decent housing facilities such as a house with 2 bedrooms, kitchen and bathroom, as well as free electricity and water facilities. Regarding the provision of PPE, it has been routinely given to workers in proper condition and if it is damaged, the PPE will be immediately replaced by the company.</p> <p>There was no child labor, immoral acts of violence that occurred during the last year at the company.</p>	<p>There are no issues/incidents that require further verification from the results of the public consultations carried out.</p>

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; padding-top: 50px;"> <div style="text-align: center;"> <p>PT Binasawit Abadiparatama Head of Sustainability Management System and Certification Operations Sustainability</p>  <p><b><u>Yahya Mustakim</u></b> Friday, 22 September 2023</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Leonada</u></b> Friday, 22 September 2023</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1	Food Security & Agriculture Agency of Seruyan Regency.	Seruyan Regency	-	Interview	14-06-2023	✓	
2	Manpower & Transmigration Agency of Seruyan Regency.	Seruyan Regency	-	Interview	14-06-2023	✓	
3	Environment Agency of Seruyan Regency.	Seruyan Regency	-	Interview	14-06-2023		✓
4	National Land Agency of Seruyan Regency.	Seruyan Regency	-	Interview	14-06-2023	✓	
5	Sebabi Village.	Seruyan Regency	-	Interview	13-06-2023	✓	
6	Pantap Village.	Seruyan Regency	-	Interview	13-06-2023	✓	
7	Rungau Raya Village.	Seruyan Regency	-	Interview	13-06-2023	✓	
8	Gender Committee of Sungai Rungau Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
9	Gender Committee of Terawan Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
10	Gender Committee of Bukit Tiga Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
11	Gender Committee of Tangar Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
12	Rungau Mandiri Worker Cooperative – Sungai Rungau Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
13	Karya Bersama Worker Cooperative – Terawan Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
14	Bukit Mandiri Worker Cooperative – Bukit Tiga Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
15	Prima Worker Cooperative – Tangar Estate.	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
16	Worker Union – <i>Serikat Pekerja Mandiri</i> (SPM) Unit Sungai Rungau Estate	PT Binasawit Abadipratama	-	Interview	13-06-2023	✓	
17	WALHI	Jakarta	<a href="mailto:info@walhi.or.id">info@walhi.or.id</a>	Questionnaire	6 June 2023		✓
18	AMAN	Jakarta	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Questionnaire	6 June 2023		✓

19	WWF Indonesia	Jakarta	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Questionnaire	6 June 2023		✓
20	Sawit Watch	Jakarta	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Questionnaire	6 June 2023		✓
21	<b>SRUM</b> <ul style="list-style-type: none"> <li>• 2 warehouse officers</li> <li>• 1 Loading ramp Operator</li> <li>• 1 Sterilizer Operator</li> <li>• 1 Press operator</li> <li>• 2 Engine room Operator</li> <li>• 1 Boiler Operator</li> <li>• 2 Grading Operator</li> <li>• 3 Mechanics</li> <li>• 4 Emergency response members</li> <li>• 1 weighbridge operator</li> <li>• 2 Securities</li> <li>• 1 Sample boy</li> </ul>	PT BAP	-	Direct	12 June 2023	✓	
22	<b>Tangar Estate</b> <ul style="list-style-type: none"> <li>• 2 warehouse officers</li> <li>• 2 workshop workers</li> <li>• 2 daycare workers</li> <li>• 2 clinic workers</li> <li>• 3 Spraying worker and 1 foreman</li> <li>• 3 harvester and 1 Foreman</li> <li>• 1 Driver and 2 FFB Loader</li> </ul>	PT BAP	-	Direct	15 June 2023	✓	
22	<b>Bukit Tiga Estate</b> <ul style="list-style-type: none"> <li>• 1 HCV officer</li> </ul>	PT BAP	-	Direct	13 June 2023	✓	
23	<b>Terawan Estate</b> <ul style="list-style-type: none"> <li>• 2 warehouse officers</li> <li>• 2 workshop workers</li> <li>• 2 daycare workers</li> <li>• 2 clinic workers</li> <li>• 5 Spraying worker and 1 foreman</li> <li>• 2 harvester, 2 lose fruit picker and 1 Foreman</li> </ul>	PT BAP	-	Direct	14 June 2023	✓	

24	<b>Sungai Rungau Estate</b> <ul style="list-style-type: none"> <li>• 2 warehouse officers</li> <li>• 2 workshop workers</li> <li>• 2 daycare workers</li> <li>• 2 clinic workers</li> <li>• 6 Spraying worker and 1 foreman</li> <li>• 3 harvester, 3 lose fruit picker and 1 Foreman</li> <li>• 1 Nursery worker</li> </ul>	PT BAP	-	Direct	13 June 2023	✓	
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**Appendix 2. Assessment Program**

DATE	12 – 17 June 2023	
PROGRAM (WIB)	CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 12 June 2023</b>		
05.45 – 07.00	<b>Jakarta → Pangkalan Bun</b>	<b>All Auditor</b>
07.00 – 13.00	<b>Pangkalan Bun → PT Binasawit Abadipratama (Site)</b>	<b>All Auditor</b>
14.00 – 14.30	<b>Opening Meeting</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	<b>All Auditor</b>
14.30 – 16.30	<b>Field Observation to Sungai Rungau Mill:</b> <ul style="list-style-type: none"> <li>Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO); Implementation of Employment Procedure and Mechanism Aspect</li> <li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)</li> </ul>	<b>KID/JON</b>  <b>RIU/IWN</b>
16.30 – 17.00	<b>Presentation of Audit Daily Progress</b>	<b>All Auditor</b>
<b>Tuesday, 13 June 2023</b>		
08.00 – 12.00	<b>Public Consultation in Rokan Hulu Regency (Environment; Manpower &amp; Transmigration; Animal Husbandry &amp; Plantation; and National Land Agency)</b>	<b>RIU</b>
08.00 – 12.00	<b>Field Observation to Sungai Rungau Estate:</b> <ul style="list-style-type: none"> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application); Implementation of Occupational Health &amp; Safety Aspect; Implementation of Employment Procedure and Mechanism Aspect</li> <li>Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> </ul>	<b>KID/IWN</b>  <b>JON</b>  <b>KID/IWN</b>
12.00 – 14.00	<b>Break/ISHOMA</b>	<b>All Auditor</b>
14.00 – 16.30	<b>Public Consultation, Verification of Stakeholders Consultation, Document Review and Completing Audit Checklist.</b>	<b>All Auditor</b>
16.30 – 17.00	<b>Presentation of Audit Daily Progress</b>	<b>All Auditor</b>
<b>Wednesday, 14 June 2023</b>		
08.00 – 12.00	<b>Public Consultation with Internal Stakeholder (Worker Union, Gender Committee, Worker Cooperative), Surrounding Community, and Contractor.</b>	<b>RIU/IWN</b>

[illegible]

DATE	12 – 17 June 2023	
PROGRAM (WIB)	CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<b>Verification of Stakeholders Consultation, Document Review and Completing Audit Checklist.</b>	All Auditor
12.00 – 14.00	<b>Break/ISHOMA</b>	All Auditor
14.00 – 15.00	<b>Interim Meeting Auditor Team (Closing Meeting Preparation).</b>	All Auditor
15.00 – 16.00	<b>Closing Meeting:</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion).</li> <li>• Comments, Responses and Questions.</li> </ul>	
16.00 – 21.00	<b>PT Binasawit Abadipratama → Pangkalan Bun</b>	
<b>Saturday, 17 June 2023</b>		
07.45 – 09.00	<b>Pangkalan Bun → Jakarta</b>	All Auditor