



RSPO P&C CERTIFICATION AUDIT REPORT

(PT. Ladang Sawit Mas- Bukit Tunggal Jaya Mill)

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|----------------------------------|-----------------------------|
| Audit Application Number: | PC25-002498 |
| Assessment Type: | Annual Surveillance Audit 4 |
| Date of Audit: | 28 Oct 2024 - 01 Nov 2024 |
| Audit Report Number: | |
| Revision Number: | |
| Audit Report Date | 19 Feb 2025 |



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1. Certification Body Background

1.1 Description of Certification Body

| Certification Body Information | |
|---|--|
| Name of Certification Body | PT. SGS Indonesia |
| Address of Certification Body (Accredited Office) | The Garden Centre, 2nd Floor, Cilandak Commercial Estate, Jl. Raya Cilandak KKO, 12560, Jakarta, Indonesia |
| Background of the Certification Body | <p>SGS is the world's leading inspection, verification, testing and certification company. We are recognized as the global benchmark for quality and integrity. With more than 95,000 employees, we operate a network of more than 2,400 offices and laboratories around the world.</p> <p>PT. SGS Indonesia is the Indonesian subsidiary of SGS S.A. and a member of the SGS Group. We are accredited Certification Body for RSPO since 05 July 2016 by ASI GmbH with Accreditation Scope of P&C (Single Site & Group) and SCCS worldwide. We have been operating in the country since 1985 and now employ more than 400 experts and highly skilled professionals offering a mix of backgrounds from Indonesia's key industries and companies. With our headquarters in the southern part of Jakarta, our network of offices and laboratories extends to several cities in Indonesia, including Medan, Balikpapan, Samarinda, Banjarmasin, Manado, Surabaya and Semarang. Our core services can be divided into four categories:</p> <ol style="list-style-type: none"> 1. Inspection: our comprehensive range of world-leading inspection and verification services, such as checking the condition and weight of traded goods at transshipment, help you to control quantity and quality, and meet all relevant regulatory requirements across different regions and markets 2. Testing: our global network of testing facilities, staffed by knowledgeable and experienced personnel, enable you to reduce risks, shorten time to market and test the quality, safety and performance of your products against relevant health, safety and regulatory standards 3. Certification: we enable you to demonstrate that your products, processes, systems or services are compliant with either national or international standards and regulations or customer defined standards, through certification 4. Verification: we ensure that products and services comply with global standards and local regulations. Combining global coverage with local knowledge, unrivalled experience and expertise in virtually every industry, SGS covers the entire supply chain from raw materials to final consumption. <p>PT SGS Indonesia provides specialized verification services to numerous industries in both domestic and international markets. The growing range and sophistication of our Indonesian and multinational clients is an indication of the global trend towards increasing levels of safety requirements, stricter regulation and greater emphasis on quality standards.</p> |

| | |
|----------------------------------|--|
| Phone Number (Accredited Office) | +62 21 2978 0600 |
| Websites | www.sgs.com |
| Contact Person Name | RSPO Accreditation Management |
| Email | ID.RSPO.Monitoring@sgs.com |
| Accreditation Information | |
| ASI Code | ASI-ACC-077 |
| Technical Scope | RSPO P&C & RSPO SCC |
| Geographical Scope | Worldwide |
| Accredited Since | July 04, 2016 |

2. Organisation Details and Certification Scope

2.1. Organisational Overview

| Management Unit Information <i>Note: Management Unit refers to unit of certification</i> | |
|--|---|
| Name of Management Unit/s | PT. Ladang Sawit Mas – Bukit Tunggul Jaya Mill Subsidiary of Bumitama Agri Ltd |
| Address of the Management Unit/s | Village of Simpang Tiga Sembelangaan & Village of Sungai Kelik, Nanga Tayap Sub District, Ketapang District, West Kalimantan Province |
| Country | Indonesia |
| Websites | www.bumitama-agri.com |
| Description of the Management Unit | <p>Listed on the Singapore Exchange on 12 April 2012, Bumitama Agri Ltd. (Bumitama or the Group) is a crude palm oil (CPO) and palm kernel (PK) producer with sizeable oil palm plantations in Indonesia. Our core business activities are cultivating oil palm trees, harvesting and processing fresh palm fruit bunches (FFB) into CPO and PK, which we sell to refineries in the country. Since commencing planting in 1998, Bumitama has increased its total land bank to about 200,000 hectares in primarily three provinces: Central Kalimantan, West Kalimantan and Riau, areas which are well-suited for oil palm industry. As a young plantation player, the weighted average of our oil palm trees is about five years, and only about 25.1% of the planted area has reached peak production age. RSPO membership No 1-0043-07-000-00 since 07 October 2007.</p> <p>PT. Ladang Sawit Mas as a member of Bumitama Agri Ltd located on Nanga Tayap District (approximately 3 hours road trip from Ketapang Airport), consist of 1 Palm Oil Mill and 5 supply base i.e Bukit Tunggul Jaya Estate, Hamparan Jaya Estate, Cemara Jaya Estate, Bengkirai Jaya Estate, and Natai Jaya Estate. Workers for PT Ladang Sawit Mas dominantly originating from local workers.</p> |
| Management Representative Name | Erick Perdana Andreas |
| Management Representative Designation | Sustainability Department |
| Management Representative Email | Erick.perdana@bumitama.com |

2.2.RSPO Membership Information

| RSPO Membership Information | |
|-----------------------------|-------------------|
| RSPO Membership No. | 1-0043-07-000-00 |
| Name of RSPO Member | BUMITAMA AGRI LTD |
| Member Since | 07 Oct 2007 |

2.3.Certificate Information

| Certificate Information | |
|--|---|
| Certificate No. | SGS-RSPO/PC24-00083 |
| prisma Document Reference Number | <i>(N/A until June 2025)</i> |
| RSPO PalmTrace ID No. | RSPO_PO1000004316 |
| prisma Trading Account ID | TA25-016797 |
| Scope of Certification | Estate dan Mill |
| Supply Chain Model | <input type="checkbox"/> Identity Preserved (IP) <input checked="" type="checkbox"/> Mass Balance (MB) |
| Applicable Standards / Normative Reference | <input checked="" type="checkbox"/> Principles and Criteria for the Production of Sustainable Palm Oil 2018 <input checked="" type="checkbox"/> RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard 2020 <input type="checkbox"/> RSPO Management System Requirements for Group Certification of FFB Production 2022 <input checked="" type="checkbox"/> RSPO Rules on Market Communication and Claims 2022 |
| National Interpretation (NI) | Indonesia National Interpretation |
| Initial Date of Certification: | 11 Dec 2020 |
| Effective Date of Certificate: | 11 Dec 2020 |
| Expiry Date of Certificate: | 10 Dec 2025 |
| Name of Peer Reviewer | Only for the case of IC or RC |

3. Description of the Management Unit

| Information of Palm Oil Mill | | | | | |
|---|-------------------------|---|---------------------------|-----------------|--------------|
| Name of Palm Oil Mills | prisma Site Business ID | Address of Palm Oil Mill | Mill's capacity (MT/hour) | GPS Coordinates | |
| | | | | Latitude | Longitude |
| <i>Bukit Tunggal Jaya</i> | prisma auto generated | Sungai Kelik & Simpang Tiga Sembelangaan Village, Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province, Indonesia | 60 | S 01°32'47" | E 110°20'38" |
| Remarks: To include additional information wherever applicable | | | | | |

| Information of Supply Bases | | | | | |
|---|-----------------------|--|----------------------|-----------------|--------------|
| Name of Supply Bases | prisma Supply Base ID | Address of Supply Bases | Type of Supply Bases | GPS Coordinates | |
| | | | | Latitude | Longitude |
| <i>Bukit Tunggal Jaya Estate (BTJE, PT.LSM)</i> | prisma auto generated | Simpang Tiga Sembelangaan Village, Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province, Indonesia | Own/Managed Estate | S 01°31'45" | E 110°22'57" |

| | | | | | | |
|---|------------------|------|--|--------------------|-------------|--------------|
| <i>Hamparan Jaya Estate (HJYE, PT. LSM)</i> | prisma generated | auto | Simpang Sembelangaan Tiga Village, Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province, Indonesia | Own/Managed Estate | S 01°27'24" | E 110°24'11" |
| <i>Cemara Jaya Estate (CMJE, PT. GMS)</i> | prisma generated | auto | Laman Satong Village, Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province, Indonesia | Own/Managed Estate | S 01°27'27" | E 110°17'23" |
| <i>Bengkirai Jaya Estate (BJYE, PT.LGI * PT.NAS)</i> | prisma generated | auto | Nanga Tayap Village, Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province, Indonesia | Own/Managed Estate | S 01°33'42" | E 110°35'17" |
| <i>Natai Jaya Estate (NJYE, PT. LGI & PT.NAS)</i> | prisma generated | auto | Nek Doyan Village, Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province, Indonesia | Own/Managed Estate | S 01°30'37" | E 110°34'52" |

3.1. Area Statement of the Management Unit

| Area Statement of Supply Bases | | | | | | | | | |
|---|---------------------|----------------------------------|--------------------------|---------------|---------------------|----------|----------|--------------|---------------------|
| Name of the Supply Base | Certified Area (Ha) | Planted Area (Ha) | | | Unplanted Area (Ha) | | | | |
| | | Oil palm planted on non peatland | Oil Palm Planted on Peat | Other Crop(s) | HCV | HCS | HCV-HCS | Conservation | Facilities / Others |
| <i>Bukit Tunggal Jaya Estate (BTJE, PT.LSM)</i> | 4,200.51 | 1,814.78 | 1,535.71 | 0 | 141 | 0 | 0 | 0 | 709.02 |
| <i>Hamparan Jaya Estate (HJYE, PT. LSM)</i> | 1,518.12 | 1028.32 | 147.17 | 0 | 174.60 | 0 | 0 | 0 | 168.03 |
| <i>Cemara Jaya Estate (CMJE, PT. GMS)</i> | 2,159.53 | 1,633.60 | 0 | 0 | 76.22 | 0 | 0 | 0 | 449.71 |
| <i>Bengkirai Jaya Estate (BJYE, PT.LGI * PT.NAS)</i> | 5,134.96 | 1,874.93 | 0 | 0 | 895.72 | 0 | 0 | 0 | 2364.31 |
| <i>Natai Jaya Estate (NJYE, PT. LGI & PT.NAS)</i> | 2,367.94 | 1,382.15 | 0 | 0 | 230.73 | 0 | 0 | 0 | 755.06 |
| TOTAL | 15,381.06 | 7,733.78 | 1,682.88 | 0 | 1518.27 | 0 | 0 | 0 | 4446.13 |
| Remarks: To include additional information wherever applicable | | | | | | | | | |

3.2. Age Profile of the Management Unit

| Name of the Supply Base | Land size (Ha) by age of the Oil Palm | | | | Production Area (Ha) | Total Planted Area (Ha) |
|--|---------------------------------------|----------------|-----------------|----------------|----------------------|-------------------------|
| | 0 - 3 Phase 1 | 4-6 Phase 2 | 7-18 Phase 3 | ≥19 Phase 4 | | |
| <i>Bukit Tunggal Jaya Estate (BTJE, PT.LSM)</i> | 0 | 88.88 | 3,261.61 | 0 | 3350.49 | 3350.49 |
| <i>Hamparan Jaya Estate (HJYE, PT. LSM)</i> | 0 | 101.50 | 1073.99 | 0 | 1175.49 | 1175.49 |
| <i>Cemara Jaya Estate (CMJE, PT. GMS)</i> | 0 | 16.65 | 1611.77 | 5.18 | 1633.60 | 1633.60 |
| <i>Bengkirai Jaya Estate (BJYE, PT.LGI * PT.NAS)</i> | 0 | 0 | 1874.93 | 0 | 1874.93 | 1874.93 |
| <i>Natai Jaya Estate (NJYE, PT. LGI & PT.NAS)</i> | 0 | 0 | 1382.15 | 0 | 1382.15 | 1382.15 |
| TOTAL (ha) | 0 | 207.03 | 9204.45 | 5.18 | 9416.66 | 9416.66 |
| Remarks: To include additional information wherever applicable | | | | | | |

Notes: This age profile range is used based on the common phase of oil palm age as referred in <https://www.researchgate.net/publication/327527812>.

3.3.Replanting Programme of the Management Unit (5 Years)

| Name of the Supply Base | Land area (ha) by year | | | | | Total Area (Ha) |
|--|------------------------|---------------------------|---------------------------|---------------------------|---------------------------|--------------------|
| | 2024 (current year) | 2025 (current year+ 1) | 2026 (current year+ 2) | 2027 (current year+ 3) | 2028 (current year+ 4) | |
| <i>Bukit Tunggal Jaya Estate (BTJE, PT.LSM)</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>Hamparan Jaya Estate (HJYE, PT. LSM)</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>Cemara Jaya Estate (CMJE, PT. GMS)</i> | 0 | 0 | 438 | 274 | 0 | 712 |
| <i>Bengkirai Jaya Estate (BJYE, PT.LGI * PT.NAS)</i> | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL (ha) | 0 | 0 | 438 | 274 | 0 | 712 |

Notes: 1st year of the replanting programme will be the current year of the audit

3.4. Name of other FFB Supplier Supplying FFB to the Mill

| Name of other FFB Suppliers | Type of FFB Suppliers | Certified Status | GPS Coordinates (dalam DMS) | | FFB received by the mil (MT) (Sep 23 – Aug 24) |
|-----------------------------|-----------------------|--------------------|---------------------------------------|-----------------------------------|---|
| | | | Longitude | Latitude | |
| AREA LIABILITY_GMS_CMJE | UNDER BGA GROUP | Non RSPO Certified | 110.28972222 110° 17' 22.9986" E | -1.4575 1° 27' 27" S | 472.16 |
| AREA LIABILITY_LGI_BJYE | UNDER BGA GROUP | Non RSPO Certified | 110.588055555 110° 35' 17.001" | -1.561666666 1° 33' 42.0006" | 5,784.75 |
| AREA LIABILITY_LGI_NJYE | UNDER BGA GROUP | Non RSPO Certified | 110.581111111111 110° 34' 51.9996" | -1.51027777778 1° 30' 37.0008" | 2,725.51 |
| AREA LIABILITY_NAS_BJYE | UNDER BGA GROUP | Non RSPO Certified | 110.588055555 110° 35' 17.001" | -1.561666666 1° 33' 42.0006" | 5,676.71 |

| | | | | | |
|---|--------------------|--------------------|---------------------------------------|------------------------------------|-----------|
| AREA LIABILITY_NAS_NJYE | UNDER BGA GROUP | Non RSPO Certified | 110.581111111111 110° 34' 51.9996" | -1.510277777778 1° 30' 37.0008" | 4,421.58 |
| Bengkirai Jaya Estate (BJYE, PT NAS)_Sanksi NPP | UNDER BGA GROUP | RSPO Certified | 110.5880555555 110° 35' 17.001" | -1.5616666666 1° 33' 42.0006" | 6,059.20 |
| Natai Jaya Estate (NJYE, PT NAS)_Sanksi NPP | UNDER BGA GROUP | RSPO Certified | 110.581111111111 110° 34' 51.9996" | -1.510277777778 1° 30' 37.0008" | 8,768.48 |
| Cemara Jaya Estate (CMJE, PT GMS)_Sanksi NPP | UNDER BGA GROUP | RSPO Certified | 110.28972222 110° 17' 22.9986" | -1.4575 1° 27' 27" | 7,990.24 |
| Koperasi Rungau Sejahtera | PLASMA | Non RSPO Certified | 110.3022011 110° 18' 7.923" | -1.48318074 1° 28' 59.4516" | 11,451.87 |

| | | | | | |
|----------------------------------|--------|--------------------|----------------------------------|--------------------------------|-----------|
| Koperasi Mitra Penjalaan Permai | PLASMA | Non RSPO Certified | 110.2855552 110° 17' 7.998" | -1.48056844 1° 28' 50.0448" | 12,274.88 |
| Koperasi Istana Pawan Mandiri | PLASMA | Non RSPO Certified | 110.286004 110° 17' 9.6144" | -1.50498775 1° 30' 17.9562" | 16,117.75 |
| Koperasi Bukit Tunggul Sejahtera | PLASMA | Non RSPO Certified | 110.3095291 110° 18' 34.3038" | -1.51918632 1° 31' 9.069" | 11,239.82 |
| Koperasi Kayong Sekayok | PLASMA | Non RSPO Certified | 110.6457 110° 38' 44.52" | -1.53639 1° 32' 11.0034" | 6,872.85 |
| Koperasi Mitra Sejati | PLASMA | Non RSPO Certified | 110.5813 110° 34' 52.6794" | -1.51043 1° 30' 37.5474" | 10,066.93 |

| | | | | | |
|---|-----------------|--------------------|-----------------------------------|---------------------------------|----------|
| Kelompok Tani Lembah Nantai Rimba | UNDER BGA GROUP | Non RSPO Certified | 110.3623544 110° 21' 44.4738" | -1.58231259 1° 34' 56.3226" | 3,944.80 |
| Hamparan Jaya Estate (HJYE, PT LSM) | UNDER BGA GROUP | Non RSPO Certified | 110.406111111 110° 24' 21.999" | -1.456666666 1° 27' 24.0006" | 133.03 |
| Cemara Jaya Estate (CMJE, PT GMS) | UNDER BGA GROUP | Non RSPO Certified | 110.28972222 110° 17' 22.9986" | -1.4575 1° 27' 27" | 3,211.42 |
| Padang Harapan Jaya Estate (PHJE, PT SSL) | UNDER BGA GROUP | Non RSPO Certified | 110.3408809 110° 20' 27.171" | -1.53377337 1° 32' 1.5828" | 8,981.62 |
| Bedaru Pagan Estate (BPJE, PT DAS) | UNDER BGA GROUP | Non RSPO Certified | 110.3240990 110° 19' 26.7564" | -1.59097054 1° 35' 27.4914" | 275.62 |

| | | | | | |
|--|--------------------|--------------------|----------------------------------|--------------------------------|-------------------|
| Sinar Lestari Jaya Estate (SLJE, PT AMS) | UNDER BGA GROUP | Non RSPO Certified | 110.5664071 110° 33' 59.0646" | -1.63576657 1° 38' 8.7576" | 9,263.93 |
| Sumber Mas Jaya Estate (SMJE, PT KML) | UNDER BGA GROUP | Non RSPO Certified | 110.2911952 110° 17' 28.302" | -0.80998916 0° 48' 35.9598" | 21,438.49 |
| Kelompok Tani Sumber Rezeki | SUPPLIER EKSTERNAL | Non RSPO Certified | 110.3241958 110° 19' 27.1056" | -1.53319501 1° 31' 59.502" | 8,191.51 |
| PT Putra Djaya Perkasa | SUPPLIER EKSTERNAL | Non RSPO Certified | 109.9579407 109° 57' 28.5876" | -1.83276834 1° 49' 57.9642" | 19,718.00 |
| TOTAL | | | | | 185,081.14 |

3.5. Projected Certified Volume for Next License

| Information of New License | | |
|---|--------------------|-------------|
| Next License Period | Start Date | 11 Dec 2024 |
| | End Date | 10 Dec 2025 |
| Projected Certified FFB Volume (MT) | 140,000 | |
| Average Production Yield (MT/ Ha) | 14.87 | |
| Projected CSPO Certified Volume (MT) | Identity Preserved | - |
| | Mass Balance | 30,000 |
| Projected CSPK Certified Volume (MT) | Identity Preserved | - |
| | Mass Balance | 6,200 |
| Oil Extraction Rate (OER) (%) | 21.43 | |
| Kernel Extraction Rate (KER) (%) | 4.43 | |

3.6. Information of Previous & Current License (Identity Preserved)

| Name of Palm Oil Mill | | | | |
|---|-----------------------|--|----------------------|--|
| Information of License | Previous Year License | | Current Year License | |
| License Period | Start Date | | Start Date | |
| | End Date | | End Date | |
| Actual Production Period Reported | From | | From | |
| | To | | To | |
| Projected FFB Certified Volume (MT) | | | | |
| Actual production of FFB (MT) | | | | |
| Projected CSPO Certified Volume (MT) | | | | |
| Actual CSPO Production Volume (MT) | | | | |
| Actual CSPO Volume Sold as RSPO Certified (MT) | | | | |
| Actual CSPO Volume Sold as Conventional (MT) | | | | |
| Actual CSPO Volume Sold under Other Scheme (MT) | | | | |
| Total Actual CSPO Volume Sold (MT) | | | | |
| Actual CSPO credits sold (where applicable) | | | | |

| | | |
|--|--|--|
| Projected CSPK Certified Volume (MT) | | |
| Actual CSPK Production Volume (MT) | | |
| Actual CSPK Volume Sold as RSPO Certified (MT) | | |
| Actual CSPK Volume Sold as Conventional (MT) | | |
| Actual CSPK Volume Sold under Other Scheme (MT) | | |

3.7. Information of Previous & Current License (Mass Balance)

| Name of Palm Oil Mill | Bukit Tunggal Jaya Mill | | | |
|--|-------------------------|-------------|----------------------|-------------|
| Information of License | Previous Year License | | Current Year License | |
| License Period | Start Date | 11 Dec 2022 | Start Date | 11 Dec 2023 |
| | End Date | 10 Dec 2023 | End Date | 10 Dec 2024 |
| Actual Production Period Reported | From | 11 Dec 2022 | From | 11 Dec 2023 |
| | To | 10 Dec 2023 | To | 30 Sep 2024 |
| Projected FFB Certified Volume (MT) | 154,000 | | 132,000 | |
| Actual production of FFB (MT) | 123,935.66 | | 104,747.52 | |
| Projected CSPO Certified Volume (MT) | 34,650 | | 29,040 | |
| Actual CSPO Production Volume (MT) | 27,160.20 | | 22,407.62 | |
| Actual CSPO Volume Sold as RSPO Certified (MT) | 0 | | 0 | |
| Actual CSPO Volume Sold as Conventional (MT) | 0 | | 0 | |
| Actual CSPO Volume Sold under Other Scheme (MT) | 0 | | 0 | |
| Total Actual CSPO Volume Sold (MT) | 0 | | 0 | |
| Actual CSPO credits sold (where applicable) (MT) | 20,000 | | 12,000 | |

| | | |
|--|----------|----------|
| Projected CSPK Certified Volume (MT) | 6,930 | 6,600 |
| Actual CSPK Production (MT) | 5,714.07 | 4,643.96 |
| Actual CSPK Volume Sold as RSPO Certified (MT) | 3,207.75 | 3,200 |
| Actual CSPK Volume Sold as Conventional (MT) | 0 | 0 |
| Actual CSPK Volume Sold under Other Scheme (MT) | 0 | 0 |

Add tables as necessary

4. Audit Programme

4.1. Audit Methodology

The assessment was conducted in 4 audit days and involving 5 supply base of PT. Ladang Sawit Mas. The audit covers documentation review, internal procedures, management system, field inspection as well as identification of any significant issues for both environment and social issues. A sample of stakeholders was consulted during the assessment to get their feedback on the management practices.

The assessment was conducted based on random samples and therefore nonconformities may exist which have not been identified. The methodology for objective evidence collection included physical site inspection, observation of tasks and processes, interview with workers, families and stakeholders, documentation review and monitoring data.

4.2. Audit Team Member

| Name | Role | CAB Auditor Number |
|---|---|---------------------------|
| Steve Mualim | Lead Auditor | UAN-SM15797 |
| Arian Handinal Siregar | Auditor | UAN-AS24562 |
| Asystasya Aishah Silalahi | Auditor | UAN-AS23728 |
| Winda Tri Wahyuni (under supervised Rene Ugroseno) | Auditor | UAN-WW2410253 |
| Rene Ugroseno | Supervised Winda Tri Wahyuni during audit | UAN-RU181167 |

4.3. Audit Plan

| Date | Time | CAB Auditor Number | Location | Activity |
|-------------|---------------------|--|---------------------------|---|
| 28 Oct 2024 | 06.20 am - 14.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Jakarta-Ketapang | Travelling from Jakarta-Ketapang |
| 28 Oct 2024 | 14.00 pm – 17.30 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Ketapang | Public consultation with relevant agency and local communities |
| 29 Oct 2024 | 09.00 am - 12.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Ketapang | Travelling from Ketapang-sites |
| 29 Oct 2024 | 13.30 am - 14.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Sites | Opening Meeting |
| 29 Oct 2024 | 14.30 pm – 17.30 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Bukit Tunggal Jaya Mill | Field Visit, document review, and stakeholder consultation for mill |
| 30 Oct 2024 | 08.00 am – 12.00 am | UAN-SM15797 UAN-WW2410253 | Bengkirai Jaya Estate | Field visit, document review, and stakeholder consultation for estate |
| 30 Oct 2024 | 08.00 am – 12.00 am | UAN-AS24562 UAN-AS23728 | Natai Jaya Estate | Field visit, document review, and stakeholder consultation for estate |
| 30 Oct 2024 | 14.00 pm – 17.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Central office | Field visit verification, document review, and stakeholder consultation |
| 31 Oct 2024 | 08.00 am – 12.00 am | UAN-SM15797 UAN-WW2410253 | Cemara Jaya Estate | Field visit, document review, and stakeholder consultation for estate |
| 31 Oct 2024 | 08.00 am – 12.00 am | UAN-AS24562 UAN-AS23728 | Bukit Tunggal Jaya Estate | Field visit, document review, and stakeholder consultation for estate |
| 31 Oct 2024 | 14.00 pm – 17.00 pm | UAN-SM15797 UAN-AS24562 | Central office | Field visit verification, document review, and stakeholder consultation |

| | | | | |
|-------------|------------------------|--|------------------|---|
| | | UAN-AS23728 UAN-WW2410253 | | |
| 01 Nov 2024 | 08.00 am – 12.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Central office | Field visit verification, document verification |
| 01 Nov 2024 | 13.00 pm – 14.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Central office | Closing meeting preparation |
| 01 Nov 2024 | 15.00 pm – 17.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Central office | Closing meeting |
| 02 Nov 2024 | 11.00 am – 19.00 pm | UAN-SM15797 UAN-AS24562 UAN-AS23728 UAN-WW2410253 | Ketapang-Jakarta | Travelling back |

Notes: Include the number of hours spent at the sample sites for each day of the audit, including the time for the opening and closing meeting

4.4. Changes of the initial audit plan (if applicable)

There is changes for opening meeting dates from Monday 28 Oct 2024 to Tuesday 29 Oct 2024 due to limited room accommodation in estate during Monday. Therefore auditors team and client decided to conduct opening meeting on Tuesday.

4.5. Sampling Details

| Description of Management Unit | Number of Estate/Members/Mills | Risk Factor | Result $x = (\sqrt{y}) \times (z)$ | Total Sampled |
|--------------------------------|--------------------------------|----------------|---------------------------------------|-----------------------------|
| <i>Mill</i> | 1 | N/A | N/A | All mills shall be audited. |
| <i>Own/Managed Estates</i> | (5 estate) | Medium Risk | 2.68 | 4 |
| <i>Scheme Smallholder</i> | 0 | Choose an item | | |
| <i>Scheme Outgrower</i> | 0 | Choose an item | | |
| <i>Independent Outgrower</i> | 0 | Choose an item | | |

Notes: Auditing is based on a sampling process of the available information

4.6. Sampling History of Current Certification Cycle

| Name (Mill/ Supply Base / Scheme Smallholder) | Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| | 2020 (Previous CB) | 2021 (Previous CB) | 2022 (Previous CB) | 2023 (Previous CB) | 2024 (SGS) |
| Bukit Tunggul Jaya Mill | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Bukit Tunggul Jaya Estate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Hampan Jaya Estate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Cemara Jaya Estate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Bengkirai Jaya Estate | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Natai Jaya Estate | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

4.7. Audit Team Leader and Audit Team Information

| Audit Team Leader: Steve Muallim | |
|---|--|
| Requirements | Description |
| At least five (5) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing, or involvement in human rights activities; | He have experience for 6 years (Feb 2013 – Oct 2019) in Mutu Agung Lestari & TUV Rheinland as Auditor, 3 years (Nov 2019 – Dec 2022) in WWF as Sustainable Palm Oil Specialist, 1 year (Jan 2023 – May 2024) in Preferred by Nature as Senior Agriculture Specialist |
| A supervised (by a qualified lead auditor) period of training in practical audits against the RSPO P&C and/or RSPO ISH standard, with a minimum of 15 days audit experience in at least three (3) audits; | He has been qualified as RSPO Auditor and Lead Auditor for Mutu Agung Lestari, TUV Rheinland and PBN. He just follows 1 witness audit in SGS Indonesia on 10 – 14 June 2024. |

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| Successfully completed a refresher course for RSPO endorsed P&C lead auditor course every three (3) years after the initial qualification as lead auditor | He follows RSPO Lead Auditor training course on 13 – 17 November 2017 by Checkmark and successfully complete the training. He also has followed Refresher RSPO P&C 2018 Lead Auditors Training on 3 – 6 May 2023 also by Checkmark. | |
| Audit Team Members: | | |
| Requirements | CAB Auditor Number | Description |
| Possess a bachelor's degree or tertiary education in related disciplines, such as agriculture, environmental science or social sciences, etc; | Audit team Leader: UAN-SM15797 | Master in Natural Resources and Environmental Management from Bogor Agricultural University (IPB) and Bachelor in Agronomy and Horticulture from Bogor Agricultural University (IPB) |
| | Audit Team Member 1: UAN-AS23728 | Bachelor (S1) degree of Economy, major in Agribusiness from Bogor Agricultural University (IPB) |
| | Audit Team Member 2: UAN-AS24562 | Auditors have a bachelor's degree in Agriculture |
| | Audit Team member 3: UAN-WW2410253 | Auditor have a bachelors degree in anthropology |
| At least three (3) years of field experience in the palm oil sector, health and safety, or environmental management. These include experience in HCV and HCS assessment, social auditing or involvement in human rights activities | Audit Team Member 2: UAN-AS23728 | Since 2015 as RSPO and ISPO auditor in CB. |
| | Audit Team Member 1: UAN-AS24562 | Has more than 10 years of experience in the field of oil palm plantations, aspects of understanding include the management of palm oil agronomy and palm oil processing, legality and laws and regulations of the palm oil industry, environmental management and monitoring, K3 and employment, currently working as an ISPO auditor at PT. SGS Indonesia permanently |
| Successfully completed an RSPO endorsed P&C lead auditor course | Audit team Leader: UAN-SM15797 | RSPO Lead Auditor training course on 13 – 17 November 2017 by Checkmark |
| | Audit Team Member 2: UAN-AS23728 | RSPO Lead Auditor training course on 13 – 17 November 2017 by Checkmark |
| | Audit Team Member 1: UAN-AS24562 | Successfully completed an RSPO endorsed P&C lead auditor course on 14 – 20 April 2024 held by Checkmark Training |
| Successfully completed the 5-day lead auditor course for ISO 9001 or ISO 14001 or ISO 45001. | Audit team Leader: UAN-SM15797 | Training LAC 9001: 2008 on 01-05 April 2013 by PT Bumi Hijau Cemerlang |

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| | Audit Team Member 2: UAN-AS23728 | Training LAC 9001: 2015 on 17-21 Feb 2020 by BSI Training Academy |
| | Audit Team Member 1: UAN-AS24562 | Successfully completed the 5-day lead auditor course for ISO 9001 : 2018 on 8 – 13 July 2018 held by SGS Academy |
| Demonstrable understanding of the latest version of RSPO Certification Systems | Audit team Leader: UAN-SM15797 | RSPO Lead Auditor training course on 13 – 17 November 2017 by Checkmark |
| | Audit Team Member 2: UAN-AS23728 | RSPO Lead Auditor training course on 13 – 17 November 2017 by Checkmark |
| | Audit Team Member 1: UAN-AS24562 | Successfully completed an RSPO endorsed P&C lead auditor course on 14 – 20 April 2024 held by Checkmark Training |
| For auditors verifying compliance with NPP procedures, auditors shall additionally be trained in the assessment of compliance with FPIC, HCV and HCS requirements in the context of RSPO NPP procedure | Audit team Leader: UAN-SM15797 | Has experienced doing NPP since 2014. |
| | Audit Team Member 1: UAN-AS24562 | She has experienced doing NPP since 2016 |
| A supervised (by a qualified auditor/lead auditor) period of training in practical audit against the RSPO P&C, with a minimum of 10 days of audit experience in at least two (2) audits. | Audit Team Member 2: UAN-AS23728 | Since 2015 as RSPO auditor in CAB. |
| | Audit Team Member 1: UAN-AS24562 | Since 2023 as RSPO auditor in CAB. |
| | Audit Team Member 2: UAN-AS23728 | Since 2023 as RSPO auditor in CAB. |
| Knowledgeable and experience of the local/regional laws | Audit team Leader: UAN-SM15797 | Experience doing RSPO Audit Since 2013 |
| | Audit Team Member 2: UAN-AS23728 | Experience doing RSPO Audit Since 2015 |
| | Audit Team Member 1: UAN-AS24562 | He has experience doing RSPO Audit Since 2023 and implementation of sustainability in grower since 2013 |
| Knowledgeable in Best Agricultural Practices, and Integrated Pest Management, pesticide and fertiliser use; | Audit team Leader: UAN-SM15797 | Experience doing RSPO Audit Since 2013 and Bachelor in Agronomy and Horticulture, Agriculture Faculty |
| | Audit Team Member 2: UAN-AS23728 | Experience doing RSPO Audit Since 2015 |
| | Audit Team Member 1: UAN-AS24562 | He has experienced in plantation company for more than 5 years |
| Experience in health and safety auditing on the farm/plantation and in the palm oil mill, for example against the ISO 45001 Occupational Health and Safety Management standard; | Audit team Leader: UAN-SM15797 | Experience doing RSPO Audit Since 2013 including safety aspect |
| | Audit Team Member 2: UAN-AS23728 | Experience doing RSPO Audit Since 2015 |

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| | Audit Team Member 1: UAN-AS24562 | He has experienced in plantation company for more than 5 years |
| Experience in handling workers' welfare or social auditing experience, such as experience with the SA8000 or other international sustainability scheme that has the social auditing requirements. The auditor auditing the social requirements shall have successfully attended the internationally recognised social auditing standard training, such as the SA8000, Social Systems (SMETA) Auditor Training or social training recognised by RSPO; | Audit team Leader: UAN-SM15797 | - |
| | Audit Team Member 2: UAN-AS23728 | She has experienced in social aspects including workers welfare aspect since 2015 and has attending SA8000 awareness training on 2019 |
| | Audit team member 3 : UAN-WW2410253 | <i>She has social audit background since 2020 and undersupervised by auditor UAN-RU181167 who has completed SA8000 training</i> |
| Experience in handling of land rights, gender and indigenous peoples' issues; | Audit team Leader: UAN-SM15797 | Experience doing RSPO Audit Since 2013 including in social community aspect |
| | Audit Team Member 2: UAN-AS23728 | Experience doing RSPO Audit Since 2015 including in social community aspect |
| | Audit Team Member 1: UAN-AS24562 | - |
| Experience in environmental and ecological auditing or assessments, such as experience with High Conservation Value (HCV)/High Carbon Stock (HCS) assessments, organic agriculture or the ISO 14001 Environmental Management Systems standard; | Audit team Leader: UAN-SM15797 | Education background as Master in Natural Resources and Environmental Management from Bogor Agricultural University (IPB). Experience doing RSPO Audit Since 2013 including in environment aspect Experience as consultant in EIA/AMDAL. |
| | Audit Team Member 2: UAN-AS23728 | Experience doing RSPO Audit Since 2015 including in environment aspect. Experience as consultant in HCV assessment. |
| Fluent in one of the main national languages | Audit team Leader: UAN-SM15797 | Fluent in Bahasa and English. |
| | Audit Team Member 2: UAN-AS23728 | Fluent in Bahasa and English. |
| | Audit Team Member 1: UAN-AS24562 | Fluent in Bahasa and English. |
| | Audit team member 3 : UAN-WW2410253 | Fluent in Bahasa and English. |
| Knowledgeable in supply chain requirements of the palm oil mill. The auditor performing this task shall have successfully completed the RSPO endorsed SCC lead auditor training course. Note: this does not apply for ISH or Group Certification. | Audit team Leader: UAN-SM15797 | Experience doing RSPO Audit Since 2013 and passed the SCC training from checkmark |
| | Audit Team Member 2: UAN-AS23728 | Experience doing RSPO Audit Since 2015 and pass the training from checkmark |

5. Audit Findings & Results

| Criterion / Indicator | Audit Findings | Audit Findings (Public Summary) | Results |
|---|---|---|---|
| Principle 1: Behave Ethically and Transparently | | | |
| Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | | |
| 1.1.1 (C) Management documents that are specified in the RSPO P&C are made publicly available and shall include (but are not necessarily limited to): <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans | The company has a set of documents and information accessible to the public, as outlined in the Communication SOP No. BGA-SUST-SOP-09 Rev. 01 dated September 6, 2024. The procedure was developed by the Sustainability Assistant, reviewed by the Area Controller, and approved by the Regional Head of Nanga Tayap. According to this SOP, the documents available to the public include: <ul style="list-style-type: none"> • AMDAL, UKL/UPL documents, and RKL/RPL reports • Company policies and manuals • Programs related to environmental, legal, and social issues in accordance with the RSPO P&C • HCV documents and Social Impact Assessment documents • Details of complaints and grievances, and summaries of certification assessment reports • GHG calculations and emission reduction programs Documents or information that are available to the public but are restricted, requiring management unit approval, include land permit-related information. Interviews with local communities, such as | The company has a set of documents and information accessible to the public, as outlined in the Communication SOP No. BGA-SUST-SOP-09 Rev. 01 dated September 6, 2024. The procedure was developed by the Sustainability Assistant, reviewed by the Area Controller, and approved by the Regional Head of Nanga Tayap. According to this SOP, the documents available to the public include: <ul style="list-style-type: none"> • AMDAL, UKL/UPL documents, and RKL/RPL reports • Company policies and manuals • Programs related to environmental, legal, and social issues in accordance with the RSPO P&C • HCV documents and Social Impact Assessment documents • Details of complaints and grievances, and summaries of certification assessment reports • GHG calculations and emission reduction programs Documents or information that are available to the public but are restricted, requiring management unit approval, include land permit-related information. Interviews with local communities, such as | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | <p>(Criterion 8.1);</p> <ul style="list-style-type: none"> Public summary of certification assessment report; Human Rights Policy (Criterion 6.13). | <p>Desa Sepakat Jaya and Desa Nanga Tayap, as well as internal stakeholders, revealed that the certification unit has conducted socialization on the procedure for requesting information and has designated a person responsible for responding to information requests. It was also explained that the documents accessible to the public are specific to each operational unit.</p> | <p>Desa Sepakat Jaya and Desa Nanga Tayap, as well as internal stakeholders, revealed that the certification unit has conducted socialization on the procedure for requesting information and has designated a person responsible for responding to information requests. It was also explained that the documents accessible to the public are specific to each operational unit.</p> | |
| 1.1.2 | <p>Information is provided in appropriate languages and made accessible to relevant stakeholders.</p> | <p>The company has a set of documents and information accessible to the public, as outlined in the Communication SOP No. BGA-SUST-SOP-09 Rev. 01 dated September 6, 2024. The procedure was developed by the Sustainability Assistant, reviewed by the Area Controller, and approved by the Regional Head of Nanga Tayap. According to this SOP, the documents available to the public include:</p> <ul style="list-style-type: none"> • AMDAL, UKL/UPL documents, and RKL/RPL reports • Company policies and manuals • Programs related to environmental, legal, and social issues in accordance with the RSPO P&C • HCV documents and Social Impact Assessment documents • Details of complaints and grievances, and summaries of certification assessment reports • GHG calculations and emission reduction programs <p>Documents or information that are available to the public but are restricted, requiring management unit approval, include land</p> | <p>The company has a set of documents and information accessible to the public, as outlined in the Communication SOP No. BGA-SUST-SOP-09 Rev. 01 dated September 6, 2024. The procedure was developed by the Sustainability Assistant, reviewed by the Area Controller, and approved by the Regional Head of Nanga Tayap. According to this SOP, the documents available to the public include:</p> <ul style="list-style-type: none"> • AMDAL, UKL/UPL documents, and RKL/RPL reports • Company policies and manuals • Programs related to environmental, legal, and social issues in accordance with the RSPO P&C • HCV documents and Social Impact Assessment documents • Details of complaints and grievances, and summaries of certification assessment reports • GHG calculations and emission reduction programs <p>Documents or information that are available to the public but are restricted, requiring management unit approval, include land</p> | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>permit-related information. Document review found that all relevant documents are available in Indonesian and based on interview with local stakeholders shown that listed documents as per procedures can be accessed by request to the company management teams.</p> <p>Interviews with local communities, such as Desa Sepakat Jaya and Desa Nanga Tayap, as well as internal stakeholders, revealed that the certification unit has conducted socialization on the procedure for requesting information and has designated a person responsible for responding to information requests. It was also explained that the documents accessible to the public are specific to each operational unit.</p> | <p>permit-related information. Document review found that all relevant documents are available in Indonesian and based on interview with local stakeholders shown that listed documents as per procedures can be accessed by request to the company management teams.</p> <p>Interviews with local communities, such as Desa Sepakat Jaya and Desa Nanga Tayap, as well as internal stakeholders, revealed that the certification unit has conducted socialization on the procedure for requesting information and has designated a person responsible for responding to information requests. It was also explained that the documents accessible to the public are specific to each operational unit.</p> | |
| 1.1.3 (C) | Records of requests for information and responses shall be maintained. | <p>The certification unit has an Information Service SOP outlined in the Communication Procedure (BGA-SUST-SOP-09 Rev. 1), approved on September 6, 2024. This procedure specifies that documents related to RSPO Criteria are accessible to stakeholders. The purpose of this procedure is to provide practical guidance for handling communication in the areas of Occupational Health and Safety (OHS) and Environmental Protection (EHS), as well as RSPO-related matters, both internally and externally, with a maximum response time of 15 days after an information request is received by the certificate holder. The designated person responsible for managing these matters is the CSR/PR/D&L staff.</p> <p>The certification unit has documented incoming letters from external stakeholders in the "Incoming Mail Logbook." Based on a</p> | <p>The certification unit has an Information Service SOP outlined in the Communication Procedure (BGA-SUST-SOP-09 Rev. 1), approved on September 6, 2024. This procedure specifies that documents related to RSPO Criteria are accessible to stakeholders. The purpose of this procedure is to provide practical guidance for handling communication in the areas of Occupational Health and Safety (OHS) and Environmental Protection (EHS), as well as RSPO-related matters, both internally and externally, with a maximum response time of 15 days after an information request is received by the certificate holder. The designated person responsible for managing these matters is the CSR/PR/D&L staff.</p> <p>The certification unit has documented incoming letters from external stakeholders in the "Incoming Mail Logbook." Based on a</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>review of the logbook for information requests during 2024, it was noted that there were no information requests from stakeholders. Requests related to financial assistance or heavy equipment, for example, have been recorded in the communication logbook and responded to by the company in accordance with the established procedures and timelines.</p> <p>Interviews with village residents (Desa Sepakat Jaya and Desa Nanga Tayap) confirmed that stakeholders are familiar with the communication and consultation mechanisms. Typically, the village head or community representatives send formal letters to the company. So far, the formal communications have primarily been related to proposals for financial assistance from the company.</p> | <p>review of the logbook for information requests during 2024, it was noted that there were no information requests from stakeholders. Requests related to financial assistance or heavy equipment, for example, have been recorded in the communication logbook and responded to by the company in accordance with the established procedures and timelines.</p> <p>Interviews with village residents (Desa Sepakat Jaya and Desa Nanga Tayap) confirmed that stakeholders are familiar with the communication and consultation mechanisms. Typically, the village head or community representatives send formal letters to the company. So far, the formal communications have primarily been related to proposals for financial assistance from the company.</p> | |
| 1.1.4 (C) | <p>Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> | <p>The company has a written communication procedure outlined in the Communication Procedure (SOP-SUST-SOP-09 Rev1, The purpose of this procedure is to provide practical guidance for handling communication related to Occupational Health and Safety (OHS) and Environmental Protection (EHS), as well as RSPO matters, both internally and externally. The maximum response time is 15 days after receiving an information request from the certificate holder. The designated responsible person for handling this communication is the CSR staff.</p> <p>Records of communication with stakeholders are documented in regular or incidental meeting minutes, as well as in the communication logbook. Interviews with local communities (Desa Sepakat Jaya, Desa</p> | <p>The company has a written communication procedure outlined in the Communication Procedure (SOP-SUST-SOP-09 Rev1, The purpose of this procedure is to provide practical guidance for handling communication related to Occupational Health and Safety (OHS) and Environmental Protection (EHS), as well as RSPO matters, both internally and externally. The maximum response time is 15 days after receiving an information request from the certificate holder. The designated responsible person for handling this communication is the CSR staff.</p> <p>Records of communication with stakeholders are documented in regular or incidental meeting minutes, as well as in the communication logbook. Interviews with local communities (Desa Sepakat Jaya, Desa</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>Nanga Tayap, labor unions, gender committees, etc.) revealed that stakeholders are familiar with the communication and consultation mechanisms, and there are no barriers in communicating with the responsible individuals.</p> <p>Interviews with government agencies in Ketapang Regency, including the Environmental Agency, Plantation Agency, Land Agency, and Labor Agency, confirmed that when they need information, they contact the company through mobile applications or formal information request letters. The company responds and provides the requested information within the stipulated 15-day period.</p> <p>Additionally, the Communication Procedure (BGA-SUST-SOP-09 Rev. 01) was socialized to stakeholders on September 4, 2024, during a stakeholders meeting involving village representatives, village officials, and internal company stakeholders.</p> | <p>Nanga Tayap, labor unions, gender committees, etc.) revealed that stakeholders are familiar with the communication and consultation mechanisms, and there are no barriers in communicating with the responsible individuals.</p> <p>Interviews with government agencies in Ketapang Regency, including the Environmental Agency, Plantation Agency, Land Agency, and Labor Agency, confirmed that when they need information, they contact the company through mobile applications or formal information request letters. The company responds and provides the requested information within the stipulated 15-day period.</p> <p>Additionally, the Communication Procedure (BGA-SUST-SOP-09 Rev. 01) was socialized to stakeholders on September 4, 2024, during a stakeholders meeting involving village representatives, village officials, and internal company stakeholders.</p> | |
| 1.1.5 | <p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> | <p>The certification unit has compiled a contact list and detailed information about stakeholders, which includes names, institutions/positions, locations, categories, contact numbers, and other relevant information. The stakeholder list for PT Ladang Sawit Mas and PT Gemilang Makmur Subur, created on October 7, 2024, by the CSR assistant, includes the following categories:</p> <ul style="list-style-type: none"> • 6 government agencies • 7 Muspika (district government) representatives • 4 village representatives | <p>The certification unit has compiled a contact list and detailed information about stakeholders, which includes names, institutions/positions, locations, categories, contact numbers, and other relevant information. The stakeholder list for PT Ladang Sawit Mas and PT Gemilang Makmur Subur, created on October 7, 2024, by the CSR assistant, includes the following categories:</p> <ul style="list-style-type: none"> • 6 government agencies • 7 Muspika (district government) representatives • 4 village representatives | <p><input type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input checked="" type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | <ul style="list-style-type: none"> • 5 community leaders • 1 contractor • 2 cooperatives • 3 testing partners • 1 FFB (Fresh Fruit Bunch) supplier • 2 media representatives • 2 neighboring companies <p>The designated person responsible for consultation and communication with the community is the CSR officer. This person is tasked with facilitating social impact assessments and is accountable to top management for communication and consultation with stakeholders. Based on actual verification from stakeholder contact list from the certification unit showed that the information provided is accurate, including the contact numbers for each stakeholder, which the auditor verified.</p> <p>The company has a list of external and internal stakeholders for PT Ladang Sawit Mas, created on October 7, 2024, by the CSR assistant. This list includes village officials, FFB suppliers, contractors, vendors, government agencies, and internal company stakeholders. During the audit, the auditor conducted a sample check by contacting stakeholders, such as the Department of Labor, Department of Plantation, Department of Environmental Affairs, and Department of Land Affairs. The audit confirmed that the contact details, such as phone numbers, were accurate and aligned with the actual situation. Field observations during the audit revealed land occupation by local residents (occupants). Additionally, a review of the</p> | <ul style="list-style-type: none"> • 5 community leaders • 1 contractor • 2 cooperatives • 3 testing partners • 1 FFB (Fresh Fruit Bunch) supplier • 2 media representatives • 2 neighboring companies <p>The designated person responsible for consultation and communication with the community is the CSR officer. This person is tasked with facilitating social impact assessments and is accountable to top management for communication and consultation with stakeholders. Based on actual verification from stakeholder contact list from the certification unit showed that the information provided is accurate, including the contact numbers for each stakeholder, which the auditor verified.</p> <p>The company has a list of external and internal stakeholders for PT Ladang Sawit Mas, created on October 7, 2024, by the CSR assistant. This list includes village officials, FFB suppliers, contractors, vendors, government agencies, and internal company stakeholders. During the audit, the auditor conducted a sample check by contacting stakeholders, such as the Department of Labor, Department of Plantation, Department of Environmental Affairs, and Department of Land Affairs. The audit confirmed that the contact details, such as phone numbers, were accurate and aligned with the actual situation. Field observations during the audit revealed land occupation by local residents (occupants). Additionally, a review of the</p> | |
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| | | <p>2023-2024 FFB received records at the BTJM Mill indicated that the mill receives FFB from third parties, such as the Rungau Sejahtera Cooperative, Istana Pawan Mandiri Cooperative, Bukit Tunggal Sejahtera Cooperative, and the Lemha Natai Rimba Group.</p> <p>However, the land occupants and FFB suppliers are not currently included in the stakeholder list. This gap has been identified as CAR#01 (Corrective Action Request).</p> | <p>2023-2024 FFB received records at the BTJM Mill indicated that the mill receives FFB from third parties, such as the Rungau Sejahtera Cooperative, Istana Pawan Mandiri Cooperative, Bukit Tunggal Sejahtera Cooperative, and the Lemha Natai Rimba Group.</p> <p>However, the land occupants and FFB suppliers are not currently included in the stakeholder list. This gap has been identified as CAR#01 (Corrective Action Request).</p> | |
|--|--|--|--|--|

| Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions. | | | |
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| 1.2.1 | A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. | The company has a Code of Conduct document outlined in the <i>BGA Code of Conduct</i> , No. BGA-COC-HC-333.1-R0, dated October 28, 2014, which was approved by the Board of Directors. This document defines the company's ethical guidelines in its relationships with stakeholders, covering the following areas: <ul style="list-style-type: none"> • Ethics with Shareholders: Emphasizes the company's commitment to transparency and accountability in all business activities. • Ethics in Relations with BGA Group Employees: Highlights the importance of fair treatment, respect for diversity, and creating a safe and inclusive work environment. • Ethics in Relations with the Community and the Environment: Encourages the company to make positive contributions to local communities and protect environmental sustainability. • Ethics in Relations with the Government: Ensures compliance with all relevant laws and regulations, while maintaining good relations with the government. • Ethics in Relations with Business Partners, Suppliers, and Contractors: Stresses the importance of integrity and transparency in all transactions and partnerships. • Ethics in Relations with the Media: Promotes honest and accurate | The company has a Code of Conduct document outlined in the <i>BGA Code of Conduct</i> , No. BGA-COC-HC-333.1-R0, dated October 28, 2014, which was approved by the Board of Directors. This document defines the company's ethical guidelines in its relationships with stakeholders, covering the following areas: <ul style="list-style-type: none"> • Ethics with Shareholders: Emphasizes the company's commitment to transparency and accountability in all business activities. • Ethics in Relations with BGA Group Employees: Highlights the importance of fair treatment, respect for diversity, and creating a safe and inclusive work environment. • Ethics in Relations with the Community and the Environment: Encourages the company to make positive contributions to local communities and protect environmental sustainability. • Ethics in Relations with the Government: Ensures compliance with all relevant laws and regulations, while maintaining good relations with the government. • Ethics in Relations with Business Partners, Suppliers, and Contractors: Stresses the importance of integrity and transparency in all transactions and partnerships. • Ethics in Relations with the Media: Promotes honest and accurate |
| <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) | | | |

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| | | <p>communication and avoids the spread of misleading information.</p> <p>The company's code of ethics includes a commitment to act professionally, responsibly, and to respect all stakeholders in every aspect of its business operations.</p> <p>This code of ethics has been socialized to workers, smallholder farmers, and contractors. For example, minutes of the socialization of the Code of Ethics and Human Rights Policy to stakeholders on August 27, 2024, were recorded, with 56 participants in NJYE and BJYE.</p> <p>The certification unit has demonstrated the implementation of business ethics and integrity pacts. For example, the certification unit presented an integrity pact signed by Aulia Sofyan (an employee of PT LSM with the position of Process Assistant) documented in <i>BGA-Form-HC-333.1-001-R1</i>, dated December 21, 2023. The pact was signed by the employee and witnessed by Binandara. This integrity pact includes statements regarding anti-bribery, anti-corruption, prohibition of forced labor and human trafficking, as well as a ban on child labor.</p> | <p>communication and avoids the spread of misleading information.</p> <p>The company's code of ethics includes a commitment to act professionally, responsibly, and to respect all stakeholders in every aspect of its business operations.</p> <p>This code of ethics has been socialized to workers, smallholder farmers, and contractors. For example, minutes of the socialization of the Code of Ethics and Human Rights Policy to stakeholders on August 27, 2024, were recorded, with 56 participants in NJYE and BJYE.</p> <p>The certification unit has demonstrated the implementation of business ethics and integrity pacts. For example, the certification unit presented an integrity pact signed by Aulia Sofyan (an employee of PT LSM with the position of Process Assistant) documented in <i>BGA-Form-HC-333.1-001-R1</i>, dated December 21, 2023. The pact was signed by the employee and witnessed by Binandara. This integrity pact includes statements regarding anti-bribery, anti-corruption, prohibition of forced labor and human trafficking, as well as a ban on child labor.</p> | |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | <p>The certification unit has a Code of Conduct, No. BGA-COC-HC-333.1-R0, which has been in effect since October 28, 2014. This policy establishes behavioural guidelines for BGA employees, including a prohibition on accepting and/or giving gifts, souvenirs, business meals, or other facilities that could influence decision-making in violation of the applicable regulations in the certification unit. This policy is implemented across all</p> | <p>The certification unit has a Code of Conduct, No. BGA-COC-HC-333.1-R0, which has been in effect since October 28, 2014. This policy establishes behavioural guidelines for BGA employees, including a prohibition on accepting and/or giving gifts, souvenirs, business meals, or other facilities that could influence decision-making in violation of the applicable regulations in the certification unit. This policy is implemented across all</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>operational units, with the whistleblowing channel serving as a system to monitor the enforcement of business ethics policies.</p> <p>The company has developed mechanisms and systems to monitor compliance and implementation of ethical business practices, including RSPO internal audits for examples internal audits 2024 (there is 5 non-conformities found and all of the nonconformities has been closed), field monitoring, and contractor performance evaluations. Additionally, a Whistleblowing system is in place, which outlines the process for reporting violations, allowing all employees, without fear of retaliation, to report potential fraudulent practices within the certification unit.</p> <p>Based on interviews with workers during the audit, it was confirmed that employees are aware of the Whistleblowing system, which is accessible to all workers, including contract workers. Furthermore, third-party collaborators working with the certification unit stated that they were provided with training on the Code of Conduct and the Whistleblowing System before signing the partnership agreement. This ensures that, prior to working with the certification unit, these parties are informed of their responsibilities and can report any violations, whether committed by the certification unit or others, during the course of their collaboration.</p> | <p>operational units, with the whistleblowing channel serving as a system to monitor the enforcement of business ethics policies.</p> <p>The company has developed mechanisms and systems to monitor compliance and implementation of ethical business practices, including RSPO internal audits for examples internal audits 2024 (there is 5 non-conformities found and all of the nonconformities has been closed), field monitoring, and contractor performance evaluations. Additionally, a Whistleblowing system is in place, which outlines the process for reporting violations, allowing all employees, without fear of retaliation, to report potential fraudulent practices within the certification unit.</p> <p>Based on interviews with workers during the audit, it was confirmed that employees are aware of the Whistleblowing system, which is accessible to all workers, including contract workers. Furthermore, third-party collaborators working with the certification unit stated that they were provided with training on the Code of Conduct and the Whistleblowing System before signing the partnership agreement. This ensures that, prior to working with the certification unit, these parties are informed of their responsibilities and can report any violations, whether committed by the certification unit or others, during the course of their collaboration.</p> | |
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Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction.

| Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. | | | | |
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| 2.1.1 (C) | The unit of certification complies with applicable legal requirements. | <p>Related in compliance with the regulation, the company has complied with all relevant laws and regulations, such as:</p> <p>Compliance with Legal Aspect</p> <p>In term of legal aspect, company has shown evidence towards legal aspect. Company has complied with regulations in the field of plantation and land legality, such as HGU (land use title), IUP (plantation business permit) etc. The company has been able to show legal documents in the form of HGU and ownership certificate, such as:</p> <p><u>HGB (building use rights)</u></p> <p>Decree of Head of Land National Agency Kalimantan Barat Province No. 24/HGB/BPN.61/2020 issued on 18 August 2020 for 8.79 Ha in PT Ladang Sawit Mas</p> <p>Decree of Head of Land National Agency Kalimantan Barat Province No. 23/HGB/BPN.61/2020 issued on 18 August 2020 for 13.38 Ha in PT Ladang Sawit Mas</p> <p>Certificate No. 10 issued on 7 December 2020 for 13.38 Ha</p> <p>Certificate No. 9 issued on 7 December 2020 for 8.79 Ha</p> <p>Total HGB is 22,17 Ha</p> | <p>Related in compliance with the regulation, the company has complied with all relevant laws and regulations, such as:</p> <p>Compliance with Legal Aspect</p> <p>In term of legal aspect, company has shown evidence towards legal aspect. Company has complied with regulations in the field of plantation and land legality, such as HGU (land use title), IUP (plantation business permit) etc. The company has been able to show legal documents in the form of HGU and ownership certificate, such as:</p> <p><u>HGB (building use rights)</u></p> <p>Decree of Head of Land National Agency Kalimantan Barat Province No. 24/HGB/BPN.61/2020 issued on 18 August 2020 for 8.79 Ha in PT Ladang Sawit Mas</p> <p>Decree of Head of Land National Agency Kalimantan Barat Province No. 23/HGB/BPN.61/2020 issued on 18 August 2020 for 13.38 Ha in PT Ladang Sawit Mas</p> <p>Certificate No. 10 issued on 7 December 2020 for 13.38 Ha</p> <p>Certificate No. 9 issued on 7 December 2020 for 8.79 Ha</p> <p>Total HGB is 22,17 Ha</p> | <input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input checked="" type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p><u>HGU (land use rights)</u> PT Ladang Sawit Mas Decree of Head of Land National Agency No. 93/HGU/KEM-ATR/BPN/2017 issued on 29 August 2017 covering area 5,696.46 Ha in PT Ladang Sawit Mas. This decree divided into certificates: Certificate No. 159 issued on 2 November 2017 covering area 1510.08 Ha Certificate No. 160 issued on 2 November 2017 covering area 3366.42 Ha Certificate No. 161 issued on 2 November 2017 covering area 88.72 Ha Certificate No. 162 issued on 2 November 2017 covering area 731.21 Ha</p> <p>PT Gemilang Makmur Subur Certificate No. 294 issued on 14 October 2017 covering area 688.9273 Ha Certificate No. 293 issued on 14 October 2017 covering area 1016.9451 Ha Certificate No. 292 issued on 14 October 2017 covering area 453.6577 Ha Total HGU: 2159.53 Ha</p> <p>PT Lestari Gemilang Intisawit Decree of Head of Land National Agency No. 119/HGU/KEM-ATR/BPN/2017 issued on 8 December 2017 covering area 6,309.73 Ha in PT Lestari Gemilang Intisawit. This decree divided into certificates:</p> | <p><u>HGU (land use rights)</u> PT Ladang Sawit Mas Decree of Head of Land National Agency No. 93/HGU/KEM-ATR/BPN/2017 issued on 29 August 2017 covering area 5,696.46 Ha in PT Ladang Sawit Mas. This decree divided into certificates: Certificate No. 159 issued on 2 November 2017 covering area 1510.08 Ha Certificate No. 160 issued on 2 November 2017 covering area 3366.42 Ha Certificate No. 161 issued on 2 November 2017 covering area 88.72 Ha Certificate No. 162 issued on 2 November 2017 covering area 731.21 Ha</p> <p>PT Gemilang Makmur Subur Certificate No. 294 issued on 14 October 2017 covering area 688.9273 Ha Certificate No. 293 issued on 14 October 2017 covering area 1016.9451 Ha Certificate No. 292 issued on 14 October 2017 covering area 453.6577 Ha Total HGU: 2159.53 Ha</p> <p>PT Lestari Gemilang Intisawit Decree of Head of Land National Agency No. 119/HGU/KEM-ATR/BPN/2017 issued on 8 December 2017 covering area 6,309.73 Ha in PT Lestari Gemilang Intisawit. This decree divided into certificates:</p> | |
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| | | <p>Certificate No. 193 issued on 14 February 2018 covering area 828.79 Ha</p> <p>Certificate No. 194 issued on 14 February 2018 covering area 700.19 Ha</p> <p>Certificate No. 195 issued on 14 February 2018 covering area 385.51 Ha</p> <p>Certificate No. 196 issued on 14 February 2018 covering area 587.39 Ha</p> <p>Certificate No. 197 issued on 14 February 2018 covering area 343.70 Ha</p> <p>Certificate No. 198 issued on 14 February 2018 covering area 432.00 Ha</p> <p>Certificate No. 199 issued on 14 February 2018 covering area 140.63 Ha</p> <p>Certificate No. 200 issued on 14 February 2018 covering area 918.64 Ha. Originally this certificate was covering 957.64 ha</p> <p>Certificate No. 201 issued on 14 February 2018 covering area 564.76 Ha. Originally this certificate was covering 567.60 ha</p> <p>Certificate No. 202 issued on 14 February 2018 covering area 278.38 Ha</p> <p>Certificate No. 203 issued on 14 February 2018 covering area 607.13 Ha. Originally this certificate was covering 609.02 ha</p> <p>Certificate No. 204 issued on 14 February 2018 covering area 53.37 Ha</p> <p>Certificate No. 205 issued on 14 February 2018 covering area 66.12 Ha</p> <p>Certificate No. 206 issued on 14 February 2018 covering area 359.64 Ha</p> <p>Total land use rights PT LGI: 6,266.25 Ha</p> | <p>Certificate No. 193 issued on 14 February 2018 covering area 828.79 Ha</p> <p>Certificate No. 194 issued on 14 February 2018 covering area 700.19 Ha</p> <p>Certificate No. 195 issued on 14 February 2018 covering area 385.51 Ha</p> <p>Certificate No. 196 issued on 14 February 2018 covering area 587.39 Ha</p> <p>Certificate No. 197 issued on 14 February 2018 covering area 343.70 Ha</p> <p>Certificate No. 198 issued on 14 February 2018 covering area 432.00 Ha</p> <p>Certificate No. 199 issued on 14 February 2018 covering area 140.63 Ha</p> <p>Certificate No. 200 issued on 14 February 2018 covering area 918.64 Ha. Originally this certificate was covering 957.64 ha</p> <p>Certificate No. 201 issued on 14 February 2018 covering area 564.76 Ha. Originally this certificate was covering 567.60 ha</p> <p>Certificate No. 202 issued on 14 February 2018 covering area 278.38 Ha</p> <p>Certificate No. 203 issued on 14 February 2018 covering area 607.13 Ha. Originally this certificate was covering 609.02 ha</p> <p>Certificate No. 204 issued on 14 February 2018 covering area 53.37 Ha</p> <p>Certificate No. 205 issued on 14 February 2018 covering area 66.12 Ha</p> <p>Certificate No. 206 issued on 14 February 2018 covering area 359.64 Ha</p> <p>Total land use rights PT LGI: 6,266.25 Ha</p> | |
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| | | <p>PT Nabati Agro Subur Decree of Head of Land National Agency No. 88/HGU/KEM-ATR/BPN/2017 issued on 25 August 2017 covering area 2,264.50 Ha in PT Nabati Agro Subur. This decree divided into certificates: Certificate No. 184 issued on 10 November 2017 covering area 918.50 Ha Certificate No. 185 issued on 10 November 2017 covering area 953.41 Ha Certificate No. 186 issued on 10 November 2017 covering area 284.44 Ha Certificate No. 187 issued on 10 November 2017 covering area 108.15 Ha</p> <p><u>Plantation Business Permit</u> PT Ladang Sawit Mas Palm Oil Plantation Business License from the Regent of Ketapang Number 420 of 2010 dated 28 July 2010 with an area of 6,450 Ha and a processing capacity of 35 Tons FFB/Hour. Risk Based Business Licensing number: 81202130022490001 dated March 29 2022 with an area of 8,970 Ha and a processing capacity of 60 Tons FFB/Hour PT Lestari Gemilang Intisawit Palm Oil Plantation Business License from the Regent of Ketapang Number 307/DISBUN-D/2013 dated 17 June 2013 with a scope of 11,765 Ha and a processing capacity of 60 Tons FFB/Hour. PT Gemilang Makmur Subur</p> | <p>PT Nabati Agro Subur Decree of Head of Land National Agency No. 88/HGU/KEM-ATR/BPN/2017 issued on 25 August 2017 covering area 2,264.50 Ha in PT Nabati Agro Subur. This decree divided into certificates: Certificate No. 184 issued on 10 November 2017 covering area 918.50 Ha Certificate No. 185 issued on 10 November 2017 covering area 953.41 Ha Certificate No. 186 issued on 10 November 2017 covering area 284.44 Ha Certificate No. 187 issued on 10 November 2017 covering area 108.15 Ha</p> <p><u>Plantation Business Permit</u> PT Ladang Sawit Mas Palm Oil Plantation Business License from the Regent of Ketapang Number 420 of 2010 dated 28 July 2010 with an area of 6,450 Ha and a processing capacity of 35 Tons FFB/Hour. Risk Based Business Licensing number: 81202130022490001 dated March 29 2022 with an area of 8,970 Ha and a processing capacity of 60 Tons FFB/Hour PT Lestari Gemilang Intisawit Palm Oil Plantation Business License from the Regent of Ketapang Number 307/DISBUN-D/2013 dated 17 June 2013 with a scope of 11,765 Ha and a processing capacity of 60 Tons FFB/Hour. PT Gemilang Makmur Subur</p> | |
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| | | <p>PT Gemilang Makmur Subur Plantation Business License from the Regent of Ketapang Number 773/DISBUN-D/2015 dated 27 November 2015 with an area of 5,190 Ha and a processing capacity of 60 Tons FFB/Hour</p> <p>PT Nabati Agro Subur Plantation Business License from the Regent of Ketapang Number 238/DISBUN-D/2015 dated March 25 2015 with an area of 2,109 Ha and processing capacity of 15 Tons FFB/Hour.</p> <p>Risk-Based Business Licensing number 81200160020590002 dated March 30 2023 with an area of 254.90 Ha.</p> <p>Compliance with OHS Aspect</p> <p>Having a steam aircraft operator in accordance with the Minister of Manpower Regulation No. 1 of 1988.</p> <p>The company provides free PPE according to Minister of Manpower Regulation No. 8 of 2010.</p> <p>The company establishes and reports on OHS Committee activities and the appointment of an OHS expert in accordance with Minister of Manpower Regulation No. 4 of 1987 concerning OHS Committee and Procedures for Appointing Work Safety Experts</p> <p>Compliance with Worker Welfare Regulations:</p> <p>The determination of wages at Unit</p> | <p>PT Gemilang Makmur Subur Plantation Business License from the Regent of Ketapang Number 773/DISBUN-D/2015 dated 27 November 2015 with an area of 5,190 Ha and a processing capacity of 60 Tons FFB/Hour</p> <p>PT Nabati Agro Subur Plantation Business License from the Regent of Ketapang Number 238/DISBUN-D/2015 dated March 25 2015 with an area of 2,109 Ha and processing capacity of 15 Tons FFB/Hour.</p> <p>Risk-Based Business Licensing number 81200160020590002 dated March 30 2023 with an area of 254.90 Ha.</p> <p>Compliance with OHS Aspect</p> <p>Having a steam aircraft operator in accordance with the Minister of Manpower Regulation No. 1 of 1988.</p> <p>The company provides free PPE according to Minister of Manpower Regulation No. 8 of 2010.</p> <p>The company establishes and reports on OHS Committee activities and the appointment of an OHS expert in accordance with Minister of Manpower Regulation No. 4 of 1987 concerning OHS Committee and Procedures for Appointing Work Safety Experts</p> <p>Compliance with Worker Welfare Regulations:</p> <p>The determination of wages at Unit</p> | |
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| | | <p>certification is based on the minimum wage in Ketapang Regency based on the Decree of the Governor of Kalimantan Barat No. 1879/Nakertran/2023 on 29 November 2023. The Minimum Wage for Ketapang Regency in 2023 is Rp. 3,188,983.34</p> <p>Environment Aspect</p> <p>The company has an environmental permit covering the plantation and factory activities which can explained in the document:</p> <p>PT Ladang Sawit Mas already has a permit for the use of wastewater on the ground in accordance with the Decree of the Ketapang Regent Number 035/DPMPSTSP-D/2020 concerning the permit for the use of wastewater from the palm oil industry on the land in the oil palm plantation of PT Ladang Sawit Mas covering an area of 196.15 hectares located in Nanga Tayap District, Ketapang Regency on February 20, 2020 with a validity period of 5 years.</p> <p>Company already has a water resource exploitation permit numbered 503/04/SDA/DPMPSTSP-C.1/2019 in accordance with the Decree of the Head of the Kalimantan Barat Province One Stop Integrated Service and Investment Service regarding the Granting of a Water Resources Concession Permit to PT. Mas Sawit Field in Ketapang Regency,</p> | <p>certification is based on the minimum wage in Ketapang Regency based on the Decree of the Governor of Kalimantan Barat No. 1879/Nakertran/2023 on 29 November 2023. The Minimum Wage for Ketapang Regency in 2023 is Rp. 3,188,983.34</p> <p>Environment Aspect</p> <p>The company has an environmental permit covering the plantation and factory activities which can explained in the document:</p> <p>PT Ladang Sawit Mas already has a permit for the use of wastewater on the ground in accordance with the Decree of the Ketapang Regent Number 035/DPMPSTSP-D/2020 concerning the permit for the use of wastewater from the palm oil industry on the land in the oil palm plantation of PT Ladang Sawit Mas covering an area of 196.15 hectares located in Nanga Tayap District, Ketapang Regency on February 20, 2020 with a validity period of 5 years.</p> <p>Company already has a water resource exploitation permit numbered 503/04/SDA/DPMPSTSP-C.1/2019 in accordance with the Decree of the Head of the Kalimantan Barat Province One Stop Integrated Service and Investment Service regarding the Granting of a Water Resources Concession Permit to PT. Mas Sawit Field in Ketapang Regency,</p> | |
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| | | <p>Kalimantan Barat Province on May 31, 2019 with a validity period of 5 years.</p> <p>The company has a clinic under the supervision of doctors and other medical personnel, based on interviews with the company's doctors and a review of the health worker list documents, there are still 3 nurses who do not have SIP and Hyperkes. This is because the nurse has just mutated from the previous certification unit so that the process of obtaining a practice permit is delayed. Therefore, the Company has the opportunity to take care of the permits of all its medical personnel.#OFI</p> | <p>Kalimantan Barat Province on May 31, 2019 with a validity period of 5 years.</p> <p>The company has a clinic under the supervision of doctors and other medical personnel, based on interviews with the company's doctors and a review of the health worker list documents, there are still 3 nurses who do not have SIP and Hyperkes. This is because the nurse has just mutated from the previous certification unit so that the process of obtaining a practice permit is delayed. Therefore, the Company has the opportunity to take care of the permits of all its medical personnel.#OFI</p> | |
| 2.1.2 | <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> | <p>Company has mechanism to monitor the regulation compliance in document of SOP Identification and Audit of Regulation Compliance document number BGA-SOP-CCS-1102.1-R0 ratified on 9 May 2012. This document explained that monitoring of regulation compliance in company conducted every 6 month or on a certain time coordinated by each responsible department.</p> <p>Company then showed the latest regulation compliance audit related to plantation regulation, environment regulation, manpower regulation, and OHS regulation. The latest audit was conducted</p> | <p>Company has mechanism to monitor the regulation compliance in document of SOP Identification and Audit of Regulation Compliance document number BGA-SOP-CCS-1102.1-R0 ratified on 9 May 2012. This document explained that monitoring of regulation compliance in company conducted every 6 month or on a certain time coordinated by each responsible department.</p> <p>Company then showed the latest regulation compliance audit related to plantation regulation, environment regulation, manpower regulation, and OHS regulation. The latest audit was conducted</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>on 9 September 2024. The document informed about history of additional of new regulation, list of relevant regulation applicable in company and the compliance status. Based on the document, company has complied with the relevant regulation.</p> <p>To ensure the regulation compliance of third party or contractor, company also conduct contractor evaluation which include the applicable regulation within contractor, for example the manpower regulation or OHS regulation. Company also showed the result of evaluation for CPO and PK transporter in the name of Bukit Tunggal Sejahtera cooperative and PT Garyber Link Group on 2 September 2024. Based on interview with CPO and PK transporter, it is known that contractor has understand and comply with the related regulation with them.</p> | <p>on 9 September 2024. The document informed about history of additional of new regulation, list of relevant regulation applicable in company and the compliance status. Based on the document, company has complied with the relevant regulation</p> <p>To ensure the regulation compliance of third party or contractor, company also conduct contractor evaluation which include the applicable regulation within contractor, for example the manpower regulation or OHS regulation. Company also showed the result of evaluation for CPO and PK transporter in the name of Bukit Tunggal Sejahtera cooperative and PT Garyber Link Group on 2 September 2024. Based on interview with CPO and PK transporter, it is known that contractor has understand and comply with the related regulation with them.</p> | |
| 2.1.3 | <p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> | <p>The company has a monitoring procedure for HGU stakes as stated in the SOP for Installation and Maintenance of HGU Stakes No. LSM-GIS-SOP-01 which was ratified on January 3, 2019. The SOP explains the procedures for installing HGU stakes, including stakes that can be installed using iron pipes, iron beams, wood, monuments, and PVC pipes. The observation and maintenance period for HGU stakes is carried out 3 times a year.</p> | <p>The company has a monitoring procedure for HGU stakes as stated in the SOP for Installation and Maintenance of HGU Stakes No. LSM-GIS-SOP-01 which was ratified on January 3, 2019. The SOP explains the procedures for installing HGU stakes, including stakes that can be installed using iron pipes, iron beams, wood, monuments, and PVC pipes. The observation and maintenance period for HGU stakes is carried out 3 times a year.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>Based on field observation to HGU stakes LGI 33, 36, and 58 in Natai Jaya Estate, HGU Stakes No. 33 Block E29 division 5, No. 31 Block E32C division 3, No. 32 Block E32C division 3 and No. 33 Block F34A in Bengkirai Jaya Estate, HGU No. 081, 082, 083, and 084 in Cemara Jaya Estate, and HGU No. 134, 135, and 136 in Bukit Tunggal Estate, it is known that HGU stake is in good condition and there is no planting beyond the boundaries. During field observation, few stakes</p> | <p>Based on field observation to HGU stakes LGI 33, 36, and 58 in Natai Jaya Estate, HGU Stakes No. 33 Block E29 division 5, No. 31 Block E32C division 3, No. 32 Block E32C division 3 and No. 33 Block F34A in Bengkirai Jaya Estate, HGU No. 081, 082, 083, and 084 in Cemara Jaya Estate, and HGU No. 134, 135, and 136 in Bukit Tunggal Estate, it is known that HGU stake is in good condition and there is no planting beyond the boundaries.</p> | |
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| Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | | |
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| 2.2.1 | A list of contracted parties is maintained. | Company showed the list of contractors in PT Ladang Sawit Mas 2024 completed with name of contractor, contract number, contractor address, PIC, and contact number. There were 5 contractors in the list, consist of FFB supplier, CPO, PK Transporter, and hazardous waste contractor. These contractors also include in the stakeholder list. | Company showed the list of contractors in PT Ladang Sawit Mas 2024 completed with name of contractor, contract number, contractor address, PIC, and contact number. There were 5 contractors in the list, consist of FFB supplier, CPO, PK Transporter, and hazardous waste contractor. These contractors also include in the stakeholder list. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 2.2.2 | All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. | Company showed agreement with contractor for example: <ul style="list-style-type: none"> - Agreement with CPO transporter PT GLG document number 001-WIL8A/LSM/SPK/VIII/2024 signed on 3 August 2024. - Agreement with PK Transporter document number 002/LSM/SOK/VIII/2024 signed on 6 August 2024. - Agreement with FFB supplier PT Sinar Karya Mandiri document number 002/SPK-TBS/SKM-LSM/2024 signed on 1 September 2024. These agreements has include the clause stated that contractor will obey regulations such as manpower, OHS, and environment regulations. | Company showed agreement with contractor for example: <ul style="list-style-type: none"> - Agreement with CPO transporter PT GLG document number 001-WIL8A/LSM/SPK/VIII/2024 signed on 3 August 2024. - Agreement with PK Transporter document number 002/LSM/SOK/VIII/2024 signed on 6 August 2024. - Agreement with FFB supplier PT Sinar Karya Mandiri document number 002/SPK-TBS/SKM-LSM/2024 signed on 1 September 2024. These agreements has include the clause stated that contractor will obey regulations such as manpower, OHS, and environment regulations. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>Company also showed the example of regulation compliance evidence, such as:</p> <ul style="list-style-type: none"> - ID of driver from PK Transporter Bukit-Tunggal Sejahtera Cooperative. There aren't driver under 18 years old. - Contract with the driver of PK-Transporter Bukit Tunggal Sejahtera Cooperative based on work order, for example work order No. 025/KBTS-PK/VI/2024 - Payment evidence of driver of PK-Transporter Bukit Tunggal Sejahtera Cooperative on 15 October 2024. The payment has above the minimum wage of Ketapang Regency. <p>Based on interview with contractor, it is known that contractor has comply with regulation such as paid the workers in accordance with minimum wage of Ketapang, no use of worker under 18 years old, provided PPE, provided the work accident insurance, etc. As follow up of nonconformity from previous assessment, company showed the proof of health insurance payment for CPO Transporter PT GLG.</p> | <p>Company also showed the example of regulation compliance evidence, such as:</p> <ul style="list-style-type: none"> - ID of driver from PK Transporter Bukit-Tunggal Sejahtera Cooperative. There aren't driver under 18 years old. - Contract with the driver of PK-Transporter Bukit Tunggal Sejahtera Cooperative based on work order, for example work order No. 025/KBTS-PK/VI/2024 - Payment evidence of driver of PK-Transporter Bukit Tunggal Sejahtera Cooperative on 15 October 2024. The payment has above the minimum wage of Ketapang Regency. <p>Based on interview with contractor, it is known that contractor has comply with regulation such as paid the workers in accordance with minimum wage of Ketapang, no use of worker under 18 years old, provided PPE, provided the work accident insurance, etc. As follow up of nonconformity from previous assessment, company showed the proof of health insurance payment for CPO Transporter PT GLG.</p> | |
| 2.2.3 | <p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their</p> | <p>Company showed agreement with contractor for example:</p> <ul style="list-style-type: none"> - Agreement with CPO transporter PT GLG document number 001-WIL 8A/LSM/SPK/VIII/2024 signed on 3 August 2024. | <p>Company showed agreement with contractor for example:</p> <ul style="list-style-type: none"> - Agreement with CPO transporter PT GLG document number 001-WIL 8A/LSM/SPK/VIII/2024 signed on 3 August 2024. | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity</p> |

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| | <p>protection.</p> | <ul style="list-style-type: none"> - Agreement with PK Transporter document number 002/LSM/SOK/VIII/2024 signed on 6 August 2024. - Agreement with FFB supplier PT Sinar Karya Mandiri document number 002/SPK-TBS/SKM-LSM/2024 signed on 1 September 2024. <p>These agreements has include the clause stated that contractor not employed workers under 18 years of age, forced labor, and not being involved in human trafficking.</p> | <ul style="list-style-type: none"> - Agreement with PK Transporter document number 002/LSM/SOK/VIII/2024 signed on 6 August 2024. - Agreement with FFB supplier PT Sinar Karya Mandiri document number 002/SPK-TBS/SKM-LSM/2024 signed on 1 September 2024. <p>These agreements has include the clause stated that contractor not employed workers under 18 years of age, forced labor, and not being involved in human trafficking.</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
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| Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources. | | | | |
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| 2.3.1 (C) | 2.3.1 (C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/ smallholder Where applicable, valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB | The mill receives FFB from outside the scope of RSPO and has shown a list of direct and indirect FFB suppliers. Based on the list, direct FFB suppliers include: <ul style="list-style-type: none"> Mitra Penjualan Permai Cooperative (Smallholder) Bukit Tunggul Sejahtera Cooperative (Smallholder) Rungau Sejahtera Cooperative (Smallholder) Istana Pawan Mandiri Plantation Cooperative (Smallholder) PT Sejahtera Sawit Lestari (BGA Group) PT Karya Makmur Langgeng (BGA Group) PT Agro Manunggal Sawitindo (BGA Group) Kayong Sekayok Service Cooperative (Smallholder) Mitra Sejati Plantation Cooperative (Smallholder) Sumber Rejeki Farmers Group (Independent Smallholder) PT Sinar Karya Mandiri (Outgrower) The company has shown the coordinates, land ownership, and relevant business permits for each supplier, for example.: <ul style="list-style-type: none"> - Kelompok Tani Sumber Rezeki: E-110.3241958 dan S 1.53319501 | The mill receives FFB from outside the scope of RSPO and has shown a list of direct and indirect FFB suppliers. Based on the list, direct FFB suppliers include: <ul style="list-style-type: none"> Mitra Penjualan Permai Cooperative (Smallholder) Bukit Tunggul Sejahtera Cooperative (Smallholder) Rungau Sejahtera Cooperative (Smallholder) Istana Pawan Mandiri Plantation Cooperative (Smallholder) PT Sejahtera Sawit Lestari (BGA Group) PT Karya Makmur Langgeng (BGA Group) PT Agro Manunggal Sawitindo (BGA Group) Kayong Sekayok Service Cooperative (Smallholder) Mitra Sejati Plantation Cooperative (Smallholder) Sumber Rejeki Farmers Group (Independent Smallholder) PT Sinar Karya Mandiri (Outgrower) The company has shown the coordinates, land ownership, and relevant business permits for each supplier, for example.: <ul style="list-style-type: none"> - Kelompok Tani Sumber Rezeki: E-110.3241958 dan S 1.53319501 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <ul style="list-style-type: none"> - PT Sinar Karya Mandiri: E 110.0950254 dan S 1.77724590 - Distribution map that showed the geolocation of direct supplier of Bukit Tunggal Jaya Mill <p>Land legality from farmers, for example SKT No. 593/242/Pem; SHM No. 989 on behalf of Suherman issued on 18 August 2018; SHM No. 988 on behalf of Suhardiman issued on 18 August 2018; SHM No. 64 on behalf of Usai issued on 3 July 2018; SHM No. 99 issued on 28 September 2018</p> | <ul style="list-style-type: none"> - PT Sinar Karya Mandiri: E 110.0950254 dan S 1.77724590 - Distribution map that showed the geolocation of direct supplier of Bukit Tunggal Jaya Mill <p>Land legality from farmers, for example SKT No. 593/242/Pem; SHM No. 989 on behalf of Suherman issued on 18 August 2018; SHM No. 988 on behalf of Suhardiman issued on 18 August 2018; SHM No. 64 on behalf of Usai issued on 3 July 2018; SHM No. 99 issued on 28 September 2018</p> | |
| 2.3.2 | <p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.</p> | <p>The mill receives FFB from outside the scope of RSPO and has shown a list of direct and indirect FFB suppliers. Based on the list, indirect FFB suppliers include PT Putra Djaya Perkasa. The company has shown a list of geolocations of each supplier farmer. However, the company has not shown evidence of the legality of the land of each farmer. In addition, the company has not reported to the RSPO regarding the time frame for fulfilling indicator 2.3.2 in accordance with the RSPO announcement on the RSPO website https://rspo.org/interim-measure-for-fulfilment-of-indicator-232-of-the-2018-rspo-principles-and-criteria--on-legality-of-indirect-ffb-supplies/. This becomes <u>nonconformity</u>. Therefore this become</p> | <p>The mill receives FFB from outside the scope of RSPO and has shown a list of direct and indirect FFB suppliers. Based on the list, indirect FFB suppliers include PT Putra Djaya Perkasa. The company has shown a list of geolocations of each supplier farmer. However, the company has not shown evidence of the legality of the land of each farmer. In addition, the company has not reported to the RSPO regarding the time frame for fulfilling indicator 2.3.2 in accordance with the RSPO announcement on the RSPO website https://rspo.org/interim-measure-for-fulfilment-of-indicator-232-of-the-2018-rspo-principles-and-criteria--on-legality-of-indirect-ffb-supplies/. This becomes <u>nonconformity</u>. Therefore this become</p> | <ul style="list-style-type: none"> <input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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Principle 3: Optimise productivity, efficiency, positive impacts and resilience

Criterion 3.1:

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

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| 3.1.1 (C) | A business or management plan (minimum three years) shall be documented and includes, where applicable, a jointly developed business case for Scheme Smallholders. | The company shows long-term planning records in the 5 Years Financial Projection document of PT Ladang Sawit Mas, Bukit Tunggal Jaya Mill 2024-2028 which has been approved by the Regional Head Administration. The document contains plantation business information including projected production of FFB, CPO, Kernel Oil, projections of CPO and Kernel extraction, CPO prices, kernel prices, FFB purchases from plasma and also from external. Based on the description above, it can be concluded that the company already has long-term planning documents covering the feasibility of a jointly developed business for plasma farmers through the purchase of FFB from plasma farmers. | The company shows long-term planning records in the 5 Years Financial Projection document of PT Ladang Sawit Mas, Bukit Tunggal Jaya Mill 2024-2028 which has been approved by the Regional Head Administration. The document contains plantation business information including projected production of FFB, CPO, Kernel Oil, projections of CPO and Kernel extraction, CPO prices, kernel prices, FFB purchases from plasma and also from external. Based on the description above, it can be concluded that the company already has long-term planning documents covering the feasibility of a jointly developed business for plasma farmers through the purchase of FFB from plasma farmers. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.1.2 | An annual replanting programme projected for a minimum of five years, is available. | Based on a review of the Long-Term Forecasting document, interviews with management representatives and field observations it is known that the company has not had any replanting activities and | Based on a review of the Long-Term Forecasting document, interviews with management representatives and field observations it is known that the company has not had any replanting activities and | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity |

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| | | has not planned any replanting activities until the next five years, because the age of the plants in the operational area of the certified unit has not yet entered a period of rejuvenation. The age of the oldest plant within the scope of this certification is 17 years (2006). | has not planned any replanting activities until the next five years, because the age of the plants in the operational area of the certified unit has not yet entered a period of rejuvenation. The age of the oldest plant within the scope of this certification is 17 years (2006). | <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.1.3 | <p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken and has agenda with the following minimum items:</p> <ul style="list-style-type: none"> Results of internal audits Customer feedback Process performance and product conformity Status of preventive and corrective actions Follow-up actions from management reviews Changes that could affect the management system Recommendations for improvement | <p>Management Review</p> <p>The company shows the minutes of the Management Review Meeting, which was held on October 21, 2024, with an agenda for discussing, among others:</p> <ul style="list-style-type: none"> - Follow up on previous management reviews, it is state that the results from previous managements review has been followed up and closed - RSPO-SCCS Internal and External Audit Results at BTJM - Claim - Complaints from Stakeholders - BTJM Process and Product Performance - Performance of External FFB Suppliers - Contractor Performance - Environmental Monitoring Management - Peatland Management - Review HCV Management Plan Period 2023/2024 - Program to Increase Understanding of Plasma/Independent Farmers - Social Management Matrix | <p>Management Review</p> <p>The company shows the minutes of the Management Review Meeting, which was held on October 21, 2024, with an agenda for discussing, among others:</p> <ul style="list-style-type: none"> - Follow up on previous management reviews, it is state that the results from previous managements review has been followed up and closed - RSPO-SCCS Internal and External Audit Results at BTJM - Claim - Complaints from Stakeholders - BTJM Process and Product Performance - Performance of External FFB Suppliers - Contractor Performance - Environmental Monitoring Management - Peatland Management - Review HCV Management Plan Period 2023/2024 - Program to Increase Understanding of Plasma/Independent Farmers - Social Management Matrix | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>Implementation Program</p> <ul style="list-style-type: none"> - OHS and Environment Progress, OHS Management and Work Accidents – Employee Health - Replanting Program - Recommendations for Improvement. <p>Internal Audit</p> <p>The company has also conducted RSPO Internal Audit conducted on September 09 – 14, 2024 with 5 non-conformities resolved on November 20, 2024.</p> | <p>Implementation Program</p> <ul style="list-style-type: none"> - OHS and Environment Progress, OHS Management and Work Accidents – Employee Health - Replanting Program - Recommendations for Improvement. <p>Internal Audit</p> <p>The company has also conducted RSPO Internal Audit conducted on September 09 – 14, 2024 with 5 non-conformities resolved on November 20, 2024.</p> | |
| <p>Criterion 3.2:</p> <p>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.</p> | | | | |
| 3.2.1 (C) | <p>The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>Action plans include continual improvement for the following:</p> <ul style="list-style-type: none"> i. Optimising the yield of the supply base. ii. Reduction in use of pesticides (Criterion 7.2) iii. Environmental impacts (Criteria 3.4, 7.6 and 7.7) iv. Waste reduction (Criterion 7.3) v. Pollution and greenhouse gas (GHG) | <p>The certification unit has a system to improve existing practices, in accordance with the latest information and techniques as well as a socialization mechanism for all workers following current technological developments. The certification unit also develops guidelines for farmers by providing systematic training for continuous improvement. Some evidence that has been implemented for continuous improvement includes:</p> <p>Environmental Aspect</p> <p>Some of the evidence that has been applied for continuous improvement include:</p> <ul style="list-style-type: none"> - The company no longer uses pesticides with the active ingredient paraquat. | <p>The certification unit has a system to improve existing practices, in accordance with the latest information and techniques as well as a socialization mechanism for all workers following current technological developments. The certification unit also develops guidelines for farmers by providing systematic training for continuous improvement. Some evidence that has been implemented for continuous improvement includes:</p> <p>Environmental Aspect</p> <p>Some of the evidence that has been applied for continuous improvement include:</p> <ul style="list-style-type: none"> - The company no longer uses pesticides with the active ingredient paraquat. | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | <p>emissions (Criterion 7.10)</p> <p>vi. Impacts on communities, workers and smallholders (Principle 6)</p> <p>vii. Integrated management of HCV-HCS, peatland and other conservation areas (Criteria 7.7 and 7.12)</p> | <ul style="list-style-type: none"> - The company has implemented biological pest control in this case by using host plants and barn owls to reduce the use of pesticides. - Management and monitoring of fires in company border areas that benefit the community. - The use of renewable energy according to reduce the use of fossil fuels such as use fiber, and empty bunch to replace fossil fuel for boiler. - Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency. - Air quality management and monitoring through several actions such as road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades. - Management and monitoring of surface and groundwater through testing the quality standard. - Green House Gas Management and using land clearing with mechanical and zero-burning policy <p>Best Management Practices Aspect:</p> <ul style="list-style-type: none"> - Improving the quality of the BGA Harvesting System, improving the quality of the BGA Manuring System and improving the quality of the BGA Ground System - Arrange alternate midrib to prevent run | <ul style="list-style-type: none"> - The company has implemented biological pest control in this case by using host plants and barn owls to reduce the use of pesticides. - Management and monitoring of fires in company border areas that benefit the community. - The use of renewable energy according to reduce the use of fossil fuels such as use fiber, and empty bunch to replace fossil fuel for boiler. - Waste management and monitoring through WWTP pond management, testing the quality of the effluent and reporting it to the Environmental Agency. - Air quality management and monitoring through several actions such as road maintenance, air quality testing, routine maintenance of vehicles and machines and vehicle upgrades. - Management and monitoring of surface and groundwater through testing the quality standard. - Green House Gas Management and using land clearing with mechanical and zero-burning policy <p>Best Management Practices Aspect:</p> <ul style="list-style-type: none"> - Improving the quality of the BGA Harvesting System, improving the quality of the BGA Manuring System and improving the quality of the BGA Ground System - Arrange alternate midrib to prevent run | |
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| | | <p>off</p> <ul style="list-style-type: none"> - Application of focal feeders as a place fertilizer, increase nutrient and water uptake, improve soil aeration and infiltration, source of organic matter for plants and increase the activity of soil microorganisms. - Pruning Nephrolepis biserrate as a source of soil organic matter. <p>The company also provides opportunities for employees to convey innovation ideas as a continuous improvement effort through the CONTINUOUS IMPROVEMENT program for example improvement to Reduce Yield Collection Points (TPH) Losses From 0.13% To 0.04% In 2024 by improving the quality of TPH and ensuring the availability of sacks of loose bedding in all TPH.</p> | <p>off</p> <ul style="list-style-type: none"> - Application of focal feeders as a place fertilizer, increase nutrient and water uptake, improve soil aeration and infiltration, source of organic matter for plants and increase the activity of soil microorganisms. - Pruning Nephrolepis biserrate as a source of soil organic matter. <p>The company also provides opportunities for employees to convey innovation ideas as a continuous improvement effort through the CONTINUOUS IMPROVEMENT program for example improvement to Reduce Yield Collection Points (TPH) Losses From 0.13% To 0.04% In 2024 by improving the quality of TPH and ensuring the availability of sacks of loose bedding in all TPH.</p> | |
| 3.2.2 | As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. | The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Base on document verification, for The RSPO metric template known annual data 12-month period use on year 2022 for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan | The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Base on document verification, for The RSPO metric template known annual data 12-month period use on year 2022 for schedule reporting annual data social and environmental, included monitoring data of water consumption, management dan | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>monitoring HCV.</p> <p>Based on document verification, for The RSPO metric template known annual data 12-month periods use (January to December 2023) for schedule reporting annual data peat area, pesticide usage, average LTIFR (Lost Time Injury Frequency Rate) and fresh water usage.</p> <p>Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The data presented can be ascertained in accordance with the existing raw data.</p> | <p>monitoring HCV.</p> <p>Based on document verification, for The RSPO metric template known annual data 12-month periods use (January to December 2023) for schedule reporting annual data peat area, pesticide usage, average LTIFR (Lost Time Injury Frequency Rate) and fresh water usage.</p> <p>Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The data presented can be ascertained in accordance with the existing raw data.</p> | |
| <p>Criterion 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.</p> | | | | |
| 3.3.1 (C) | Standard Operating Procedures (SOPs) for the unit of certification are in place. | <p>The company shows the recorded SOP for Plant Cultivation contained in the Standard Operational Procedure (Oil Palm Agronomy) document which was approved by the Director on January 4, 2011, consisting of 3 volumes, namely:</p> <ul style="list-style-type: none"> • BGAAGRKS-SOP-01 Jilid 1: Pembibitan (SOP-01), Persiapan Lahan (SOP-02), Pembuatan dan Perawatan Jalan dan Jembatan (SOP-03), Pembuatan dan Pemeliharaan Parit (SOP-04), Konservasi Tanah dan Air (SOP-05), Penanaman Kacangan (SOP-06), Penanaman Kelapa Sawit (SOP-07). • BGAAGRKS-SOP-01 Jilid 2: | <p>The company shows the recorded SOP for Plant Cultivation contained in the Standard Operational Procedure (Oil Palm Agronomy) document which was approved by the Director on January 4, 2011, consisting of 3 volumes, namely:</p> <ul style="list-style-type: none"> • BGAAGRKS-SOP-01 Jilid 1: Pembibitan (SOP-01), Persiapan Lahan (SOP-02), Pembuatan dan Perawatan Jalan dan Jembatan (SOP-03), Pembuatan dan Pemeliharaan Parit (SOP-04), Konservasi Tanah dan Air (SOP-05), Penanaman Kacangan (SOP-06), Penanaman Kelapa Sawit (SOP-07). • BGAAGRKS-SOP-01 Jilid 2: | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>Pengendalian Gulma (BGAAGRKS-SOP-08), Pemupukan (BGAAGRKS-SOP-09), Pengendalian Hama dan Penyakit (BGAAGRKS-SOP-10).</p> <ul style="list-style-type: none"> • BGAAGRKS-SOP-I Jilid 3: Kastrasi dan Manajemen Kanopi (BGAAGRKS-SOP-11), Sensus Pokok dan Produksi (SOP-12), Panen (SOP-13), Pengelolaan Pestisida (SOP-14), Pengelolaan Transport (SOP-15), Pengelolaan Lahan Marginal (SOP-16), Peremajaan (SOP-17). <p>The Company also has a Standard Operating Procedure for processing plantation products in the Factory Operational Control document (BGA-SOP-KMB22-RO), approved on September 25, 2012 by the Area Controller. The document contains general and operational requirements for each processing station as well as procedures for the laboratory.</p> <p>The company's procedures have covered all processes of the main activities from land clearing to the transportation of FFB and for mills from fruit reception to CPO dispatch. These procedures are also available in the respective units and are written in Bahasa. Based on field observations at the mill and estate during the audit, it is known if procedures have been implemented and workers can describe and demonstrate their work according to the procedures, referring to operational, safety and environmental best practices</p> | <p>Pengendalian Gulma (BGAAGRKS-SOP-08), Pemupukan (BGAAGRKS-SOP-09), Pengendalian Hama dan Penyakit (BGAAGRKS-SOP-10).</p> <ul style="list-style-type: none"> • BGAAGRKS-SOP-I Jilid 3: Kastrasi dan Manajemen Kanopi (BGAAGRKS-SOP-11), Sensus Pokok dan Produksi (SOP-12), Panen (SOP-13), Pengelolaan Pestisida (SOP-14), Pengelolaan Transport (SOP-15), Pengelolaan Lahan Marginal (SOP-16), Peremajaan (SOP-17). <p>The Company also has a Standard Operating Procedure for processing plantation products in the Factory Operational Control document (BGA-SOP-KMB22-RO), approved on September 25, 2012 by the Area Controller. The document contains general and operational requirements for each processing station as well as procedures for the laboratory.</p> <p>The company's procedures have covered all processes of the main activities from land clearing to the transportation of FFB and for mills from fruit reception to CPO dispatch. These procedures are also available in the respective units and are written in Bahasa. Based on field observations at the mill and estate during the audit, it is known if procedures have been implemented and workers can describe and demonstrate their work according to the procedures, referring to operational, safety and environmental best practices</p> | |
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| <p>3.3.2</p> | <p>A mechanism to check consistent implementation of procedures is in place.</p> | <p>The Company has a mechanism that ensures consistency in the implementation of its SOP's, such as a check or inspection of the quality of work (operational audit of estate and mill), RSPO internal audits that check whether procedures in the certification unit have been implemented by the certification unit and financial audits carried out by external parties to ensure the usage or fees used are in accordance with the rules set by the certification unit contained in the SOP Internal Audit No. LSM-SUST-SOP-35.</p> <p>Daily internal supervision is carried out by the supervisory level starting from the Foreman, Division Assistant, Assistant Head, to the Plantation Manager. Operational audits are conducted once a month. Operational audits evaluate the operational and administrative performance of plantations and mills. Meanwhile, the RSPO internal audit is conducted once a year to evaluate the implementation of sustainability procedures in plantations and mills. Public accountant financial audit is conducted once a year. Furthermore, management representatives (related Assistants and Managers) regularly make inspectorate visits to control the implementation of procedures.</p> | <p>The Company has a mechanism that ensures consistency in the implementation of its SOP's, such as a check or inspection of the quality of work (operational audit of estate and mill), RSPO internal audits that check whether procedures in the certification unit have been implemented by the certification unit and financial audits carried out by external parties to ensure the usage or fees used are in accordance with the rules set by the certification unit contained in the SOP Internal Audit No. LSM-SUST-SOP-35.</p> <p>Daily internal supervision is carried out by the supervisory level starting from the Foreman, Division Assistant, Assistant Head, to the Plantation Manager. Operational audits are conducted once a month. Operational audits evaluate the operational and administrative performance of plantations and mills. Meanwhile, the RSPO internal audit is conducted once a year to evaluate the implementation of sustainability procedures in plantations and mills. Public accountant financial audit is conducted once a year. Furthermore, management representatives (related Assistants and Managers) regularly make inspectorate visits to control the implementation of procedures.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>All inspection activities and corrective actions carried out by the company are recorded in the form of a report in accordance with the audit carried out. The results of the audit are scored which show the performance of the estate and are used as a reference for improvement in the next assessment. Each Estate will make efforts to improve performance based on the score obtained. The contractor's performance assessment has been verified in indicator 2.2.2.</p> | <p>All inspection activities and corrective actions carried out by the company are recorded in the form of a report in accordance with the audit carried out. The results of the audit are scored which show the performance of the estate and are used as a reference for improvement in the next assessment. Each Estate will make efforts to improve performance based on the score obtained. The contractor's performance assessment has been verified in indicator 2.2.2.</p> | |
| 3.3.3 | <p>Records of monitoring and any actions taken are maintained and available.</p> | <p>The company has conducted RSPO Internal Audit conducted on September 09 – 14, 2024 with 5 non-conformities resolved on November 20, 2024 which was carried out by personnel who have attended RSPO training. The company has shown the RSPO Internal Audit Report and from the results of the internal audit there and all nonconformities were close on November 20, 2024.</p> <p>The company has shown Agronomy internal audit Area 8A and 8B conducted period May 2024. There is an action plan for the results of the visit, which has been followed up by each PIC.</p> <p>All inspection activities and corrective actions carried out by the company are recorded in the form of a report in accordance with the audit carried out. The</p> | <p>The company has conducted RSPO Internal Audit conducted on September 09 – 14, 2024 with 5 non-conformities resolved on November 20, 2024 which was carried out by personnel who have attended RSPO training. The company has shown the RSPO Internal Audit Report and from the results of the internal audit there and all nonconformities were close on November 20, 2024.</p> <p>The company has shown Agronomy internal audit Area 8A and 8B conducted period May 2024. There is an action plan for the results of the visit, which has been followed up by each PIC.</p> <p>All inspection activities and corrective actions carried out by the company are recorded in the form of a report in accordance with the audit carried out. The</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | results of the audit are scored which show the performance of the estate and are used as a reference for improvement in the next assessment. Each Estate will make efforts to improve performance based on the score obtained. The contractor's performance assessment has been verified in indicator 2.2.2. | results of the audit are scored which show the performance of the estate and are used as a reference for improvement in the next assessment. Each Estate will make efforts to improve performance based on the score obtained. The contractor's performance assessment has been verified in indicator 2.2.2. | |
| Criterion 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 (C) | In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented. | The certification unit has several documents related to social and environmental impact assessments, which are conducted independently and participatively, involving impacted stakeholders. These documents cover pre-construction, operational, and post-operational phases. Some of the key documents include: 1. Environmental Impact Assessment (AMDAL) The certification unit has conducted environmental impact assessments through various documents, including: <ul style="list-style-type: none"> PT Ladang Sawit Mas (PT LSM): <ul style="list-style-type: none"> AMDAL Addendum (2019), including ANDAL, RKL, and RPL, for activities related to increasing the processing capacity of the plantation from 35 tons/hour to 60 tons/hour. This addendum received Environmental Feasibility approval from the | The certification unit has several documents related to social and environmental impact assessments, which are conducted independently and participatively, involving impacted stakeholders. These documents cover pre-construction, operational, and post-operational phases. Some of the key documents include: 1. Environmental Impact Assessment (AMDAL) The certification unit has conducted environmental impact assessments through various documents, including: <ul style="list-style-type: none"> PT Ladang Sawit Mas (PT LSM): <ul style="list-style-type: none"> AMDAL Addendum (2019), including ANDAL, RKL, and RPL, for activities related to increasing the processing capacity of the plantation from 35 tons/hour to 60 tons/hour. This addendum received Environmental Feasibility approval from the | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>Ketapang Regent on February 19, 2019 (No. 026/DPMPTSP-D.B/2019).</p> <ul style="list-style-type: none"> ○ The company also obtained Environmental Permit No. 027/DPMPTSP-DB/2019 for oil palm plantation activities covering approximately 8,300 ha and for the upgraded palm oil processing plant. <ul style="list-style-type: none"> • PT Gemilang Makmur Subur (PT GMS): <ul style="list-style-type: none"> ○ The company has an AMDAL document from 2015, including ANDAL, RKL, and RPL for a plantation of approximately 5,190 ha and a palm oil mill with a capacity of 45 tons/hour. This AMDAL was approved by the Ketapang Regent on October 28, 2015 (No. 716/KLH-B/2015). • PT Lestari Gemilang Intisawit (PT LGI) (formerly PT Sawit Jaya Makmur): <ul style="list-style-type: none"> ○ This company has an AMDAL document from 2009, covering ANDAL, RKL, and RPL for a plantation of 12,677 ha and a palm oil mill with a capacity of 60 tons/hour. It received Environmental Feasibility approval from the West Kalimantan Governor on | <p>Ketapang Regent on February 19, 2019 (No. 026/DPMPTSP-D.B/2019).</p> <ul style="list-style-type: none"> ○ The company also obtained Environmental Permit No. 027/DPMPTSP-DB/2019 for oil palm plantation activities covering approximately 8,300 ha and for the upgraded palm oil processing plant. <ul style="list-style-type: none"> • PT Gemilang Makmur Subur (PT GMS): <ul style="list-style-type: none"> ○ The company has an AMDAL document from 2015, including ANDAL, RKL, and RPL for a plantation of approximately 5,190 ha and a palm oil mill with a capacity of 45 tons/hour. This AMDAL was approved by the Ketapang Regent on October 28, 2015 (No. 716/KLH-B/2015). • PT Lestari Gemilang Intisawit (PT LGI) (formerly PT Sawit Jaya Makmur): <ul style="list-style-type: none"> ○ This company has an AMDAL document from 2009, covering ANDAL, RKL, and RPL for a plantation of 12,677 ha and a palm oil mill with a capacity of 60 tons/hour. It received Environmental Feasibility approval from the West Kalimantan Governor on | |
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| | | <p>May 20, 2009 (No. 284/2009).</p> <ul style="list-style-type: none"> • PT Nabati Agro Subur (PT NAS): <ul style="list-style-type: none"> ○ This company has an UKL/UPL document for oil palm plantation activities covering 2,390 ha. The permit was granted by the Ketapang Regent under Decision No. 456/PEM/2014 on September 1, 2014. <p>2. Social Impact Assessment (SIA) The certification unit has also conducted Social Impact Assessments (SIA) for its operations:</p> <ul style="list-style-type: none"> • PT Ladang Sawit Mas (PT LSM): <ul style="list-style-type: none"> ○ An SIA was conducted in November-December 2021 by PT Meganesia Tirta Foresta. The assessment involved field visits to several villages (Sungai Kelik, Simpang Tiga Sembelangan, and Tanjung Medan) and used secondary data, primary data collection (interviews, discussions, and questionnaires). Identified social impacts include: <ul style="list-style-type: none"> ▪ Natural Resources: Flooding, reduced agricultural land, loss of honey trees, hunting resources, reduced fish catch, water quality deterioration. | <p>May 20, 2009 (No. 284/2009).</p> <ul style="list-style-type: none"> • PT Nabati Agro Subur (PT NAS): <ul style="list-style-type: none"> ○ This company has an UKL/UPL document for oil palm plantation activities covering 2,390 ha. The permit was granted by the Ketapang Regent under Decision No. 456/PEM/2014 on September 1, 2014. <p>2. Social Impact Assessment (SIA) The certification unit has also conducted Social Impact Assessments (SIA) for its operations:</p> <ul style="list-style-type: none"> • PT Ladang Sawit Mas (PT LSM): <ul style="list-style-type: none"> ○ An SIA was conducted in November-December 2021 by PT Meganesia Tirta Foresta. The assessment involved field visits to several villages (Sungai Kelik, Simpang Tiga Sembelangan, and Tanjung Medan) and used secondary data, primary data collection (interviews, discussions, and questionnaires). Identified social impacts include: <ul style="list-style-type: none"> ▪ Natural Resources: Flooding, reduced agricultural land, loss of honey trees, hunting resources, reduced fish catch, water quality deterioration. | |
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| | | <ul style="list-style-type: none"> ▪ Human Resources: Health issues for community members and workers, competition for labor. ▪ Economic/Financial Resources: Consumptive behavior, lack of transparency in plasma estate calculations. ▪ Social Resources: Social jealousy, inadequate CSR programs, coordination and communication issues, slow responses. ▪ Physical Resources: Damage to bridges, pipelines. ▪ Internal Company Impacts: Recruitment practices, OHS compliance (SMK3), employee welfare (health benefits, wages), career development, issues related to child labor, discrimination, and | <ul style="list-style-type: none"> ▪ Human Resources: Health issues for community members and workers, competition for labor. ▪ Economic/Financial Resources: Consumptive behavior, lack of transparency in plasma estate calculations. ▪ Social Resources: Social jealousy, inadequate CSR programs, coordination and communication issues, slow responses. ▪ Physical Resources: Damage to bridges, pipelines. ▪ Internal Company Impacts: Recruitment practices, OHS compliance (SMK3), employee welfare (health benefits, wages), career development, issues related to child labor, discrimination, and | |
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| | | <p>the role of unions and employee cooperatives.</p> <ul style="list-style-type: none"> • PT Gemilang Makmur Subur (PT GMS): <ul style="list-style-type: none"> ○ A social impact assessment was conducted by Meganesia Tirta Foresta in December 2021. Field visits were made to villages like Desa Laman Satong. The identified social impacts include: <ul style="list-style-type: none"> ▪ Natural Resources: Decrease in forest area, reduced hunting yields, and limited contribution to community forestry programs. ▪ Human Resources: Competition for labor. ▪ Social Resources: CSR-related issues, social capital, and negative perceptions. ▪ Internal Company Impacts: Recruitment practices, OHS compliance, employee welfare, career development, issues of child labor, | <p>the role of unions and employee cooperatives.</p> <ul style="list-style-type: none"> • PT Gemilang Makmur Subur (PT GMS): <ul style="list-style-type: none"> ○ A social impact assessment was conducted by Meganesia Tirta Foresta in December 2021. Field visits were made to villages like Desa Laman Satong. The identified social impacts include: <ul style="list-style-type: none"> ▪ Natural Resources: Decrease in forest area, reduced hunting yields, and limited contribution to community forestry programs. ▪ Human Resources: Competition for labor. ▪ Social Resources: CSR-related issues, social capital, and negative perceptions. ▪ Internal Company Impacts: Recruitment practices, OHS compliance, employee welfare, career development, issues of child labor, | |
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| | | <p>discrimination, unions, and employee cooperatives.</p> <ul style="list-style-type: none"> • PT Lestari Gemilang Intisawit (PT LGI) and PT Nabati Agro Subur (PT NAS): <ul style="list-style-type: none"> ○ SIA was conducted by ECOTROP in February 2022, covering 7 surrounding villages (Betenung, Kayong Hulu, Kayong Utara, Nanga Tayap, Sepakat Jaya, and others). The identified social impacts include: <ul style="list-style-type: none"> ▪ Land Conflicts: Overlapping land areas between the certification unit and local communities. ▪ Theft of Fresh Fruit Bunches (TBS). ▪ Land Disputes: Between the community and the certification unit. ▪ Lack of Transparency: Regarding the boundaries of the certified unit and plasma areas. ▪ CSR Issues: Limited knowledge and information about the company's CSR | <p>discrimination, unions, and employee cooperatives.</p> <ul style="list-style-type: none"> • PT Lestari Gemilang Intisawit (PT LGI) and PT Nabati Agro Subur (PT NAS): <ul style="list-style-type: none"> ○ SIA was conducted by ECOTROP in February 2022, covering 7 surrounding villages (Betenung, Kayong Hulu, Kayong Utara, Nanga Tayap, Sepakat Jaya, and others). The identified social impacts include: <ul style="list-style-type: none"> ▪ Land Conflicts: Overlapping land areas between the certification unit and local communities. ▪ Theft of Fresh Fruit Bunches (TBS). ▪ Land Disputes: Between the community and the certification unit. ▪ Lack of Transparency: Regarding the boundaries of the certified unit and plasma areas. ▪ CSR Issues: Limited knowledge and information about the company's CSR | |
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| | | <p>programs.</p> <ul style="list-style-type: none"> ▪ Plasma Management: Suboptimal management of plasma plantations. <p>The certification unit has conducted comprehensive environmental and social impact assessments using various data collection methods such as interviews, questionnaires, and focus group discussions (FGD). These assessments cover both operational impacts and potential social issues arising from the company's activities. From interviews with local community representatives in villages such as Tanjung Medan, Sungai Kelik, Nanga Tayap, and Sepakat Jaya, it was found that there are no significant social impacts that have yet to be identified as issues in the community. This indicates that the company has made significant efforts to listen to and involve the community in identifying and managing the potential social impacts of its operations.</p> <p>Overall, the company appears to have established a solid framework for conducting and managing social and environmental impact assessments and effectively engaging with stakeholders in this process.</p> | <p>programs.</p> <ul style="list-style-type: none"> ▪ Plasma Management: Suboptimal management of plasma plantations. <p>The certification unit has conducted comprehensive environmental and social impact assessments using various data collection methods such as interviews, questionnaires, and focus group discussions (FGD). These assessments cover both operational impacts and potential social issues arising from the company's activities. From interviews with local community representatives in villages such as Tanjung Medan, Sungai Kelik, Nanga Tayap, and Sepakat Jaya, it was found that there are no significant social impacts that have yet to be identified as issues in the community. This indicates that the company has made significant efforts to listen to and involve the community in identifying and managing the potential social impacts of its operations.</p> <p>Overall, the company appears to have established a solid framework for conducting and managing social and environmental impact assessments and effectively engaging with stakeholders in this process.</p> | |
| 3.4.2 | For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of | In 2022, several Social Impact Assessments (SIA) were conducted by various consultancy teams for different companies in several villages, identifying key stakeholders and involving consultations with affected | In 2022, several Social Impact Assessments (SIA) were conducted by various consultancy teams for different companies in several villages, identifying key stakeholders and involving consultations with affected | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity |

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| | <p>affected stakeholders.</p> | <p>communities:</p> <ol style="list-style-type: none"> 1. SIA PT Ladang Sawit Mas (LSM) in 2022: The assessment was carried out by PT Meganesia Tirta Foresta within the villages of Sungai Kelik, Simpang Tiga Sebelanggan, and Tanjung Medan. Key stakeholders identified included the Village Representative Board (BPD), village heads, traditional leaders, youth leaders, women's leaders, landowners, village residents, and members of cooperatives. 2. SIA PT Gemilang Makmur Subur (GMS) in 2022: Also conducted by PT Meganesia Tirta Foresta, this assessment covered the village of Laman Satong. Similar to the previous assessment, key stakeholders involved were the BPD, village heads, traditional leaders, youth leaders, women's leaders, landowners, village residents, and cooperative members. 3. SIA PT LGI&NAS in 2022: Conducted by Ecotrop, this assessment covered multiple villages, including Betenung, Kayong Hulu, Kayong Utara, Kayong Tuhe, Nanga Tayap, Sepakat Jaya, Tajok Kayong, Demung Adat, Kayong Sekayo Cooperative, and Mitra Sejati Cooperative, along with the Agriculture and Environmental Services of Ketapang District. <p>Additionally, the social management and monitoring plan (Rencana Kelola dan Pantau</p> | <p>communities:</p> <ol style="list-style-type: none"> 1. SIA PT Ladang Sawit Mas (LSM) in 2022: The assessment was carried out by PT Meganesia Tirta Foresta within the villages of Sungai Kelik, Simpang Tiga Sebelanggan, and Tanjung Medan. Key stakeholders identified included the Village Representative Board (BPD), village heads, traditional leaders, youth leaders, women's leaders, landowners, village residents, and members of cooperatives. 2. SIA PT Gemilang Makmur Subur (GMS) in 2022: Also conducted by PT Meganesia Tirta Foresta, this assessment covered the village of Laman Satong. Similar to the previous assessment, key stakeholders involved were the BPD, village heads, traditional leaders, youth leaders, women's leaders, landowners, village residents, and cooperative members. 3. SIA PT LGI&NAS in 2022: Conducted by Ecotrop, this assessment covered multiple villages, including Betenung, Kayong Hulu, Kayong Utara, Kayong Tuhe, Nanga Tayap, Sepakat Jaya, Tajok Kayong, Demung Adat, Kayong Sekayo Cooperative, and Mitra Sejati Cooperative, along with the Agriculture and Environmental Services of Ketapang District. <p>Additionally, the social management and monitoring plan (Rencana Kelola dan Pantau</p> | <p><input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>Sosial) was developed based on the involvement of the affected communities. Evidence of this engagement includes summaries and documentation of consultations, such as:</p> <ul style="list-style-type: none"> • Consultations in October 2024 with the communities of Kayong Utara and Kayong Tuhe for PT LGI and PT NAS. • Consultations in August 2024 in Laman Satong for PT GMS. • Consultations in September 2024 in the village of Sungai Kelik, Simpang Tiga Sebelanggan for PT LSM. <p>These consultations were aimed at ensuring stakeholder participation and integrating local community concerns into the planning process.</p> | <p>Sosial) was developed based on the involvement of the affected communities. Evidence of this engagement includes summaries and documentation of consultations, such as:</p> <ul style="list-style-type: none"> • Consultations in October 2024 with the communities of Kayong Utara and Kayong Tuhe for PT LGI and PT NAS. • Consultations in August 2024 in Laman Satong for PT GMS. • Consultations in September 2024 in the village of Sungai Kelik, Simpang Tiga Sebelanggan for PT LSM. <p>These consultations were aimed at ensuring stakeholder participation and integrating local community concerns into the planning process.</p> | |
| 3.4.3 (C) | <p>The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> | <p>The environmental management and monitoring (RKL-RPL) for the first semester of 2024 have been implemented in accordance with the guidelines outlined in the RKL-RPL, as described in indicator 3.4.1. The effectiveness of environmental management and monitoring is reflected in the analysis of its implementation, showing the alignment between planned activities and their on-the-ground execution. The identified impacts in the Social Impact Assessment (SIA) for PT LSM, PT GMS, and PT LGI-NAS have been managed and monitored through the companies' Social Management and Monitoring Plans (Rencana Pengelolaan dan Pemantauan SIA). These plans include monitoring indicators, monitoring methods, PIC (person</p> | <p>The environmental management and monitoring (RKL-RPL) for the first semester of 2024 have been implemented in accordance with the guidelines outlined in the RKL-RPL, as described in indicator 3.4.1. The effectiveness of environmental management and monitoring is reflected in the analysis of its implementation, showing the alignment between planned activities and their on-the-ground execution. The identified impacts in the Social Impact Assessment (SIA) for PT LSM, PT GMS, and PT LGI-NAS have been managed and monitored through the companies' Social Management and Monitoring Plans (Rencana Pengelolaan dan Pemantauan SIA). These plans include monitoring indicators, monitoring methods, PIC (person</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>in charge), and monitoring frequency. The development of these plans was based on the participatory review of the management plans conducted on January 2, 2023. The implementation of the SIA management and monitoring activities for 2023 has been evaluated and updated, with the results documented in the "Public Consultation Summary for Social Management Plan."</p> <p>Review and Monitoring Process: The companies have conducted a review of their social management and monitoring plans every two years, with annual monitoring activities. The review for the 2022-2023 period was carried out between September and October 2024, involving a participatory process with relevant stakeholders from each company unit.</p> <p>Feedback from Local Communities: Interviews with local residents from Tanjung Medan, Nanga Tayap, and Sepakat Jaya revealed that there are currently no social issues raised by the local communities. The interviews also indicated that the companies have considered the social impacts of their operations and consistently involve nearby communities to evaluate and propose new SIA monitoring and management programs.</p> <p>Stakeholder Mapping and Issues Identified: The companies have conducted a stakeholder mapping process, considering external stakeholders such as women, local residents, youth leaders, and contractors, and internal stakeholders such as workers (with a focus on local</p> | <p>in charge), and monitoring frequency. The development of these plans was based on the participatory review of the management plans conducted on January 2, 2023. The implementation of the SIA management and monitoring activities for 2023 has been evaluated and updated, with the results documented in the "Public Consultation Summary for Social Management Plan."</p> <p>Review and Monitoring Process: The companies have conducted a review of their social management and monitoring plans every two years, with annual monitoring activities. The review for the 2022-2023 period was carried out between September and October 2024, involving a participatory process with relevant stakeholders from each company unit.</p> <p>Feedback from Local Communities: Interviews with local residents from Tanjung Medan, Nanga Tayap, and Sepakat Jaya revealed that there are currently no social issues raised by the local communities. The interviews also indicated that the companies have considered the social impacts of their operations and consistently involve nearby communities to evaluate and propose new SIA monitoring and management programs.</p> <p>Stakeholder Mapping and Issues Identified: The companies have conducted a stakeholder mapping process, considering external stakeholders such as women, local residents, youth leaders, and contractors, and internal stakeholders such as workers (with a focus on local</p> | |
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| | | workers, women, and new hires). Key social issues identified include land disputes, industrial relations, cooperative management, and other ongoing concerns. | workers, women, and new hires). Key social issues identified include land disputes, industrial relations, cooperative management, and other ongoing concerns. | |
| Criterion 3.5: A system for managing human resources is in place. | | | | |
| 3.5.1 | Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. | <p>The Company has documented the Employment Procedures for BGA Group, such as Recruitment Procedure No. BGA-SOP-HC-304.08-R0 and Company Regulations for the 2023-2025 period which have been registered with the Ministry of Manpower of the Republic of Indonesian No. Kep.4/HI.00.00/00.0000/230618011/B/VII/2023. The document has detailed the recruitment and promotion mechanism with non-discriminatory measures, as well as regulating the terms and conditions of employee employment, including the arrangement of recruitment requirements, working hours, wages, social security, leave, termination of employment, work rules and work discipline, rules of the dispute resolution process, and other provisions. In addition, the company has employment SOPs such as:</p> <ul style="list-style-type: none"> • BGA-SOP-HC-304.01-R1 on Employee Recruitment and Selection | <p>The Company has documented the Employment Procedures for BGA Group, such as Recruitment Procedure No. BGA-SOP-HC-304.08-R0 and Company Regulations for the 2023-2025 period which have been registered with the Ministry of Manpower of the Republic of Indonesian No. Kep.4/HI.00.00/00.0000/230618011/B/VII/2023. The document has detailed the recruitment and promotion mechanism with non-discriminatory measures, as well as regulating the terms and conditions of employee employment, including the arrangement of recruitment requirements, working hours, wages, social security, leave, termination of employment, work rules and work discipline, rules of the dispute resolution process, and other provisions. In addition, the company has employment SOPs such as:</p> <ul style="list-style-type: none"> • BGA-SOP-HC-304.01-R1 on Employee Recruitment and Selection | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>Process,</p> <ul style="list-style-type: none"> • BGA-SOP-HC-307.01-R1 on Promotion, • BGA-SOP-HC-307.02-R1 on Employee Movement, • BGA-SOP-HC-315.02-R0 concerning Insurance Payment for BPJS Operational Units <p>Based on interviews with the Bipartite and Gender Committee, the company has demonstrated good practices and transparency throughout the recruitment process, as well as in the cancellation of performance for each promotion, without discrimination. Based on an interview with. A review of the Employee List document, it is known that workers come from various ethnicities such as Dayak, NTT, Javanese and others.</p> | <p>Process,</p> <ul style="list-style-type: none"> • BGA-SOP-HC-307.01-R1 on Promotion, • BGA-SOP-HC-307.02-R1 on Employee Movement, • BGA-SOP-HC-315.02-R0 concerning Insurance Payment for BPJS Operational Units <p>Based on interviews with the Bipartite and Gender Committee, the company has demonstrated good practices and transparency throughout the recruitment process, as well as in the cancellation of performance for each promotion, without discrimination. Based on an interview with. A review of the Employee List document, it is known that workers come from various ethnicities such as Dayak, NTT, Javanese and others.</p> | |
| 3.5.2 | Employment procedures are implemented and records are maintained. | Based on interviews with the Bipartite LKS and the Gender Committee, it is known that all workers have understood this procedure and they also stated that the recruitment and promotion process has been carried out openly with an annual assessment. The results of the review of the company's documents have carried out recruitment and promotions carried out during 2023/2024 at Mill and Estate. It is known that the company only provides | Based on interviews with the Bipartite and the Gender Committee, it is known that all workers have understood this procedure and they also stated that the recruitment and promotion process has been carried out openly with an annual assessment. The results of the review of the company's documents have carried out recruitment and promotions carried out during 2023/2024 at Mill and Estate. It is known that the company only provides relevant | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>relevant requirements that need to be met by the promoted candidate by means of an assessment every 3 months and an annual assessment conducted by each superior.</p> <p>Example of Documented Recruitment at PT Ladang Sawit Mas: Recruitment for the Admin Payroll section in 2024, with the requirement of a photocopy of the Identity Card, a photocopy of the Family Card, and the Results of the Health Examination. This is in accordance with the company's recruitment procedures. The auditor also has confirmation to the Manpower Office of Ketapang Regency, that there have been no termination for the past 1 year, even if there are problems regarding termination in the company, it will be carried out in a tripartite or mediated manner.</p> | <p>requirements that need to be met by the promoted candidate by means of an assessment every 3 months and an annual assessment conducted by each superior.</p> <p>Example of Documented Recruitment at PT Ladang Sawit Mas: Recruitment for the Admin Payroll section in 2024, with the requirement of a photocopy of the Identity Card, a photocopy of the Family Card, and the Results of the Health Examination. This is in accordance with the company's recruitment procedures. The auditor also has confirmation to the Manpower Office of Ketapang Regency, that there have been no termination for the past 1 year, even if there are problems regarding layoffs in the company, it will be carried out in a tripartite or mediated manner.</p> | |
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| 3.6.1 (C) | <p>All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> | <p>The company has a Plantation Management System Policy which was approved by the Manager in January 2023, which regulates, among other things, prioritizing OHS in all aspects of work in order to prevent and reduce accidents as well as occupational illness by implementing OHS Management Systems. The company has a HIRAC Document for</p> | <p>The company has a Plantation Management System Policy which was approved by the Manager in January 2023, which regulates, among other things, prioritizing OHS in all aspects of work in order to prevent and reduce accidents as well as occupational illness by implementing OHS Management Systems. The company has a HIRAC Document for</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>the plantation IBPR/BGA-K3/11/2023-R01 which was ratified on November 16, 2023 and a HIRAC Document for the factory which was ratified on November 21, 2023 which was prepared by Sustainability and ratified by RH Nanga Tayap.</p> <p>Following up the results from previous audit, the company has completed the HIRAC document with all operational activities both plantations and factories. The latest HIRAC evaluation was on 16 November 2023. The HIRAC document will be evaluated the following year from the last evaluation, if there is a new type of work, or if there are major accidents. The HIRAC document has identified locations, activities, hazards, effects, risk evaluation, risk control, residual risk and PIC. Samples for Bukit Tunggal Jaya Mill include FFB cleaning activities at clogged hooper doors, the identified hazard is eye contact with loose drops, the identified effect is irritation and injury to the eye with a high level of risk. Risk control is safety briefing, team training, supervision and PPE. The PIC is the process foreman, and worker.</p> <p>Mitigation plans are also contained in HIRADC documents such as providing PPE, awareness training, and inspections.</p> | <p>the plantation IBPR/BGA-K3/11/2023-R01 which was ratified on November 16, 2023 and a HIRAC Document for the factory which was ratified on November 21, 2023 which was prepared by Sustainability and ratified by RH Nanga Tayap.</p> <p>Following up the results from previous audit, the company has completed the HIRAC document with all operational activities both plantations and factories. The latest HIRAC evaluation was on 16 November 2023. The HIRAC document will be evaluated the following year from the last evaluation, if there is a new type of work, or if there are major accidents. The HIRAC document has identified locations, activities, hazards, effects, risk evaluation, risk control, residual risk and PIC. Samples for Bukit Tunggal Jaya Mill include FFB cleaning activities at clogged hooper doors, the identified hazard is eye contact with loose drops, the identified effect is irritation and injury to the eye with a high level of risk. Risk control is safety briefing, team training, supervision and PPE. The PIC is the process foreman, and worker.</p> <p>Mitigation plans are also contained in HIRADC documents such as providing PPE, awareness training, and inspections.</p> | |
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| | | <p>Based on field visits to harvesting and spraying activities in the plantations, the workers have used the PPE provided by the company. In addition, mitigation is also carried out at the factory.</p> <p>Based on the results of the verification of RSPO internal audit documents, the HIRAC evaluation has been discussed and there are no discrepancies related to the HIRAC evaluation.</p> | <p>Based on field visits to harvesting and spraying activities in the plantations, the workers have used the PPE provided by the company. In addition, mitigation is also carried out at the factory.</p> <p>Based on the results of the verification of RSPO internal audit documents, the HIRAC evaluation has been discussed and there are no discrepancies related to the HIRAC evaluation.</p> | |
| 3.6.2 (C) | <p>The effectiveness of the H&S plan to address health and safety risks to people is monitored</p> | <p>The company already has a HIRAC Estate document IBPR/BGA-K3/11/2023-R01 dated November 16, 2023 as part of the company's OHS plan that regulates the storage of PPE at the location that has been provided. In addition, the company also has a personal protective equipment procedure number BGA-SOP-CCS-1106.1-R0 dated December 1, 2011 which at point 7.7.2 regulates personal protective equipment that has been contaminated with hazardous chemicals is prohibited from being taken home.</p> <p>Permenaker number 03 of 1986 concerning Safety and Health Requirements in the workplace that manages pesticides in Article 2 paragraph 2 point b explains that PPE includes work clothes, high lars shoes, gloves, protective glasses or face shields and respiratory protection.</p> | <p>The company already has a HIRAC Estate document IBPR/BGA-K3/11/2023-R01 dated November 16, 2023 as part of the company's OHS plan that regulates the storage of PPE at the location that has been provided. In addition, the company also has a personal protective equipment procedure number BGA-SOP-CCS-1106.1-R0 dated December 1, 2011 which at point 7.7.2 regulates personal protective equipment that has been contaminated with hazardous chemicals is prohibited from being taken home.</p> <p>Permenaker number 03 of 1986 concerning Safety and Health Requirements in the workplace that manages pesticides in Article 2 paragraph 2 point b explains that PPE includes work clothes, high lars shoes, gloves, protective glasses or face shields and respiratory protection.</p> | <p><input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>The company has provided a rinse house as a means to store work tools and personal protective equipment (PPE) that have been exposed to poison, but based on field observations and interviews of employees in NJYE and BTJE, spray employees do not store PPE in the places that have been provided, such as boots and work clothes that have been exposed to pesticide poison. This is not in accordance with HIRAC procedures and existing PPE procedures.</p> <p>Based on the explanation above, this raised to be Nonconformity CAR#03</p> | <p>The company has provided a rinse house as a means to store work tools and personal protective equipment (PPE) that have been exposed to poison, but based on field observations and interviews of employees in NJYE and BTJE, spray employees do not store PPE in the places that have been provided, such as boots and work clothes that have been exposed to pesticide poison. This is not in accordance with HIRAC procedures and existing PPE procedures.</p> <p>Based on the explanation above, this raised to be Nonconformity CAR#03</p> | |
| <p>Criterion 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p> | | | | |
| <p>3.7.1 (C)</p> | <p>A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>Training for workers must cover, at minimum, the following:</p> <ul style="list-style-type: none"> - the health and environmental risks of pesticide exposure; | <p>The company shows the Training Programme for each unit in 2024/2025 covering all aspects of the RSPO P&C. Based on interviews with management, it is known that training also includes parties who need training such as staff, workers, and contractor workers. Training program documents inform the type of training, plan/schedule, learning objectives, and target audience. Below is an example of a training program for 2024/2025:</p> <ul style="list-style-type: none"> • HCV Management and Monitoring Training, In order to improve the ability | <p>The company have the Training Programme for each unit in 2024/2025 covering all aspects of the RSPO P&C. Based on interviews with management, it is known that training also includes parties who need training such as staff, workers, and contractor workers. Training program documents inform the type of training, plan/schedule, learning objectives, and target audience. Below is an example of a training program for 2024/2025:</p> <ul style="list-style-type: none"> • HCV Management and Monitoring Training, In order to improve the ability | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | <ul style="list-style-type: none"> - recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women); - International and national instruments or regulations that protect workers' health; - Productivity and best management practice; - relevant SOPs. | <p>in HCV Management and Monitoring and Conservation areas, which was attended by HCV officers who have been appointed by Unit Leaders.</p> <ul style="list-style-type: none"> • Training for Estate Foreman, to improve the ability of foremen in carrying out their duties as foremen, which was attended by PHJE Foremen. | <p>in HCV Management and Monitoring and Conservation areas, which was attended by HCV officers who have been appointed by Unit Leaders.</p> <ul style="list-style-type: none"> • Training for Estate Foreman, to improve the ability of foremen in carrying out their duties as foremen, which was attended by PHJE Foremen. | |
| 3.7.2 | Records of training are maintained, where appropriate on an individual basis. | The company has a training record, as described in indicator 3.7.1, Based on interviews with representatives of the Gender Committee and workers such as boiler operators, harvesters, spraying workers stated that the company has provided training or socialization regarding work procedures for each worker in Bahasa and understood by the workers. Beside, from interviews with workers such as boiler officers, sterilizers, etc., it was also said that workers had been given training related to OHS and work procedures. | The company has a training record, as described in indicator 3.7.1, Based on interviews with representatives of the Gender Committee and workers such as boiler operators, harvesters, spraying workers stated that the company has provided training or socialization regarding work procedures for each worker in Bahasa and understood by the workers. Beside, from interviews with workers such as boiler officers, sterilizers, etc., it was also said that workers had been given training related to OHS and work procedures. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.7.3 | Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. | <p>The company shows that they have well documented every training and socialization activity that has been carried out to all workers, contractors, and related stakeholders.</p> <p>The SCCS training was held on January 4, 2024 which was attended by 25</p> | <p>The company shows that they have well documented every training and socialization activity that has been carried out to all workers, contractors, and related stakeholders.</p> <p>The SCCS training was held on January 4, 2024 which was attended by 25</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement |

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| | | participants including supply chain handling personnel (weighbridge operators, security and several process employees). | participants including supply chain handling personnel (weighbridge operators, security and several process employees). | <input type="checkbox"/> Not Applicable (justification required) |
| Criterion 3.8: | | | | |
| Supply Chain Requirements for Mills | | | | |
| 3.8.1 | <p>Identity Preserved Module</p> <p>A mill is deemed to be IP is the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO P&C, or against a Group Certification Scheme</p> <p>Certification for the CPO mills is necessary to verify the volumes and sourced of certified FFB entering the mill, the implementation of any processing control as and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, the inly MB Module is applicable.</p> | Based on document of FFB supplier list, it is known that mill received FFB from certified and uncertified sources. Therefore, the mill implements a mass balance module. | Based on document of FFB supplier list, it is known that mill received FFB from certified and uncertified sources. Therefore, the mill implements a mass balance module. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.8.2 | <p>Mass balance Module</p> <p>A mill is deemed to be MB is the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those</p> | Based on document of FFB supplier list, it is known that mill received FFB from certified and uncertified sources. Therefore, the mill implements a mass balance module. | Based on document of FFB supplier list, it is known that mill received FFB from certified and uncertified sources. Therefore, the mill implements a mass balance module. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |

| | from its own and 3 rd party certified supply base. | | | <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------|---|---|---|---|--------------------------------------|--|---|-----|---------|---------|------------|---------|-----|--------|--------|--------|--------|----|-------|----------|---------|-------|--|---------|--|--------------------------------------|--|---|-----|---------|---------|------------|---------|-----|--------|--------|--------|--------|----|-------|----------|---------|-------|---|
| 3.8.3 | <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> | <p>The estimated CSPO, CSPK, and FFB for next license will record in RSPO report and will be updated in RSPO palmtrace. Company also record the actual production of certified product in the latest of 12 months. The data showed below.</p> <table border="1" data-bbox="772 619 1301 1054"> <thead> <tr> <th>Product</th> <th>Last Year Projected Certified Volume (Ton)</th> <th>Extension projected certified volume</th> <th>Actual production from Oct 23 – Sep 24 (Ton)</th> <th>Projection certified volume (12 months)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>132,000</td> <td>132,000</td> <td>178,389.34</td> <td>190,000</td> </tr> <tr> <td>CPO</td> <td>29,040</td> <td>25,040</td> <td>28,070</td> <td>43,700</td> </tr> <tr> <td>PK</td> <td>6,600</td> <td>6,102.36</td> <td>5,853.3</td> <td>9,500</td> </tr> </tbody> </table> | Product | Last Year Projected Certified Volume (Ton) | Extension projected certified volume | Actual production from Oct 23 – Sep 24 (Ton) | Projection certified volume (12 months) | FFB | 132,000 | 132,000 | 178,389.34 | 190,000 | CPO | 29,040 | 25,040 | 28,070 | 43,700 | PK | 6,600 | 6,102.36 | 5,853.3 | 9,500 | <p>The estimated CSPO, CSPK, and FFB for next license will record in RSPO report and will be updated in RSPO palmtrace. Company also record the actual production of certified product in the latest of 12 months. The data showed below.</p> <table border="1" data-bbox="1301 619 1830 1054"> <thead> <tr> <th>Product</th> <th>Last Year Projected Certified Volume (Ton)</th> <th>Extension projected certified volume</th> <th>Actual production from Oct 23 – Sep 24 (Ton)</th> <th>Projection certified volume (12 months)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>132,000</td> <td>132,000</td> <td>178,389.34</td> <td>190,000</td> </tr> <tr> <td>CPO</td> <td>29,040</td> <td>25,040</td> <td>28,070</td> <td>43,700</td> </tr> <tr> <td>PK</td> <td>6,600</td> <td>6,102.36</td> <td>5,853.3</td> <td>9,500</td> </tr> </tbody> </table> | Product | Last Year Projected Certified Volume (Ton) | Extension projected certified volume | Actual production from Oct 23 – Sep 24 (Ton) | Projection certified volume (12 months) | FFB | 132,000 | 132,000 | 178,389.34 | 190,000 | CPO | 29,040 | 25,040 | 28,070 | 43,700 | PK | 6,600 | 6,102.36 | 5,853.3 | 9,500 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| Product | Last Year Projected Certified Volume (Ton) | Extension projected certified volume | Actual production from Oct 23 – Sep 24 (Ton) | Projection certified volume (12 months) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB | 132,000 | 132,000 | 178,389.34 | 190,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO | 29,040 | 25,040 | 28,070 | 43,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| FFB | 132,000 | 132,000 | 178,389.34 | 190,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CPO | 29,040 | 25,040 | 28,070 | 43,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| PK | 6,600 | 6,102.36 | 5,853.3 | 9,500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.8.4 | The mill shall also meet all registration and reporting. Requirements for the appropriate supply chain through the RSPO IT platform | <p>The mill has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: Bukit Tunggal Jaya Mill – PT Ladang Sawit Mas • License ID: CB144681 • Core Product: Palm Oil • Member ID: RSPO_PO1000004316 | <p>The mill has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: Bukit Tunggal Jaya Mill – PT Ladang Sawit Mas • License ID: CB144681 • Core Product: Palm Oil • Member ID: RSPO_PO1000004316 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <ul style="list-style-type: none"> • RSPO Membership Number: 1-0043-07-000-00 (BUMITAMA AGRI LTD) • Type of Business: Oil Mill • Supply chain model: Mass Balance <p>All transaction has been announced to RSPO IT Platform and confirmed shipped.</p> | <ul style="list-style-type: none"> • RSPO Membership Number: 1-0043-07-000-00 (BUMITAMA AGRI LTD) • Type of Business: Oil Mill • Supply chain model: Mass Balance <p>All transaction has been announced to RSPO IT Platform and confirmed shipped.</p> | |
| 3.8.5 | <p>Documented Procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all elements of the supply chain model requirements</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records)</p> <p>c) Identification of the role of the person having the overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> | <p>Mill has supply chain procedure written in document SOP of <i>Identifikasi dan Kemampuan Telusur Produk</i> No. SUST-LSM-SOP-43 revision R2 on 16 July 2021. The procedure explains the responsibilities of the person in charge of the supply chain, the FFB recording mechanism, the communication and claims mechanism, and the use of the RSPO trademark logo. This procedure also explained related to the identification of raw materials (clause 7.1.1), from the field and recorded in the delivery recipient (vehicle number, driver, plantation, division, time of departure, destination, block, planted year, fruit weight released, number of bunches, field number) and identification of FFB at reception at POM (security posts and weighbridges). It was also explained that the identification of raw materials originating from certified and non-certified areas was marked with the FFB Certified stamp on the FFB cover letter.</p> | <p>Mill has supply chain procedure written in document SOP of <i>Identifikasi dan Kemampuan Telusur Produk</i> No. SUST-LSM-SOP-43 revision R2 on 16 July 2021. The procedure explains the responsibilities of the person in charge of the supply chain, the FFB recording mechanism, the communication and claims mechanism, and the use of the RSPO trademark logo. This procedure also explained related to the identification of raw materials (clause 7.1.1), from the field and recorded in the delivery recipient (vehicle number, driver, plantation, division, time of departure, destination, block, planted year, fruit weight released, number of bunches, field number) and identification of FFB at reception at POM (security posts and weighbridges). It was also explained that the identification of raw materials originating from certified and non-certified areas was marked with the FFB Certified stamp on the FFB cover letter.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | d) The mill shall have documented procedures for receiving and processing certified and non-certified FFB's including ensuring no contamination in the IP mill. | | | |
| 3.8.6 | <p>Internal Audit</p> <p>(i) The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO SC requirements for mills and the RSPO Rules on Market Communication and Claims</p> <p>b) Effectively implements and maintains the standard requirements within its organization.</p> <p>(ii) Any con-conformities found as part of the internal audit shall be issued and required corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mills shall maintain the internal audit records and reports.</p> | <p>Company has procedure about internal audit in document of SOP of Internal Audit document number LSM-SUT-SOP-39 ratified on 1 January 2019. Based on the procedure, internal audit for RSPO conduct every one year. The latest internal audit for RSPO was conducted on 9 – 14 September 2024. There is one nonconformity related to supply chain indicator and has been closed on 20 October 2024. Company also showed the checklist audit for RSPO Rules on Market Communication and Claims 2022.</p> <p>The management review also has conducted on 21 October 2024. Company showed the minutes of management review meeting, discussed about follow up from previous review, result of internal audit, claims, productivity, complaints from stakeholders, and other aspects.</p> | <p>Company has procedure about internal audit in document of SOP of Internal Audit document number LSM-SUT-SOP-39 ratified on 1 January 2019. Based on the procedure, internal audit for RSPO conduct every one year. The latest internal audit for RSPO was conducted on 9 – 14 September 2024. There is one nonconformity related to supply chain indicator and has been closed on 20 October 2024. Company also showed the checklist audit for RSPO Rules on Market Communication and Claims 2022.</p> <p>The management review also has conducted on 21 October 2024. Company showed the minutes of management review meeting, discussed about follow up from previous review, result of internal audit, claims, productivity, complaints from stakeholders, and other aspects.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.8.7 | <p>Purchasing and Goods In</p> <p>(i) The mill shall verify and document. The tonnage and sources of certified and the tonnage of non-certified FFB's</p> | <p>Bukti Tunggal Jaya Mill record FFB received from certified and noncertified source for 12 months (October 2023 – September 2024).</p> | <p>Bukti Tunggal Jaya Mill record FFB received from certified and noncertified source for 12 months (October 2023 – September 2024).</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity |

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| | <p>received.</p> <p>(ii) The mill shall inform the CB immediately if there is a projected overproduction of certified volume</p> <p>(iii) The mill shall have a mechanism in place for handling of non-conforming FFB and/or documents.</p> | <p>Total of FFB certified: 178,389.34 Ton</p> <p>Total of CSPO production: 28,070.00 Ton</p> <p>Total of CSPK production: 5,853.29 Ton</p> <p>From the mass balance and compared with the projected certified volume 5 February 2024 – 10 December 2024, there is no overproduction of certified volume. Also, company showed that the FFB source from scope certification that subject to sanction is claimed as non RSPO. Company showed the delivery note of FFB from uncertified block G35 division 3 BJYE (PT LGI) and the weighbridge ticket on 15 July 2024. The delivery note and weighbridge ticket was no stamped with RSPO. Also, from block F55 and 56 NJYE and weighbridge ticket on 6 June 2024 was no stamped with RSPO.</p> | <p>Total of FFB certified: 178,389.34 Ton</p> <p>Total of CSPO production: 28,070.00 Ton</p> <p>Total of CSPK production: 5,853.29 Ton</p> <p>From the mass balance and compared with the projected certified volume 5 February 2024 – 10 December 2024, there is no overproduction of certified volume. Also, company showed that the FFB source from scope certification that subject to sanction is claimed as non RSPO. Company showed the delivery note of FFB from uncertified block G35 division 3 BJYE (PT LGI) and the weighbridge ticket on 15 July 2024. The delivery note and weighbridge ticket was no stamped with RSPO. Also, from block F55 and 56 NJYE and weighbridge ticket on 6 June 2024 was no stamped with RSPO.</p> | <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
| 3.8.8 | <p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single-documents or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documentation and specification documentation):</p> | <p>Based on document verification it is known that there were only CSPK transaction on licenses period. The company shows documentation of certified products, such delivery order and buyer contract. These documents describe the names and contacts of the buyers and sellers, delivery dates, product descriptions, quality, quantity, member ID, and others. For examples:</p> <p>Company showed the contract No. 044/LSM/PK/VIII/2024 on 7 August 2024 for CSPK sales to PT Sumber Indah</p> | <p>Based on document verification it is known that there were only CSPK transaction on licenses period. The company shows documentation of certified products, such delivery order and buyer contract. These documents describe the names and contacts of the buyers and sellers, delivery dates, product descriptions, quality, quantity, member ID, and others. For examples:</p> <p>Company showed the contract No. 044/LSM/PK/VIII/2024 on 7 August 2024 for CSPK sales to PT Sumber Indah</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

| | | | | |
|-------|--|--|--|---|
| | <ul style="list-style-type: none"> a) The name and address of buyer; b) The name and address of the seller c) The leading or shipment/delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (IP or MB or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation i) A unique identification number | <p>Perkasa and Permission Letter of Delivery Goods No. SIPB.0126/SIPB/LSML/2024 on 16 August 2024. Also company showed the weighbridge ticket No. 02024137555 shipped on 21 August 2024. This document informs about name and address of seller and buyer, product descriptions, quality, quantity, member ID, RSPO certificate number, unique identification number, etc.</p> | <p>Perkasa and Permission Letter of Delivery Goods No. SIPB.0126/SIPB/LSML/2024 on 16 August 2024. Also company showed the weighbridge ticket No. 02024137555 shipped on 21 August 2024. This document informs about name and address of seller and buyer, product descriptions, quality, quantity, member ID, RSPO certificate number, unique identification number, etc.</p> | |
| 3.8.9 | <p>Outsourcing Activities</p> <ul style="list-style-type: none"> (i) The mill shall not outsource its milling activities. In cases where the mill outsourced activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO SC Certification. (ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable | <p>Company uses outsource for CPO and PK transport activity. There are one CPO transporter and one PK transporter. Company showed the example of agreement with CPO and PK transporter, i.e: Agreement of PK Transporter No. 002/LSM/SPK/VIII/2024 issued on 6 August 2024. In the agreement has stated that contractor must fulfill the RSPO and SCCS requirements and be willing to be audited by a third party if necessary, regarding fulfillment of RSPO and SCCS standards. Also, based on interview with representative of PK transporter, they willing to be audited by certification body.</p> | <p>Company uses outsource for CPO and PK transport activity. There are one CPO transporter and one PK transporter. Company showed the example of agreement with CPO and PK transporter, i.e: Agreement of PK Transporter No. 002/LSM/SPK/VIII/2024 issued on 6 August 2024. In the agreement has stated that contractor must fulfill the RSPO and SCCS requirements and be willing to be audited by a third party if necessary, regarding fulfillment of RSPO and SCCS standards. Also, based on interview with representative of PK transporter, they willing to be audited by certification body.</p> | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | <p>agreement with the contractor. The onus is on the mill to ensure that CB has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to the respective operations, systems, and all information, when this is announced in advance.</p> | | | |
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | Company has list of CPO and PK transporter for 2024. The list has included name of contractor, No. contract, address, and contact number of contractors. The contractor are PT Garyber Link Group as CPO transporter and Bukit Tunggal Sejahtera Cooperative as PK Transporter. | Company has list of CPO and PK transporter for 2024. The list has included name of contractor, No. contract, address, and contact number of contractors. The contractor are PT Garyber Link Group as CPO transporter and Bukit Tunggal Sejahtera Cooperative as PK Transporter. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.8.11 | The mill shall inform its CB in advance prior to conduct of its next audit of the | Based on interview with management and from list of contractors, there is no | Based on interview with management and from list of contractors, there is no | <input checked="" type="checkbox"/> Conform |

| | names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products. | additional CPO and PK transporter from last year. | additional CPO and PK transporter from last year. | <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------|---|---|---|--|--------------------|--|--|------|--------------|----------|-------|---|--|--|--|-------|---------|---|---|---------|-------|---------|---|---|---------|-------|---------|---|---|---------|-------|---------|---|---|---------|-------|---------|---|---|---------|--|-------|----------------|--------------------|--|--|------|--------------|----------|-------|---|--|--|--|-------|---------|---|---|---------|-------|---------|---|---|---------|-------|---------|---|---|---------|-------|---------|---|---|---------|-------|---------|---|---|---------|---|
| 3.8.12 | <p>Record Keeping</p> <p>(i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>(ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>(iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>(iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified</p> | <p>During assessment, Bukti Tunggal Jaya Mill has record of all CSPO and CSPK production and selling. The retention times for all records and report is 2 years. Based on field observation to weighbridge station, the record for dispatch of CPO and PK from 2 years ago can be traced. Company also can showed the mass balance record for year 2022.</p> <p>CPO</p> <table border="1" data-bbox="779 922 1285 1351"> <thead> <tr> <th rowspan="2">Month</th> <th rowspan="2">CSPO Prod (MT)</th> <th colspan="3">CSPO Delivery (MT)</th> </tr> <tr> <th>RSPO</th> <th>Other Scheme</th> <th>Non-Cert</th> </tr> </thead> <tbody> <tr> <td>Stock</td> <td>0</td> <td></td> <td></td> <td></td> </tr> <tr> <td>10/23</td> <td>2557.12</td> <td>0</td> <td>0</td> <td>7200.00</td> </tr> <tr> <td>11/23</td> <td>2398.46</td> <td>0</td> <td>0</td> <td>8097.79</td> </tr> <tr> <td>12/23</td> <td>2502.94</td> <td>0</td> <td>0</td> <td>8802.21</td> </tr> <tr> <td>01/24</td> <td>2198.20</td> <td>0</td> <td>0</td> <td>6200.00</td> </tr> <tr> <td>02/24</td> <td>1812.91</td> <td>0</td> <td>0</td> <td>4850.00</td> </tr> </tbody> </table> | Month | CSPO Prod (MT) | CSPO Delivery (MT) | | | RSPO | Other Scheme | Non-Cert | Stock | 0 | | | | 10/23 | 2557.12 | 0 | 0 | 7200.00 | 11/23 | 2398.46 | 0 | 0 | 8097.79 | 12/23 | 2502.94 | 0 | 0 | 8802.21 | 01/24 | 2198.20 | 0 | 0 | 6200.00 | 02/24 | 1812.91 | 0 | 0 | 4850.00 | <p>During assessment, Bukti Tunggal Jaya Mill has record of all CSPO and CSPK production and selling. The retention times for all records and report is 2 years. Based on field observation to weighbridge station, the record for dispatch of CPO and PK from 2 years ago can be traced. Company also can showed the mass balance record for year 2022.</p> <p>CPO</p> <table border="1" data-bbox="1301 922 1807 1351"> <thead> <tr> <th rowspan="2">Month</th> <th rowspan="2">CSPO Prod (MT)</th> <th colspan="3">CSPO Delivery (MT)</th> </tr> <tr> <th>RSPO</th> <th>Other Scheme</th> <th>Non-Cert</th> </tr> </thead> <tbody> <tr> <td>Stock</td> <td>0</td> <td></td> <td></td> <td></td> </tr> <tr> <td>10/23</td> <td>2557.12</td> <td>0</td> <td>0</td> <td>7200.00</td> </tr> <tr> <td>11/23</td> <td>2398.46</td> <td>0</td> <td>0</td> <td>8097.79</td> </tr> <tr> <td>12/23</td> <td>2502.94</td> <td>0</td> <td>0</td> <td>8802.21</td> </tr> <tr> <td>01/24</td> <td>2198.20</td> <td>0</td> <td>0</td> <td>6200.00</td> </tr> <tr> <td>02/24</td> <td>1812.91</td> <td>0</td> <td>0</td> <td>4850.00</td> </tr> </tbody> </table> | Month | CSPO Prod (MT) | CSPO Delivery (MT) | | | RSPO | Other Scheme | Non-Cert | Stock | 0 | | | | 10/23 | 2557.12 | 0 | 0 | 7200.00 | 11/23 | 2398.46 | 0 | 0 | 8097.79 | 12/23 | 2502.94 | 0 | 0 | 8802.21 | 01/24 | 2198.20 | 0 | 0 | 6200.00 | 02/24 | 1812.91 | 0 | 0 | 4850.00 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| Month | CSPO Prod (MT) | CSPO Delivery (MT) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | RSPO | Other Scheme | Non-Cert | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Stock | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10/23 | 2557.12 | 0 | 0 | 7200.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11/23 | 2398.46 | 0 | 0 | 8097.79 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12/23 | 2502.94 | 0 | 0 | 8802.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 01/24 | 2198.20 | 0 | 0 | 6200.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 02/24 | 1812.91 | 0 | 0 | 4850.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | CSPO Prod (MT) | CSPO Delivery (MT) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | RSPO | Other Scheme | Non-Cert | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Stock | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10/23 | 2557.12 | 0 | 0 | 7200.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11/23 | 2398.46 | 0 | 0 | 8097.79 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12/23 | 2502.94 | 0 | 0 | 8802.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 01/24 | 2198.20 | 0 | 0 | 6200.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 02/24 | 1812.91 | 0 | 0 | 4850.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---|-------|--------------|-----------------------|---------------------------|-----------------|-------|----------|--------------|-----------------------|---------------------------|-----------------|
| <p>CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.)</p> | 03/24 | 2081.69 | 0 | 0 | 4800.00 | 03/24 | 2081.69 | 0 | 0 | 4800.00 | |
| | 04/24 | 2303.01 | 0 | 0 | 4100.00 | 04/24 | 2303.01 | 0 | 0 | 4100.00 | |
| | 05/24 | 2787.82 | 0 | 0 | 6250.00 | 05/24 | 2787.82 | 0 | 0 | 6250.00 | |
| | 06/24 | 2172.00 | 0 | 0 | 4900.00 | 06/24 | 2172.00 | 0 | 0 | 4900.00 | |
| | 07/24 | 3345.08 | 0 | 0 | 7100.00 | 07/24 | 3345.08 | 0 | 0 | 7100.00 | |
| | 08/24 | 1932.56 | 0 | 0 | 4200.00 | 08/24 | 1932.56 | 0 | 0 | 4200.00 | |
| | 09/24 | 1978.22 | 0 | 0 | 4000.00 | 09/24 | 1978.22 | 0 | 0 | 4000.00 | |
| | Total | 28070.00 | 0 | 0 | 70500.00 | Total | 28070.00 | 0 | 0 | 70500.00 | |
| | PK | | | | | PK | | | | | |
| | | Month | CSPK Prod (MT) | CSPK Delivery (MT) | | | | Month | CSPK Prod (MT) | CSPK Delivery (MT) | |
| | | | RSPO | Other Scheme | Non-Cert | | | | RSPO | Other Scheme | Non-Cert |
| | Stock | 0 | | | | | Stock | 0 | | | |
| | 10/23 | 557.96 | 300.00 | 0 | 1,106.87 | | 10/23 | 557.96 | 300.00 | 0 | 1,106.87 |
| | 11/23 | 494.94 | 400.00 | 0 | 943.13 | | 11/23 | 494.94 | 400.00 | 0 | 943.13 |
| | 12/23 | 494.20 | 800.00 | 0 | 491.63 | | 12/23 | 494.20 | 800.00 | 0 | 491.63 |
| | 01/24 | 455.14 | 0.00 | 0 | 887.04 | | 01/24 | 455.14 | 0.00 | 0 | 887.04 |
| | 02/24 | 387.32 | 600.00 | 0 | 837.69 | | 02/24 | 387.32 | 600.00 | 0 | 837.69 |
| | 03/24 | 447.68 | 200.00 | 0 | 726.99 | | 03/24 | 447.68 | 200.00 | 0 | 726.99 |
| | 04/24 | 515.75 | 300.00 | 0 | 906.65 | | 04/24 | 515.75 | 300.00 | 0 | 906.65 |
| | 05/24 | 598.87 | 200.00 | 0 | 882.38 | | 05/24 | 598.87 | 200.00 | 0 | 882.38 |

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|--------|---|---|----------|----------|---|----------|---|----------|----------|---|----------|---|
| | | 06/24 | 437.00 | 400.00 | 0 | 702.38 | 06/24 | 437.00 | 400.00 | 0 | 702.38 | |
| | | 07/24 | 653.49 | 450.00 | 0 | 790.24 | 07/24 | 653.49 | 450.00 | 0 | 790.24 | |
| | | 08/24 | 406.72 | 250.00 | 0 | 613.44 | 08/24 | 406.72 | 250.00 | 0 | 613.44 | |
| | | 09/24 | 404.23 | 0.00 | 0 | 717.30 | 09/24 | 404.23 | 0.00 | 0 | 717.30 | |
| | | Total | 5,853.29 | 3,900.00 | 0 | 9,605.74 | Total | 5,853.29 | 3,900.00 | 0 | 9,605.74 | |
| | | . | | | | | . | | | | | |
| 3.8.13 | <p>Extraction rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | <p>Company recorded the extraction rate of oil and kernel monthly in Mill Report. The extraction rate is determine based on FFB production, CPO Production, and PK Production. For example, based on report document the OER for September 2024 is 20.55% and KER is 4.20%.</p> | | | | | <p>Company recorded the extraction rate of oil and kernel monthly in Mill Report. The extraction rate is determine based on FFB production, CPO Production, and PK Production. For example, based on report document the OER for September 2024 is 20.55% and KER is 4.20%.</p> | | | | | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.8.14 | <p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p> | <p>The extraction rate will be updated daily and recorded in Mill Report. The Mill Report will updates OER and KER daily, month to date, and year to date.</p> | | | | | <p>The extraction rate will be updated daily and recorded in Mill Report. The Mill Report will updates OER and KER daily, month to date, and year to date.</p> | | | | | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 3.8.15 | <p>Processing</p> | <p>Based on list of FFB supplier, it is known</p> | | | | | <p>Based on list of FFB supplier, it is known</p> | | | | | |

| | <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | <p>that mill receives FFB from certified and noncertified sources. Thus, mill uses supply chain module Mass Balance. Based on mass balance record, mill has separate the FFB source between certified and uncertified source.</p> | <p>that mill receives FFB from certified and noncertified sources. Thus, mill uses supply chain module Mass Balance. Based on mass balance record, mill has separate the FFB source between certified and uncertified source.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------|---|--|---|--|--|----------|--|------|---------|------|----------|-------|-----|---|--|--|-------|-----|-----|-----|-------|-------|-----|-------|-----|-----|-------|-----|-----|-----|-------|-------|-----|-----|-----|-------|-------|-----|-----|-----|-------|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|---|-----|-------|-----|-----|-----|-----|---|-------|---------|--|----------|--|------|---------|------|----------|-------|-----|---|--|--|-------|-----|-----|-----|-------|-------|-----|-------|-----|-----|-------|-----|-----|-----|-------|-------|-----|-----|-----|-------|-------|-----|-----|-----|-------|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|---|-----|-------|-----|-----|-----|-----|--|
| <p>3.8.16</p> | <p>Registration of Transactions</p> <p>(i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>(ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform</p> | <p>Shipping announcement</p> <p>Company has made shipping announcement not more than 3 months after dispatch. For example: Shipping announcement No. TR-0dfec563-1387 for CSPK transferred to PT Sumber Indah Perkasa about 250.11 MT created on 10 September 2024. This shipment was shipped on 21 August 2024 based on weighbridge ticket No. 02024137555.</p> <p>Removed stock</p> <p>Based on mass balance data, the following is known::</p> <table border="1" data-bbox="788 1093 1290 1390"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">PK Prod</th> <th colspan="2">PK Sales</th> </tr> <tr> <th>Cert</th> <th>Noncert</th> <th>RSPO</th> <th>Non RSPO</th> </tr> </thead> <tbody> <tr> <td>Stock</td> <td>391</td> <td>0</td> <td></td> <td></td> </tr> <tr> <td>06/23</td> <td>564</td> <td>932</td> <td>153</td> <td>1,345</td> </tr> <tr> <td>07/23</td> <td>707</td> <td>1,065</td> <td>146</td> <td>786</td> </tr> <tr> <td>08/23</td> <td>700</td> <td>996</td> <td>608</td> <td>1,546</td> </tr> <tr> <td>09/23</td> <td>505</td> <td>898</td> <td>500</td> <td>1,530</td> </tr> <tr> <td>10/23</td> <td>558</td> <td>948</td> <td>300</td> <td>1,107</td> </tr> <tr> <td>11/23</td> <td>495</td> <td>906</td> <td>400</td> <td>943</td> </tr> <tr> <td>12/23</td> <td>494</td> <td>794</td> <td>800</td> <td>492</td> </tr> <tr> <td>01/24</td> <td>455</td> <td>738</td> <td>0</td> <td>887</td> </tr> <tr> <td>02/24</td> <td>387</td> <td>650</td> <td>600</td> <td>838</td> </tr> </tbody> </table> | Month | PK Prod | | PK Sales | | Cert | Noncert | RSPO | Non RSPO | Stock | 391 | 0 | | | 06/23 | 564 | 932 | 153 | 1,345 | 07/23 | 707 | 1,065 | 146 | 786 | 08/23 | 700 | 996 | 608 | 1,546 | 09/23 | 505 | 898 | 500 | 1,530 | 10/23 | 558 | 948 | 300 | 1,107 | 11/23 | 495 | 906 | 400 | 943 | 12/23 | 494 | 794 | 800 | 492 | 01/24 | 455 | 738 | 0 | 887 | 02/24 | 387 | 650 | 600 | 838 | <p>Shipping announcement</p> <p>Company has made shipping announcement not more than 3 months after dispatch. For example: Shipping announcement No. TR-0dfec563-1387 for CSPK transferred to PT Sumber Indah Perkasa about 250.11 MT created on 10 September 2024. This shipment was shipped on 21 August 2024 based on weighbridge ticket No. 02024137555.</p> <p>Removed stock</p> <p>Based on mass balance data, the following is known::</p> <table border="1" data-bbox="1317 1093 1818 1390"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">PK Prod</th> <th colspan="2">PK Sales</th> </tr> <tr> <th>Cert</th> <th>Noncert</th> <th>RSPO</th> <th>Non RSPO</th> </tr> </thead> <tbody> <tr> <td>Stock</td> <td>391</td> <td>0</td> <td></td> <td></td> </tr> <tr> <td>06/23</td> <td>564</td> <td>932</td> <td>153</td> <td>1,345</td> </tr> <tr> <td>07/23</td> <td>707</td> <td>1,065</td> <td>146</td> <td>786</td> </tr> <tr> <td>08/23</td> <td>700</td> <td>996</td> <td>608</td> <td>1,546</td> </tr> <tr> <td>09/23</td> <td>505</td> <td>898</td> <td>500</td> <td>1,530</td> </tr> <tr> <td>10/23</td> <td>558</td> <td>948</td> <td>300</td> <td>1,107</td> </tr> <tr> <td>11/23</td> <td>495</td> <td>906</td> <td>400</td> <td>943</td> </tr> <tr> <td>12/23</td> <td>494</td> <td>794</td> <td>800</td> <td>492</td> </tr> <tr> <td>01/24</td> <td>455</td> <td>738</td> <td>0</td> <td>887</td> </tr> <tr> <td>02/24</td> <td>387</td> <td>650</td> <td>600</td> <td>838</td> </tr> </tbody> </table> | Month | PK Prod | | PK Sales | | Cert | Noncert | RSPO | Non RSPO | Stock | 391 | 0 | | | 06/23 | 564 | 932 | 153 | 1,345 | 07/23 | 707 | 1,065 | 146 | 786 | 08/23 | 700 | 996 | 608 | 1,546 | 09/23 | 505 | 898 | 500 | 1,530 | 10/23 | 558 | 948 | 300 | 1,107 | 11/23 | 495 | 906 | 400 | 943 | 12/23 | 494 | 794 | 800 | 492 | 01/24 | 455 | 738 | 0 | 887 | 02/24 | 387 | 650 | 600 | 838 | <p><input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
| Month | PK Prod | | | PK Sales | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Cert | Noncert | RSPO | Non RSPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Stock | 391 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 06/23 | 564 | 932 | 153 | 1,345 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 07/23 | 707 | 1,065 | 146 | 786 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 08/23 | 700 | 996 | 608 | 1,546 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 09/23 | 505 | 898 | 500 | 1,530 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10/23 | 558 | 948 | 300 | 1,107 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11/23 | 495 | 906 | 400 | 943 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12/23 | 494 | 794 | 800 | 492 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 01/24 | 455 | 738 | 0 | 887 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 02/24 | 387 | 650 | 600 | 838 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | PK Prod | | PK Sales | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Cert | Noncert | RSPO | Non RSPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Stock | 391 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 06/23 | 564 | 932 | 153 | 1,345 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 07/23 | 707 | 1,065 | 146 | 786 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 08/23 | 700 | 996 | 608 | 1,546 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 09/23 | 505 | 898 | 500 | 1,530 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10/23 | 558 | 948 | 300 | 1,107 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11/23 | 495 | 906 | 400 | 943 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12/23 | 494 | 794 | 800 | 492 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 01/24 | 455 | 738 | 0 | 887 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 02/24 | 387 | 650 | 600 | 838 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------|--|---|--|--|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-------|--------|-------|--------|---|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-----|-----|-----|-----|-------|-------|--------|-------|--------|--|
| | | <table border="1"> <tr><td>03/24</td><td>448</td><td>532</td><td>200</td><td>727</td></tr> <tr><td>04/24</td><td>516</td><td>715</td><td>300</td><td>907</td></tr> <tr><td>05/24</td><td>599</td><td>699</td><td>200</td><td>882</td></tr> <tr><td>06/24</td><td>437</td><td>585</td><td>400</td><td>702</td></tr> <tr><td>07/24</td><td>653</td><td>621</td><td>450</td><td>790</td></tr> <tr><td>08/24</td><td>407</td><td>459</td><td>250</td><td>613</td></tr> <tr><td>Total</td><td>8,316</td><td>11,538</td><td>5,307</td><td>14,095</td></tr> </table> <p>Based on the table above, it is known that in the sample from June 2023 - August 2024 (previous license and current license), it is known that non-RSPO PK sales are greater than non-RSPO PK production, so that non-RSPO PK sales use CSPK stock (conventional sales). However, based on BTJM mill transaction palmtrace data, it is known that there have been no remove stock transactions since 2023. This becomes nonconformity CAR#04. BTJM has conduct removed stock for the active license period on 1 November 2024.</p> | 03/24 | 448 | 532 | 200 | 727 | 04/24 | 516 | 715 | 300 | 907 | 05/24 | 599 | 699 | 200 | 882 | 06/24 | 437 | 585 | 400 | 702 | 07/24 | 653 | 621 | 450 | 790 | 08/24 | 407 | 459 | 250 | 613 | Total | 8,316 | 11,538 | 5,307 | 14,095 | <table border="1"> <tr><td>03/24</td><td>448</td><td>532</td><td>200</td><td>727</td></tr> <tr><td>04/24</td><td>516</td><td>715</td><td>300</td><td>907</td></tr> <tr><td>05/24</td><td>599</td><td>699</td><td>200</td><td>882</td></tr> <tr><td>06/24</td><td>437</td><td>585</td><td>400</td><td>702</td></tr> <tr><td>07/24</td><td>653</td><td>621</td><td>450</td><td>790</td></tr> <tr><td>08/24</td><td>407</td><td>459</td><td>250</td><td>613</td></tr> <tr><td>Total</td><td>8,316</td><td>11,538</td><td>5,307</td><td>14,095</td></tr> </table> <p>Based on the table above, it is known that in the sample from June 2023 - August 2024 (previous license and current license), it is known that non-RSPO PK sales are greater than non-RSPO PK production, so that non-RSPO PK sales use CSPK stock (conventional sales). However, based on BTJM mill transaction palmtrace data, it is known that there have been no remove stock transactions since 2023. This becomes nonconformity CAR#04. BTJM has conduct removed stock for the active license period on 1 November 2024.</p> | 03/24 | 448 | 532 | 200 | 727 | 04/24 | 516 | 715 | 300 | 907 | 05/24 | 599 | 699 | 200 | 882 | 06/24 | 437 | 585 | 400 | 702 | 07/24 | 653 | 621 | 450 | 790 | 08/24 | 407 | 459 | 250 | 613 | Total | 8,316 | 11,538 | 5,307 | 14,095 | |
| 03/24 | 448 | 532 | 200 | 727 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 04/24 | 516 | 715 | 300 | 907 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 05/24 | 599 | 699 | 200 | 882 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 06/24 | 437 | 585 | 400 | 702 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 07/24 | 653 | 621 | 450 | 790 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 08/24 | 407 | 459 | 250 | 613 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 8,316 | 11,538 | 5,307 | 14,095 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 03/24 | 448 | 532 | 200 | 727 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 04/24 | 516 | 715 | 300 | 907 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 05/24 | 599 | 699 | 200 | 882 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 06/24 | 437 | 585 | 400 | 702 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 07/24 | 653 | 621 | 450 | 790 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 08/24 | 407 | 459 | 250 | 613 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 8,316 | 11,538 | 5,307 | 14,095 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.8.17 | <p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p> | <p>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. Also, based on review of weighbridge ticket, the using of trademark is in accordance with RSPO Rules on Market Communications and Claims.</p> | <p>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. Also, based on review of weighbridge ticket, the using of trademark is in accordance with RSPO Rules on Market Communications and Claims.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion / Indicator | Audit Findings | Audit Findings (Public Summary) | Results | |
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| Principle 4: Respect Community and Human Rights and Deliver Benefits | | | | |
| Criterion 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders | | | | |
| 4.1.1 (C) | A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. | The company has a policy to protect human rights as stated in the Internal Office Memo document No. 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019. The policy explains that BGA Group management is committed to not carrying out acts of intimidation against legal rights/violence in the form of employees or related communities and human rights defenders, including the use of paramilitary and/or mercenaries. Based on interview with workers in estate and mill and also with representative of surrounding village, it is known that stakeholders understand the human rights policy of company. | The company has a policy to protect human rights as stated in the Internal Office Memo document No. 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019. The policy explains that BGA Group management is committed to not carrying out acts of intimidation against legal rights/violence in the form of employees or related communities and human rights defenders, including the use of paramilitary and/or mercenaries. Based on interview with workers in estate and mill and also with representative of surrounding village, it is known that stakeholders understand the human rights policy of company. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.1.2 | The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. | The company has a policy to protect human rights which is stated in the document Internal Office Memo No. 05/IOM/Reg-Nanga Tayap/VI/2019 on 16 June 2019. Based on interview representative of Tanjung Medan Village and Sungai Kelik Village and contractor of PT GLG and Bukit Tunggal Sejahtera Cooperative, it is known that there was no intimidation or use of mercenaries in maintaining peace and order in the | The company has a policy to protect human rights which is stated in the document Internal Office Memo No. 05/IOM/Reg-Nanga Tayap/VI/2019 on 16 June 2019. Based on interview representative of Tanjung Medan Village and Sungai Kelik Village and contractor of PT GLG and Bukit Tunggal Sejahtera Cooperative, it is known that there was no intimidation or use of mercenaries in maintaining peace and order in the | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>company's area. Until this assessment, there were no conflicts and land disputes within the company area. This is also in line with the results of interviews with surrounding communities and related agencies during a public consultation, which stating that there were no land conflicts in the company's operational area.</p> | <p>company's area. Until this assessment, there were no conflicts and land disputes within the company area. This is also in line with the results of interviews with surrounding communities and related agencies during a public consultation, which stating that there were no land conflicts in the company's operational area.</p> | |
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Criterion 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.

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| <p>4.2.1 (C)</p> | <p>The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> | <p>The company has the following documents:</p> <ul style="list-style-type: none"> • Complaint handling procedures listed in the Complaint SOP document No. LSM-SUST-SOP-45 approved on January 1, 2019 • The system for maintaining human rights defenders is included in IOM No. 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019 • The system for maintaining anonymity and whistleblowers is included in the LSM-SUST-SOP-09 document. <p>Then, based on interviews with the management of the Kayong Sekayok Cooperative, it was discovered that the management did not understand the complaint submission mechanism and the Company had never socialized the complaint submission mechanism to the cooperative. In addition, the company has not been able to show evidence of an agreement with other affected parties regarding the Company's complaint resolution mechanism. This becomes nonconformity CAR#05</p> | <p>The company has the following documents:</p> <ul style="list-style-type: none"> • Complaint handling procedures listed in the Complaint SOP document No. LSM-SUST-SOP-45 approved on January 1, 2019 • The system for maintaining human rights defenders is included in IOM No. 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019 • The system for maintaining anonymity and whistleblowers is included in the LSM-SUST-SOP-09 document. <p>Then, based on interviews with the management of the Kayong Sekayok Cooperative, it was discovered that the management did not understand the complaint submission mechanism and the Company had never socialized the complaint submission mechanism to the cooperative. In addition, the company has not been able to show evidence of an agreement with other affected parties regarding the Company's complaint resolution mechanism. This becomes nonconformity CAR#05</p> | <p> <input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p> |
| <p>4.2.2</p> | <p>Procedures are in place to ensure that the system is understood by the</p> | <p>The unit of certification has established a complaint and complaint handling system</p> | <p>The unit of certification has established a complaint and complaint handling system</p> | <p><input checked="" type="checkbox"/> Conform</p> |

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| | <p>affected parties, including by illiterate parties.</p> | <p>for all affected parties which is documented in the Grievance and Complaint Handling Procedure with document number LSM-SUST-SOP-09. There are additional provisions regarding the implementation of communication and consultation procedures to stakeholders, in which the socialization of this procedure is carried out by displaying the procedure in writing or by showing pictures so that it can be understood by stakeholders who cannot read and write. The procedures state that all complaints must be registered in a Complaint Form in clear and easy-to-understand language. All complaint forms will be collected and registered monthly in the Complaint Registration Book. The unit of certification will respond to each complaint within 14 days from the date the complaint was received.</p> <p>However, illiterate people can submit their complaints through company representative from the stakeholder and also recorded in the grievance logbook. Based on interviews with government agencies, surrounding communities, and workers, it is known that they have understood the person responsible and the grievance mechanism in which complainant's identity is protected.</p> | <p>for all affected parties which is documented in the Grievance and Complaint Handling Procedure with document number LSM-SUST-SOP-09. There are additional provisions regarding the implementation of communication and consultation procedures to stakeholders, in which the socialization of this procedure is carried out by displaying the procedure in writing or by showing pictures so that it can be understood by stakeholders who cannot read and write. The procedures state that all complaints must be registered in a Complaint Form in clear and easy-to-understand language. All complaint forms will be collected and registered monthly in the Complaint Registration Book. The unit of certification will respond to each complaint within 14 days from the date the complaint was received.</p> <p>However, illiterate people can submit their complaints through company representative from the stakeholder and also recorded in the grievance logbook. Based on interviews with government agencies, surrounding communities, and workers, it is known that they have understood the person responsible and the grievance mechanism in which complainant's identity is protected.</p> | <p><input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| 4.2.3 | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. | Company has record the complaints from stakeholders in the Logbook, where during 2024 there were only complaints from workers related to damage that occurred in housing which had all been followed up by the company. In addition, the results of interviews with representatives of contractors (Transporting CPO and PK) and representatives of surrounding villages communities (Tanjung Medan Village and Sungai Kelik Village) known that so far, the company's relationship with stakeholders has been going well and no complaints have been submitted to the company. | Company has record the complaints from stakeholders in the Logbook, where during 2024 there were only complaints from workers related to damage that occurred in housing which had all been followed up by the company. In addition, the results of interviews with representatives of contractors (Transporting CPO and PK) and representatives of surrounding villages communities (Tanjung Medan Village and Sungai Kelik Village) known that so far, the company's relationship with stakeholders has been going well and no complaints have been submitted to the company. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. | Company has complaint handling mechanism written in document of Complaint Procedure document number LSM-SUST-SOP-45 ratified on 1 January 2019. The procedure has covered that complaint resolution efforts are carried out by negotiating to reach an agreement in resolving the complaint. If the complaint is not resolved through deliberation and consensus, then the company and the party filing the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at a third party location or another place agreed upon as a neutral place. | Company has complaint handling mechanism written in document of Complaint Procedure document number LSM-SUST-SOP-45 ratified on 1 January 2019. The procedure has covered that complaint resolution efforts are carried out by negotiating to reach an agreement in resolving the complaint. If the complaint is not resolved through deliberation and consensus, then the company and the party filing the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at a third party location or another place agreed upon as a neutral place. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

Criterion 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.

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| <p>4.3.1 (C)</p> | <p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> | <p>Company already implemented Contributions to community development that are based on the results of consultation with local community and record the documentation on CSR Report of PT LSM 2024. Based on the report, contribution to community during 2024 such as:</p> <ul style="list-style-type: none"> • Fish farming in Simpang Tiga Sembelangan Village • Chicken farming in Simpang Tiga Sembelangan Village • Conducting socialization to smallholder farmers • Heavy equipment assistance in Sungai Kelik Village • Mass circumcision assistance in Ulak Medang Village and Laman Satong Village • And others <p>The company also shows participatory evidence related to the implementation of contributions to the development of surrounding communities through proposals submitted by the village and through regular visits to the village. For example, a consultation was shown in Sungai Kelik Village in August 2023 discussing CSR. In addition, based on</p> | <p>Company already implemented Contributions to community development that are based on the results of consultation with local community and record the documentation on CSR Report of PT LSM 2024. Based on the report, contribution to community during 2024 such as:</p> <ul style="list-style-type: none"> • Fish farming in Simpang Tiga Sembelangan Village • Chicken farming in Simpang Tiga Sembelangan Village • Conducting socialization to smallholder farmers • Heavy equipment assistance in Sungai Kelik Village • Mass circumcision assistance in Ulak Medang Village and Laman Satong Village • And others <p>The company also shows participatory evidence related to the implementation of contributions to the development of surrounding communities through proposals submitted by the village and through regular visits to the village. For example, a consultation was shown in Sungai Kelik Village in August 2023 discussing CSR. In addition, based on</p> | <p> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p> |
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| | | <p>interviews with representatives of Sungai Kelik Village and Tanjung Medan, it is known that the Company has provided assistance to the village regularly.</p> | <p>interviews with representatives of Sungai Kelik Village and Tanjung Medan, it is known that the Company has provided assistance to the village regularly.</p> | |
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| Criterion 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. | | | | |
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| 4.4.1 (C) | <p>Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> | <p>Company already has land use rights as described below:</p> <p><u>HGB (building use rights)</u></p> <ul style="list-style-type: none"> • Decree of Head of Land National Agency Kalimantan Barat Province No. 24/HGB/BPN.61/2020 issued on 18 August 2020 for 8.79 Ha in PT Ladang Sawit Mas • Decree of Head of Land National Agency Kalimantan Barat Province No. 23/HGB/BPN.61/2020 issued on 18 August 2020 for 13.38 Ha in PT Ladang Sawit Mas • Certificate No. 10 issued on 7 December 2020 for 13.38 Ha • Certificate No. 9 issued on 7 December 2020 for 8.79 Ha • Total HGB is 22.17 Ha <p><u>HGU (land use rights)</u></p> <p>PT Ladang Sawit Mas</p> <p>Decree of Head of Land National Agency No. 93/HGU/KEM-ATR/BPN/2017 issued on 29 August 2017 covering area 5,696.46 Ha in PT Ladang Sawit Mas. This decree divided into certificates:</p> <ul style="list-style-type: none"> - Certificate No. 159 issued on 2 November 2017 covering area 1510.08 Ha - Certificate No. 160 issued on 2 | <p>Company already has land use rights as described below:</p> <p><u>HGB (building use rights)</u></p> <ul style="list-style-type: none"> • Decree of Head of Land National Agency Kalimantan Barat Province No. 24/HGB/BPN.61/2020 issued on 18 August 2020 for 8.79 Ha in PT Ladang Sawit Mas • Decree of Head of Land National Agency Kalimantan Barat Province No. 23/HGB/BPN.61/2020 issued on 18 August 2020 for 13.38 Ha in PT Ladang Sawit Mas • Certificate No. 10 issued on 7 December 2020 for 13.38 Ha • Certificate No. 9 issued on 7 December 2020 for 8.79 Ha • Total HGB is 22.17 Ha <p><u>HGU (land use rights)</u></p> <p>PT Ladang Sawit Mas</p> <p>Decree of Head of Land National Agency No. 93/HGU/KEM-ATR/BPN/2017 issued on 29 August 2017 covering area 5,696.46 Ha in PT Ladang Sawit Mas. This decree divided into certificates:</p> <ul style="list-style-type: none"> - Certificate No. 159 issued on 2 November 2017 covering area 1510.08 Ha - Certificate No. 160 issued on 2 | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>November 2017 covering area 3366.42 Ha</p> <ul style="list-style-type: none"> - Certificate No. 161 issued on 2 November 2017 covering area 88.72 Ha - Certificate No. 162 issued on 2 November 2017 covering area 731.21 Ha <p>PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - Certificate No. 294 issued on 14 October 2017 covering area 688.9273 Ha - Certificate No. 293 issued on 14 October 2017 covering area 1016.9451 Ha - Certificate No. 292 issued on 14 October 2017 covering area 453.6577 Ha - Total HGU: 2159.53 Ha <p>PT Lestari Gemilang Intisawit</p> <p>Decree of Head of Land National Agency No. 119/HGU/KEM-ATR/BPN/2017 issued on 8 December 2017 covering area 6,309.73 Ha in PT Lestari Gemilang Intisawit. This decree divided into certificates:</p> <ul style="list-style-type: none"> - Certificate No. 193 issued on 14 February 2018 covering area 828.79 Ha - Certificate No. 194 issued on 14 February 2018 covering area 700.19 | <p>November 2017 covering area 3366.42 Ha</p> <ul style="list-style-type: none"> - Certificate No. 161 issued on 2 November 2017 covering area 88.72 Ha - Certificate No. 162 issued on 2 November 2017 covering area 731.21 Ha <p>PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - Certificate No. 294 issued on 14 October 2017 covering area 688.9273 Ha - Certificate No. 293 issued on 14 October 2017 covering area 1016.9451 Ha - Certificate No. 292 issued on 14 October 2017 covering area 453.6577 Ha - Total HGU: 2159.53 Ha <p>PT Lestari Gemilang Intisawit</p> <p>Decree of Head of Land National Agency No. 119/HGU/KEM-ATR/BPN/2017 issued on 8 December 2017 covering area 6,309.73 Ha in PT Lestari Gemilang Intisawit. This decree divided into certificates:</p> <ul style="list-style-type: none"> - Certificate No. 193 issued on 14 February 2018 covering area 828.79 Ha - Certificate No. 194 issued on 14 February 2018 covering area 700.19 | |
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| | | <p>Ha</p> <ul style="list-style-type: none"> - Certificate No. 195 issued on 14 February 2018 covering area 385.51 Ha - Certificate No. 196 issued on 14 February 2018 covering area 587.39 Ha - Certificate No. 197 issued on 14 February 2018 covering area 343.70 Ha - Certificate No. 198 issued on 14 February 2018 covering area 432.00 Ha - Certificate No. 199 issued on 14 February 2018 covering area 140.63 Ha - Certificate No. 200 issued on 14 February 2018 covering area 918.64 Ha. Originally this certificate was covering 957.64 ha - Certificate No. 201 issued on 14 February 2018 covering area 564.76 Ha. Originally this certificate was covering 567.60 ha - Certificate No. 202 issued on 14 February 2018 covering area 278.38 Ha - Certificate No. 203 issued on 14 February 2018 covering area 607.13 Ha. Originally this certificate was covering 609.02 ha - Certificate No. 204 issued on 14 February 2018 covering area 53.37 Ha | <p>Ha</p> <ul style="list-style-type: none"> - Certificate No. 195 issued on 14 February 2018 covering area 385.51 Ha - Certificate No. 196 issued on 14 February 2018 covering area 587.39 Ha - Certificate No. 197 issued on 14 February 2018 covering area 343.70 Ha - Certificate No. 198 issued on 14 February 2018 covering area 432.00 Ha - Certificate No. 199 issued on 14 February 2018 covering area 140.63 Ha - Certificate No. 200 issued on 14 February 2018 covering area 918.64 Ha. Originally this certificate was covering 957.64 ha - Certificate No. 201 issued on 14 February 2018 covering area 564.76 Ha. Originally this certificate was covering 567.60 ha - Certificate No. 202 issued on 14 February 2018 covering area 278.38 Ha - Certificate No. 203 issued on 14 February 2018 covering area 607.13 Ha. Originally this certificate was covering 609.02 ha - Certificate No. 204 issued on 14 February 2018 covering area 53.37 Ha | |
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| | | <ul style="list-style-type: none"> - Certificate No. 205 issued on 14 February 2018 covering area 66.12 Ha - Certificate No. 206 issued on 14 February 2018 covering area 359.64 Ha - Total land use rights PT LGI: 6,266.25 Ha <p>PT Nabati Agro Subur Decree of Head of Land National Agency No. 88/HGU/KEM-ATR/BPN/2017 issued on 25 August 2017 covering area 2,264.50 Ha in PT Nabati Agro Subur. This decree divided into certificates:</p> <ul style="list-style-type: none"> - Certificate No. 184 issued on 10 November 2017 covering area 918.50 Ha - Certificate No. 185 issued on 10 November 2017 covering area 953.41 Ha - Certificate No. 186 issued on 10 November 2017 covering area 284.44 Ha - Certificate No. 187 issued on 10 November 2017 covering area 108.15 Ha <p>Total all land use rights in certificate holder is 16,408.88 Ha. However, there are area covering 1,027.82 Ha that excluded from scope of certifications at PT NAS that identified as liability area. Based on explanations above the scope</p> | <ul style="list-style-type: none"> - Certificate No. 205 issued on 14 February 2018 covering area 66.12 Ha - Certificate No. 206 issued on 14 February 2018 covering area 359.64 Ha - Total land use rights PT LGI: 6,266.25 Ha <p>PT Nabati Agro Subur Decree of Head of Land National Agency No. 88/HGU/KEM-ATR/BPN/2017 issued on 25 August 2017 covering area 2,264.50 Ha in PT Nabati Agro Subur. This decree divided into certificates:</p> <ul style="list-style-type: none"> - Certificate No. 184 issued on 10 November 2017 covering area 918.50 Ha - Certificate No. 185 issued on 10 November 2017 covering area 953.41 Ha - Certificate No. 186 issued on 10 November 2017 covering area 284.44 Ha - Certificate No. 187 issued on 10 November 2017 covering area 108.15 Ha <p>Total all land use rights in certificate holder is 16,408.88 Ha. However, there are area covering 1,027.82 Ha that excluded from scope of certifications at PT NAS that identified as liability area. Based on explanations above the scope</p> | |
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| | | <p>of certification are 15,156.06 Ha.</p> <p>Company also showed the example documents of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. <p>Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. There is no update of land compensation during Surveillance 4 audit.</p> | <p>of certification are 15,156.06 Ha.</p> <p>Company also showed the example documents of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. <p>Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. There is no update of land compensation during Surveillance 4 audit.</p> | |
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| <p>4.4.2</p> | <p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include.</p> <p>a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> | <p>Company showed the example documents of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. <p>Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. There is no update of land compensation during Surveillance 4 audit. Also, stakeholder stated that the land compensation process was already conducted with FPIC.</p> | <p>Company showed the example documents of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. <p>Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. There is no update of land compensation during Surveillance 4 audit. Also, stakeholder stated that the land compensation process was already conducted with FPIC.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
| <p>4.4.3 (C)</p> | <p>Maps of an appropriate scale showing the</p> | <p>Company has land use map scale</p> | <p>Company has land use map scale</p> | |

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| | extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). | 1:50,000 which shows the working area of their HGU including the surrounding community villages. The HGU map produced through participatory mapping involving affected parties. Based on interview with representative of Sungai Kelik Village and Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. There is no update of land compensation during Surveillance 4 audit. Also, stakeholder stated that the land compensation process was already conducted with FPIC. | 1:50,000 which shows the working area of their HGU including the surrounding community villages. The HGU map produced through participatory mapping involving affected parties. Based on interview with representative of Sungai Kelik Village and Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. There is no update of land compensation during Surveillance 4 audit. Also, stakeholder stated that the land compensation process was already conducted with FPIC. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.. | All of documents building/land use rights and land compensation documents as described at indicator 4.4.1 – 4.4.3 was made in Bahasa Indonesia. | All of documents building/land use rights and land compensation documents as described at indicator 4.4.1 – 4.4.3 was made in Bahasa Indonesia. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.4.5 (C) | Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. | As described in indicator 4.4.1 and 4.4.2, representative of the community recorded in the documents mentioned in indicators. The landowner represents them self during negotiation process accompanied by community leader and village head. This is the only way that | As described in indicator 4.4.1 and 4.4.2, representative of the community recorded in the documents mentioned in indicators. The landowner represents them self during negotiation process accompanied by community leader and village head. This is the only way that | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement |

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| | | accepted by the community. | accepted by the community. | <input type="checkbox"/> Not Applicable (justification required) |
| 4.4.6 | There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. | Based on interview with representative of Sungai Kelik and Tanjung Medan Village, it is known that company conducts annual reviews through consultations with surrounding village and stakeholders as part of the process and developing CSR programs, and monitoring and management plan of social aspect on the communities who live around the plantation area. The implementation of agreement such as CSR has described in 4.3.1. | Based on interview with representative of Sungai Kelik and Tanjung Medan Village, it is known that company conducts annual reviews through consultations with surrounding village and stakeholders as part of the process and developing CSR programs, and monitoring and management plan of social aspect on the communities who live around the plantation area. The implementation of agreement such as CSR has described in 4.3.1. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| Criterion 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 (C) | Documents showing identification and assessment of demonstrable legal, customary and user rights are available | Based on document review of statement area and interview with management, it is known that there was new planting above 2010. Based on social impact assessment report, there is no customary/indigenous people in operational area. Some ethnic identified in area surrounding company is Melayu, Dayak, Banjar, Bugis, Madura, and others ethnic. | Based on document review of statement area and interview with management, it is known that there was new planting above 2010. Based on social impact assessment report, there is no customary/indigenous people in operational area. Some ethnic identified in area surrounding company is Melayu, Dayak, Banjar, Bugis, Madura, and others ethnic. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.5.2 (C) | FPIC is obtained for all oil palm development through a comprehensive | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land | <input checked="" type="checkbox"/> Conform |

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| | <p>process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> | <p>compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | <p>compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | <p><input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
| 4.5.3 | <p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements should be non-coercive and</p> | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | <p>entered into voluntarily and carried out prior to new operations.</p> <p>b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> | <p>landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company.</p> <p>- Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013.</p> <p>From interview with stakeholder also obtained information that they are aware that they have the right to say 'no' to operational activity planned or implication of palm oil plantation.</p> | <p>landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company.</p> <p>- Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013.</p> <p>From interview with stakeholder also obtained information that they are aware that they have the right to say 'no' to operational activity planned or implication of palm oil plantation.</p> | |
| 4.5.4 | <p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> | <p>Company already has EIA and SIA which made with the participation from stakeholders. Based on document review of SIA management plan, company also conduct consultation with surrounding village to assess the social impact from operational activity. For example, a consultation was shown in Sungai Kelik Village in August 2023 discussing CSR. In addition, based on interviews with representatives of Sungai Kelik Village and Tanjung Medan, it is known that the</p> | <p>Company already has EIA and SIA which made with the participation from stakeholders. Based on document review of SIA management plan, company also conduct consultation with surrounding village to assess the social impact from operational activity. For example, a consultation was shown in Sungai Kelik Village in August 2023 discussing CSR. In addition, based on interviews with representatives of Sungai Kelik Village and Tanjung Medan, it is known that the</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | Company has provided assistance to the village regularly. The consultation give input from stakeholders to company to ensure the social responsibility, including food and water security. Also, there is no food or water source in company operational area. | Company has provided assistance to the village regularly. The consultation give input from stakeholders to company to ensure the social responsibility, including food and water security. Also, there is no food or water source in company operational area. | |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that stakeholder can conduct consultation and communication with company through the social PIC. Stakeholder knows the mechanism to consult and can access information related to operational activity, environmental and social implication in company. Company also has conducted consultation with stakeholder, for example during review of social management and monitoring plan. The latest consultation was conducted in September and October 2024. | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that stakeholder can conduct consultation and communication with company through the social PIC. Stakeholder knows the mechanism to consult and can access information related to operational activity, environmental and social implication in company. Company also has conducted consultation with stakeholder, for example during review of social management and monitoring plan. The latest consultation was conducted in September and October 2024. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.5.6 | Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as: - Land transfer letter from Bandi/Robertus on 20 October 2012 | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as: - Land transfer letter from Bandi/Robertus on 20 October 2012 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement |

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| | | <p>to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company.</p> <p>- Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013.</p> | <p>to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company.</p> <p>- Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013.</p> | <input type="checkbox"/> Not Applicable (justification required) |
| 4.5.7 | <p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <p>- Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company.</p> | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <p>- Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <ul style="list-style-type: none"> - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. - From the documentation of land compensation, there is no any land compensation after 15 November 2018. | <ul style="list-style-type: none"> - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. - From the documentation of land compensation, there is no any land compensation after 15 November 2018. | |
| 4.5.8 (C) | New lands are not acquired in areas inhabited by communities in voluntary isolation. | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | |
| Criterion 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 (C) | A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. | Company has procedure for identifying legal, customary or user rights in document of Procedure – Indemnity of Planting and Area (BGA- SOP-GL-903.1-R0)) in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | Company has procedure for identifying legal, customary or user rights in document of Procedure – Indemnity of Planting and Area (BGA- SOP-GL-903.1-R0)) in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| 4.6.2 (C) | A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. | Company has procedure of calculating and distributing fair and gender-equal compensation written in document Procedure – Indemnity of Planting and Area (BGA- SOP-GL- 903.1-R0)) in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | Company has procedure of calculating and distributing fair and gender-equal compensation written in document Procedure – Indemnity of Planting and Area (BGA- SOP-GL- 903.1-R0)) in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings. | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as: - Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as: - Land transfer letter from Bandi/Robertus on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>land compensation signed by landowner and company.</p> <ul style="list-style-type: none"> - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | <p>land compensation signed by landowner and company.</p> <ul style="list-style-type: none"> - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | |
| 4.6.4 | <p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of | <p>Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that land compensation process was conducted through FPIC. Company can show the documentation of land compensation, such as:</p> <ul style="list-style-type: none"> - Land transfer letter from Bandi/Robentius on 20 October 2012 to PT Gemilang Makmur Subur covering area 2.85 Ha signed by landowner, witnesses, Head of Laman Satong Village, and Matan Hilir Utara Subregency. Company also showed the payment receipt for land compensation signed by landowner and company. - Land transfer letter from Bolram to PT Ladang Sawit Mas covering area 3 Ha signed by landowner, Head of Simpang Tiga Sembelangan Village, and Nanga Tayap Subregency. Company also showed the minutes of | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | land compensation payment signed by landowner and Simpang Tiga Sembelangan Village on 14 May 2013. | |
| Criterion 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 (C) | A mutually agreed procedure for identifying people entitled to compensation is in place. | Company has procedure of identifying people entitled to compensation written in document Procedure – Indemnity of Planting and Area (BGA- SOP-GL- 903.1-R0)) in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | Company has procedure of identifying people entitled to compensation written in document Procedure – Indemnity of Planting and Area (BGA- SOP-GL- 903.1-R0)) in the procedure described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.7.2 (C) | A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. | Company has procedure of calculating and distributing fair compensation written in document Procedure – Indemnity of Planting and Area (BGA- SOP-GL- 903.1-R0)) in the procedure | Company has procedure of calculating and distributing fair compensation written in document Procedure – Indemnity of Planting and Area (BGA- SOP-GL- 903.1-R0)) in the procedure | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity |

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| | | described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interview with representative of Tanjung Medan Village, there still ongoing land compensation process and the land still occupied by community. Also from review of statement area, there is no update of land compensation during Surveillance 4 audit. | <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.7.3 | Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that company has also developed palm oil plantations for the community through a smallholder scheme. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are several access roads that cross the company connecting the surrounding villages/hamlets. | Based on interview with representative of Tanjung Medan Village and Sungai Kelik Village, it is known that company has also developed palm oil plantations for the community through a smallholder scheme. The development of the smallholder scheme is one of the company's efforts so that the community around the company can benefit from the company's existence. In addition, to facilitate community access, the company has opened and built access roads to the community, where there are several access roads that cross the company connecting the surrounding villages/hamlets. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

| Criterion 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. | | | | |
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| 4.8.1 | Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.8.2 (C) | Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 4.8.4 | For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | Based on area statement, there are area that are occupied by surrounding community. From interview also obtained information that there still ongoing land compensation process and the land still occupied by community. However, there is no land conflict between the villagers and company. Then from review of statement area known that there is no update of land compensation during Surveillance 4 audit. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

Principle 5: Support Smallholder Inclusion

Criterion 5.1:

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

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| <p>5.1.1</p> | <p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> | <p>Based on interviews with the management of the Mitra Sejati Cooperative and the Kayong Sekayok Cooperative, it is known that the company has provided price information periodically every period by following the provisions for determining the price of FFB from the Plantation Département of West Kalimantan Province. Information regarding the pricing update was delivered directly to cooperative member farmers via WhatsApp sent by the partnership team and the FFB pricing announcement was displayed at the mill.</p> <p>For example, <i>dokumen of Berita Acara Penetapan Indeks K dan Harga TBS Kelapa Sawit Produksi Pekebun Kalimantan Barat periode II dan III bulan Oktober 2024</i>. The price is set based on the Regulation of the Minister of Agriculture No. 01/Permentan/KB.120/1/2018.</p> <p>According to representatives of cooperatives that have collaborated with the company, such as the Mitra Sejati Cooperative and the Kayong Sekayok Cooperative, the price is also sent via WhatsApp message every there is a change by the company's partnership team. Beside, cooperative administrators</p> | <p>Based on interviews with the management of the Mitra Sejati Cooperative and the Kayong Sekayok Cooperative, it is known that the company has provided price information periodically every period by following the provisions for determining the price of FFB from the Plantation Département of West Kalimantan Province. Information regarding the pricing update was delivered directly to cooperative member farmers via WhatsApp sent by the partnership team and the FFB pricing announcement was displayed at the mill.</p> <p>For example, <i>dokumen of Berita Acara Penetapan Indeks K dan Harga TBS Kelapa Sawit Produksi Pekebun Kalimantan Barat periode II dan III bulan Oktober 2024</i>. The price is set based on the Regulation of the Minister of Agriculture No. 01/Permentan/KB.120/1/2018.</p> <p>According to representatives of cooperatives that have collaborated with the company, such as the Mitra Sejati Cooperative and the Kayong Sekayok Cooperative, the price is also sent via WhatsApp message every there is a change by the company's</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>can also download directly from the website of the Plantation Department of West Kalimantan Province.</p> <p>The source of the price has been listed in the contract agreement between the company and the cooperative, and to ensure this, we have assessed two contracts, namely the Cooperation Agreement for the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Jasa Kayong Sekayok Cooperative). Based on the review of documents and interviews with the Management unit, it is known that there is also a contract made between BTJM and the Independent Supplier/outgrower, the contract itself will be renewed every year. All pricing information is also written in the contract that the pricing itself is determined based on the agreement of both parties.</p> | <p>partnership team. Beside, cooperative administrators can also download directly from the website of the Plantation Department of West Kalimantan Province.</p> <p>The source of the price has been listed in the contract agreement between the company and the cooperative, and to ensure this, we have assessed two contracts, namely the Cooperation Agreement for the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Jasa Kayong Sekayok Cooperative). Based on the review of documents and interviews with the Management unit, it is known that there is also a contract made between BTJM and the Independent Supplier/outgrower, the contract itself will be renewed every year. All pricing information is also written in the contract that the pricing itself is determined based on the agreement of both parties.</p> | |
| 5.1.2 (C) | Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. | As explained in indicator 5.1.1, the price of FFB plasma refers to the price determined by the Plantation Department of West Kalimantan Province which is updated every period to farmers via | As explained in indicator 5.1.1, the price of FFB plasma refers to the price determined by the Plantation Department of West Kalimantan Province which is updated every period | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |

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| | | <p>WhatsApp. Based on the results of an interview with the management of the Kayong Sekayok cooperative, it was stated that the price set by the company was in accordance with the price set by the local Plantation Office, where if there was a price update, the company immediately conveyed it through communication media to the management of the cooperative. The information on the determination of FFB prices referring to the Plantation Department of West Kalimantan Province is also written and explained in the agreement letter between the company and the Plasma cooperative. Based on interviews with representatives of cooperatives, such as with members of the Kayong Sekayok Cooperative, it is known that the pricing is understood and known by all members and never once they are not notified if there is a change in the price of FFB.</p> <p>The company can also show evidence of transparency in plasma management by showing details of production and costs for the April-June 2024 period, where in the document there is a table explaining FFB production data and details of management costs starting from</p> | <p>to farmers via WhatsApp. Based on the results of an interview with the management of the Kayong Sekayok cooperative, it was stated that the price set by the company was in accordance with the price set by the local Plantation Office, where if there was a price update, the company immediately conveyed it through communication media to the management of the cooperative. The information on the determination of FFB prices referring to the Plantation Department of West Kalimantan Province is also written and explained in the agreement letter between the company and the Plasma cooperative. Based on interviews with representatives of cooperatives, such as with members of the Kayong Sekayok Cooperative, it is known that the pricing is understood and known by all members and never once they are not notified if there is a change in the price of FFB.</p> <p>The company can also show evidence of transparency in plasma management by showing details of production and costs for the April-June 2024 period, where in the document there is a table explaining FFB production data and</p> | <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>maintenance costs, fertilization costs, and others. This was conveyed to the plasma management cooperative and had received approval from the cooperative management with proof of stamp duty before the payment was made. The results of the interview with the cooperative management also stated that the price distribution was quite clear and there were no complaints related to payments.</p> | <p>details of management costs starting from maintenance costs, fertilization costs, and others. This was conveyed to the plasma management cooperative and had received approval from the cooperative management with proof of stamp duty before the payment was made. The results of the interview with the cooperative management also stated that the price distribution was quite clear and there were no complaints related to payments.</p> | |
| 5.1.3 (C) | <p>Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> | <p>Bukit Tunggal Jaya Mill receives FFB from its own plantations (Bukit Tunggal Jaya Estate, Hampan Jaya Estate, Cemara Jaya Estate and Natai Estate) and then receives FFB from cooperatives as well as from independent suppliers.</p> <p>The price of FFB used by mills to buy FFB from third parties follows the price set by the Plantation Department of West Kalimantan Province. For example, <i>Berita Acara Penetapan Indeks K dan Harga TBS Kelapa Sawit Produksi Pekebun Kalimantan Barat periode II dan III bulan Oktober 2024</i>. The price is set based on the Regulation of the Minister of Agriculture No. 01/Permentan/KB.120/1/2018.</p> <p>The cooperative has agreed on the price</p> | <p>Bukit Tunggal Jaya Mill receives FFB from its own plantations (Bukit Tunggal Jaya Estate, Hampan Jaya Estate, Cemara Jaya Estate and Natai Estate) and then receives FFB from cooperatives as well as from independent suppliers.</p> <p>The price of FFB used by mills to buy FFB from third parties follows the price set by the Plantation Department of West Kalimantan Province. For example, <i>Berita Acara Penetapan Indeks K dan Harga TBS Kelapa Sawit Produksi Pekebun Kalimantan Barat periode II dan III bulan Oktober 2024</i>. The price is set based on the Regulation of the Minister of Agriculture No. 01/Permentan/KB.120/1/2018.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>and it is contained in the contract agreement between the company and the cooperative, and to ensure this, we reviewed two contracts, namely the Cooperation Agreement for the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Cooperative Jasa Kayong Sekayok)</p> | <p>The cooperative has agreed on the price and it is contained in the contract agreement between the company and the cooperative, and to ensure this, we reviewed two contracts, namely the Cooperation Agreement for the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Cooperative Jasa Kayong Sekayok)</p> | |
| 5.1.4 (C) | <p>Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> | <p>The company has collaborated with cooperatives in terms of buying and selling FFB, this is stated in contract agreements such as Cooperation in the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Kayong Sekayok Cooperative). Based on the results of interviews with cooperative representatives and the review of contract documents, the cooperative plays a role in managing the finances obtained from the sale of FFB and distributing it to all its members.</p> <p>Women's involvement in decision-making can also be proven from the results of interviews with the head of the cooperative who stated that plasma land is given to all people living in the designated village, not limited to men or</p> | <p>The company has collaborated with cooperatives in terms of buying and selling FFB, this is stated in contract agreements such as Cooperation in the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Kayong Sekayok Cooperative). Based on the results of interviews with cooperative representatives and the review of contract documents, the cooperative plays a role in managing the finances obtained from the sale of FFB and distributing it to all its members.</p> <p>Women's involvement in decision-making can also be proven from the results of interviews with the head of the cooperative who stated that plasma land is given to all people living in the designated village, not limited to men</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | women. The cooperative management states that the contract is made by agreement of both parties without coercion, intimidation or discrimination. | or women. The cooperative management states that the contract is made by agreement of both parties without coercion, intimidation or discrimination. | |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. | <p>Cooperation in the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Kayong Sekayok Cooperative) is valid for one cycle of oil palm plantations from the date of signing.</p> <p>The results of the interview with the Cooperative Management stated that all members have understood the stipulated provisions such as FFB pricing, management costs, management costs, loans, disputes, and others as explained in indicator 5.1.2. The agreement has also been made in accordance with applicable law in a fair, transparent and clear time frame.</p> | <p>Cooperation in the Development and Management of Oil Palm Plantations Partnership Pattern No. 001/ADD I/SPK-KSK/III/2016 (Kayong Sekayok Cooperative) is valid for one cycle of oil palm plantations from the date of signing.</p> <p>The results of the interview with the Cooperative Management stated that all members have understood the stipulated provisions such as FFB pricing, management costs, management costs, loans, disputes, and others as explained in indicator 5.1.2. The agreement has also been made in accordance with applicable law in a fair, transparent and clear time frame.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 5.1.6 (C) | Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. | The Company has show proof of FFB Payment to the Plasma Cooperative such as to the Kayong Sekayok Plasma Cooperative for the period of July to September 2024 on October 30, 2024. The minutes, which are held every 3 | The Company has show proof of FFB Payment to the Plasma Cooperative such as to the Kayong Sekayok Plasma Cooperative for the period of July to September 2024 on October 30, 2024. The minutes, which are held every 3 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement |

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| | | <p>months, explain the pricing and pricing period, the amount of FFB, the reduction/cost, and the total paid.</p> <p>Payments are made every month for the total FFB received every month by Bukit Tunggal Jaya Mill and based on interviews with representatives of the Kayong Sekayok and Mitra Sejati Cooperative, it is known that there is no problem of late payment during the cooperation with the company.</p> | <p>months, explain the pricing and pricing period, the amount of FFB, the reduction/cost, and the total paid.</p> <p>Payments are made every month for the total FFB received every month by Bukit Tunggal Jaya Mill and based on interviews with representatives of the Kayong Sekayok and Mitra Sejati Cooperative, it is known that there is no problem of late payment during the cooperation with the company.</p> | <input type="checkbox"/> Not Applicable (justification required) |
| 5.1.7 | <p>Weighing equipment is verified by an independent third party on a regular basis (this can be government).</p> | <p>The company has two electronic weighbridges at the Bukit Tunggal Jaya Plant that have been re-branded by the Metrology Unit on October 1, 2024 for the Avery Weigh Tronix machine; E 1205 with serial number 141050338 with a maximum capacity of 40,000 Kg, from BTJM, PT Ladang Sawit Mas. Test result certificate number 046/SKHP/MET-TJE/V/2023 for Avery Weigh Tronix E 1025 with serial number 144550496 with a maximum capacity of 40,000 Kg., from BTJM, PT Ladang Sawit Mas.</p> <p>The third party stated that the test results, the condition of the weighbridge and the heavy equipment were functioning properly and normally. then valid for the Calibrate in accordance with “Undang-Undang Republik Indonesia No. 2 Tahun 1981 tentang Metrologi Legal” by affixing</p> | <p>The company has two electronic weighbridges at the Bukit Tunggal Jaya Plant that have been re-branded by the Metrology Unit on October 1, 2024 for the Avery Weigh Tronix machine; E 1205 with serial number 141050338 with a maximum capacity of 40,000 Kg, from BTJM, PT Ladang Sawit Mas. Test result certificate number 046/SKHP/MET-TJE/V/2023 for Avery Weigh Tronix E 1025 with serial number 144550496 with a maximum capacity of 40,000 Kg., from BTJM, PT Ladang Sawit Mas.</p> <p>The third party stated that the test results, the condition of the weighbridge and the heavy equipment were functioning properly and normally. then valid for the Calibrate in accordance with “Undang-Undang Republik</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | the 2024 tera mark. | Indonesia No. 2 Tahun 1981 tentang Metrologi Legal” by affixing the 2024 tera mark. | |
| 5.1.8 | The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. | The Bukit Tunggul Jaya Mill receives FFB from its own plantations and cooperatives as third-party suppliers whose plantations are located around the Company's area and have been bound by a partnership agreement. The Cooperative currently has not participated in the certification, but based on the information of the Cooperative management that the company has socialized related to the RSPO Certification System and Best Management Practices Aspects to representatives of Plasma Cooperative Farmers | The Bukit Tunggul Jaya Mill receives FFB from its own plantations and cooperatives as third-party suppliers whose plantations are located around the Company's area and have been bound by a partnership agreement. The Cooperative currently has not participated in the certification, but based on the information of the Cooperative management that the company has socialized related to the RSPO Certification System and Best Management Practices Aspects to representatives of Plasma Cooperative Farmers | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 5.1.9 (C) | The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. | The Company also has communication procedures listed in the Communication SOP Number LSM-SUST-SOP- 09 revised on December 3, 2019 and applies to all activities and fields of the PT. LSM that include internal or external communications related to HSE, Labour, Social, RSPO & ISPO. The scope of external communication includes the delivery of HSE, employment, social information to or from third parties, including the Government, | The Company also has communication procedures listed in the Communication SOP No: LSM-SUST-SOP- 09 Rev on December 3, 2019 and applies to all activities and fields of the PT. LSM that include internal or external communications related to HSE, Labour, Social, RSPO & ISPO. The scope of external communication includes the delivery of HSE, employment, social information to or from third parties, including the | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>business partners, contractors and suppliers, families of employees of PT. LSM, communities, Non-Governmental Organizations, media, and others.</p> <p>According to this procedure, internal and external complaints can be submitted directly or indirectly through various channels, such as suggestion boxes, telecommunications, short messages, and mass media. The Company guarantees the confidentiality of the whistleblower to reduce the risk of retaliation, and the involvement of third parties in the complaint handling process is allowed. Complaints must be reported and recorded in the complaint report book. Based on the verification documents of the internal and external complaint books for the 2024 period, it is known that there are no complaints by cooperatives or farmer complaints.</p> | <p>Government, business partners, contractors and suppliers, families of employees of PT. LSM, communities, Non-Governmental Organizations, media, and others.</p> <p>According to this procedure, internal and external complaints can be submitted directly or indirectly through various channels, such as suggestion boxes, telecommunications, short messages, and mass media. The Company guarantees the confidentiality of the whistleblower to reduce the risk of retaliation, and the involvement of third parties in the complaint handling process is allowed. Complaints must be reported and recorded in the complaint report book. Based on the verification documents of the internal and external complaint books for the 2024 period, it is known that there are no complaints by cooperatives or farmer complaints.</p> | |
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Criterion 5.2:

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

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| 5.2.1 | The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for | The results of the interview with representatives of the cooperative management obtained information that the company's partnership team has | The results of the interview with representatives of the cooperative management obtained information that the company's partnership team has | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
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| | <p>support to improve their livelihoods and their interest in RSPO certification.</p> | <p>conducted certification socialization to independent smallholders on RSPO matters, including improving livelihoods through participating in RSPO certification to smallholders and indirect FFB suppliers. The socialization also includes subjects on best management practices and safety aspects such as integrated pest management, land management, zero burning methods, pesticide handling, etc.</p> <p>In support for independent smallholders to make their plantations RSPO certified, the certification unit has facilitated farmers with some initial training such as the one that was carried out on 12 October 2023. The training materials provided include: RSPO Certification System for independent smallholders, group management and dynamics, Internal Control System (ICS), functions and performance, internal audit system and documentation system. The result of this training is the formation of an ICS group/team that will be maximized in conducting internal audits as well as providing socialization/socialization related to the RSPO certification program.</p> | <p>conducted certification socialization to independent smallholders on RSPO matters, including improving livelihoods through participating in RSPO certification to smallholders and indirect FFB suppliers. The socialization also includes subjects on best management practices and safety aspects such as integrated pest management, land management, zero burning methods, pesticide handling, etc.</p> <p>In support for independent smallholders to make their plantations RSPO certified, the certification unit has facilitated farmers with some initial training such as the one that was carried out on 12 October 2023. The training materials provided include: RSPO Certification System for independent smallholders, group management and dynamics, Internal Control System (ICS), functions and performance, internal audit system and documentation system. The result of this training is the formation of an ICS group/team that will be maximized in conducting internal audits as well as providing socialization/socialization related to the RSPO certification program.</p> | <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| <p>5.2.2</p> | <p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder)</p> <p>PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders.</p> | <p>The results of interviews with the management of the Kayong Sekayok cooperative and the results of document reviews and interviews with management, it is known that farmers are fully managed by the company so that the management of the plantation is in accordance with the standards of the parent company. Certificate holders are not developing and implementing livelihood improvement programs including the RSPO Standard for Independent Smallholders. This is because there are no Independent Farmers in PT LSM.</p> <p>The company's partnership team has conducted certification socialization to independent smallholders on RSPO matters including livelihood improvement through participating in RSPO certification to smallholders and indirect FFB suppliers. The socialization also includes subjects on best management practices and safety aspects such as integrated pest management, land management, zero burning methods, pesticide handling, etc.</p> | <p>The results of interviews with the management of the Kayong Sekayok cooperative and the results of document reviews and interviews with management, it is known that farmers are fully managed by the company so that the management of the plantation is in accordance with the standards of the parent company. Certificate holders are not developing and implementing livelihood improvement programs including the RSPO Standard for Independent Smallholders. This is because there are no Independent Farmers in PT LSM.</p> <p>The company's partnership team has conducted certification socialization to independent smallholders on RSPO matters including livelihood improvement through participating in RSPO certification to smallholders and indirect FFB suppliers. The socialization also includes subjects on best management practices and safety aspects such as integrated pest management, land management, zero burning methods, pesticide handling, etc.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.. | <p>Based on interviews with management representatives, it is known that there was no addition of plasma until the time the audit was carried out. To ensure the traceability of the FFB received, the certification unit has conducted a "Traceability to Plantation (TTP)" which aims to obtain some data through visits to FFB supplier areas owned by independent farmers, collectors (obtained indirectly) and plasma.</p> <p>The data collected is the coordinate points, then to check and overlay the spatial layout to ensure the area is in the "APL area". When the location of the FFB source does not overlap with the conservation area or forest, the FFB supply contract agreement can be continued. Based on this explanation, it can be concluded that the certification unit has selected FFB sources through checking the status of its land ownership and there is no agricultural land that is not yet legal and overlaps with conservation/forest areas.</p> | <p>Based on interviews with management representatives, it is known that there was no addition of plasma until the time the audit was carried out. To ensure the traceability of the FFB received, the certification unit has conducted a "Traceability to Plantation (TTP)" which aims to obtain some data through visits to FFB supplier areas owned by independent farmers, collectors (obtained indirectly) and plasma.</p> <p>The data collected is the coordinate points, then to check and overlay the spatial layout to ensure the area is in the "APL area". When the location of the FFB source does not overlap with the conservation area or forest, the FFB supply contract agreement can be continued. Based on this explanation, it can be concluded that the certification unit has selected FFB sources through checking the status of its land ownership and there is no agricultural land that is not yet legal and overlaps with conservation/forest areas.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 5.2.4 (C) | Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | Based on interviews with the management of the Mitra Sejati cooperative, it is known that the land is fully managed by the company, so that the workers who use pesticides are | Based on interviews with the management of the Mitra Sejati cooperative, it is known that the land is fully managed by the company, so that the workers who use pesticides are | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement |

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| | | employee companies. However, the company's partnership team has conducted socialization covering subjects on best management practices and safety aspects such as integrated pest management, land management, zero burning methods, pesticide handling, etc. | employee companies. However, the company's partnership team has conducted socialization covering subjects on best management practices and safety aspects such as integrated pest management, land management, zero burning methods, pesticide handling, etc. | <input type="checkbox"/> Not Applicable (justification required) |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | The company has reported on the development of the plantation business submitted to the Plantation Department of Ketapang Regency, for example, the First Quarter Report of 2024 was submitted to the agency on June 30, 2024. The report includes the realization of assistance programs for plasma farmers. | The company has reported on the development of the plantation business submitted to the Plantation Department of Ketapang Regency, for example, the First Quarter Report of 2024 was submitted to the agency on June 30, 2024. The report includes the realization of assistance programs for plasma farmers. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

Principle 6: Respect Workers Rights and Conditions

Criterion 6.1:

Any form of discrimination is prohibited.

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| 6.1.1 (C) | Publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. | Non-discrimination and equal opportunity policies are available in the Human Rights Policy, June 16, 2019, and signed by Nanga Tayap Region Head. This policy explains that BGA Group Management is committed to laws and regulations that are relevant to the company's business activities as well as in the formulation of | Non-discrimination and equal opportunity policies are available in the Human Rights Policy, June 16, 2019, and signed by Nanga Tayap Region Head. This policy explains that BGA Group Management is committed to laws and regulations that are relevant to the company's business activities as well as in the formulation of | <input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
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| | | <p>ISPO/RSPO principles and criteria. In point 3, it is explained that the BGA Group Management Region Nanga Tayap provides the same treatment and job opportunities by not differentiating ethnicity, race, religion, caste, nationality, disability, gender, sexual orientation, union membership, political affiliation and age.</p> <p>However, this policy has not been implemented properly, based on the verification of the Company's Job Vacancy documents for the March 2024 period, it is known that there are still discriminatory prerequisites, for example, Payroll Admin job vacancies require a maximum age limit of 25 years, require female gender and attractive appearance and BAPP Admin job vacancies require a maximum age limit of 25 years, require female gender and attractive appearance. This become CAR#06</p> | <p>ISPO/RSPO principles and criteria. In point 3, it is explained that the BGA Group Management Region Nanga Tayap provides the same treatment and job opportunities by not differentiating ethnicity, race, religion, caste, nationality, disability, gender, sexual orientation, union membership, political affiliation and age.</p> <p>However, this policy has not been implemented properly, based on the verification of the Company's Job Vacancy documents for the March 2024 period, it is known that there are still discriminatory prerequisites, for example, Payroll Admin job vacancies require a maximum age limit of 25 years, require female gender and attractive appearance and BAPP Admin job vacancies require a maximum age limit of 25 years, require female gender and attractive appearance. This become CAR#06</p> | |
| 6.1.2 (C) | <p>Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees</p> | <p>The company has a recruitment procedure available in the SOP for Non-Staff Employee Recruitment No: BGA-SOP-HC-304.08-R0, January 28, 2023, and signed by the CFO. Information from management is known that there has been no recruitment of workers from outside the region in the past year. This is line with interviews with harvester at Cemara Jaya Estate and boiler</p> | <p>The company has a recruitment procedure available in the SOP for Non-Staff Employee Recruitment No: BGA-SOP-HC-304.08-R0, January 28, 2023, and signed by the CFO. Information from management is known that there has been no recruitment of workers from outside the region in the past year. This is line with interviews with harvester at Cemara Jaya Estate and boiler operators at Bukit</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>operators at Bukit Tunggal Jaya Mill is a community of the village around the company.</p> <p>Based on document verification list of workers and interview with Bipartite, there is no contract worker and migrant worker in PT Ladang Sawit Mas. Besides, from interview with new workers in Bengkirai Jaya Estate, it is known that there is no recruitment fees and retention of worker documents.</p> | <p>Tunggal Jaya Mill is a community of the village around the company.</p> <p>Based on document verification list of workers and interview with Bipartite, there is no contract worker and migrant worker in PT Ladang Sawit Mas. Besides, from interview with new workers in Bengkirai Jaya Estate, it is known that there is no recruitment fees and retention of worker documents.</p> | |
| 6.1.3 | <p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available</p> | <p>During the audit, the company demonstrated that recruitment selection, access to training and promotion were based on the skills, abilities, qualities and medical fitness required for the available job through well-maintained employment documents. The recruitment process begins with a job application letter, CV, photocopy of ID card, Family Card and photocopy of supporting documents such as certificates and diplomas.</p> <p>The company keeps these files for applicants who are accepted for employment, including the results of written tests, interview results and contract agreements signed by both parties, such as the Employment Agreement Letter with the initial FS</p> | <p>During the audit, the company demonstrated that recruitment selection, access to training and promotion were based on the skills, abilities, qualities and medical fitness required for the available job through well-maintained employment documents. The recruitment process begins with a job application letter, CV, photocopy of ID card, Family Card and photocopy of supporting documents such as certificates and diplomas.</p> <p>The company keeps these files for applicants who are accepted for employment, including the results of written tests, interview results and contract agreements signed by both parties, such as the Employment Agreement Letter with the initial FS dated January 16, 2023.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>dated January 16, 2023.</p> <p>Promotion for workers is in accordance with the management decree based on the employee's assessment of 4 criteria, that is morality, capability, integrity, competence, and recommendations from superiors or superiors. An example of such a promotion is in the Employee Achievement Assessment document on behalf of the FS of the Land Application Mill position regarding the appointment of permanent employees.</p> <p>In indicator 3.7.1 above, it is explained that the company has a training program for workers in factories and plantations, covering all aspects of operations and RSPO and covering all parties who need training such as staff, workers, and contractors. This confirms that every worker has access to the training needed to improve their skills according to their field of work and for promotion. The auditor has confirmed to the Ketapang Manpower Office of the Industrial Relations section regarding the problem of layoffs in the company, definitely through tripartite or mediation will be scheduled, but in the past year there has been no issue of layoffs at PT. Ladang</p> | <p>Promotion for workers is in accordance with the management decree based on the employee's assessment of 4 criteria, that is morality, capability, integrity, competence, and recommendations from superiors or superiors. An example of such a promotion is in the Employee Achievement Assessment document on behalf of the FS of the Land Application Mill position regarding the appointment of permanent employees.</p> <p>In indicator 3.7.1 above, it is explained that the company has a training program for workers in factories and plantations, covering all aspects of operations and RSPO and covering all parties who need training such as staff, workers, and contractors. This confirms that every worker has access to the training needed to improve their skills according to their field of work and for promotion. The auditor has confirmed to the Ketapang Manpower Office of the Industrial Relations section regarding the problem of layoffs in the company, definitely through tripartite or mediation will be scheduled, but in the past year there has been no issue of layoffs at PT. Ladang Sawit Mas. The company conducts recruitment for the 2024 period as described in indicator 6.1.1.</p> | |
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| | | Sawit Mas. The company conducts recruitment for the 2024 period as described in indicator 6.1.1. | | |
| 6.1.4 | Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women | <p>Based on interview with the Bipartite, gender committee and women workers both at Mill and estate revealed that the company not conducting pregnancy tests as part of the recruitment procedure. The pregnancy tests were only conducted for chemical material applicators to avoid the workers being exposed with chemical cause pregnant or breastfeeding women are prohibited and are not allowed to work in fertilization and chemical work (spraying pesticides) or hazardous materials that contain poison.</p> <p>Women workers who are declared pregnant will be transferred to an alternative field that is not related to chemicals until the end of the child's breastfeeding period (1-year-old of child).</p> <p>Further explained that so far there had never been a pregnancy test which leads to a discriminatory measure.</p> | <p>Based on interview with the Bipartite, gender committee and women workers both at Mill and estate revealed that the company not conducting pregnancy tests as part of the recruitment procedure. The pregnancy tests were only conducted for chemical material applicators to avoid the workers being exposed with chemical cause pregnant or breastfeeding women are prohibited and are not allowed to work in fertilization and chemical work (spraying pesticides) or hazardous materials that contain poison.</p> <p>Women workers who are declared pregnant will be transferred to an alternative field that is not related to chemicals until the end of the child's breastfeeding period (1-year-old of child).</p> <p>Further explained that so far there had never been a pregnancy test which leads to a discriminatory measure.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 6.1.5 (C) | A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities | A gender committee is formed in each unit to handle women's or gender issues, with an organizational structure for the | A gender committee is formed in each unit to handle women's or gender issues, with an organizational structure for the | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity |

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| | <p>and improvements for women.</p> | <p>2024-2026 period, The structure consists of the chairman of the gender committee and representatives of the division, whose members consist of male and female workers.</p> <p>The work program outlined in the document "Gender Committee Work Program in 2024" consists of integrated health service posts (Posyandu) in plantations, socialization of gender committees, assessing the needs of new mothers, visiting daycare, providing additional food and providing education on the prevention of sexual violence for employees.</p> <p>Based on interviews with the gender committee officer, their understanding of the duties and responsibilities of the gender committee has been good, especially in terms of women's rights, providing counselling for women involved in cases of violence, and dealing with related issues such as sexual harassment and the fulfilment of reproductive rights.</p> <p>From the results of interviews with representatives of the gender committee and workers at Bukit Tunggal Jaya Mill and caregivers at the Cemara Jaya</p> | <p>2024-2026 period, The structure consists of the chairman of the gender committee and representatives of the division, whose members consist of male and female workers.</p> <p>The work program outlined in the document "Gender Committee Work Program in 2024" consists of integrated health service posts (Posyandu) in the estate, conducting gender committee socialization, assessing the needs of new mothers, visiting daycare, providing additional food and providing education on the prevention of sexual violence for employees.</p> <p>Based on interviews with the gender committee officer, their understanding of the duties and responsibilities of the gender committee has been good, especially in terms of women's rights, providing counselling for women involved in cases of violence, and dealing with related issues such as sexual harassment and the fulfilment of reproductive rights.</p> <p>From the results of interviews with representatives of the gender committee and workers at Bukit Tunggal Jaya Mill and caregivers at the Cemara Jaya</p> | <p><input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | Estate daycare, there has never been sexual harassment or domestic violence during the time the person concerned worked at PT. Ladang Sawit Mas. | Estate daycare, there has never been sexual harassment or domestic violence during the time the person concerned worked at PT. Ladang Sawit Mas. | |
| 6.1.6 | There is evidence of equal pay for the same work scope | <p>The same wage payment has been carried out by the company well, taking into account ability, performance, expertise, length of work and other factors as the basis for remuneration, so that the payment of wages given is in accordance with the load/task/type of work of each. Based on interviews with LKS Bipartite and boiler operator workers at BTJM and Security, TPA Caregivers and Nurses at HJYE, and verification of workers' wages with checks on their payslips October 2024, for example on behalf of EP (Medical Nurses at Hamparan Jaya Estate) who receive a basic salary of Rp. 3,189,000 and get a premium for working more than 7 hours of work of Rp. 1,707,560, and E (Security Bengkirai Estate) who received a basic salary of Rp. 3,189,000. From this, it is confirmed that there is no difference in wages for workers at the same level.</p> <p>Other supporting documents reviewed include a memo from HCG No. 492/MEMO-BGA/HC-POP/XII/2023 concerning the Determination of Wages for PTH & PTB Employees in 2024, and</p> | <p>The same wage payment has been carried out by the company well, taking into account ability, performance, expertise, length of work and other factors as the basis for remuneration, so that the payment of wages given is in accordance with the load/task/type of work of each. Based on interviews with LKS Bipartite and boiler operator workers at BTJM and Security, TPA Caregivers and Nurses at HJYE, and verification of workers' wages with checks on their payslips October 2024, for example on behalf of EP (Medical Nurses at Hamparan Jaya Estate) who receive a basic salary of Rp. 3,189,000 and get a premium for working more than 7 hours of work of Rp. 1,707,560, and E (Security Bengkirai Estate) who received a basic salary of Rp. 3,189,000. From this, it is confirmed that there is no difference in wages for workers at the same level.</p> <p>Other supporting documents reviewed include a memo from HCG No. 492/MEMO-BGA/HC-POP/XII/2023 concerning the Determination of Wages for PTH & PTB Employees in 2024, and Decree of the Governor of West</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>Decree of the Governor of West Kalimantan No. 1879/NAKERTRAN/2023 concerning the minimum wage for Ketapang Regency in 2024. These two documents are the basis for determining workers' wages in 2024 and have been implemented. In addition, the company has established the wage structure and scale for 2024 as well as the Determination of Premiums for each job, for example the Intern Office Memo Number: 027/IOM/RH/Reg NT-BGA/V/2020, dated May 21, 2020 concerning the Determination of Nanga Tayap Regional Security Premiums.</p> <p>Based on the results of an interview with the Manpower Office in Ketapang Regency, there has never been a report of Bipartite employees/representatives to the agency regarding the lack of wage payment.</p> | <p>Kalimantan No. 1879/NAKERTRAN/2023 concerning the minimum wage for Ketapang Regency in 2024. These two documents are the basis for determining workers' wages in 2024 and have been implemented. In addition, the company has established the wage structure and scale for 2024 as well as the Determination of Premiums for each job, for example the Intern Office Memo Number: 027/IOM/RH/Reg NT-BGA/V/2020, dated May 21, 2020 concerning the Determination of Nanga Tayap Regional Security Premiums.</p> <p>Based on the results of an interview with the Manpower Office in Ketapang Regency, there has never been a report of Bipartite employees/representatives to the agency regarding the lack of wage payment.</p> | |
| <p>Criterion 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)</p> | | | | |

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| <p>6.2.1 (C)</p> | <p>Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p> | <p>The Company has regulated employment relations, working hours/overtime, wages, training, employee assessments, welfare and insurance, business travel allowances, discipline, mutations, termination of employment, complaints and complaints and others in the Company Regulations that have been registered with the Ministry of Manpower of the Republic of Indonesia No. Kep.4/HI.00.00/00.0000/230618011/B/VI I/2023. Documentation of salaries and working conditions in accordance with applicable labor laws is available to workers in the national language and explained to workers in a language they understand. This is in line with the review of Company Regulation documents, employee agreements (SPK), outsourcing contractors (SPK), employee payslips and confirmation through interviews with the workforce, worker representatives and HR.</p> <p>Workers' wages are in accordance with labor laws, namely Law of the Republic of Indonesia No. 06 of 2023 concerning the Omnibus Law and 13 of 2003 concerning Manpower, which details payments and other provisions for each employee. The</p> | <p>The Company has regulated employment relations, working hours/overtime, wages, training, employee assessments, welfare and insurance, business travel allowances, discipline, mutations, termination of employment, complaints and complaints and others in the Company Regulations that have been registered with the Ministry of Manpower of the Republic of Indonesia No. Kep.4/HI.00.00/00.0000/230618011/B/VI I/2023. Documentation of salaries and working conditions in accordance with applicable labor laws is available to workers in the national language and explained to workers in a language they understand. This is in line with the review of Company Regulation documents, employee agreements (SPK), outsourcing contractors (SPK), employee payslips and confirmation through interviews with the workforce, worker representatives and HR.</p> <p>Workers' wages are in accordance with labor laws, namely Law of the Republic of Indonesia No. 06 of 2023 concerning the Omnibus Law and 13 of 2003 concerning Manpower, which details payments and other provisions for each employee. The</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>document is in Indonesian, explained by management officials and easy to understand by workers.</p> <p>Based on interviews with the management of the Bipartite LKS and workers in the mill and plantation, it was concluded that the workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the Company Regulations. Based on the description above, it can be concluded that the company already has documentation of wages and work requirements in accordance with labor regulations applicable to workers in the national language, along with explanations for workers in the language they understand.</p> | <p>document is in Indonesian, explained by management officials and easy to understand by workers. Based on interviews with the management of the Bipartite LKS and workers in the mill and plantation, it was concluded that the workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the Company Regulations 2023-2025.</p> <p>Based on the description above, it can be concluded that the company already has documentation of wages and work requirements in accordance with labor regulations applicable to workers in the national language, along with explanations for workers in the language they understand.</p> | |
| 6.2.2 (C) | <p>Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members</p> | <p>During the audit, several employment contracts and wage payments were reviewed to verify the working conditions established by the company and agreed with the Bipartite and recorded in the Company's Regulations period of 2023-2025.</p> <p>For example, the employment contract with the initials E (Security Bengkirai Estate) dated March 16, 2023, as well as the salary slip for the October 2024</p> | <p>During the audit, several employment contracts and wage payments were reviewed to verify the working conditions established by the company and agreed with the Bipartite and recorded in the Company's Regulations period of 2023-2025.</p> <p>For example, the employment contract with the initials E (Security Bengkirai Estate) dated March 16, 2023, as well as the salary slip for the October 2024</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>period which received a basic salary of Rp. 3,189,000 and a premium of Rp. 600,000. Related to premiums has been explained in the Intern Office Memo document No: 027/IOM/RH/RegNT-BGA/V/2020 dated May 21, 2020 concerning the Determination of Nanga Tayap Regional Security Premiums.</p> <p>Based on the review, the contract has explained the terms of work, working hours and wages, permits, social security, leave rights, facilities and PPE, worker obligations, training and development, discipline and sanctions, industrial relations, termination of contracts, etc. The content of the contract is in accordance with the applicable regulations, prepared in a language understood by the worker, explained to the worker by the management officer, and signed by the official signatory of the company and the employee.</p> <p>Based on the explanation above, the company has good documentation related to regular working hours, cuts, overtime, sickness, vacation rights, maternity leave, reasons for termination, and notification periods that have been informed in the Company Regulation</p> | <p>period which received a basic salary of Rp. 3,189,000 and a premium of Rp. 600,000. Related to premiums has been explained in the Intern Office Memo document No: 027/IOM/RH/RegNT-BGA/V/2020 dated May 21, 2020 concerning the Determination of Nanga Tayap Regional Security Premiums.</p> <p>Based on the review, the contract has explained the terms of work, working hours and wages, permits, social security, leave rights, facilities and PPE, worker obligations, training and development, discipline and sanctions, industrial relations, termination of contracts, etc. The content of the contract is in accordance with the applicable regulations, prepared in a language understood by the worker, explained to the worker by the management officer, and signed by the official signatory of the company and the employee.</p> <p>Based on the explanation above, the company has good documentation related to regular working hours, cuts, overtime, sickness, vacation rights, maternity leave, reasons for termination, and notification periods that have been informed in the Company Regulation</p> | |
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| | | <p>period on 2023-2025. Based on interviews with representatives of the Union and workers in factories and plantations, it is confirmed that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Company Regulation, in accordance with the employment contract and in accordance with the regular socialization provided by the company.</p> | <p>period on 2023-2025. Based on interviews with representatives of the Union and workers in factories and plantations, it is confirmed that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Company Regulation, in accordance with the employment contract and in accordance with the regular socialization provided by the company.</p> | |
| 6.2.3 (C) | <p>There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements</p> | <p>Based on interviews with bipartite representatives and workers in factories and plantations, it is explained that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Company's Regulations for the period 2023-2025, in accordance with the employment contract and in accordance with the regular socialization provided by the company.</p> <p>Interviews with contractor workers revealed that workers receive salaries in accordance with the applicable minimum wage. The company shows evidence of compliance with labor requirements, for example:</p> <p>1. Maternity leave form for employees with the initials MT as an admin at Bengkirai Estate starting from</p> | <p>Based on interviews with bipartite representatives and workers in factories and plantations, it is explained that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Company's Regulations for the period 2023-2025, in accordance with the employment contract and in accordance with the regular socialization provided by the company.</p> <p>Interviews with contractor workers revealed that workers receive salaries in accordance with the applicable minimum wage. The company shows evidence of compliance with labor requirements, for example:</p> <p>1. Maternity leave form for employees with the initials MT as an admin at Bengkirai Estate starting from</p> | <p><input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>September 27 to November 25, 2024 approved by the RLC Manager.</p> <p>2. Salary slip of boiler operator employees at Bukit Tunggal Jaya Mill, workers with the initials S in October 2024 receive a basic salary of Rp. 3,189,000 and overtime pay during the September-October period is 124 hours. Overtime payment has been paid in accordance with applicable regulations.</p> <p>3. Nurse salary slip at the primary clinic, workers with the initials N in October 2024 receive a basic salary of Rp. 3,189,000. Data on the working hours of the health workers were obtained working 2 shifts, namely 07.00-16.00 for the first shift and 16.00.07.00 for the second shift.</p> <p>However, the calculation of the working hours of boiler operators at the Mill and Medical Personnel at the Clinic for the second shift has been more than 4 hours a day and 18 hours a week, this is not in accordance with PP 35 of 2021, Article 26 (overtime working time).</p> <p>Then it was strengthened by an interview with the labor office, that overtime of more than 18 hours is not allowed according to regulations, especially since the overtime is carried</p> | <p>September 27 to November 25, 2024 approved by the RLC Manager.</p> <p>2. Salary slip of boiler operator employees at Bukit Tunggal Jaya Mill, workers with the initials S in October 2024 receive a basic salary of Rp. 3,189,000 and overtime pay during the September-October period is 124 hours. Overtime payment has been paid in accordance with applicable regulations.</p> <p>3. Nurse salary slip at the primary clinic, workers with the initials N in October 2024 receive a basic salary of Rp. 3,189,000. Data on the working hours of the health workers were obtained working 2 shifts, namely 07.00-16.00 for the first shift and 16.00.07.00 for the second shift.</p> <p>However, the calculation of the working hours of boiler operators at the Mill and Medical Personnel at the Clinic for the second shift has been more than 4 hours a day and 18 hours a week, this is not in accordance with PP 35 of 2021, Article 26 (overtime working time).</p> <p>Then it was strengthened by an interview with the labor office, that overtime of more than 18 hours is not allowed according to regulations, especially since the overtime is carried</p> | |
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| | | out continuously. CAR#07 | out continuously. CAR#07 | |
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| 6.2.4 (C) | <p>The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure</p> | <p>Based on a review of the list of social facilities for employees in 2024, interviews with representatives of Bipartit, workers in mill and estate as well as field observations to workers' housing in mills and estate, the company has provided welfare facilities for its employees, including permanent housing, clinics, water supply, electricity, education, transportation, places of worship (mosques and churches), sports facilities, and others.</p> <p>Field visits to the residential areas of Bukit Tunggal Jaya Mill, Bengkirai Estate, and Cemara Jaya Estate revealed that the workers are equipped with adequate housing, consisting of 2 bedrooms, 1 bathroom, each house accommodates one family. The company also has a reliable supply of water from drilled wells, which ensures there are no shortages. In addition, the company operates clinics with competent and certified medical staff.</p> <p>The children of employees have access to good educational facilities, ranging from kindergarten to high school. Overall, the facilities provided by the</p> | <p>Based on a review of the list of social facilities for employees in 2024, interviews with representatives of Bipartit, workers in mill and estate as well as field observations to workers' housing in mills and estates, the company has provided welfare facilities for its employees, including permanent housing, clinics, water supply, electricity, education, transportation, places of worship (mosques and churches), sports facilities, and others.</p> <p>Field visits to the residential areas of Bukit Tunggal Jaya Mill, Bengkirai Estate, and Cemara Jaya Estate revealed that the workers are equipped with adequate housing, consisting of 2 bedrooms, 1 bathroom, each house accommodates one family. The company also has a reliable supply of water from drilled wells, which ensures there are no shortages. In addition, the company operates clinics with competent and certified medical staff.</p> <p>The children of employees have access to good educational facilities, ranging from kindergarten to high school. Overall, the facilities provided by the</p> | <p><input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input checked="" type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>company are suitable for workers and their families.</p> <p>The company can consider sanitation of domestic waste disposal using PVC pipes for all employee housing so that there is no puddle in the backyard area. This is because based on visits to the CMJE housing block F23, it is known that there are houses that use paralon pipes as domestic waste disposal routes, but there are also houses that do not use them.</p> | <p>company are suitable for workers and their families.</p> <p>The company can consider sanitation of domestic waste disposal using PVC pipes for all employee housing so that there is no puddle in the backyard area. This is because based on visits to the CMJE housing block F23, it is known that there are houses that use paralon pipes as domestic waste disposal routes, but there are also houses that do not use them.</p> | |
| 6.2.5 | <p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> | <p>Where workers live (housing) are not located in remote areas, there are staple food shops and traditional markets available. It is known that in the certification unit area there are 4 units of basic food services, vegetable sellers and stalls in employees' homes that provide daily necessities at affordable prices.</p> <p>Based on interviews with representatives of Bipartite and with workers and their families in mill housing and estate, it was noted that workers do not have difficulties in obtaining basic necessities due to the existence of shophouses and cooperatives at normal prices.</p> | <p>Where workers live (housing) are not located in remote areas, there are staple food shops and traditional markets available. It is known that in the certification unit area there are 4 units of basic food services, vegetable sellers and stalls in employees' homes that provide daily necessities at affordable prices.</p> <p>Based on interviews with representatives of Bipartite and with workers and their families in mill housing and estate, it was noted that workers do not have difficulties in obtaining basic necessities due to the existence of shophouses and cooperatives at normal prices.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| <p>6.2.6</p> | <p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist</p> | <p>Indonesia is one of the countries where the standard of living wage is determined by the government. The company pays salaries to all employees based on the national minimum wage decree set by the local government (see Indicator 6.1.6 above). Workers have been paid using the minimum wage set by the local government, excluding some facilities such as education, housing, water, electricity, and childcare provided by the company.</p> <p>In addition, the company has assessed the applicable wages for all types of work referring to the Company's Annual Budget, the National Minimum Wage, and the RSPO Guidelines on Calculating Applicable Wages (DLW). The calculation describes benefits and facilities such as Eid bonuses, electricity, housing, water, education, childcare, etc. Assessment prepared by HR Department illustrates Decent Living Wage for 2024 in the company is IDR 9,849,444</p> | <p>Indonesia is one of the countries where the standard of living wage is determined by the government. The company pays salaries to all employees based on the national minimum wage decree set by the local government (see Indicator 6.1.6 above). Workers have been paid using the minimum wage set by the local government, excluding some facilities such as education, housing, water, electricity, and childcare provided by the company.</p> <p>In addition, the company has assessed the applicable wages for all types of work referring to the Company's Annual Budget, the National Minimum Wage, and the RSPO Guidelines on Calculating Applicable Wages (DLW). The calculation describes benefits and facilities such as Eid bonuses, electricity, housing, water, education, childcare, etc. Assessment prepared by HR Department illustrates Decent Living Wage for 2024 in the company is IDR 9,849,444.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
| <p>6.2.7</p> | <p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary</p> | <p>Based on interviews with HRD staff, with representatives of Bipartite and workers in mill and estate, as well as a review of the update Employee List period of September 2024 the company no longer</p> | <p>Based on interviews with HRD staff, with representatives of Bipartite and workers in mill and estate, as well as a review of the update Employee List period of</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity</p> |

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| | or seasonal | has workers with daily contracts (BHL). Currently, the company only employs permanent jobs, namely PTH and PTB, which are used for all core jobs such as harvesting in the estate and processing in the mill. According to information received from the Manpower Office of Ketapang Regency, it is known that the company has reported all permanent workers through the Mandatory Employment Report at the Company every year. | September 2024 the company no longer has workers with daily contracts (BHL). Currently, the company only employs permanent jobs, namely PTH and PTB, which are used for all core jobs such as harvesting in the estate and processing in the mill. According to information received from the Manpower Office of Ketapang Regency, it is known that the company has reported all permanent workers through the Mandatory Employment Report at the Company every year. | <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
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Criterion 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

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| 6.3.1 (C) | A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented | The policy of freedom of association and the right to collective bargaining is explicitly explained in the Internal Office Memo No: 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019 concerning the Human Rights Policy in point 5 it is explained that the management of BGA Group Nanga Tayap Region gives freedom to all employees to form and/or become a union. The policy is written in Bahasa and can be understood by workers. The policy has been implemented and | The policy of freedom of association and the right to collective bargaining is explicitly explained in the Internal Office Memo No: 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019 concerning the Human Rights Policy in point 5 it is explained that the management of BGA Group Nanga Tayap Region gives freedom to all employees to form and/or become a union. The policy is written in Bahasa and can be understood by workers. The policy has been implemented and | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
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| | | <p>communicated to all levels of labor, suppliers, contractors, and the local community. This is evidenced by interviews with representatives of Bipartite and workers in estate and factories.</p> <p>Based on interviews with company representatives and workers, it is known that there is no union in the company, but there is a Bipartite. The company showed the documents establishing Bipartite cooperation for each unit, for example the Decree of the Head of the Regency Manpower and Transmigration Office of Regency Ketapang No: 82/DISNAKERTRANS-B.500.15.13.2/2024 concerning Changes in the Membership Registration of the Bipartite Cooperation Institution PT. Ladang Sawit Mas, September 19, 2024. The results of the interview with the Bipartite cooperation representative found that the Management Representative representing the workers was openly selected by the workers without intervention from the company.</p> | <p>communicated to all levels of labor, suppliers, contractors, and the local community. This is evidenced by interviews with representatives of Bipartite and workers in estate and factories.</p> <p>Based on interviews with company representatives and workers, it is known that there is no union in the company, but there is a Bipartite. The company showed the documents establishing Bipartite cooperation for each unit, for example the Decree of the Head of the Regency Manpower and Transmigration Office of Regency Ketapang No: 82/DISNAKERTRANS-B.500.15.13.2/2024 concerning Changes in the Membership Registration of the Bipartite Cooperation Institution PT. Ladang Sawit Mas, September 19, 2024. The results of the interview with the Bipartite cooperation representative found that the Management Representative representing the workers was openly selected by the workers without intervention from the company.</p> | |
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| 6.3.2 | <p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request</p> | <p>The company keeps records of bipartite meetings. Based on a review of documents and interviews with trade unions and bipartite representatives, at the time of the interview with the representative of the Bipartite, it was known that for the routine meeting to be held every 3 months, the last meeting was held on June 6, 2024.</p> <p>Discussions related to OHS and the prevention of occupational accidents and occupational diseases. Meeting minutes are documented in Indonesian and are available to members upon request. Still based on information from bipartite representatives, they hold meetings every 3 months if there is any or no problem.</p> | <p>The company keeps records of bipartite meetings. Based on a review of documents and interviews with trade unions and bipartite representatives, at the time of the interview with the representative of the Bipartite LKS, it was known that for the routine meeting to be held every 3 months, the last meeting was held on June 6, 2024. Discussions related to OHS and the prevention of occupational accidents and occupational diseases. Meeting minutes are documented in Indonesian and are available to members upon request. Still based on information from bipartite representatives, they hold meetings every 3 months if there is any or no problem.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
| 6.3.3 | <p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers</p> | <p>Based on interviews with LKS Bipartite and company representatives (bipartites), it was emphasized that there was no corporate interference with the establishment or operation of registered Bipartite organizations. Everything is planned and carried out based on an agreement between the management of the Trade Union and the workers. Companies provide freedom for bipartites to express their opinions.</p> | <p>Based on interviews with LKS Bipartite and company representatives (bipartites), it was emphasized that there was no corporate interference with the establishment or operation of registered Bipartite organizations. Everything is planned and carried out based on an agreement between the management of the Trade Union and the workers. Companies provide freedom for bipartites to express their opinions.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>The establishment of the Bipartite LKS is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office of Ketapang Regency. The company provides freedom for workers to express their opinions and also, the company does not provide any intervention related to union activities.</p> | <p>The establishment of the Bipartite LKS is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office of Ketapang Regency. The company provides freedom for workers to express their opinions and also, the company does not provide any intervention related to union activities.</p> | |
| <p>Criterion 6.4: Children are not employed or exploited.</p> | | | | |
| 6.4.1 | <p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements</p> | <p>The Certification Unit has an Internal Office Memo No: 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019 concerning the Human Rights Policy in point 1 which explains that the BGA Group Management of the Nanga Tayap Region strictly prohibits children under the age (less than 18 years old) from working and/or being employed that may endanger the safety, health and morals of children. This applies to both internal workers and contractors. Interviews with CPO/PK transporter contractors, Bipartite cooperation representatives and workers at the Estate and Mill know that they understand the policy.</p> | <p>The Certification Unit has an Internal Office Memo No: 05/IOM/Reg-Nanga Tayap/VI/2019 dated June 16, 2019 concerning the Human Rights Policy in point 1 which explains that the BGA Group Management of the Nanga Tayap Region strictly prohibits children under the age (less than 18 years old) from working and/or being employed that may endanger the safety, health and morals of children. This applies to both internal workers and contractors. Interviews with CPO/PK transporter contractors, Bipartite cooperation representatives and workers at the Estate and Mill know that they understand the policy.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>Based on interviews with worker representatives (LKS Bipartit) and the community around the company, it was confirmed that there were no child workers in the plantations and factories. Based on a review of the Employee Master List for September 2024, no child labor was found on the list. Based on a review of the contract agreement between the company and its contractor, for example, the contract agreement based on No. 001/WIL 8A/LSM/SPK/VIII/2024 dated August 3, 2024, there is a clause stating that it does not employ underage workers (18 years old).</p> | <p>Based on interviews with worker representatives (LKS Bipartit) and the community around the company, it was confirmed that there were no child workers in the plantations and factories. Based on a review of the Employee Master List for September 2024, no child labor was found on the list. Based on a review of the contract agreement between the company and its contractor, for example, the contract agreement based on No. 001/WIL 8A/LSM/SPK/VIII/2024 dated August 3, 2024, there is a clause stating that it does not employ underage workers (18 years old).</p> | |
| 6.4.2 (C) | <p>There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure</p> | <p>The Company has policies (see indicator 6.4.1) and Company Regulations that state and ensure that it does not employ employees under 18 years of age. This minimum working age is in accordance with national regulations (Law No.13/2003 sub chapter 68). Based on a review of the Employee Master List for September 2024, and interviews with representatives of the Bipartite and workers in Mill and Estate, as well as field observations, it is ensured that there are no child laborers in Mill and</p> | <p>The Company has policies (see indicator 6.4.1) and Company Regulations that state and ensure that it does not employ employees under 18 years of age. This minimum working age is in accordance with national regulations (Law No.13/2003 sub chapter 68). Based on a review of the Employee Master List for September 2024, and interviews with representatives of the Bipartite and workers in Mill and Estate, as well as field observations, it is ensured that there are no child laborers in Mill and</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>Estate.</p> <p>This is in line with interviews with Caremaker workers at the daycare and the Manpower Office of Ketapang Regency, that so far there has never been an issue of the use of underage workers in the area of the PT. Ladang Sawit Mas.</p> | <p>Estate.</p> <p>This is in line with interviews with Caremaker workers at the daycare and the Manpower Office of Ketapang Regency, that so far there has never been an issue of the use of underage workers in the area of the PT. Ladang Sawit Mas.</p> | |
| 6.4.3 (C) | <p>Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.</p> | <p>The Company already have age-limiting procedures for employing workers, described in the non-discrimination policy (see indicator 6.4.1). In the context of RSPO member oil palm plantations in Indonesia, young workers are not recognized, but sometimes some students carry out fieldwork practices in oil palm plantations to meet the requirements of the learning curriculum as referred to in Article 70 of Law No. 13 of 2003 concerning Manpower. Related to that, during the audit, the company did not accept students from outside the Mill/Estate who carried out fieldwork practices (internships) in Mill and Estate.</p> | <p>The Company already have age-limiting procedures for employing workers, described in the non-discrimination policy (see indicator 6.4.1). In the context of RSPO member oil palm plantations in Indonesia, young workers are not recognized, but sometimes some students carry out fieldwork practices in oil palm plantations to meet the requirements of the learning curriculum as referred to in Article 70 of Law No. 13 of 2003 concerning Manpower. Related to that, during the audit, the company did not accept students from outside the Mill/Estate who carried out fieldwork practices (internships) in Mill and Estate.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
| 6.4.4 | <p>The unit of certification demonstrates communication about its 'no child labour policy and the negative effects of child labour, and promotes child protection to</p> | <p>The policy (see indicator 6.4.1 above) has been disseminated to all levels of the workforce, for example through warnings at the Cemara Jaya Estate</p> | <p>The policy (see indicator 6.4.1 above) has been disseminated to all levels of the workforce, for example through warnings at the Cemara Jaya Estate</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> |

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| | <p>supervisors and other key staff, smallholders, FFB suppliers and communities where workers live</p> | <p>division office regarding the prohibition of underage employment. This is supported by the results of a review of the documents of the company's workers and contractors which prove that there are no workers under the age of 18 at the time of entering the job. Based on the results of the review of the cooperation agreement document with the contractor, for example, a contract agreement based on No. 001/WIL 8A/LSM/SPK/VIII/2024 dated August 3, 2024, there is a clause stating that it does not employ underage workers (18 years old).</p> <p>In addition, based on field observations and verification, each of the estate and mill Employee Lists for the September 2024 period did not find workers who were less than 18 years old at the time of recruitment. Based on this, it can be concluded that the certification unit has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers</p> | <p>division office regarding the prohibition of underage employment. This is supported by the results of a review of the documents of the company's workers and contractors which prove that there are no workers under the age of 18 at the time of entering the job. Based on the results of the review of the cooperation agreement document with the contractor, for example, a contract agreement based on No. 001/WIL 8A/LSM/SPK/VIII/2024 dated August 3, 2024, there is a clause stating that it does not employ underage workers (18 years old).</p> <p>In addition, based on field observations and verification, each of the estate and mill Employee Lists for the September 2024 period did not find workers who were less than 18 years old at the time of recruitment. Based on this, it can be concluded that the certification unit has a policy on child protection including the prohibition of child labor and has been well documented and known to all workers</p> | <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
| <p>Criterion 6.5: Policies and procedures in place to protect workers' rights.</p> | | | | |

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| <p>6.5.1 (C)</p> | <p>A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce</p> | <p>The formal policy to prohibit all forms of sexual harassment and violence and any other form is explicitly described in Sexual Harassment Procedure No. BGA-SOP-HC-311.2-R0 and in the Employment and human rights policy signed by the Regional Head in June 2019. The Sexual Harassment Procedure explains the reporting mechanism in the event of sexual harassment, the handling of victims and the protection of victims, witnesses, and perpetrators, investigations, and the provision of sanctions.</p> <p>Based on interviews with workers at the Estate and Mill, representatives from the bipartite and gender committees, there were no complaints about harassment or harassment in the workplace and they knew how to report harassment in the workplace. In line with the review of the complaint logbook, grievances, and communications, no cases of sexual harassment and violence and all other forms of workplace harassment and violence were reported.</p> | <p>The formal policy to prohibit all forms of sexual harassment and violence and any other form is explicitly described in Sexual Harassment Procedure No. BGA-SOP-HC-311.2-R0 and in the Employment and human rights policy signed by the Regional Head in June 2019. The Sexual Harassment Procedure explains the reporting mechanism in the event of sexual harassment, the handling of victims and the protection of victims, witnesses, and perpetrators, investigations, and the provision of sanctions.</p> <p>Based on interviews with workers at the Estate and Mill, representatives from the bipartite and gender committees, there were no complaints about harassment or harassment in the workplace and they knew how to report harassment in the workplace. In line with the review of the complaint logbook, grievances, and communications, no cases of sexual harassment and violence and all other forms of workplace harassment and violence were reported.</p> | <p> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p> |
| <p>6.5.2 (C)</p> | <p>A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce</p> | <p>Formal policies to protect the reproductive rights of all, especially women, are explicitly described in the Policy on the Prevention of Sexual Harassment and Violence contained in</p> | <p>Formal policies to protect the reproductive rights of all, especially women, are explicitly described in the Policy on the Prevention of Sexual Harassment and Violence contained in</p> | <p> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity </p> |

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| | <p>the Employment Policy signed on July 10, 2017. The policy states that the certification unit strives to provide a conducive work environment characterized by equality and mutual respect, and encourages the reporting of all incidents of sexual violence and harassment, as well as violations of reproductive rights experienced by each individual.</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities. Based on an interview with the Gender Committee administrator, the person concerned has conducted socialization through the morning circle to all workers, both men and women.</p> <p>For example, the implementation of this policy is the provision of menstrual leave and maternity leave rights for women, which are regulated in detail in the Company Regulations. The company provides menstrual leave for female workers for two days based on recommendations from the results of clinical examinations. Maternity leave is given paid leave for three months, 1.5 months before childbirth and 1.5 months</p> | <p>the Employment Policy signed on July 10, 2017. The policy states that the certification unit strives to provide a conducive work environment characterized by equality and mutual respect, and encourages the reporting of all incidents of sexual violence and harassment, as well as violations of reproductive rights experienced by each individual.</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities. Based on an interview with the Gender Committee administrator, the person concerned has conducted socialization through the morning circle to all workers, both men and women.</p> <p>For example, the implementation of this policy is the provision of menstrual leave and maternity leave rights for women, which are regulated in detail in the Company Regulations. The company provides menstrual leave for female workers for two days based on recommendations from the results of clinical examinations. Maternity leave is given paid leave for three months, 1.5 months before childbirth and 1.5 months</p> | <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| 6.5.3 | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified | <p>The certification unit has identified the needs of new mothers through questionnaires and interviews with representatives of the gender committee as well as field observations to daycare, it is known that the company has provided a specific place for breastfeeding in daycare with a special time for breastfeeding.</p> <p>Based on interviews with pregnant workers, the company has accommodated them by providing light jobs that do not involve chemical exposure, childcare facilities, and paid maternity leave for three months.</p> | <p>The certification unit has identified the needs of new mothers through questionnaires and interviews with representatives of the gender committee as well as field observations to daycare, it is known that the company has provided a specific place for breastfeeding in daycare with a special time for breastfeeding.</p> <p>Based on interviews with pregnant workers, the company has accommodated them by providing light jobs that do not involve chemical exposure, childcare facilities, and paid maternity leave for three months.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 6.5.4 | Grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. | <p>The mechanism for handling employment complaints developed by the company is in SOP BGA-SOP-HC-311.1.R0 concerning Procedures – Complaint Resolution approved by the director on April 26, 2012. The SOP has explained the mechanism for submitting complaints and the response time for the complaint has been determined by the company.</p> <p>In addition, the company has an Employment and Human Rights Policy adopted by the Regional Head in June</p> | <p>The mechanism for handling employment complaints developed by the company is in SOP BGA-SOP-HC-311.1.R0 concerning Procedures – Complaint Resolution approved by the director on April 26, 2012. The SOP has explained the mechanism for submitting complaints and the response time for the complaint has been determined by the company.</p> <p>In addition, the company has an Employment and Human Rights Policy adopted by the Regional Head in June</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>2019. The policy states that companies will respect human rights as stipulated in Law No. 32 of 1999. The company is also committed to protecting whistleblowers related to human rights. The policy also states that the company is committed to not committing any form of extrajudicial intimidation/violence against human rights defenders, including the use of the military/security forces. The company also protects whistleblowers related to human rights. This is written in the Labor and Human Rights Policy adopted by the Region Head in June 2019.</p> <p>These procedures include respecting anonymity and protecting the whistleblower if requested, for example if reporting a complaint to an employer. Based on the results of interviews with workers at the Mill and the estate concerned, they understand the mechanism of the complaint.</p> | <p>2019. The policy states that companies will respect human rights as stipulated in Law No. 32 of 1999. The company is also committed to protecting whistleblowers related to human rights. The policy also states that the company is committed to not committing any form of extrajudicial intimidation/violence against human rights defenders, including the use of the military/security forces. The company also protects whistleblowers related to human rights. This is written in the Labor and Human Rights Policy adopted by the Region Head in June 2019.</p> <p>These procedures include respecting anonymity and protecting the whistleblower if requested, for example if reporting a complaint to an employer. Based on the results of interviews with workers at the Mill and the estate concerned, they understand the mechanism of the complaint.</p> | |
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Criterion 6.6:

Work is voluntary and specific labor policy and procedures are implemented.

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| <p>6.6.1 (C)</p> | <p>All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages | <p>Based on interviews with representatives of the Bipartite as well as workers in mill and estate, and a review of the Employee List for September 2024, there are no migrant workers in the company, and there is no evidence of any form of forced and trafficked labor, no payment of recruitment fees, no withholding of workers' documents, no forced overtime, no obstacles for workers to stop. All workers work freely.</p> <p>Every contractual agreement between a company and a contractor or supplier, there are clauses related to the fulfilment of legal obligations in Indonesia, some of which are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with this clause, the company always requests the completeness requirements before the contractor works. According to the Bipartite and Gender representative in line with the results of consultation with the representative of the Manpower Office of Ketapang Regency, there are no problems of discrimination and forced</p> | <p>Based on interviews with representatives of the Bipartite as well as workers in mill and estate, and a review of the Employee List for September 2024, there are no migrant workers in the company, and there is no evidence of any form of forced and trafficked labor, no payment of recruitment fees, no withholding of workers' documents, no forced overtime, no obstacles for workers to stop. All workers work freely.</p> <p>Every contractual agreement between a company and a contractor or supplier, there are clauses related to the fulfilment of legal obligations in Indonesia, some of which are related to anti-bribery, anti-corruption, and anti-forced labor. To ensure compliance with this clause, the company always requests the completeness requirements before the contractor works. According to the Bipartite and Gender representative in line with the results of consultation with the representative of the Manpower Office of Ketapang Regency, there are no problems of discrimination and forced</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | labor in the company, and there are no significant obstacles related to employment or violations of company regulations. | labor in the company, and there are no significant obstacles related to employment or violations of company regulations. | |
| 6.6.2 (C) | Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented | <p>Based on a review of special employment procedures, namely the BGA Company Regulation 2023-2025, which explains the status of workers there are PKWT and PKWTT, then the results of the review of employee registration documents, interviews with company representatives and workers in factories and plantations are known that there are no temporary workers or migrant workers in the company. All workers are permanent workers where when the worker is accepted as an employee, they have become permanent workers with a probationary period of 3 months.</p> <p>The company can show a new employee's employment agreement, for example the Employment Agreement Letter dated January 16, 2024 with the initials FS regarding a probationary period of 3 months as an operator of the Land Application, this document explains the type of work, rights and obligations of both parties.</p> | <p>Based on a review of special employment procedures, namely the BGA Company Regulation 2023-2025, which explains the status of workers there are PKWT and PKWTT, then the results of the review of employee registration documents, interviews with company representatives and workers in factories and plantations are known that there are no temporary workers or migrant workers in the company. All workers are permanent workers where when the worker is accepted as an employee, they have become permanent workers with a probationary period of 3 months.</p> <p>The company can show a new employee's employment agreement, for example the Employment Agreement Letter dated January 16, 2024 with the initials FS regarding a probationary period of 3 months as an operator of the Land Application, this document explains the type of work, rights and obligations of both parties.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

| Criterion 6.7: Appropriate health and safety measures are in place. | | | | |
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| 6.7.1 (C) | <p>The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded</p> | <p>The company has formed a team that is responsible for implementing Occupational Health and Safety (OHS) program. This organization is called the OHS Committee (P2K3) which is formed in each management unit. The OHS Committee team has received approval from the Head of the Ketapang Regency Manpower and Transmigration Service and the OHS Committee secretary is a certified occupational health and safety expert. The following are the OHS Committees that have been approved by the relevant agencies and appointed OHS Experts: for example:</p> <ul style="list-style-type: none"> • Ratification of the Occupational Safety and Health Committee (P2K3) of PT Ladang Sawit Mas (560/163/NAKER/TAHUN 2021), which was approved by the Head of the Ketapang Regency Manpower and Transmigration Service on November 8, 2021. • The company also shows OHS Expert permission with Decree No. 5/16699/AS.02.04/XII/2021 which is valid until December 17, 2024 from the Ministry of Manpower of the | <p>The company has formed a team that is responsible for implementing Occupational Health and Safety (OHS) program. This organization is called the OHS Committee (P2K3) which is formed in each management unit. The OHS Committee team has received approval from the Head of the Ketapang Regency Manpower and Transmigration Service and the OHS Committee secretary is a certified occupational health and safety expert. The following are the OHS Committees that have been approved by the relevant agencies and appointed OHS Experts: for example:</p> <ul style="list-style-type: none"> • Ratification of the Occupational Safety and Health Committee (P2K3) of PT Ladang Sawit Mas (560/163/NAKER/TAHUN 2021), which was approved by the Head of the Ketapang Regency Manpower and Transmigration Service on November 8, 2021. • The company also shows OHS Expert permission with Decree No. 5/16699/AS.02.04/XII/2021 which is valid until December 17, 2024 from the Ministry of Manpower of the | <p> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p> |

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| | | <p>Republic of Indonesia on December 17, 2021.</p> <p>The OHS Committee regularly holds quarterly meetings regarding OHS issues in the workplace, the last meeting was held on September 20, 2024. Meeting documentation is recorded and maintained properly. Based on interviews with company management, it is known that the Occupational Health and Safety Committee management holds regular monthly meetings to discuss OHS such as consistent use of PPE, work accident analysis, reports, fire extinguishing simulations, checking emergency response equipment, OHS signs, safety patrols, etc.</p> <p>The Company routinely reports the OHS Committee Report every quarter, for example the OHS Committee Report for the third quarter of 2024 to the Ketapang Regency Manpower and Transmigration Service which was submitted on October 10, 2024.</p> | <p>Republic of Indonesia on December 17, 2021.</p> <p>The OHS Committee regularly holds quarterly meetings regarding OHS issues in the workplace, the last meeting was held on September 20, 2024. Meeting documentation is recorded and maintained properly. Based on interviews with company management, it is known that the Occupational Health and Safety Committee management holds regular monthly meetings to discuss OHS such as consistent use of PPE, work accident analysis, reports, fire extinguishing simulations, checking emergency response equipment, OHS signs, safety patrols, etc.</p> <p>The Company routinely reports the OHS Committee Report every quarter, for example the OHS Committee Report for the third quarter of 2024 to the Ketapang Regency Manpower and Transmigration Service which was submitted on October 10, 2024.</p> | |
| 6.7.2 | <p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are</p> | <p>The company has Emergency Preparedness and Response procedures (Document No: LSM-SUST-SOP-23, January 1, 2019 regarding instructions for handling and preventing emergencies as well as recovery efforts</p> | <p>The company has Emergency Preparedness and Response procedures (Document No: LSM-SUST-SOP-23, January 1, 2019 regarding instructions for handling and preventing emergencies as well as recovery efforts</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement</p> |

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| | <p>present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> | <p>that affect humans, the environment or work activities/processes, such as procedures land fire control, factory and office fire management, explosion prevention and prevention, hazardous spill/leak management and prevention, earthquake handling, evacuation procedures, etc. These procedures are in a language easily understood by workers.</p> <p>Based on field observations, such as in harvesting and upkeep activities and also to Bukit Tinggi Jaya Mill, the procedures clearly understood by all workers and field observations on the warehouse and offices there is availability of first aid and has evacuation route and collecting point.</p> <p>The company also shows the Structure of the Emergency Response Team which has been provided with training and has a First Aid certificate, totaling 2 people. The Emergency Response Team structure consists of Responsible Official Area, Emergency Response Manager, Emergency Response Commander, Head of Equipment and Logistics, Head of Management, Heavy Equipment and Transport, Administration and Investigation, Team.</p> <p>Training regarding first aid kit personnel</p> | <p>that affect humans, the environment or work activities/processes, such as procedures land fire control, factory and office fire management, explosion prevention and prevention, hazardous spill/leak management and prevention, earthquake handling, evacuation procedures, etc. These procedures are in a language easily understood by workers.</p> <p>Based on field observations, such as in harvesting and upkeep activities and also to Bukit Tinggi Jaya Mill, the procedures clearly understood by all workers and field observations on the warehouse and offices there is availability of first aid and has evacuation route and collecting point.</p> <p>The company also shows the Structure of the Emergency Response Team which has been provided with training and has a First Aid certificate, totaling 2 people. The Emergency Response Team structure consists of Responsible Official Area, Emergency Response Manager, Emergency Response Commander, Head of Equipment and Logistics, Head of Management, Heavy Equipment and Transport, Administration and Investigation, Team.</p> <p>Training regarding first aid kit personnel</p> | <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>and emergency response Rantau Factory was conducted on August 22, 2024, for 70 company staff and employees who presented Doctors.</p> <p>As stated in the OHS Committee report and monthly monitoring of work accidents carried out by the OHS committee secretary, it is known that during 2023 – September 2024 there were no work accidents causing fatality at Bukit Tunggal Jaya Mill, Bukit Tunggal Jaya Estate, Natai Jaya Estate, Bengkirai Jaya Estate and Cemara Jaya Estate.</p> | <p>and emergency response Rantau Factory was conducted on August 22, 2024, for 70 company staff and employees who presented Doctors.</p> <p>As stated in the OHS Committee report and monthly monitoring of work accidents carried out by the OHS committee secretary, it is known that during 2023 – September 2024 there were no work accidents causing fatality at Bukit Tunggal Jaya Mill, Bukit Tunggal Jaya Estate, Natai Jaya Estate, Bengkirai Jaya Estate and Cemara Jaya Estate.</p> | |
| 6.7.3 (C) | <p>Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> | <p>All estate and factory units within the company have identified the appropriate PPE for employees based on a risk assessment. PPE records distributed to employees are also recorded by the PIC in the store. During the observation of Harvesting Activities on the estate it is verified that employees are using PPE (safety shoes, and helmets) as identified for maintenance activities. It is also verified through observation of Estate replanting activities, ensuring that employees are using the appropriate PPE. It is also ensured that sanitation facilities are provided so that employees can use them to clean their PPE (particularly for sprayers and</p> | <p>All estate and factory units within the company have identified the appropriate PPE for employees based on a risk assessment. PPE records distributed to employees are also recorded by the PIC in the store. During the observation of Harvesting Activities on the estate it is verified that employees are using PPE (safety shoes, and helmets) as identified for maintenance activities. It is also verified through observation of Estate replanting activities, ensuring that employees are using the appropriate PPE. It is also ensured that sanitation facilities are provided so that employees can use them to clean their PPE (particularly for sprayers and</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>fertilizer applicants) that are exposed to chemicals.</p> <p>For factories, the company has identified the appropriate PPE for employees based on a risk assessment. During observation of employees in the engine room, it is ensured that employees use the appropriate PPE (helmet, safety shoes, earmuffs and gloves) based on PPE identification for the engine room. Observations were also made of employees at the grading station and it was verified that employees were using appropriate PPE (such as safety shoes and helmets) based on PPE identification for welding activities at the grading station, etc.</p> <p>The unit certification unit show documents related to the provision of PPE in the Information Memo document No. 088/MEMO- BGA/CS-CRC/IX/2023 dated 25 September 2023. The guidelines state that for PPE that has been damaged/cannot function properly before the specified replacement frequency, you can request a replacement by bringing the old PPE and getting approval from their respective superiors.</p> <p>In order to implement these regulations, the Company provides adequate</p> | <p>fertilizer applicants) that are exposed to chemicals.</p> <p>For factories, the company has identified the appropriate PPE for employees based on a risk assessment. During observation of employees in the engine room, it is ensured that employees use the appropriate PPE (helmet, safety shoes, earmuffs and gloves) based on PPE identification for the engine room. Observations were also made of employees at the grading station and it was verified that employees were using appropriate PPE (such as safety shoes and helmets) based on PPE identification for welding activities at the grading station, etc.</p> <p>The unit certification unit show documents related to the provision of PPE in the Information Memo document No. 088/MEMO- BGA/CS-CRC/IX/2023 dated 25 September 2023. The guidelines state that for PPE that has been damaged/cannot function properly before the specified replacement frequency, you can request a replacement by bringing the old PPE and getting approval from their respective superiors.</p> <p>In order to implement these regulations, the Company provides adequate</p> | |
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| | | <p>Personal Protective Equipment (PPE) according to its intended purpose to each worker, which is shown as follows:</p> <ul style="list-style-type: none"> Record of PPE Replacement on March 04, 2024. PPE in the form of Boots and uniforms for harvest employees. Record of PPE replacement on September 26, 2024. PPE in the uniforms and apron for sprayer employees. Record of PPE Handover on November 1 2023. PPE in the form of Ear Muffs to kernel operators. <p>In line with the results of document verification, spray workers at Block E52 Natai Estate also explained that employees had received free PPE by the company and understood the mechanism for replacing PPE if PPE was damaged/lost. The PPE currently used by workers is in good condition and ready to use.</p> <p>Based on the explanation above, it is known that Business Actors provide adequate Personal Protective Equipment (PPE) according to its intended purpose to each worker.</p> <p>Sanitation Facilities</p> <p>Based on the results of the field visit, it is known that the company already has</p> | <p>Personal Protective Equipment (PPE) according to its intended purpose to each worker, which is shown as follows:</p> <ul style="list-style-type: none"> Record of PPE Replacement on March 04, 2024. PPE in the form of Boots and uniforms for harvest employees. Record of PPE replacement on September 26, 2024. PPE in the uniforms and apron for sprayer employees. Record of PPE Handover on November 1 2023. PPE in the form of Ear Muffs to kernel operators. <p>In line with the results of document verification, spray workers at Block E52 Natai Estate also explained that employees had received free PPE by the company and understood the mechanism for replacing PPE if PPE was damaged/lost. The PPE currently used by workers is in good condition and ready to use.</p> <p>Based on the explanation above, it is known that Business Actors provide adequate Personal Protective Equipment (PPE) according to its intended purpose to each worker.</p> <p>Sanitation Facilities</p> <p>Based on the results of the field visit, it is known that the company already has</p> | |
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| | | <p>sanitation facilities for workers with chemicals that can clean themselves as well as the equipment used and change clothes, which is also equipped with a storage area for controlling devices and PPE, this is in accordance with the results of interviews with spray workers in Natai Estate who stated that after work they carry out self-cleaning activities and remove PPE in the rinse place provided by the company. The numbers of rinse house or sanitation facility are sufficient because the unit certification had sanitation facility in each division of estates.</p> | <p>sanitation facilities for workers with chemicals that can clean themselves as well as the equipment used and change clothes, which is also equipped with a storage area for controlling devices and PPE, this is in accordance with the results of interviews with spray workers in Natai Estate who stated that after work they carry out self-cleaning activities and remove PPE in the rinse place provided by the company. The numbers of rinse house or sanitation facility are sufficient because the unit certification had sanitation facility in each division of estates.</p> | |
| 6.7.4 | <p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection</p> | <p>The company has provided free medical care to all its workers and is allowed to get medical treatment from the dispensary at the Estate clinic free of charge. If there is a serious injury or accident, the worker will be referred to a public hospital at the expense of the company's management or BPJS.</p> <p>Based on the results of the document review, interviews with workers found that the company has facilitated workers to access the BPJS program. The company has been registered in the BPJS Health and BPJS Employment programs. It is known from the list of BPJS participants for September 2024</p> | <p>The company has provided free medical care to all its workers and is allowed to get medical treatment from the dispensary at the Estate clinic free of charge. If there is a serious injury or accident, the worker will be referred to a public hospital at the expense of the company's management or BPJS.</p> <p>Based on the results of the document review, interviews with workers found that the company has facilitated workers to access the BPJS program. The company has been registered in the BPJS Health and BPJS Employment programs. It is known from the list of BPJS participants for September 2024</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

| | | <p>that all workers are included in the BPJS (health and employment) program. The company also shows proof of payment of BPJS contributions for the September 2024 period which were paid via bank transfer.</p> <p>Based on interviews with harvesters, fertilizer employees and spraying employees, it is known that employees are fully covered by accident insurance in accordance with applicable regulations.</p> <p>In this case all workers provided with health services and protected by work accident insurance. Costs incurred as a result of work incidents, resulting in injury or illness, are borne in accordance with applicable regulations or with unit certification if applicable regulations do not provide protection.</p> | <p>that all workers are included in the BPJS (health and employment) program. The company also shows proof of payment of BPJS contributions for the September 2024 period which were paid via bank transfer.</p> <p>Based on interviews with harvesters, fertilizer employees and spraying employees, it is known that employees are fully covered by accident insurance in accordance with applicable regulations.</p> <p>In this case all workers provided with health services and protected by work accident insurance. Costs incurred as a result of work incidents, resulting in injury or illness, are borne in accordance with applicable regulations or with unit certification if applicable regulations do not provide protection.</p> | | | | | | | | | | | | | |
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| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics | <p>Records of work accidents</p> <p>Work accidents are recorded using the Lost Time Accident (LTA) listed in the Accident Statistic Period 2024 document, which among others explains the number of accident cases, the number of days lost, Frequency Rate (FR) and Severity Rate (SR), among others as follows: following:</p> <table border="1" data-bbox="792 1321 1279 1390"> <thead> <tr> <th>UNIT</th> <th>FR</th> <th>SR</th> </tr> </thead> <tbody> <tr> <td>Area 8A</td> <td>60.40</td> <td>18.43</td> </tr> </tbody> </table> | UNIT | FR | SR | Area 8A | 60.40 | 18.43 | <p>Records of work accidents</p> <p>Work accidents are recorded using the Lost Time Accident (LTA) listed in the Accident Statistic Period 2024 document, which among others explains the number of accident cases, the number of days lost, Frequency Rate (FR) and Severity Rate (SR), among others as follows: following:</p> <table border="1" data-bbox="1279 1321 1783 1390"> <thead> <tr> <th>UNIT</th> <th>FR</th> <th>SR</th> </tr> </thead> <tbody> <tr> <td>Area 8A</td> <td>60.40</td> <td>18.43</td> </tr> </tbody> </table> | UNIT | FR | SR | Area 8A | 60.40 | 18.43 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
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| | | Area 8B | 24.53 | 15.75 | Area 8B | 24.53 | 15.75 | |
| | | <p>From the results of a review of work accident records during the 2024 period, it is known that there were no major accidents that required the company to make a claim to the BPJS.</p> | | | <p>From the results of a review of work accident records during the 2024 period, it is known that there were no major accidents that required the company to make a claim to the BPJS.</p> | | | |

Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment

Criterion 7.1:

IPM plans are implemented and monitored to ensure effective pest control.

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| 7.1.1 (C) | IPM plans are implemented and monitored to ensure effective pest control. | <p>The company has a program for pest and disease control in 2024 with the Integrated Pest Management (IPM) mechanism, activities in the IPM include a census of leafworms and rats, planting beneficial plants and installing owl cages. The company has shown the implementation of the planned program, including the recapitulation of the leaf and rat pest census, the recapitulation of the realization of planting and caring for beneficial plants, the recapitulation of the progress of installing owl cages.</p> <p>Based on census summary and maps of infestation of January – October 2024, known that there was no pest and disease infestation exceed the economical threshold, therefore no usage of pesticide to pest and disease control, except for routine weed control.</p> | <p>The company has a program for pest and disease control in 2024 with the Integrated Pest Management (IPM) mechanism, activities in the IPM include a census of leafworms and rats, planting beneficial plants and installing owl cages. The company has shown the implementation of the planned program, including the recapitulation of the leaf and rat pest census, the recapitulation of the realization of planting and caring for beneficial plants, the recapitulation of the progress of installing owl cages.</p> <p>Based on census summary and maps of infestation of January – October 2024, known that there was no pest and disease infestation exceed the economical threshold, therefore no usage of pesticide to pest and disease control, except for routine weed control.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 7.1.2 | Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. | Results Based on document review and visits, it is known that the company uses species control agents including: Turnera subulata, Antigonon leptopus, and Cassia cabonensis which species are not invasive according to the Minister | Results Based on document review and visits, it is known that the company uses species control agents including: Turnera subulata, Antigonon leptopus, and Cassia cabonensis which species are not invasive according to the Minister | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement |

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| | | of Environment and Forestry Regulation no. P.94/MENLHK/SEKJEN/KUM.1/12/2016. | of Environment and Forestry Regulation no. P.94/MENLHK/SEKJEN/KUM.1/12/2016. | <input type="checkbox"/> Not Applicable (justification required) |
| 7.1.3 | There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with ap prior approval of government authorities. [For NI to define process] | Based on the results of interviews with company management, it is known that the company has never used fire to control pests and diseases. Pest and disease control in the company only uses biological and chemical if it is above the set threshold. | Based on the results of interviews with company management, it is known that the company has never used fire to control pests and diseases. Pest and disease control in the company only uses biological and chemical if it is above the set threshold. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| Criterion 7.2: | | | | |
| Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | | |
| 7.2.1 (C) | Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. | The certification unit has shown the SOP for the Safe Use of Pesticides. The purpose of the procedure is that workers handling pesticides are always aware of the magnitude of the danger of poisoning and the level of health risk due to their work activities, in addition to carrying out safe and appropriate operational performance related to the use of pesticides in accordance with the instructions for use. The contents of the procedure include the level of material hazard based on WHO class, level of poisoning based on LD50, statement of material hazard, color and hazard symbols and danger signs. | The certification unit has shown the SOP for the Safe Use of Pesticides. The purpose of the procedure is that workers handling pesticides are always aware of the magnitude of the danger of poisoning and the level of health risk due to their work activities, in addition to carrying out safe and appropriate operational performance related to the use of pesticides in accordance with the instructions for use. The contents of the procedure include the level of material hazard based on WHO class, level of poisoning based on LD50, statement of material hazard, color and hazard symbols and danger signs. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | Based on document review, interviews, and field observations during the onsite audit, it is known that the certification unit already has justification for the application of pesticides, the certification unit has shown a document listing the pesticides used in the 2023 - 2024 period. The document explains the name of the pesticide, active ingredient, registration and the purpose of using the pesticide. | Based on document review, interviews, and field observations during the onsite audit, it is known that the certification unit already has justification for the application of pesticides, the certification unit has shown a document listing the pesticides used in the 2023 - 2024 period. The document explains the name of the pesticide, active ingredient, registration and the purpose of using the pesticide. | |
| 7.2.2 (C) | Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. | The company has shown documents on the use of pesticides for the period 2023 - 2024. The documents describe the type of pesticide, active ingredient, LD50, active ingredient content, amount of pesticide use, area of pesticide use, and pesticide use per hectare. | The company has shown documents on the use of pesticides for the period 2023 - 2024. The documents describe the type of pesticide, active ingredient, LD50, active ingredient content, amount of pesticide use, area of pesticide use, and pesticide use per hectare. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 7.2.3 (C) | Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. | The Company has a commitment to minimize the use of pesticides and has the IPM concept. Based on the leaf eater caterpillar census in All Estate in October 2024 with attacks below the threshold correlated with planting beneficial plants in All Estate area as leaf eater caterpillar biological control using <i>Turnera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonon leptosus</i> . This means that the use of pesticides controlling leaf eater caterpillar can be | The Company has a commitment to minimize the use of pesticides and has the IPM concept. Based on the leaf eater caterpillar census in All Estate in October 2024 with attacks below the threshold correlated with planting beneficial plants in All Estate area as leaf eater caterpillar biological control using <i>Turnera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonon leptosus</i> . This means that the use of pesticides controlling leaf eater caterpillar can be | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>minimized according to the IPM plan. It is noted that the use of chemicals for pesticides and herbicides has been minimized every year, for example in the use of Glyphosate in 2022 it was 1,377 liters, in 2023 it was 511 liters and in 2024 (up to September) it was 12 liters.</p> <p>Based on verification document of pesticide use for the period January - October 2024, it was found that the certification unit no longer used pesticides with the active ingredients of paraquat dichloride, brodifacum, coumatetralyl, and carbofuran. This shows that the certification unit has implemented a policy of limited pesticide use in accordance with the circular described above.</p> | <p>minimized according to the IPM plan. It is noted that the use of chemicals for pesticides and herbicides has been minimized every year, for example in the use of Glyphosate in 2022 it was 1,377 liters, in 2023 it was 511 liters and in 2024 (up to September) it was 12 liters.</p> <p>Based on verification document of pesticide use for the period January - October 2024, it was found that the certification unit no longer used pesticides with the active ingredients of paraquat dichloride, brodifacum, coumatetralyl, and carbofuran. This shows that the certification unit has implemented a policy of limited pesticide use in accordance with the circular described above.</p> | |
| 7.2.4 | <p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> | <p>Regarding the use of pesticides for pest control, it is based on census results. Weed control is carried out based on a work plan taking into account weed growth in the field. Based on this, it is known that there is no preventive use of pesticides (prophylactic use).</p> | <p>Regarding the use of pesticides for pest control, it is based on census results. Weed control is carried out based on a work plan taking into account weed growth in the field. Based on this, it is known that there is no preventive use of pesticides (prophylactic use).</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
| 7.2.5 | <p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam</p> | <p>The company has justification for the use of selective pesticides according to pest specifications, both in pest,</p> | <p>The company has justification for the use of selective pesticides according to pest specifications, both in pest,</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity</p> |

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| | <p>Conventions, and paraquat, are not used, unless unexceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application 7.2.5</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> | <p>disease and weed control procedures, as well as a management commitment to update 2022. The document contains the type and name of the pesticide, physical form, active ingredient, group according to WHO, , target selective, manufacturer, register number at the Pesticide Commission. From the review of the document, it is known that the pesticides used do not fall into categories 1A, 1B, the Stockholm/Rotterdam Convention, and there is no paraquat.</p> <p>Regarding the commitment to reduce the use of pesticides, it has been stated in the Bumitama Agri Ltd Sustainability Policy document updated 31 December 2022, which explains "We prohibit the use of WHO Class 1A and 1B pesticides and other chemicals specified in the Stockholm and Rotterdam Conventions. We are implementing a strict permanent ban on the use of paraquat. This policy applies to all of our operations and all of our suppliers' operations.</p> <p>We implement an integrated pest management (IPM) plan to optimize the use of pesticides and other chemicals, through maintenance of biological control agents and beneficial plants to</p> | <p>disease and weed control procedures, as well as a management commitment to update 2022. The document contains the type and name of the pesticide, physical form, active ingredient, group according to WHO, , target selective, manufacturer, register number at the Pesticide Commission. From the review of the document, it is known that the pesticides used do not fall into categories 1A, 1B, the Stockholm/Rotterdam Convention, and there is no paraquat.</p> <p>Regarding the commitment to reduce the use of pesticides, it has been stated in the Bumitama Agri Ltd Sustainability Policy document updated 31 December 2022, which explains "We prohibit the use of WHO Class 1A and 1B pesticides and other chemicals specified in the Stockholm and Rotterdam Conventions. We are implementing a strict permanent ban on the use of paraquat. This policy applies to all of our operations and all of our suppliers' operations.</p> <p>We implement an integrated pest management (IPM) plan to optimize the use of pesticides and other chemicals, through maintenance of biological control agents and beneficial plants to</p> | <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <p>reduce environmental and health hazards and to ensure optimal crop yields for the long term.”</p> <p>Based on census summary and maps of infestation of January – October 2024, known that there was no pest and disease infestation exceed the economical threshold, therefore no usage of pesticide to pest and disease control, except for routine weed control.</p> | <p>reduce environmental and health hazards and to ensure optimal crop yields for the long term.”</p> <p>Based on census summary and maps of infestation of January – October 2024, known that there was no pest and disease infestation exceed the economical threshold, therefore no usage of pesticide to pest and disease control, except for routine weed control.</p> | |
| 7.2.6 (C) | <p>Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> | <p>Pesticide applications have been carried out by persons who have completed the required training, and have been applied according to the product label and pesticide handling procedure.</p> <p>Based on interviews with spray workers, if there are female spray workers, they are not allowed to be pregnant and or breastfeeding and are transferred to other jobs that are identified as safe for them. The allowed working age is above 18 years. It is also showed that workers were able to explain the safe handling of pesticides according to procedures. The source informed that they had received training in handling pesticides from the company. The results of field observations also showed that workers had implemented safe work techniques with appropriate PPE according to the</p> | <p>Pesticide applications have been carried out by persons who have completed the required training, and have been applied according to the product label and pesticide handling procedure.</p> <p>Based on interviews with spray workers, if there are female spray workers, they are not allowed to be pregnant and or breastfeeding and are transferred to other jobs that are identified as safe for them. The allowed working age is above 18 years. It is also showed that workers were able to explain the safe handling of pesticides according to procedures. The source informed that they had received training in handling pesticides from the company. The results of field observations also showed that workers had implemented safe work techniques with appropriate PPE according to the</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>HIRAC. Appropriate PPE has been provided and used by workers. If damaged, PPE can be easily replaced. Workers can explain that after spray application, work tools and PPE exposed to pesticides are washed and stored at home rinse, and workers clean themselves and change into clean clothes before returning home. The company also demonstrated Training on proper and proper spraying techniques for spray workers on August 13, 2024.</p> | <p>HIRAC. Appropriate PPE has been provided and used by workers. If damaged, PPE can be easily replaced. Workers can explain that after spray application, work tools and PPE exposed to pesticides are washed and stored at home rinse, and workers clean themselves and change into clean clothes before returning home. The company also demonstrated Training on proper and proper spraying techniques for spray workers on August 13, 2024.</p> | |
| 7.2.7 (C) | <p>Storage of all pesticides is in accordance with recognised best practices.</p> | <p>The company shows procedures/policies related to pesticide mitigation which are contained in document Number BGAAGRKS- SOP-14 dated 04 January 2011 concerning Pesticide Management, this document explains the classification of pesticides, procedures for using pesticides, storing pesticides, pesticide poisoning and its symptoms, first aid against pesticide poisoning.</p> <p>Pesticide storage in the company is in accordance with best practices. The results of field observations in the pesticide warehouse area at BTJE and NJYE show that pesticides have been grouped by type, there is an MSDS in a language understood by workers, symbols for dangerous and toxic</p> | <p>The company shows procedures/policies related to pesticide mitigation which are contained in document Number BGAAGRKS- SOP-14 dated 04 January 2011 concerning Pesticide Management, this document explains the classification of pesticides, procedures for using pesticides, storing pesticides, pesticide poisoning and its symptoms, first aid against pesticide poisoning.</p> <p>Pesticide storage in the company is in accordance with best practices. The results of field observations in the pesticide warehouse area at BTJE and NJYE show that pesticides have been grouped by type, there is an MSDS in a language understood by workers, symbols for dangerous and toxic</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>substances, in a place that has good air circulation and sufficient lighting. The warehouse is locked and there is a restricted area warning and the use of PPE when accessing it. The results of interviews with workers revealed that workers were able to explain and demonstrate safe work techniques in the area and spray tools are not brought home.</p> <p>Based on the explanation above, it is concluded that the company has procedures/policies related to pesticide mitigation and they have been socialized.</p> | <p>substances, in a place that has good air circulation and sufficient lighting. The warehouse is locked and there is a restricted area warning and the use of PPE when accessing it. The results of interviews with workers revealed that workers were able to explain and demonstrate safe work techniques in the area and spray tools are not brought home.</p> <p>Based on the explanation above, it is concluded that the company has procedures/policies related to pesticide mitigation and they have been socialized.</p> | |
| 7.2.8 | All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | The certification unit already has the SOP for the management of pesticide packaging waste, namely the number GA/LSM- K3/IK-01/03/2012, ratified on March 12, 2012 and the SOP for the Management of Hazardous and Toxic waste, namely Number LSM-SUST-SOP-14 which was ratified on 19 July 2021. The procedure explains that all used pesticide packaging that is empty must be controlled and managed properly in circulation and cannot be used for employee needs, such as for water containers, food containers, and others. Used pesticide packages that are not reused must be immediately | The certification unit already has the SOP for the management of pesticide packaging waste, namely the number GA/LSM- K3/IK-01/03/2012, ratified on March 12, 2012 and the SOP for the Management of Hazardous and Toxic waste, namely Number LSM-SUST-SOP-14 which was ratified on 19 July 2021. The procedure explains that all used pesticide packaging that is empty must be controlled and managed properly in circulation and cannot be used for employee needs, such as for water containers, food containers, and others. Used pesticide packages that are not reused must be immediately | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>perforated at the bottom and sent to the Hazardous and Toxic Waste Warehouse.</p> <p>Based on field observation and interviews with pesticide warehouses and temporary storage areas for hazardous and toxic waste materials officers, in BTJE and NJYE and rinse rooms, it was found that pesticide storage areas are well managed. Oil traps are available, adequate ventilation and safe location with no potential pesticide exposure. Before being stored in a temporary storage area for hazardous and toxic waste or reuse of used pesticide packaging such as jerry cans, it has to be rinsed first.</p> <p>Based on document review it is known that the company has also conducted training on pesticides for small holders, for example training on pesticide handling at Division 1 Natai Jaya Estate Block which was attended by 13 participants on September 03, 2024.</p> | <p>perforated at the bottom and sent to the Hazardous and Toxic Waste Warehouse.</p> <p>Based on field observation and interviews with pesticide warehouses and temporary storage areas for hazardous and toxic waste materials officers, in BTJE and NJYE and rinse rooms, it was found that pesticide storage areas are well managed. Oil traps are available, adequate ventilation and safe location with no potential pesticide exposure. Before being stored in a temporary storage area for hazardous and toxic waste or reuse of used pesticide packaging such as jerry cans, it has to be rinsed first.</p> <p>Based on document review it is known that the company has also conducted training on pesticides for small holders, for example training on pesticide handling at Division 1 Natai Jaya Estate Block which was attended by 13 participants on September 03, 2024.</p> | |
| 7.2.9 (C) | <p>Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial</p> | <p>Based on the review of pesticide use documents and interviews with company management, it is known that the company does not carry out pest control by spraying pesticides through the air.</p> | <p>Based on the review of pesticide use documents and interviews with company management, it is known that the company does not carry out pest control by spraying pesticides through the air.</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement</p> |

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| | spraying. | | | <input type="checkbox"/> Not Applicable (justification required) |
| 7.2.10 (C) | Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | <p>Records of the results of special health examinations for pesticide operators for period 1 of 2023 have been shown, as follows:</p> <ul style="list-style-type: none"> • BTJE, NJYE, CJAE, CMJE and HJYE Health Examination Results Recapitulation Form, implemented on August 2024. Cholinesterase and spirometry examinations for spray workers, with results there is several workers needs further examinations. The Company has conducted follow up examinations and the results are the workers fit to work. <p>In addition, based on interviews with workers, it is known that they have never had a work accident caused by chemicals such as irritants.</p> <p>Based on this, it is known that records of the results of annual special health examinations for pesticide operators are available.</p> | <p>Records of the results of special health examinations for pesticide operators for period 1 of 2023 have been shown, as follows:</p> <ul style="list-style-type: none"> • BTJE, NJYE, CJAE, CMJE and HJYE Health Examination Results Recapitulation Form, implemented on August 2024. Cholinesterase and spirometry examinations for spray workers, with results there is several workers needs further examinations. The Company has conducted follow up examinations and the results are the workers fit to work. <p>In addition, based on interviews with workers, it is known that they have never had a work accident caused by chemicals such as irritants.</p> <p>Based on this, it is known that records of the results of annual special health examinations for pesticide operators are available.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 7.2.11 (C) | No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. | Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got | Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |

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| | | <p>information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breastfeeding.</p> | <p>information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breastfeeding.</p> | <p><input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner | | | | |
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| 7.3.1 | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. | Waste Management and Monitoring: The company has provided evidence that waste has been identified based on its toxicity and hazard characteristics, and managed in accordance with waste management procedures and government regulations. Waste identification and management plans are documented in the Waste Source Identification and Management document. Waste sources and potential pollution from the mill and plantation have been identified. Examples include: <ul style="list-style-type: none"> • Machine rooms producing emissions from generators. • Sterilizer stations generating solid waste and scattered loose fruit. • Chemical storage areas producing solid waste, such as used chemical containers, etc. | Waste Management and Monitoring: The company has provided evidence that waste has been identified based on its toxicity and hazard characteristics, and managed in accordance with waste management procedures and government regulations. Waste identification and management plans are documented in the Waste Source Identification and Management document. Waste sources and potential pollution from the mill and plantation have been identified. Examples include: <ul style="list-style-type: none"> • Machine rooms producing emissions from generators. • Sterilizer stations generating solid waste and scattered loose fruit. • Chemical storage areas producing solid waste, such as used chemical containers, etc. | <input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| | | Wastewater Treatment (POME): The processing of waste in the mill is conducted using a WWTP (Wastewater Treatment Plant) pond system. Before being used on plantation land, all wastewater is treated in the WWTP pond to meet the required quality standards for wastewater use, including pH 6-9 and BOD ≤ 5000 mg/l. The Bukit Tunggal Jaya (BTJM) Mill has obtained a waste management permit for disposal or application on soil, in line with the Palm Oil | Wastewater Treatment (POME): The processing of waste in the mill is conducted using a WWTP (Wastewater Treatment Plant) pond system. Before being used on plantation land, all wastewater is treated in the WWTP pond to meet the required quality standards for wastewater use, including pH 6-9 and BOD ≤ 5000 mg/l. The Bukit Tunggal Jaya (BTJM) Mill has obtained a waste management permit for disposal or application on soil, in line with the Palm Oil | |

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| | | <p>Wastewater Utilization Permit No. 035/DPMPSTP-D/2020 issued on February 20, 2020, valid for 5 years.</p> <p>Solid Waste (Fiber, Shells, and EFB): The certification unit uses fiber and shells as boiler fuel, while Empty Fruit Bunches (EFB) are applied to plantation land as fertilizer for oil palm crops.</p> <p>Hazardous Waste: The company has an SOP for Hazardous Waste Management, outlined in the document Hazardous and Toxic Waste Management (document number LSM-SUST-SOP-15, Revision 1, dated February 11, 2023). The SOP includes the following:</p> <ul style="list-style-type: none"> • Hazardous waste is stored in designated areas, specifically in Temporary Hazardous Waste Storage Areas (TPS LB3) with a permit. • A Hazardous Waste Logbook must be available in the temporary storage facility with up-to-date data. • Hazardous waste containers must be labeled with appropriate symbols and markings according to hazardous waste packaging regulations. <p>The Certification Unit conducted a socialization on hazardous waste on August 8, 2023, with topics including maintaining cleanliness in workshops and hazardous waste storage areas, managing oil spills, and storing hazardous waste</p> | <p>Wastewater Utilization Permit No. 035/DPMPSTP-D/2020 issued on February 20, 2020, valid for 5 years.</p> <p>Solid Waste (Fiber, Shells, and EFB): The certification unit uses fiber and shells as boiler fuel, while Empty Fruit Bunches (EFB) are applied to plantation land as fertilizer for oil palm crops.</p> <p>Hazardous Waste: The company has an SOP for Hazardous Waste Management, outlined in the document Hazardous and Toxic Waste Management (document number LSM-SUST-SOP-15, Revision 1, dated February 11, 2023). The SOP includes the following:</p> <ul style="list-style-type: none"> • Hazardous waste is stored in designated areas, specifically in Temporary Hazardous Waste Storage Areas (TPS LB3) with a permit. • A Hazardous Waste Logbook must be available in the temporary storage facility with up-to-date data. • Hazardous waste containers must be labeled with appropriate symbols and markings according to hazardous waste packaging regulations. <p>The Certification Unit conducted a socialization on hazardous waste on August 8, 2023, with topics including maintaining cleanliness in workshops and hazardous waste storage areas, managing oil spills, and storing hazardous waste</p> | |
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| | | <p>properly.</p> <p>Hazardous Waste Storage and Permits:</p> <ul style="list-style-type: none"> • Ketapang Regent's Decree No. 362/DPMPTSP-D.B.2018 on the temporary hazardous waste storage permit for PT Ladang Sawit Mas in Nanga Tayap, dated October 23, 2018, valid for 5 years. The storage location is at the Bukit Tunggal Jaya Mill with coordinates S 01°32'44" and E 110°20'38". • The company has also shown a technical request for the hazardous waste storage facility with registration number R202401220004 dated August 1, 2024, which includes types of waste stored such as used batteries, laboratory waste, B3-contaminated waste, expired chemicals, and other hazardous materials. The storage is located at BTJM with coordinates S 01°32'44" and E 110°20'38". • PT Nabati Agro Subur received the Environmental Management Commitment Approval for its palm oil plantation operations in Nanga Tayap, Ketapang, under Ministry of Environment and Forestry Decree No. SK.13391/MenLHK-PKTL/PDLUK/PLA.4/12/2023, including the management of B3 waste such as used batteries, expired pharmaceutical products, used lubricants, medical waste, etc. The hazardous waste storage facility is | <p>properly.</p> <p>Hazardous Waste Storage and Permits:</p> <ul style="list-style-type: none"> • Ketapang Regent's Decree No. 362/DPMPTSP-D.B.2018 on the temporary hazardous waste storage permit for PT Ladang Sawit Mas in Nanga Tayap, dated October 23, 2018, valid for 5 years. The storage location is at the Bukit Tunggal Jaya Mill with coordinates S 01°32'44" and E 110°20'38". • The company has also shown a technical request for the hazardous waste storage facility with registration number R202401220004 dated August 1, 2024, which includes types of waste stored such as used batteries, laboratory waste, B3-contaminated waste, expired chemicals, and other hazardous materials. The storage is located at BTJM with coordinates S 01°32'44" and E 110°20'38". • PT Nabati Agro Subur received the Environmental Management Commitment Approval for its palm oil plantation operations in Nanga Tayap, Ketapang, under Ministry of Environment and Forestry Decree No. SK.13391/MenLHK-PKTL/PDLUK/PLA.4/12/2023, including the management of B3 waste such as used batteries, expired pharmaceutical products, used lubricants, medical waste, etc. The hazardous waste storage facility is | |
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| | | <p>located at 01°32'54.42" LS and 110°36'18.9" BT.</p> <p>Hazardous Waste Transportation: The company has agreements with PT Semesta Langgeng Sentosa for hazardous waste transportation:</p> <ul style="list-style-type: none"> • Agreement No. 10/MOU/LSM-SLS/add I/III/2023 (dated February 19, 2024) for waste transportation between PT Ladang Sawit Mas and PT Semesta Langgeng Sentosa, valid from March 1, 2023, to March 1, 2025. • Tripartite Agreement No. 0743/TJS/SPK/IV/2024 (dated April 1, 2024) for B3 waste management and transportation between PT Tenang Jaya Sejahtera, PT Semesta Langgeng Sentosa, and PT Ladang Sawit Mas, valid from April 1, 2024, to March 1, 2025. <p>PT Tenang Jaya Sejahtera holds the following licenses for managing hazardous waste:</p> <ul style="list-style-type: none"> • B3 Waste Collection Permit (S.291/PSLB3/PLB3/PLB.3/4/2022, dated April 20, 2022, valid for 5 years). • B3 Waste Transportation Permit (S.337/PSLB3-PLB3/PK/PLB.3/5/2023, valid until May 30, 2028). <p>Manifest for Hazardous Waste Transportation: The company can show the latest</p> | <p>located at 01°32'54.42" LS and 110°36'18.9" BT.</p> <p>Hazardous Waste Transportation: The company has agreements with PT Semesta Langgeng Sentosa for hazardous waste transportation:</p> <ul style="list-style-type: none"> • Agreement No. 10/MOU/LSM-SLS/add I/III/2023 (dated February 19, 2024) for waste transportation between PT Ladang Sawit Mas and PT Semesta Langgeng Sentosa, valid from March 1, 2023, to March 1, 2025. • Tripartite Agreement No. 0743/TJS/SPK/IV/2024 (dated April 1, 2024) for B3 waste management and transportation between PT Tenang Jaya Sejahtera, PT Semesta Langgeng Sentosa, and PT Ladang Sawit Mas, valid from April 1, 2024, to March 1, 2025. <p>PT Tenang Jaya Sejahtera holds the following licenses for managing hazardous waste:</p> <ul style="list-style-type: none"> • B3 Waste Collection Permit (S.291/PSLB3/PLB3/PLB.3/4/2022, dated April 20, 2022, valid for 5 years). • B3 Waste Transportation Permit (S.337/PSLB3-PLB3/PK/PLB.3/5/2023, valid until May 30, 2028). <p>Manifest for Hazardous Waste Transportation: The company can show the latest</p> | |
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| | | <p>Hazardous Waste Transport Manifest for transportation from the Temporary Hazardous Waste Storage at Bukit Tunggal Jaya Mill on October 4, 2024, using authorized vehicles:</p> <ul style="list-style-type: none"> • KLHK-1739151053, dated October 4, 2024, vehicle KH8901 GN, carrying 0.20 tons of used B3 packaging. • KLHK-1739261339, dated October 4, 2024, vehicle KH8716 GN, carrying 0.047 tons of infectious waste. • KLHK-1739153099, dated October 4, 2024, vehicle KH8901GN, carrying 2.16 tons of used oil. <p>Domestic Solid Waste Management: The company has an SOP for Domestic Solid Waste Management, outlined in the document Solid Waste Management for Housing and Offices (document number LSM-SUST-SOP-41, Revision 0). This SOP covers the following:</p> <ul style="list-style-type: none"> • Sufficient waste bins must be provided in residential complexes, offices, and other facilities. • Temporary Waste Disposal Areas (TPS) should store waste before it is sent to the final disposal site, with separate containers for organic and inorganic waste. • All waste sent from TPS to the final disposal site must be documented for type and amount. • All employees and workers in housing, office, or other work facilities must dispose of waste in the designated | <p>Hazardous Waste Transport Manifest for transportation from the Temporary Hazardous Waste Storage at Bukit Tunggal Jaya Mill on October 4, 2024, using authorized vehicles:</p> <ul style="list-style-type: none"> • KLHK-1739151053, dated October 4, 2024, vehicle KH8901 GN, carrying 0.20 tons of used B3 packaging. • KLHK-1739261339, dated October 4, 2024, vehicle KH8716 GN, carrying 0.047 tons of infectious waste. • KLHK-1739153099, dated October 4, 2024, vehicle KH8901GN, carrying 2.16 tons of used oil. <p>Domestic Solid Waste Management: The company has an SOP for Domestic Solid Waste Management, outlined in the document Solid Waste Management for Housing and Offices (document number LSM-SUST-SOP-41, Revision 0). This SOP covers the following:</p> <ul style="list-style-type: none"> • Sufficient waste bins must be provided in residential complexes, offices, and other facilities. • Temporary Waste Disposal Areas (TPS) should store waste before it is sent to the final disposal site, with separate containers for organic and inorganic waste. • All waste sent from TPS to the final disposal site must be documented for type and amount. • All employees and workers in housing, office, or other work facilities must dispose of waste in the designated | |
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| | | <p>containers.</p> <p>This comprehensive waste management approach ensures that the company complies with environmental regulations and implements responsible waste handling practices across its operations.</p> <p>The company has established a Domestic Waste Management Procedure, outlined in LSM-SUST-SOP-41, Revision 1, dated May 18, 2023. This procedure states that if waste falls under the category of hazardous waste (B3), its management must follow the BGA CCS No. 1101 SOP for B3 waste management. It also specifies that all employees and workers in the housing areas must dispose of waste in the provided bins.</p> <p>During a field observation at TPSA CMJE Block E25, it was noted that used lubricant containers were improperly discarded in the waste disposal area (TPSA). In addition, a visit to the residential areas of Division 2 and 3, Block G40 BJYE revealed that domestic waste was still accumulating behind the housing units</p> <p>A review of company documents showed that these issues have been identified previously in the same indicator during the RSPO ASA-3 Surveillance Audit by the certification body, PT Mutu Agung Lestari. The audit also highlighted similar findings related to waste management.</p> | <p>containers.</p> <p>This comprehensive waste management approach ensures that the company complies with environmental regulations and implements responsible waste handling practices across its operations.</p> <p>The company has established a Domestic Waste Management Procedure, outlined in LSM-SUST-SOP-41, Revision 1, dated May 18, 2023. This procedure states that if waste falls under the category of hazardous waste (B3), its management must follow the BGA CCS No. 1101 SOP for B3 waste management. It also specifies that all employees and workers in the housing areas must dispose of waste in the provided bins.</p> <p>During a field observation at TPSA CMJE Block E25, it was noted that used lubricant containers were improperly discarded in the waste disposal area (TPSA). In addition, a visit to the residential areas of Division 2 and 3, Block G40 BJYE revealed that domestic waste was still accumulating behind the housing units</p> <p>A review of company documents showed that these issues have been identified previously in the same indicator during the RSPO ASA-3 Surveillance Audit by the certification body, PT Mutu Agung Lestari. The audit also highlighted similar findings related to waste management.</p> | |
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| | | <p>The company conducted a waste management socialization session on September 5, 2024, specifically for CMJE employees regarding the handling of B3 waste. However, the company has not demonstrated significant progress or corrective actions to prevent the recurrence of these issues.</p> <p>A Minor Nonconformance was raised during the audit, which was subsequently escalated to Major Nonconformance (CAR#08) due to the company's lack of visible improvement or actions to address the identified waste management issues and prevent them from happening again. CAR#08</p> | <p>The company conducted a waste management socialization session on September 5, 2024, specifically for CMJE employees regarding the handling of B3 waste. However, the company has not demonstrated significant progress or corrective actions to prevent the recurrence of these issues.</p> <p>A Minor Nonconformance was raised during the audit, which was subsequently escalated to Major Nonconformance (CAR#08) due to the company's lack of visible improvement or actions to address the identified waste management issues and prevent them from happening again. CAR#08</p> | |
| 7.3.2 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> | <p>The company has established plans and procedures for managing different types of waste (solid, liquid, air, and domestic) within its operational units. These procedures are documented as follows:</p> <ul style="list-style-type: none"> • LSM-SUST-SOP-41, Revision 1, dated May 18, 2023, for domestic waste management. • LSM-SUST-SOP-15, dated February 11, 2023, for hazardous waste (B3) management <p>The company has implemented waste management practices in accordance with the types of waste generated:</p> <ul style="list-style-type: none"> • Domestic Waste: In residential areas, waste is collected in provided bins and transported to the final disposal site | <p>The company has established plans and procedures for managing different types of waste (solid, liquid, air, and domestic) within its operational units. These procedures are documented as follows:</p> <ul style="list-style-type: none"> • LSM-SUST-SOP-41, Revision 1, dated May 18, 2023, for domestic waste management. • LSM-SUST-SOP-15, dated February 11, 2023, for hazardous waste (B3) management <p>The company has implemented waste management practices in accordance with the types of waste generated:</p> <ul style="list-style-type: none"> • Domestic Waste: In residential areas, waste is collected in provided bins and transported to the final disposal site | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>twice a week.</p> <ul style="list-style-type: none"> • Hazardous Waste: For hazardous materials such as used chemical containers (e.g., pesticide containers, paint cans, etc.), the waste is sent to a licensed Temporary Hazardous Waste Storage (TPS LB3) facility. The hazardous waste generated at the Palm Oil Mill (POM) is stored in a designated and permitted TPS LB3. <p>The company has conducted socialization efforts to raise awareness among employees about waste management procedures and the prohibition of reusing hazardous waste. For instance, on September 5, 2024, a socialization session on managing B3 and domestic waste was held for employees at the CMJE (CMJE employee housing area).</p> | <p>twice a week.</p> <ul style="list-style-type: none"> • Hazardous Waste: For hazardous materials such as used chemical containers (e.g., pesticide containers, paint cans, etc.), the waste is sent to a licensed Temporary Hazardous Waste Storage (TPS LB3) facility. The hazardous waste generated at the Palm Oil Mill (POM) is stored in a designated and permitted TPS LB3. <p>The company has conducted socialization efforts to raise awareness among employees about waste management procedures and the prohibition of reusing hazardous waste. For instance, on September 5, 2024, a socialization session on managing B3 and domestic waste was held for employees at the CMJE (CMJE employee housing area).</p> | |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. | <p>The company has a Domestic Solid Waste Management SOP, detailed in the document LSM-SUST-SOP-41, Revision 0, which outlines the following key points:</p> <ul style="list-style-type: none"> • Each residential complex, office, public facility, or other facilities must provide an adequate number of waste bins. • Temporary Waste Storage is designated to store waste from residential areas before it is sent to the final disposal site. Each TPS has separate storage bins for organic and inorganic waste. | <p>The company has a Domestic Solid Waste Management SOP, detailed in the document LSM-SUST-SOP-41, Revision 0, which outlines the following key points:</p> <ul style="list-style-type: none"> • Each residential complex, office, public facility, or other facilities must provide an adequate number of waste bins. • Temporary Waste Storage is designated to store waste from residential areas before it is sent to the final disposal site. Each TPS has separate storage bins for organic and inorganic waste. | <input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <ul style="list-style-type: none"> • All waste sent from the TPS to the final disposal site must be documented, including the quantity and type of waste. • All employees and workers in residential areas, offices, or other facilities are required to dispose of waste in the provided bins. <p>The company has a Zero Burning Policy outlined in the Bumitama Agri Ltd. Sustainability Policy, which states: "A strict zero-burning policy applies to all new plantings, replanting, and other activities. The company has an updated Domestic Waste Management Procedure (LSM-SUST-SOP-41 Revision 1, dated May 18, 2024), specifically Section 6.2, which clarifies that: "Everyone must control the waste generated in their household, and it is strictly prohibited to dispose of waste by burning." During a field observation at the BTJM Mill Residential Area, Block D, it was found that domestic waste burning was still being carried out by the residents, despite the company's Zero Burning Policy and the prohibition stated in the waste management SOP. This issue was also noted during the RSPO ASA-3 Surveillance Audit by the certification body, PT Mutu Agung Lestari, under the same indicator. The company conducted a waste management socialization session on September 5, 2024, for CMJE employees, but there has been no visible progress in preventing the recurrence of waste burning activities.</p> | <ul style="list-style-type: none"> • All waste sent from the TPS to the final disposal site must be documented, including the quantity and type of waste. • All employees and workers in residential areas, offices, or other facilities are required to dispose of waste in the provided bins. <p>The company has a Zero Burning Policy outlined in the Bumitama Agri Ltd. Sustainability Policy, which states: "A strict zero-burning policy applies to all new plantings, replanting, and other activities. The company has an updated Domestic Waste Management Procedure (LSM-SUST-SOP-41 Revision 1, dated May 18, 2024), specifically Section 6.2, which clarifies that: "Everyone must control the waste generated in their household, and it is strictly prohibited to dispose of waste by burning." During a field observation at the BTJM Mill Residential Area, Block D, it was found that domestic waste burning was still being carried out by the residents, despite the company's Zero Burning Policy and the prohibition stated in the waste management SOP. This issue was also noted during the RSPO ASA-3 Surveillance Audit by the certification body, PT Mutu Agung Lestari, under the same indicator. The company conducted a waste management socialization session on September 5, 2024, for CMJE employees, but there has been no visible progress in preventing the recurrence of waste burning activities.</p> | |
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| | | A Minor Nonconformance was raised regarding this issue, which was escalated to a Major Nonconformance (CAR#09) due to the company's failure to show progress in addressing and preventing the recurrence of domestic waste burning by employees and residents. CAR#09 | A Minor Nonconformance was raised regarding this issue, which was escalated to a Major Nonconformance (CAR#09) due to the company's failure to show progress in addressing and preventing the recurrence of domestic waste burning by employees and residents. CAR#09 | |
| Criterion 7.4: | | | | |
| Practice maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | | |
| 7.4.1 | Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. | <p>The company has Technical Guidelines for Palm Oil Plantations / Standard Operational Procedures for Palm Oil Agronomy to manage soil fertility which was issued on May 25, 2011 including:</p> <ul style="list-style-type: none"> • BGA-AGR-KS-SOP-01 Volume 1 contains about soil and water conservation (SOP-05) and planting of legumes (SOP-06) • BGA-AGR-KS-SOP-01 Volume 2 contains Fertilization (SOP-09) • BGA-AGR-KS-SOP-01 Volume 3 contains Management of marginal lands (SOP-16) <p>Based on document observation and interview with management the program soil analysis conducted every 5 years and leaf analysis every year. There are records of leaf and soil sample analysis activities on a regular basis to monitor</p> | <p>The company has Technical Guidelines for Palm Oil Plantations / Standard Operational Procedures for Palm Oil Agronomy to manage soil fertility which was issued on May 25, 2011 including:</p> <ul style="list-style-type: none"> • BGA-AGR-KS-SOP-01 Volume 1 contains about soil and water conservation (SOP-05) and planting of legumes (SOP-06) • BGA-AGR-KS-SOP-01 Volume 2 contains Fertilization (SOP-09) • BGA-AGR-KS-SOP-01 Volume 3 contains Management of marginal lands (SOP-16) <p>Based on document observation and interview with management the program soil analysis conducted every 5 years and leaf analysis every year. There are records of leaf and soil sample analysis activities on a regular basis to monitor</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | and manage changes in soil fertility and plant health. | and manage changes in soil fertility and plant health. | |
| 7.4.2 | Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health. | <p>The program soil analysis conducted every 5 years and leaf analysis every year. There are records of leaf and soil sample analysis activities on a regular basis to monitor and manage changes in soil fertility and plant health, Based on the results of leaf and soil tissue analysis, this is one of the bases for making fertilizer recommendations Following are some of the results of leaf and soil tissue analysis, such as:</p> <p>Soil Analysis Results</p> <p>For example, Soil Analysis of Bukit Tunggal Jaya Estate Number 015/RSC/SSU/II/2024 dated February 14, 2024 issued by the Analytical Laboratory Research Department PT Bumitama Gunajaya Agro for a total of 32 samples. The parameters analyzed included pH, hydrometry, C. Org, N-tot, P, K, Mg Ca, Exchange base, P Bray, CEC and H-Al Exchange.</p> <p>Leaf Analysis Results</p> <p>For example, Bukit Tunggal Jaya Estate Analysis Number 002/RSC/LSU/II/2024 dated February 12, 2024 issued by the Analytical Laboratory Research</p> | <p>The program soil analysis conducted every 5 years and leaf analysis every year. There are records of leaf and soil sample analysis activities on a regular basis to monitor and manage changes in soil fertility and plant health, Based on the results of leaf and soil tissue analysis, this is one of the bases for making fertilizer recommendations Following are some of the results of leaf and soil tissue analysis, such as:</p> <p>Soil Analysis Results</p> <p>For example, Soil Analysis of Bukit Tunggal Jaya Estate Number 015/RSC/SSU/II/2024 dated February 14, 2024 issued by the Analytical Laboratory Research Department PT Bumitama Gunajaya Agro for a total of 32 samples. The parameters analyzed included pH, hydrometry, C. Org, N-tot, P, K, Mg Ca, Exchange base, P Bray, CEC and H-Al Exchange.</p> <p>Leaf Analysis Results</p> <p>For example, Bukit Tunggal Jaya Estate Analysis Number 002/RSC/LSU/II/2024 dated February 12, 2024 issued by the Analytical Laboratory Research</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | Department PT Bumitama Gunajaya Agro for a total of 53 samples. The parameters analyzed include N, P, K, Mg, Ca, B and Cu. | Department PT Bumitama Gunajaya Agro for a total of 53 samples. The parameters analyzed include N, P, K, Mg, Ca, B and Cu. | |
| 7.4.3 | A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. | Based on the document review, it is known that as a nutrient recycling strategy, the certification unit utilizes EFB, and POME. The certification unit shows a record for example EFB application in an area of 12,395 Tons and land application in an area of August 2024 Total 12,395 m3. Application in 2024 has been applied in accordance with recommendations. | Based on the document review, it is known that as a nutrient recycling strategy, the certification unit utilizes EFB, and POME. The certification unit shows a record for example EFB application in an area of 12,395 Tons and land application in an area of August 2024 Total 12,395 m3. Application in 2024 has been applied in accordance with recommendations. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 7.4.4 | Records of fertiliser inputs are maintained. | <p>The Company has maintained records of the use of fertilizers that have been applied on the estate, such as MOP, Urea, Dolomite, etc. For example, in 2024, as follows:</p> <p>NJYE, Urea application example up to September 202 is 16.86 tons according to recommendations.</p> <p>BJYE, example of MOP application for semester 1 of 2023 of 7.28 tons according to recommendations.</p> <p>BTJE, example of MOP application for semester 1 of 2024 of 1,864.155 tons according to recommendations.</p> <p>CMJE, example of MOP application for semester 1 of 2024 of 1,631.723 tons according to recommendations</p> | <p>The Company has maintained records of the use of fertilizers that have been applied on the estate, such as MOP, Urea, Dolomite, etc. For example, in 2024, as follows:</p> <p>NJYE, Urea application example up to September 202 is 16.86 tons according to recommendations.</p> <p>BJYE, example of MOP application for semester 1 of 2023 of 7,28 tons according to recommendations.</p> <p>BTJE, example of MOP application for semester 1 of 2024 of 1,864.155 tons according to recommendations.</p> <p>CMJE, example of MOP application for semester 1 of 2024 of 1,631.723 tons according to recommendations</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

| Criterion 7.5: Practices minimise and control erosion and degradation of soils | | | | |
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| 7.5.1 (C) | Maps identifying marginal and fragile soils, including steep terrain, are available. | The company has conducted land mapping based on the land suitability class of 1:50,000 scale contained in the Soil and Land Suitability Report document prepared by the Nanga Tayap Area Research Department of PT Bumitama Gunajaya Agro. Based on the results of the mapping, it is known that the company has several land map units, namely: <ul style="list-style-type: none"> • Soil Map Unit-1, land class S2 (moderately suitable) with typical paleudults soil types, namely deep saline, good drainage, clayey and acidic loam texture. Has undulating topography (15-25%). • Soil Map Unit -2, land class S2 (moderately suitable) with typical dystrodepts soil types, namely deep saline, good drainage, sandy loam texture, acidic. Has a flat topography (0-8%). • Soil Map Unit -3, land class S2 (moderately suitable) with typical udifluvents soil types, namely deep saline, moderate drainage, sour loam texture. Has a flat topography (0-8%). • Soil Map Unit-4, land class S3 | The company has conducted land mapping based on the land suitability class of 1:50,000 scale contained in the Soil and Land Suitability Report document prepared by the Nanga Tayap Area Research Department of PT Bumitama Gunajaya Agro. Based on the results of the mapping, it is known that the company has several land map units, namely: <ul style="list-style-type: none"> • Soil Map Unit-1, land class S2 (moderately suitable) with typical paleudults soil types, namely deep saline, good drainage, clayey and acidic loam texture. Has undulating topography (15-25%). • Soil Map Unit -2, land class S2 (moderately suitable) with typical dystrodepts soil types, namely deep saline, good drainage, sandy loam texture, acidic. Has a flat topography (0-8%). • Soil Map Unit -3, land class S2 (moderately suitable) with typical udifluvents soil types, namely deep saline, moderate drainage, sour loam texture. Has a flat topography (0-8%). • Soil Map Unit-4, land class S3 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | (marginal suitable) with typical plinthudults soil types, namely deep saline, moderate drainage, clayey loam texture, acidic. Has a flat topography (0-8%). | (marginal suitable) with typical plinthudults soil types, namely deep saline, moderate drainage, clayey loam texture, acidic. Has a flat topography (0-8%). | |
| 7.5.2 | There is no extensive replanting of oil palm on steep terrain. | There were no land clearing and planting activities carried out by the company. Based on a review of the Long-Term Forecasting document, interviews with management representatives and field observations it is known that the company has not had any replanting activities and has not planned any replanting activities until 2027, because the age of the plants in the operational area of the certified unit has not yet entered a period of rejuvenation. The age of the oldest plant within the scope of this certification is 18 years (2006). The company has made drainage and planted LCC to minimize erosion. | There were no land clearing and planting activities carried out by the company. Based on a review of the Long-Term Forecasting document, interviews with management representatives and field observations it is known that the company has not had any replanting activities and has not planned any replanting activities until 2027, because the age of the plants in the operational area of the certified unit has not yet entered a period of rejuvenation. The age of the oldest plant within the scope of this certification is 18 years (2006). The company has made drainage and planted LCC to minimize erosion. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 7.5.3 | There is no new planting of oil palm on steep terrain. | There were no land clearing and planting activities carried out by the company. Based on a review of the Long-Term Forecasting document, interviews with management representatives and field observations it is known that the company has not had any replanting activities and has not planned any replanting activities until 2027, because the age of the plants in the operational | There were no land clearing and planting activities carried out by the company. Based on a review of the Long-Term Forecasting document, interviews with management representatives and field observations it is known that the company has not had any replanting activities and has not planned any replanting activities until 2027, because the age of the plants in the operational | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | area of the certified unit has not yet entered a period of rejuvenation. The age of the oldest plant within the scope of this certification is 18 years (2006). The company has made drainage and planted LCC to minimize erosion. | area of the certified unit has not yet entered a period of rejuvenation. The age of the oldest plant within the scope of this certification is 18 years (2006). The company has made drainage and planted LCC to minimize erosion. | |
| Criterion 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 (C) | To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils including steep terrain, are taken into account in plans and operations. | <p>The company shows a map that identifies soil types and land slope, including:</p> <ul style="list-style-type: none"> In-Depth Review Soil Map PT Ladang Sawit Mas Scale 1:50,000 with soil types including Typic Dystrudepts, Haplohumods, Endoaquepts and Haplosaprists. The slope class is between 0 – 25%. Land suitability classes are S2 (Quite Suitable) and S3 (Marginal Suitable). <p>The company shows a map of the realization of making terraces and ditches as a form of soil conservation in areas planted with oil palm in undulating and low-lying areas.</p> | <p>The company shows a map that identifies soil types and land slope, including:</p> <ul style="list-style-type: none"> In-Depth Review Soil Map PT Ladang Sawit Mas Scale 1:50,000 with soil types including Typic Dystrudepts, Haplohumods, Endoaquepts and Haplosaprists. The slope class is between 0 – 25%. Land suitability classes are S2 (Quite Suitable) and S3 (Marginal Suitable). <p>The company shows a map of the realization of making terraces and ditches as a form of soil conservation in areas planted with oil palm in undulating and low-lying areas.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>Based on field observations at Bukit Tunggal Jaya Estate, Hamparan Jaya Estate and Bengkirai Jaya Estate, it's known that no new oil palm planting activities were found in new or existing areas. This is in accordance with the results of the document review and interviews with company representatives. For the undulating area, a fairly wide terrace has been made with the aim of soil conservation and mechanization implementation plans.</p> | <p>Based on field observations at Bukit Tunggal Jaya Estate, Hamparan Jaya Estate and Bengkirai Jaya Estate, it's known that no new oil palm planting activities were found in new or existing areas. This is in accordance with the results of the document review and interviews with company representatives. For the undulating area, a fairly wide terrace has been made with the aim of soil conservation and mechanization implementation plans.</p> | |
| 7.6.2 | <p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> | <p>Based on field observations at Bukit Tunggal Jaya Estate, Hamparan Jaya Estate and Bengkirai Jaya Estate, it's known that no new oil palm planting activities were found in new or existing areas. This is in accordance with the results of the document review and interviews with company representatives.</p> <p>The Company has a Department Group Policy related to Replanting Land Preparation effective February 16, 2022 which states that replanting will not be carried out on peatland that is included in the peat hydrological area of the protection function and in areas with a slope of more than 24 degrees. As a result of document review and interviews, it is known that there is no</p> | <p>Based on field observations at Bukit Tunggal Jaya Estate, Hamparan Jaya Estate and Bengkirai Jaya Estate, it's known that no new oil palm planting activities were found in new or existing areas. This is in accordance with the results of the document review and interviews with company representatives.</p> <p>The Company has a Department Group Policy related to Replanting Land Preparation effective February 16, 2022 which states that replanting will not be carried out on peatland that is included in the peat hydrological area of the protection function and in areas with a slope of more than 24 degrees. As a result of document review and interviews, it is known that there is no</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | planting on steep slopes. | planting on steep slopes. | |
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure | <p>The company shows a map that identifies soil types and land slope, including:</p> <p>In-Depth Review Soil Map PT Ladang Sawit Mas Scale 1:50,000 with soil types including Typic Dystrudepts, Haplohumods, Endoaquepts and Haplosaprists. The slope class is between 0 – 25%. Land suitability classes are S2 (Quite Suitable) and S3 (Marginal Suitable).</p> <p>The company shows a map of the realization of making terraces and ditches as a form of soil conservation in areas planted with oil palm in undulating and low-lying areas.</p> <p>As a result of document review and interviews, it is known that there is no planting on steep slopes. The results of field observations at all assessment locations during the audit were carried out, it was discovered that oil palm planting had referred to the results of the soil survey.</p> | <p>The company shows a map that identifies soil types and land slope, including:</p> <p>In-Depth Review Soil Map PT Ladang Sawit Mas Scale 1:50,000 with soil types including Typic Dystrudepts, Haplohumods, Endoaquepts and Haplosaprists. The slope class is between 0 – 25%. Land suitability classes are S2 (Quite Suitable) and S3 (Marginal Suitable).</p> <p>The company shows a map of the realization of making terraces and ditches as a form of soil conservation in areas planted with oil palm in undulating and low-lying areas.</p> <p>As a result of document review and interviews, it is known that there is no planting on steep slopes. The results of field observations at all assessment locations during the audit were carried out, it was discovered that oil palm planting had referred to the results of the soil survey.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

Criterion 7.7:

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

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| 7.7.1 (C) | There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. | Based on a document review and interviews with the management of PT LSM found there is no new planting on peat areas after Nov 18 for PT.Ladang Sawit Mas and its supply base | Based on a document review and interviews with the management of PT LSM found there is no new planting on peat areas after Nov 18 for PT.Ladang Sawit Mas and its supply base | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| 7.7.2 (C) | Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). | <p>The company shows the recorded peatland inventory report document that was sent to the RSPO on March 29, 2021, which explains the area of peatland in the operational area of PT Ladang Sawit Mas company, the reported peat area is divided into two parts, namely certified and uncertified peat areas.</p> <p>The recording company of the peatland inventory document that was sent to the RSPO on 29 March 2021, which describes the area of peatland in the company's operational area of PT Ladang Sawit Mas.</p> <p>The unit certification also filling in Second Submission of RSPO Peat Inventory on September 5, 2023 with total area 1,682.88 ha. Following the passing of Resolution 6A16-6E on 6 November 2019, all RSPO Grower and Processor & Trader members are required to submit their peat inventory to report the status of planting and conservation on peat to the RSPO</p> | <p>The company shows the recorded peatland inventory report document that was sent to the RSPO on March 29, 2021, which explains the area of peatland in the operational area of PT Ladang Sawit Mas company, the reported peat area is divided into two parts, namely certified and uncertified peat areas.</p> <p>The recording company of the peatland inventory document that was sent to the RSPO on 29 March 2021, which describes the area of peatland in the company's operational area of PT Ladang Sawit Mas.</p> <p>The unit certification also filling in Second Submission of RSPO Peat Inventory on September 5, 2023 with total area 1,682.88 ha. Following the passing of Resolution 6A16-6E on 6 November 2019, all RSPO Grower and Processor & Trader members are required to submit their peat inventory to report the status of planting and conservation on peat to the</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

| | | Secretariat. | RSPO Secretariat. | |
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| 7.7.3 (C) | Subsidence of peat is monitored, documented and minimised. | <p>The company shows the recorded results of measurements and observations of peat subsidence in HGU areas where oil palm plantations are being planted, with the following explanation:</p> <ul style="list-style-type: none"> The company has 14 subsidence poles (2 poles/240 Ha) with details of 4 installation units in 2020, 4 installation units in 2021 and 6 new installation units in 2022. Based on the document of peat subsidence measurements, it is known that subsidence measurements are carried out every month, and peat soil subsidence is obtained from 2020 – 2024 (4 years) from the measuring instruments for peat subsidence, it is 8.40 cm /4 years (still below the standard regulation of Minister of Environment Regulation No. 7 of 2006 which is < 35 Cm/5 years). <p>Based on the results of field visits, interviews, and document review, it is known that the company has documented records of the implementation of planting on peatlands in accordance with procedures and/or laws and regulations.</p> | <p>The company shows the recorded results of measurements and observations of peat subsidence in HGU areas where oil palm plantations are being planted, with the following explanation:</p> <ul style="list-style-type: none"> The company has 14 subsidence poles (2 poles/240 Ha) with details of 4 installation units in 2020, 4 installation units in 2021 and 6 new installation units in 2022. Based on the document of peat subsidence measurements, it is known that subsidence measurements are carried out every month, and peat soil subsidence is obtained from 2020 – 2024 (4 years) from the measuring instruments for peat subsidence, it is 8.40 cm /4 years (still below the standard regulation of Minister of Environment Regulation No. 7 of 2006 which is < 35 Cm/5 years). <p>Based on the results of field visits, interviews, and document review, it is known that the company has documented records of the implementation of planting on peatlands in accordance with procedures and/or laws and regulations.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| <p>7.7.4 (C)</p> | <p>A documented water and ground cover management programme is in place.</p> | <p>The company has guidelines and measurements for water levels issued by the Deputy Head of Oil Palm Research on May 5, 2018 which explains how to manufacture a water level meter and how to measure it (water level is maintained at 60-70 cm). The company also has a documented program for water management such as routine water level monitoring and piezometer.</p> <p>The company shows the recorded results of measurements and observations of peatland management in HGU areas where oil palm plantations are being planted, including:</p> <ul style="list-style-type: none"> • Documents of measuring ground water level using a piezometer in October 2024, namely BTJE average ground water level 52 Cm, HJYE average groundwater level 35 Cm. Based on these documents, it is known that the average water level is still below the set standard, which is 60-70 cm. • Based on field observations in the peat areas of BTJE and HJYE in general, there are ground cover crops such as legumes and Nephrolepis in the dead trees of each crop path. | <p>The company has guidelines and measurements for water levels issued by the Deputy Head of Oil Palm Research on May 5, 2018 which explains how to manufacture a water level meter and how to measure it (water level is maintained at 60-70 cm). The company also has a documented program for water management such as routine water level monitoring and piezometer.</p> <p>The company shows the recorded results of measurements and observations of peatland management in HGU areas where oil palm plantations are being planted, including:</p> <ul style="list-style-type: none"> • Documents of measuring ground water level using a piezometer in October 2024, namely BTJE average ground water level 52 Cm, HJYE average groundwater level 35 Cm. Based on these documents, it is known that the average water level is still below the set standard, which is 60-70 cm. • Based on field observations in the peat areas of BTJE and HJYE in general, there are ground cover crops such as legumes and Nephrolepis in the dead trees of each crop path. | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | Based on the results of field visits, interviews, and document review, it is known that the company has documented the recording of the application of planting on peatlands by observing and adjusting the water level according to the standard threshold that has been set. | Based on the results of field visits, interviews, and document review, it is known that the company has documented the recording of the application of planting on peatlands by observing and adjusting the water level according to the standard threshold that has been set. | |
| 7.7.5 (C) | <p>For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the time frame for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January</p> | Based on the document review, PT LSM, PT GMS, PT NAS and PT LGI have no replanting plans in the next 5 years. The oldest planting year in PT LSM, PT GMS, PT NAS and PT LGI was the 2006 planting year (18 years old). | Based on the document review, PT LSM, PT GMS, PT NAS and PT LGI have no replanting plans in the next 5 years. The oldest planting year in PT LSM, PT GMS, PT NAS and PT LGI was the 2006 planting year (18 years old). | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | <p>2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG. PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p> | | | |
| 7.7.6 © | <p>All existing plantings on peat are managed according to the '<i>RSPO Manual on Best Management Practices (BMTs) for existing oil palm cultivation on peat</i>', version 2 (2018) and associated audit guidance.</p> | <p>The company shows a map of the realization of water management at a scale of 1:40,520 which informs the number and distribution of water management facilities, such as 2 units of water gate, peat subsidence poles of 14 units (4 installation units in 2020, 4 installation units in 2021 and 6 new</p> | <p>The company shows a map of the realization of water management at a scale of 1:40,520 which informs the number and distribution of water management facilities, such as 2 units of water gate, peat subsidence poles of 14 units (4 installation units in 2020, 4 installation units in 2021 and 6 new</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>installation units in 2022) and a piezometer of 14 units, and water level pole of 14 unit. Based on the document, it is known that the company has fulfilled the number of subsidence poles of 2 poles/240 Ha (standard 1 pole/240 Ha) and the number of piezometers of 1 units/120 Ha (standard 1 unit/120 Ha).</p> <p>The company shows recorded results of measurements and observations of water level in several locations, such as:</p> <ul style="list-style-type: none"> • Documents of measuring ground water level using a piezometer in October 2023, namely BTJE average ground water level 52 Cm, HJYE average groundwater level 35 Cm. Based on these documents, it is known that the average water level is still below the set standard, which is 60-70 cm. • Documents of measuring peat subsidence using a peat subsidence pole in October 2024, based on the document of peat subsidence measurements, it is known that subsidence measurements are carried out every month, and peat soil subsidence is obtained from 2020 – 2024 (4 years) from the measuring instruments for peat subsidence, it is 8.40 cm /3 years | <p>installation units in 2022) and a piezometer of 14 units, and water level pole of 14 unit. Based on the document, it is known that the company has fulfilled the number of subsidence poles of 2 poles/240 Ha (standard 1 pole/240 Ha) and the number of piezometers of 1 units/120 Ha (standard 1 unit/120 Ha).</p> <p>The company shows recorded results of measurements and observations of water level in several locations, such as:</p> <ul style="list-style-type: none"> • Documents of measuring ground water level using a piezometer in October 2023, namely BTJE average ground water level 52 Cm, HJYE average groundwater level 35 Cm. Based on these documents, it is known that the average water level is still below the set standard, which is 60-70 cm. • Documents of measuring peat subsidence using a peat subsidence pole in October 2024, based on the document of peat subsidence measurements, it is known that subsidence measurements are carried out every month, and peat soil subsidence is obtained from 2020 – 2024 (4 years) from the measuring instruments for peat subsidence, it is 8.40 cm /3 years | |
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| | | <p>(still below the standard regulation of Minister of Environment Regulation No. 7 of 2006 which is < 35 Cm/5 years).</p> <p>Based on the results of field visits, interviews, and document review, it is known that the company has documented the recording of the application of planting on peatlands by observing and adjusting the water level according to the standard threshold that has been set.</p> | <p>(still below the standard regulation of Minister of Environment Regulation No. 7 of 2006 which is < 35 Cm/5 years).</p> <p>Based on the results of field visits, interviews, and document review, it is known that the company has documented the recording of the application of planting on peatlands by observing and adjusting the water level according to the standard threshold that has been set.</p> | |
| 7.7.7 (C) | <p>All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version2 (2018) and associated audit guidance.</p> | <p>Based on the hectares of PT Ladang Sawit Mas statements shown, from the entire area of the company's management, there are areas that are not planted with oil palm. The area consists of roads, buildings, Mill, lake borders, reserved areas, occupations and conservation areas. Of the areas not planted with palm oil, there is a peat area that is a conservation area and the company has managed the area to become HCV. Based on field observations to the company's HCV area, it is known that everything planned has been planted, the areas that were not planted from the start become HCV areas. In addition, Based on hectare statement and information from estate management, it was known that there</p> | <p>Based on the hectares of PT Ladang Sawit Mas statements shown, from the entire area of the company's management, there are areas that are not planted with oil palm. The area consists of roads, buildings, Mill, lake borders, reserved areas, occupations and conservation areas. Of the areas not planted with palm oil, there is a peat area that is a conservation area and the company has managed the area to become HCV. Based on field observations to the company's HCV area, it is known that everything planned has been planted, the areas that were not planted from the start become HCV areas. In addition, Based on hectare statement and information from estate management, it was known that there</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | was no new planting on peat area after 15 November 2018. The peat area that was not planted was the CR and MR road that was made during the construction of the estate. | was no new planting on peat area after 15 November 2018. The peat area that was not planted was the CR and MR road that was made during the construction of the estate. | |
| Criterion 7.8: | | | | |
| Practices maintain the quality and availability of surface and groundwater. | | | | |
| 7.8.1 (C) | <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1 b. Workers have adequate access to clean water</p> | <p>The company has implemented a water management plan that includes the following key measures:</p> <ul style="list-style-type: none"> • Prohibition on Chemical Application Near Riverbanks: Chemicals are not applied in areas close to riverbanks to prevent contamination of water sources. • Wastewater Recycling: The company does not discharge liquid waste into rivers. Instead, wastewater is treated in the Effluent Treatment Plant (IPAL) and then recycled for use in plantation areas, ensuring the water meets government quality standards before being used. • Water Usage in Processing: Water used for processing in the factory is managed according to company standards. • Periodic Water Quality Testing: The company regularly tests the quality of river water to ensure it meets the required environmental standards. <p>The company ensures access to clean water for its workers, and no restrictions</p> | <p>The company has implemented a water management plan that includes the following key measures:</p> <ul style="list-style-type: none"> • Prohibition on Chemical Application Near Riverbanks: Chemicals are not applied in areas close to riverbanks to prevent contamination of water sources. • Wastewater Recycling: The company does not discharge liquid waste into rivers. Instead, wastewater is treated in the Effluent Treatment Plant (IPAL) and then recycled for use in plantation areas, ensuring the water meets government quality standards before being used. • Water Usage in Processing: Water used for processing in the factory is managed according to company standards. • Periodic Water Quality Testing: The company regularly tests the quality of river water to ensure it meets the required environmental standards. <p>The company ensures access to clean water for its workers, and no restrictions</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>are placed on the use of clean water by the employees. Based on field observations and interviews with workers (such as those in fertilizer application, spraying, and harvesting), it was confirmed that the clean water supply for residential areas comes from bore wells provided by the company, while water for factory workers living in the mill's housing is sourced from a reservoir that has been processed through a Water Treatment Plant (WTP).</p> <p>To ensure a sustainable water supply, the company has implemented the following actions:</p> <ul style="list-style-type: none"> • Reservoir Construction: The company has built a reservoir equipped with a spillway to monitor the water level. The spillway's height is set to ensure that enough water is available for downstream communities. • Ensuring No Negative Impact on Other Water Users: The company ensures that water usage and management do not negatively impact other users within the same catchment area, including local communities and general water users. • Adequate Access to Clean Water for Local Communities and Workers: The company ensures that local communities, workers, and their families have adequate access to clean water for drinking, bathing, washing, and sanitation. | <p>are placed on the use of clean water by the employees. Based on field observations and interviews with workers (such as those in fertilizer application, spraying, and harvesting), it was confirmed that the clean water supply for residential areas comes from bore wells provided by the company, while water for factory workers living in the mill's housing is sourced from a reservoir that has been processed through a Water Treatment Plant (WTP).</p> <p>To ensure a sustainable water supply, the company has implemented the following actions:</p> <ul style="list-style-type: none"> • Reservoir Construction: The company has built a reservoir equipped with a spillway to monitor the water level. The spillway's height is set to ensure that enough water is available for downstream communities. • Ensuring No Negative Impact on Other Water Users: The company ensures that water usage and management do not negatively impact other users within the same catchment area, including local communities and general water users. • Adequate Access to Clean Water for Local Communities and Workers: The company ensures that local communities, workers, and their families have adequate access to clean water for drinking, bathing, washing, and sanitation. | |
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| | | <p>Field Observations In the Penjajaan River buffer area (Blocks E27, E28, and E30), it was observed that the company does not apply chemicals near the riverbanks. Additionally, the company has implemented a pesticide buffer zone by marking the palm oil trees with paint, ensuring that pesticides are not applied near the river.</p> | <p>Field Observations In the Penjajaan River buffer area (Blocks E27, E28, and E30), it was observed that the company does not apply chemicals near the riverbanks. Additionally, the company has implemented a pesticide buffer zone by marking the palm oil trees with paint, ensuring that pesticides are not applied near the river.</p> | |
| 7.8.2 | <p>7.8.2 (C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> | <p>Based on field observations, for example, in the riparian areas of the Penjajaan River in blocks E27, E28, and E30, it was found that the company does not apply chemicals near the riverbanks, and the boundary for pesticide application is marked by painting the oil palm trees.</p> <p>The company has also been monitoring surface water quality through an accredited laboratory (KAN accreditation, LP-024-IDN). For example, the Surface Water Quality Test Results for Semester I 2023, reported in the RKL/RPL document, show that the water quality results for Kayong River (PT NAS) in Semester I 2024 were as follows: Nitrate: 4.8 mg/L (<10 mg/L), Total Nitrogen: 5 mg/L (<15 mg/L), Oil/Grease: <0.3 mg/L (<1 mg/L) The water quality standards used were based on Government Regulation No. 22/2021,</p> | <p>Based on field observations, for example, in the riparian areas of the Penjajaan River in blocks E27, E28, and E30, it was found that the company does not apply chemicals near the riverbanks, and the boundary for pesticide application is marked by painting the oil palm trees.</p> <p>The company has also been monitoring surface water quality through an accredited laboratory (KAN accreditation, LP-024-IDN). For example, the Surface Water Quality Test Results for Semester I 2023, reported in the RKL/RPL document, show that the water quality results for Kayong River (PT NAS) in Semester I 2024 were as follows: Nitrate: 4.8 mg/L (<10 mg/L), Total Nitrogen: 5 mg/L (<15 mg/L), Oil/Grease: <0.3 mg/L (<1 mg/L) The water quality standards used were based on Government Regulation No. 22/2021,</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <p>Class II.</p> <p>From interviews with spraying/fertilizing workers during the audit, it was found that the workers understand the prohibition on applying chemicals near riparian zones and other activities such as fishing that could potentially pollute the river. The company has also installed signs and HCV markers in the riparian areas.</p> <p>Based on audit verification, it was confirmed that the company's water management practices align with the Best Management Practices (BMPs) for riparian area management and rehabilitation, including the prohibition of chemical application near riparian zones or water sources. According to document reviews, field observations, and interviews with management, it was also confirmed that no replanting has occurred in riparian areas or other operational areas under the scope of RSPO certification for PT LSM, PT LGI, PT NAS, and PT GSM.</p> <p>In interviews with the Ketapang District Environmental Office, it was confirmed that there are no issues related to water pollution or river contamination caused by the company's operational activities.</p> | <p>Class II.</p> <p>From interviews with spraying/fertilizing workers during the audit, it was found that the workers understand the prohibition on applying chemicals near riparian zones and other activities such as fishing that could potentially pollute the river. The company has also installed signs and HCV markers in the riparian areas.</p> <p>Based on audit verification, it was confirmed that the company's water management practices align with the Best Management Practices (BMPs) for riparian area management and rehabilitation, including the prohibition of chemical application near riparian zones or water sources. According to document reviews, field observations, and interviews with management, it was also confirmed that no replanting has occurred in riparian areas or other operational areas under the scope of RSPO certification for PT LSM, PT LGI, PT NAS, and PT GSM.</p> <p>In interviews with the Ketapang District Environmental Office, it was confirmed that there are no issues related to water pollution or river contamination caused by the company's operational activities.</p> | |
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| 7.8.3 | <p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> | <p>The wastewater treatment process at the factory is carried out in the WWTP (Wastewater Treatment Plant), which consists of 10 ponds with a multi-effluent system. Before being used in the plantation area, all wastewater is first treated in the WWTP until it meets the quality standards allowed for wastewater utilization, with the required parameters being pH 6-9 and BOD ≤ 5000 mg/l.</p> <p>Bukit Tunggal Jaya Mill holds a permit for factory wastewater management, disposal, or land utilization in accordance with the specified requirements. The permit for utilizing palm oil industry wastewater on plantation land is based on Wastewater Utilization Permit No. 035/DPMPTSP-D/2020, issued by the Ketapang Regent on February 20, 2020, and is valid for five years.</p> <p>Test results for the period July-August 2024 show the following results:</p> <ul style="list-style-type: none"> • July 2024: BOD 3212 mg/l (<5000), pH 6.5 (6-9) • August 2024: BOD 3794 mg/l (<5000), pH 6.6 (6-9) <p>These results indicate that the treated wastewater complies with the quality standards set for its utilization.</p> | <p>The wastewater treatment process at the factory is carried out in the WWTP (Wastewater Treatment Plant), which consists of 10 ponds with a multi-effluent system. Before being used in the plantation area, all wastewater is first treated in the WWTP until it meets the quality standards allowed for wastewater utilization, with the required parameters being pH 6-9 and BOD ≤ 5000 mg/l.</p> <p>Bukit Tunggal Jaya Mill holds a permit for factory wastewater management, disposal, or land utilization in accordance with the specified requirements. The permit for utilizing palm oil industry wastewater on plantation land is based on Wastewater Utilization Permit No. 035/DPMPTSP-D/2020, issued by the Ketapang Regent on February 20, 2020, and is valid for five years.</p> <p>Test results for the period July-August 2024 show the following results:</p> <ul style="list-style-type: none"> • July 2024: BOD 3212 mg/l (<5000), pH 6.5 (6-9) • August 2024: BOD 3794 mg/l (<5000), pH 6.6 (6-9) <p>These results indicate that the treated wastewater complies with the quality standards set for its utilization.</p> | <p><input checked="" type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |
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| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. | Document review and field observations at the Bukit Tunggal Jaya Mill Water Treatment Plant (WTP) indicate that the flowmeter is functioning properly, and the monitoring or recording of water usage has been carried out regularly by the WTP operator. During the January-September 2024 period, the average water usage per ton of FFB (Fresh Fruit Bunches) processed at Bukit Tunggal Jaya Mill was 0.83 m ³ /MT FFB. This indicates that the water consumption efficiency in the mill's operations is being carefully monitored and based on interview with WTP operator is within the expected parameters for sustainable water usage standards sets by BTJM which is in average 1.2 m ³ /MT FFB process. | Document review and field observations at the Bukit Tunggal Jaya Mill Water Treatment Plant (WTP) indicate that the flowmeter is functioning properly, and the monitoring or recording of water usage has been carried out regularly by the WTP operator. During the January-September 2024 period, the average water usage per ton of FFB (Fresh Fruit Bunches) processed at Bukit Tunggal Jaya Mill was 0.83 m ³ /MT FFB. This indicates that the water consumption efficiency in the mill's operations is being carefully monitored and based on interview with WTP operator is within the expected parameters for sustainable water usage standards sets by BTJM which is in average 1.2 m ³ /MT FFB process. | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
| Criterion 7.9: Efficiency of fossil fuel use and the use of renewal energy is optimized. | | | | |
| 7.9.1 | A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. | <p>As part of its efforts to reduce the use of fossil fuels, the company has implemented a substitution strategy for boiler fuel. The certification unit has maximized the use of renewable energy sources, specifically fiber and shell, as boiler fuel. This substitution is documented in the renewable energy usage record at Bukit Tunggal Jaya Palm Oil Mill.</p> <p>Document review shows that during the January-September 2024 period, the use</p> | <p>As part of its efforts to reduce the use of fossil fuels, the company has implemented a substitution strategy for boiler fuel. The certification unit has maximized the use of renewable energy sources, specifically fiber and shell, as boiler fuel. This substitution is documented in the renewable energy usage record at Bukit Tunggal Jaya Palm Oil Mill.</p> <p>Document review shows that during the January-September 2024 period, the use</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>of fossil fuels and renewable fuels resulted in energy efficiency as follows:</p> <ul style="list-style-type: none"> • Fossil fuel consumption: 0.11 L/MT FFB processed on 2024 and 0.27 L/MT FFB processed on 2023. • Renewable energy consumption: 110.49 kWh/MT CPO produced on 2024 and 121.44 kWh/ MT CPO produced on 2023. <p>These figures demonstrate the company's efforts to improve energy efficiency and reduce reliance on fossil fuels by increasing the use of renewable energy in its operations.</p> | <p>of fossil fuels and renewable fuels resulted in energy efficiency as follows:</p> <ul style="list-style-type: none"> • Fossil fuel consumption: 0.11 L/MT FFB processed on 2024 and 0.27 L/MT FFB processed on 2023. • Renewable energy consumption: 110.49 kWh/MT CPO produced on 2024 and 121.44 kWh/ MT CPO produced on 2023.. <p>These figures demonstrate the company's efforts to improve energy efficiency and reduce reliance on fossil fuels by increasing the use of renewable energy in its operations.</p> | |
| <p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions</p> | | | | |
| 7.10.1 (C) | <p>GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> | <p>The company has established an inventory of Greenhouse Gas (GHG) emission sources, which is outlined in the Greenhouse Gas Emission Source Identification document for both its plantation and mill operations. Based on a document review, it can be concluded that the company has identified significant GHG emission sources associated with PT Ladang Sawit Mas and the Bukit Tunggul Jaya Mill (BTJM).</p> <p>The significant GHG emission sources identified include:</p> | <p>The company has established an inventory of Greenhouse Gas (GHG) emission sources, which is outlined in the Greenhouse Gas Emission Source Identification document for both its plantation and mill operations. Based on a document review, it can be concluded that the company has identified significant GHG emission sources associated with PT Ladang Sawit Mas and the Bukit Tunggul Jaya Mill (BTJM).</p> <p>The significant GHG emission sources identified include:</p> | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <ol style="list-style-type: none"> 1. Land use change, 2. POME (Palm Oil Mill Effluent) processing, 3. Fertilizer and pesticide use, 4. Fossil fuel consumption for operations and transportation. <p>The company has developed a mitigation plan that addresses these emission sources, covering both the plantation and mill operations. The mitigation strategies include:</p> <ul style="list-style-type: none"> • Proper fertilizer use and application according to recommendations, • Limiting electricity use, • Transportation optimization, • Maintenance of machinery to improve efficiency, and • Regular air quality testing. <p>Furthermore, the company has publicly reported its GHG emissions calculation results, with a summary report available in the RSPO Summary Report Attachment. This GHG calculation is carried out annually for the period of January to December.</p> <p>As an example, the GHG emissions calculation for Bukit Tunggal Jaya Mill for the period January-December 2024 resulted in the following emissions per product: 2.79 tCO₂eq/ton product for</p> | <ol style="list-style-type: none"> 1. Land use change, 2. POME (Palm Oil Mill Effluent) processing, 3. Fertilizer and pesticide use, 4. Fossil fuel consumption for operations and transportation. <p>The company has developed a mitigation plan that addresses these emission sources, covering both the plantation and mill operations. The mitigation strategies include:</p> <ul style="list-style-type: none"> • Proper fertilizer use and application according to recommendations, • Limiting electricity use, • Transportation optimization, • Maintenance of machinery to improve efficiency, and • Regular air quality testing. <p>Furthermore, the company has publicly reported its GHG emissions calculation results, with a summary report available in the RSPO Summary Report Attachment. This GHG calculation is carried out annually for the period of January to December.</p> <p>As an example, the GHG emissions calculation for Bukit Tunggal Jaya Mill for the period January-December 2024 resulted in the following emissions per product: 2.79 tCO₂eq/ton product for</p> | |
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| | | CPO (Crude Palm Oil) and PK (Palm Kernel). | CPO (Crude Palm Oil) and PK (Palm Kernel). | |
| 7.10.2 (C) | Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). | <p>Based on a document review, it is noted that the company has cleared land after November 2014. In this regard, the company can demonstrate, for example, the HCV-HCS (High Conservation Value - High Carbon Stock) assessment report Version 2, conducted on November 8, 2019, by the consultant team from PT. Gagas Dinamika Aksenta, led by Idung Risdiyanto (ALS15029IR), for PT. LGI and PT. NAS (revision).</p> <p>The assessment report shows that, based on carbon stock classification of land cover, there are areas identified with potential HCV (High Conservation Value). Specifically, the land cover classification includes low-density forests and young regeneration forests, with average carbon stocks of:</p> <ul style="list-style-type: none"> • 102.70 Ton C/ha for low-density forests, • 52.71 Ton C/ha for young regeneration forests. <p>This indicates the company's commitment to conducting environmental assessments in line with HCV-HCS requirements, identifying areas with significant carbon stock, and ensuring that land clearing activities are in accordance with the appropriate sustainability standards.</p> | <p>Based on a document review, it is noted that the company has cleared land after November 2014. In this regard, the company can demonstrate, for example, the HCV-HCS (High Conservation Value - High Carbon Stock) assessment report Version 2, conducted on November 8, 2019, by the consultant team from PT. Gagas Dinamika Aksenta, led by Idung Risdiyanto (ALS15029IR), for PT. LGI and PT. NAS (revision).</p> <p>The assessment report shows that, based on carbon stock classification of land cover, there are areas identified with potential HCV (High Conservation Value). Specifically, the land cover classification includes low-density forests and young regeneration forests, with average carbon stocks of:</p> <ul style="list-style-type: none"> • 102.70 Ton C/ha for low-density forests, • 52.71 Ton C/ha for young regeneration forests. <p>This indicates the company's commitment to conducting environmental assessments in line with HCV-HCS requirements, identifying areas with significant carbon stock, and ensuring that land clearing activities are in accordance with the appropriate sustainability standards.</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| <p>7.10.3 (C)</p> | <p>Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p> | <p>The certification unit has identified pollution sources and emissions from the Bukit Tunggal Jaya Palm Oil Mill (POM) for the year 2024, which include:</p> <ul style="list-style-type: none"> • CO2 emissions (from boilers, generators, transportation), • CH4 emissions (from POME), • Hazardous waste (from WTP, chemical storage), • Noise pollution (from machinery). <p>Pollution and emission sources for the plantation are listed in the document Identification and Management Plan of Pollution Sources for the 2024 period. These include emissions (CO2, CO), noise pollution, chemical waste, organic and inorganic waste, as well as infectious waste.</p> <p>To minimize the impact, mitigation measures have been applied and are monitored as described in the RKL-RPL (Environmental Management and Monitoring Plan) for semester 1, 2024. One key initiative to reduce the use of fossil fuels at the POM Bukit Tunggal Jaya has been the use of fiber and shells as boiler fuel.</p> <p>In line with the environmental monitoring plan, the company conducts regular air quality emissions testing. The air emission and ambient air test results for semester 1, 2024 are as follows:</p> <ul style="list-style-type: none"> • Boiler 1 emission air at BTJM: <ul style="list-style-type: none"> ○ Particulate matter: 53 | <p>The certification unit has identified pollution sources and emissions from the Bukit Tunggal Jaya Palm Oil Mill (POM) for the year 2024, which include:</p> <ul style="list-style-type: none"> • CO2 emissions (from boilers, generators, transportation), • CH4 emissions (from POME), • Hazardous waste (from WTP, chemical storage), • Noise pollution (from machinery). <p>Pollution and emission sources for the plantation are listed in the document Identification and Management Plan of Pollution Sources for the 2024 period. These include emissions (CO2, CO), noise pollution, chemical waste, organic and inorganic waste, as well as infectious waste.</p> <p>To minimize the impact, mitigation measures have been applied and are monitored as described in the RKL-RPL (Environmental Management and Monitoring Plan) for semester 1, 2024. One key initiative to reduce the use of fossil fuels at the POM Bukit Tunggal Jaya has been the use of fiber and shells as boiler fuel.</p> <p>In line with the environmental monitoring plan, the company conducts regular air quality emissions testing. The air emission and ambient air test results for semester 1, 2024 are as follows:</p> <ul style="list-style-type: none"> • Boiler 1 emission air at BTJM: <ul style="list-style-type: none"> ○ Particulate matter: 53 | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |
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| | | <p>mg/m³ (limit: 300 mg/m³)</p> <ul style="list-style-type: none"> ○ SO₂: 21.6 mg/m³ (limit: 600 mg/m³) ○ Opacity: 20% (limit: 30%) ● Ambient air at BTJM office: <ul style="list-style-type: none"> ○ SO₂: 38.3 µg/m³ (limit: 150 µg/m³) ○ NO₂: 17.8 µg/m³ (limit: 200 µg/m³) ○ CO: 1075 µg/m³ (limit: 10,000 µg/m³) <p>These results show that the company is closely monitoring and managing pollution and emissions, with the levels of pollutants generally well within the permissible limits set by environmental regulations. The company is also making efforts to reduce its environmental footprint through initiatives such as switching to renewable fuel sources for boilers.</p> | <p>mg/m³ (limit: 300 mg/m³)</p> <ul style="list-style-type: none"> ○ SO₂: 21.6 mg/m³ (limit: 600 mg/m³) ○ Opacity: 20% (limit: 30%) ● Ambient air at BTJM office: <ul style="list-style-type: none"> ○ SO₂: 38.3 µg/m³ (limit: 150 µg/m³) ○ NO₂: 17.8 µg/m³ (limit: 200 µg/m³) ○ CO: 1075 µg/m³ (limit: 10,000 µg/m³) <p>These results show that the company is closely monitoring and managing pollution and emissions, with the levels of pollutants generally well within the permissible limits set by environmental regulations. The company is also making efforts to reduce its environmental footprint through initiatives such as switching to renewable fuel sources for boilers.</p> | |
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| Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area. | | | | |
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| 7.11.1 (C) | Land for new planting or replanting is not prepared by burning. | <p>The company has implemented a Zero Burning Policy, as outlined in the Group Department Policy on HCV & HCS Management and Monitoring, dated June 4, 2021, which was developed by the SSD Department Head and approved by the Director of CHC and COO. This policy states that PT Bumitama and its subsidiaries are committed to environmental protection through the no-burning policy in plantations and proactive involvement of local communities in fire-free village programs.</p> <p>Additionally, the company has a standard operating procedure SOP No. 002/KG-BGA/EDR/10/2021/R0, which was approved by the Chief Operating Officer on February 16, 2022, regarding Land Preparation. This procedure specifies that land clearing must be carried out mechanically and without the use of fire.</p> <p>During the audit, it was noted that there were no activities related to replanting or new planting in the plantations. Interviews with management representatives, the Environmental Agency, and the Agriculture Agency confirmed that the company is committed to refraining from using fire in land clearing activities.</p> <p>This commitment aligns with the company's broader sustainability goals and ensures that it adheres to regulatory requirements and best practices for</p> | <p>The company has implemented a Zero Burning Policy, as outlined in the Group Department Policy on HCV & HCS Management and Monitoring, dated June 4, 2021, which was developed by the SSD Department Head and approved by the Director of CHC and COO. This policy states that PT Bumitama and its subsidiaries are committed to environmental protection through the no-burning policy in plantations and proactive involvement of local communities in fire-free village programs.</p> <p>Additionally, the company has a standard operating procedure SOP No. 002/KG-BGA/EDR/10/2021/R0, which was approved by the Chief Operating Officer on February 16, 2022, regarding Land Preparation. This procedure specifies that land clearing must be carried out mechanically and without the use of fire.</p> <p>During the audit, it was noted that there were no activities related to replanting or new planting in the plantations. Interviews with management representatives, the Environmental Agency, and the Agriculture Agency confirmed that the company is committed to refraining from using fire in land clearing activities.</p> <p>This commitment aligns with the company's broader sustainability goals and ensures that it adheres to regulatory requirements and best practices for</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | environmental protection, especially regarding fire prevention in land clearing and plantation management. | environmental protection, especially regarding fire prevention in land clearing and plantation management. | |
| 7.11.2 | The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. | <p>The company has implemented a Zero Burning Policy, which is outlined in the Group Department Policy on HCV & HCS Management and Monitoring, dated June 4, 2021, developed by the SSD4, 2021, developed by the SSD Department Head and approved by the Director of CHC and COO. This policy affirms that PT Bumitama and its subsidiaries are committed to environmental protection, including adhering to a no-burning policy within plantations and engaging local communities proactively in fire-free village programs.</p> <p>Additionally, the company has a standard operating procedure SOP No. 002/KG-BGA/EDR/10/2021/R0, which was approved by the Chief Operating Officer on February 16, 2022, regarding Land Preparation. This procedure specifies that land clearing must be conducted mechanically, without the use of fire.</p> <p>In terms of fire prevention and control, the company has implemented several activities. These include the formation of an emergency response structure and the marking of fire-prone areas on maps, with color-coded assessments based on fire risk levels and control factors.</p> <p>The certification unit also has fire</p> | <p>The company has implemented a Zero Burning Policy, which is outlined in the Group Department Policy on HCV & HCS Management and Monitoring, dated June 4, 2021, developed by the SSD4, 2021, developed by the SSD Department Head and approved by the Director of CHC and COO. This policy affirms that PT Bumitama and its subsidiaries are committed to environmental protection, including adhering to a no-burning policy within plantations and engaging local communities proactively in fire-free village programs.</p> <p>Additionally, the company has a standard operating procedure SOP No. 002/KG-BGA/EDR/10/2021/R0, which was approved by the Chief Operating Officer on February 16, 2022, regarding Land Preparation. This procedure specifies that land clearing must be conducted mechanically, without the use of fire.</p> <p>In terms of fire prevention and control, the company has implemented several activities. These include the formation of an emergency response structure and the marking of fire-prone areas on maps, with color-coded assessments based on fire risk levels and control factors.</p> <p>The certification unit also has fire</p> | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>management facilities and infrastructure, as detailed in the Fire Control System Readiness Report for plantation land. This document indicates that the company has provided fire control facilities in compliance with Ministry of Agriculture Regulation No. 5 of 2018. According to this document, the fire control facilities and infrastructure meet the applicable regulations, which include for examples:</p> <ul style="list-style-type: none"> • 5 portable water tanks • 6 high-pressure water pumps • 3 suction hoses (for high-pressure pumps) • 20 outlet hoses (for high-pressure pumps) • 22 nozzles (for high-pressure pumps) • 24 fire beaters • 9 hoes • 18 sharp rakes <p>This comprehensive infrastructure ensures that the company is prepared to respond quickly and effectively to any fire incidents, further supporting its commitment to fire prevention and control in plantation operations.</p> | <p>management facilities and infrastructure, as detailed in the Fire Control System Readiness Report for plantation land. This document indicates that the company has provided fire control facilities in compliance with Ministry of Agriculture Regulation No. 5 of 2018. According to this document, the fire control facilities and infrastructure meet the applicable regulations, which include for examples:</p> <ul style="list-style-type: none"> • 5 portable water tanks • 6 high-pressure water pumps • 3 suction hoses (for high-pressure pumps) • 20 outlet hoses (for high-pressure pumps) • 22 nozzles (for high-pressure pumps) • 24 fire beaters • 9 hoes • 18 sharp rakes <p>This comprehensive infrastructure ensures that the company is prepared to respond quickly and effectively to any fire incidents, further supporting its commitment to fire prevention and control in plantation operations.</p> | |
| 7.11.3 | The unit of certification engages with adjacent stakeholders on fire prevention and control measures. | The company has actively involved stakeholders in fire management, as demonstrated by a Memorandum of Understanding (MoU) between the BGA Group Nanga Tayap Region and the Nanga Tayap District Leadership Communication Forum in Ketapang, West Kalimantan, regarding forest and land fire control. This MoU, signed on June 26, | The company has actively involved stakeholders in fire management, as demonstrated by a Memorandum of Understanding (MoU) between the BGA Group Nanga Tayap Region and the Nanga Tayap District Leadership Communication Forum in Ketapang, West Kalimantan, regarding forest and land fire control. This MoU, signed on June 26, | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>2024, includes collaboration with local villages and relevant agencies, such as Manggala Agni Daops Ketapang, village heads from Sungai Kelik, Tanjung Medan, Simpang Tiga Sembelangaan, and Laman Santong. The MoU formalizes the commitment of both the company and stakeholders to cooperate in managing fire risks within the Nanga Tayap sub-district. Furthermore, the company has conducted fire management training for surrounding villages. For instance, the Forestry Training and Firefighting Simulation event held on June 24, 2024, was attended by 27 participants from neighboring villages such as Kayong Utara and Kayong Tuhe. These efforts highlight the company's proactive approach to community involvement and collaborative fire risk management.</p> | <p>2024, includes collaboration with local villages and relevant agencies, such as Manggala Agni Daops Ketapang, village heads from Sungai Kelik, Tanjung Medan, Simpang Tiga Sembelangaan, and Laman Santong. The MoU formalizes the commitment of both the company and stakeholders to cooperate in managing fire risks within the Nanga Tayap sub-district. Furthermore, the company has conducted fire management training for surrounding villages. For instance, the Forestry Training and Firefighting Simulation event held on June 24, 2024, was attended by 27 participants from neighboring villages such as Kayong Utara and Kayong Tuhe. These efforts highlight the company's proactive approach to community involvement and collaborative fire risk management.</p> | |
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PROCEDURAL NOTE for 7.12

The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.

The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems. High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.

Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).

The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.

Criteria 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.

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| <p>7.12.1 (C)</p> | <p>Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> | <p>Based on the information provided, it appears that the certification unit began planting in 2012, while the HCV study (High Conservation Value) was conducted later in 2014. This gap suggests that land was cleared before the completion of the HCV assessment. However, it has been clarified that the company performed a LUCA (Land Use Change Analysis), which was approved by RSPO, identifying some areas that had already been cleared as secondary forests. The LUCA analysis showed the following findings for the respective companies:</p> <ol style="list-style-type: none"> 1. PT LSM <ul style="list-style-type: none"> ○ Conservation Area Obligation: 1,628 hectares ○ Raw Liability: 3,006 hectares ○ Estimated Area for Remediation: 740 hectares 2. PT GMS <ul style="list-style-type: none"> ○ Conservation Area Obligation: 39.54 hectares ○ Raw Liability: 4,258.08 hectares ○ Estimated Area for Remediation: 176.83 hectares 3. PT NAS | <p>Based on the information provided, it appears that the certification unit began planting in 2012, while the HCV study (High Conservation Value) was conducted later in 2014. This gap suggests that land was cleared before the completion of the HCV assessment. However, it has been clarified that the company performed a LUCA (Land Use Change Analysis), which was approved by RSPO, identifying some areas that had already been cleared as secondary forests. The LUCA analysis showed the following findings for the respective companies:</p> <ol style="list-style-type: none"> 1. PT LSM <ul style="list-style-type: none"> ○ Conservation Area Obligation: 1,628 hectares ○ Raw Liability: 3,006 hectares ○ Estimated Area for Remediation: 740 hectares 2. PT GMS <ul style="list-style-type: none"> ○ Conservation Area Obligation: 39.54 hectares ○ Raw Liability: 4,258.08 hectares ○ Estimated Area for Remediation: 176.83 hectares 3. PT NAS | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |
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| | | <ul style="list-style-type: none"> ○ Conservation Area Obligation: 1,027.82 hectares ○ Raw Liability: 1,384.25 hectares ○ Estimated Area for Remediation: 36.78 hectares <p>4. PT LGI</p> <ul style="list-style-type: none"> ○ Conservation Area Obligation: 761.35 hectares ○ Raw Liability: 1,588.96 hectares ○ Estimated Area for Remediation: 345.66 hectares | <ul style="list-style-type: none"> ○ Conservation Area Obligation: 1,027.82 hectares ○ Raw Liability: 1,384.25 hectares ○ Estimated Area for Remediation: 36.78 hectares <p>4. PT LGI</p> <ul style="list-style-type: none"> ○ Conservation Area Obligation: 761.35 hectares ○ Raw Liability: 1,588.96 hectares ○ Estimated Area for Remediation: 345.66 hectares | |
| 7.12.2 (C) | <p>HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> | <p>PT LSM (PT Ladang Sawit Mas) PT LSM has a High Conservation Value (HCV) assessment document prepared by PT Sonokeling Akreditasi Nusantara in 2014, with field data collection carried out from April 26 – May 8, 2013, and the final report released in December 2013. The assessment was conducted by RSPO-accredited assessor Kresno Dwi Santosa. The assessment refers to the location permit held by PT Ladang Sawit Mas, dated November 11, 2008, covering an area of 8,300 hectares.</p> <p>Based on the HCV study, an HCV area of 1,188.7 hectares was identified, consisting of river boundaries, shrub areas, forested areas, and peat areas. The identified HCV</p> | <p>PT LSM (PT Ladang Sawit Mas) PT LSM has a High Conservation Value (HCV) assessment document prepared by PT Sonokeling Akreditasi Nusantara in 2014, with field data collection carried out from April 26 – May 8, 2013, and the final report released in December 2013. The assessment was conducted by RSPO-accredited assessor Kresno Dwi Santosa. The assessment refers to the location permit held by PT Ladang Sawit Mas, dated November 11, 2008, covering an area of 8,300 hectares.</p> <p>Based on the HCV study, an HCV area of 1,188.7 hectares was identified, consisting of river boundaries, shrub areas, forested areas, and peat areas. The identified HCV</p> | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>types at PT LSM are:</p> <ul style="list-style-type: none"> • HCV 1.2, 1.3, 1.4 (biological diversity) • HCV 2.3 (fragile ecosystems) • HCV 4.1 (ecosystem services) • HCV 5 (landscape-level ecosystems) <p>The HCV study identified several types of flora and fauna, with a total of 154 species of flora, 6 of which are RTE (Rare, Threatened, and Endangered) species such as Bengkapas (<i>Vatica oblongifolia</i>), Majau Air (<i>Shorea lepidota</i>), Meranti Merah (<i>Shorea smithiana</i>), Meranti Batu (<i>Shorea platyclados</i>), Ramin (<i>Gonytilus bancanus</i>), and Tengawang (<i>Shorea stenoptera</i>).</p> <p>For fauna, there are 95 species of birds, 18 species of mammals, 6 species of reptiles, and 1 amphibian. Among these, some RTE species were identified, including Banggat Lutung, Simpai Lutung, Orangutan, Kalawat Gibbon, Timor Deer, Turtle, Senyulong, Proboscis Monkey, Beaver, Storm Stork, Tongtong Stork, Cucak Rawa, Kerbau Egrets, Punai Besar, and Blue-necked King Prawn.</p> <p>The HCV report was reviewed by Kunkun Jaya Gurmaya in August 2013. Referring to the HGU (Hak Guna Usaha - Land Use Rights) area of 5,718.63 hectares, the area of HCV within it is 315.60 hectares (141.00 hectares from BTJE, 174.60 hectares from HJYE).</p> <p>PT GMS (PT Gemilang Makmur Subur)</p> | <p>types at PT LSM are:</p> <ul style="list-style-type: none"> • HCV 1.2, 1.3, 1.4 (biological diversity) • HCV 2.3 (fragile ecosystems) • HCV 4.1 (ecosystem services) • HCV 5 (landscape-level ecosystems) <p>The HCV study identified several types of flora and fauna, with a total of 154 species of flora, 6 of which are RTE (Rare, Threatened, and Endangered) species such as Bengkapas (<i>Vatica oblongifolia</i>), Majau Air (<i>Shorea lepidota</i>), Meranti Merah (<i>Shorea smithiana</i>), Meranti Batu (<i>Shorea platyclados</i>), Ramin (<i>Gonytilus bancanus</i>), and Tengawang (<i>Shorea stenoptera</i>).</p> <p>For fauna, there are 95 species of birds, 18 species of mammals, 6 species of reptiles, and 1 amphibian. Among these, some RTE species were identified, including Banggat Lutung, Simpai Lutung, Orangutan, Kalawat Gibbon, Timor Deer, Turtle, Senyulong, Proboscis Monkey, Beaver, Storm Stork, Tongtong Stork, Cucak Rawa, Kerbau Egrets, Punai Besar, and Blue-necked King Prawn.</p> <p>The HCV report was reviewed by Kunkun Jaya Gurmaya in August 2013. Referring to the HGU (Hak Guna Usaha - Land Use Rights) area of 5,718.63 hectares, the area of HCV within it is 315.60 hectares (141.00 hectares from BTJE, 174.60 hectares from HJYE).</p> <p>PT GMS (PT Gemilang Makmur Subur)</p> | |
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| | | <p>PT GMS has an HCV assessment document prepared by PT Sonokeling Akreditasi Nusantara in 2014. Field data collection was conducted from October 6-11, 2015, and the final report was issued on September 14, 2016. The assessment was carried out by RSPO-accredited assessor Resit Sozer. The assessment refers to the location permit held by PT Gemilang Makmur Subur, which covers 5,190 hectares.</p> <p>Based on the HCV study, an HCV area of 848.8 hectares was identified, consisting of river boundaries, shrub areas, forested areas, and peat areas. The identified HCV types at PT GMS are:</p> <ul style="list-style-type: none"> • HCV 1.2, 1.3, 1.4 (biological diversity) • HCV 2.3 (fragile ecosystems) • HCV 4.1 (ecosystem services) • HCV 5 (landscape-level ecosystems) <p>The HCV study identified several types of flora and fauna, with a total of 101 species of flora, 16 of which are RTE species such as Orangutan (<i>Pongo pygmaeus</i>), Owa Ungko (<i>Hylobates agilis</i>), and Krabuku Inggat (<i>Tarsius sp.</i>). It also identified 7 RTE species of flora such as Nyatoh (<i>Palaquium leiocarpum</i>), Pitcher Plant Perluk (<i>Nepenthes ampullaria</i>), and Ulin (<i>Eusideroxylon zwageri</i>).</p> <p>It is known that the HCV area in PT GMS is located in Kebun Cemara Jaya (CMJE), covering 76.22 hectares.</p> | <p>PT GMS has an HCV assessment document prepared by PT Sonokeling Akreditasi Nusantara in 2014. Field data collection was conducted from October 6-11, 2015, and the final report was issued on September 14, 2016. The assessment was carried out by RSPO-accredited assessor Resit Sozer. The assessment refers to the location permit held by PT Gemilang Makmur Subur, which covers 5,190 hectares.</p> <p>Based on the HCV study, an HCV area of 848.8 hectares was identified, consisting of river boundaries, shrub areas, forested areas, and peat areas. The identified HCV types at PT GMS are:</p> <ul style="list-style-type: none"> • HCV 1.2, 1.3, 1.4 (biological diversity) • HCV 2.3 (fragile ecosystems) • HCV 4.1 (ecosystem services) • HCV 5 (landscape-level ecosystems) <p>The HCV study identified several types of flora and fauna, with a total of 101 species of flora, 16 of which are RTE species such as Orangutan (<i>Pongo pygmaeus</i>), Owa Ungko (<i>Hylobates agilis</i>), and Krabuku Inggat (<i>Tarsius sp.</i>). It also identified 7 RTE species of flora such as Nyatoh (<i>Palaquium leiocarpum</i>), Pitcher Plant Perluk (<i>Nepenthes ampullaria</i>), and Ulin (<i>Eusideroxylon zwageri</i>).</p> <p>It is known that the HCV area in PT GMS is located in Kebun Cemara Jaya (CMJE), covering 76.22 hectares.</p> | |
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| | <p>PT LGI (PT Lestari Gemilang Intisawit) and PT NAS (PT Nabati Agro Subur) PT LGI and PT NAS conducted HCV-HCS assessment on October 2021, carried out by Aksenta and approved assessor Idung Risdiyanto (ALS15029IR). Notes : this HCV-HCS assessment determined the area of interest (AOI) for total 173,526 Ha areas (includes PT. Agro Manunggal Sawitindo (not in the certification scope for this audit))</p> <p>.</p> <p>Based on the HCV study, HCV area identified in PT.LGI and PT. NAS with following details : PT.LGI total HCV area 1,079.58 Ha (891.13 ha in Bengkirai Jaya estate and 188.45 in Natai Jaya estate) and PT.NAS total HCV area 46.87 Ha (4.59 in Bengkirai Jaya Estate and 42.28 Ha in Natai Jaya Estate), consisting of river boundaries, shrub areas, forested areas, and cemetery areas. The identified HCV types at PT LGI and PT NAS are:</p> <ul style="list-style-type: none"> • HCV 1 (species and habitats) • HCV 4 (ecosystem services) • HCV 5 (landscape-level ecosystems) • HCV 6 (cultural and historical values) <p>Summary of HCV areas from each certification unit are presented in the table below Notes there is difference between HCV area identified vs areal statement because areal statement HCV area are based on actual hectarage during ground</p> | <p>PT LGI (PT. PT Lestari Gemilang Intisawit) and PT NAS (PT PT Nabati Agro Subur) PT LGI and PT NAS conducted HCV-HCS assessment on October 2021, carried out by Aksenta and approved assessor Idung Risdiyanto (ALS15029IR). Notes : this HCV-HCS assessment determined the area of interest (AOI) for total 173,526 Ha areas (includes PT. Agro Manunggal Sawitindo (not in the certification scope for this audit))</p> <p>.</p> <p>Based on the HCV study, HCV area identified in PT.LGI and PT. NAS with following details : PT.LGI total HCV area 1,079.58 Ha (891.13 ha in Bengkirai Jaya estate and 188.45 in Natai Jaya estate) and PT.NAS total HCV area 46.87 Ha (4.59 in Bengkirai Jaya Estate and 42.28 Ha in Natai Jaya Estate), consisting of river boundaries, shrub areas, forested areas, and cemetery areas. The identified HCV types at PT LGI and PT NAS are:</p> <ul style="list-style-type: none"> • HCV 1 (species and habitats) • HCV 4 (ecosystem services) • HCV 5 (landscape-level ecosystems) • HCV 6 (cultural and historical values) <p>Summary of HCV areas from each certification unit are presented in the table below Notes (there is difference between HCV area identified vs areal statement because areal statement HCV area are based on actual hectarage during ground</p> |
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| | | verification and some HCV area are located on liability area that not includes in this scope certification) | verification and some HCV area are located on liability area that not includes in this scope certification) | | |
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| | | : | : | | |
| Company entity | Estate | HCV areas (ha) | Company entity | Estate | HCV areas (ha) |
| PT Ladang Sawit Mas | Bukit tunggal jaya estate (BTJE) | 141.00 | PT Ladang Sawit Mas | Bukit tunggal jaya estate (BTJE) | 141.00 |
| | Hamparan jaya estate (HJYE) | 174.60 | | Hamparan jaya estate (HJYE) | 174.60 |
| PT Gemilang Makmur Subur | Cemara Jaya Estate (CMJE) | 76.22 | PT Gemilang Makmur Subur | Cemara Jaya Estate (CMJE) | 76.22 |
| PT Lestari Gemilang Intisawit | Bengkirai jaya estate (BJYE) | 891.13 | PT Lestari Gemilang Intisawit | Bengkirai jaya estate (BJYE) | 891.13 |
| | Natai Jaya estate (NTJE) | 188.45 | | Natai Jaya estate (NTJE) | 188.45 |
| PT. Nabati Agro subur | Bengkirai jaya estate (BJYE) | 4.59 | PT. Nabati Agro subur | Bengkirai jaya estate (BJYE) | 4.59 |
| | Natai jaya estate (NTJE) | 42.28 | | | |
| Total | | 1518.27 | | | |

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| | | | | Natai jaya estate (NTJE) | 42.28 | |
| | | | Total | | 1518.27 | |
| 7.12.2 b) | Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations. | Based on document review and interview with management shown that PT.LGI and PT NAS conduct new planting after November 2018, therefore this unit supply base conducted HCV-HCS assessment as per informed in indicator 7.12.1. | Based on document review and interview with management shown that PT.LGI and PT NAS conduct new planting after November 2018, therefore this unit supply base conducted HCV-HCS assessment as per informed in indicator 7.12.1 | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) | | |
| 7.12.3 (C) | <p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and</p> | Not applicable, as Indonesia has not been categorized as a country with High Forest Cover Landscape (HFCL). | Not applicable, as Indonesia has not been categorized as a country with High Forest Cover Landscape (HFCL). | <input type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input checked="" type="checkbox"/> Not Applicable (justification required) | | |

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| | <p>development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> | | | |
| <p>7.12.4 (C)</p> | <p>Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level</p> | <p>The certification unit has a High Conservation Value (HCV) management and monitoring plan for the 2024 period. The management and monitoring plan includes:</p> <ul style="list-style-type: none"> • Boundary marker installation • Signboard installation • Rehabilitation and enrichment • Outreach to communities and employees • Monthly patrols • Flora and fauna monitoring • Incidental monitoring • Forest patrols • Fire hazard monitoring | <p>The certification unit has a High Conservation Value (HCV) management and monitoring plan for the 2024 period. The management and monitoring plan includes:</p> <ul style="list-style-type: none"> • Boundary marker installation • Signboard installation • Rehabilitation and enrichment • Outreach to communities and employees • Monthly patrols • Flora and fauna monitoring • Incidental monitoring • Forest patrols • Fire hazard monitoring | <p> <input type="checkbox"/> Conform <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) </p> |

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| <p>considerations (where these are identified).</p> | <p>The HCV management plan was developed through public consultation, conducted concurrently with the Social Impact Assessment (SIA), involving relevant stakeholders. This is evidenced by the minutes of the Environmental and Social Management Review Meeting held in September 2024, which included discussions on the HCV management plan as one of the agenda items.</p> <p>The certification unit can also present a summary report on the monitoring and rehabilitation of conservation areas at PT Ladang Sawit Mas for the 2024 period, and the results of this report will inform the management plan for the following year.</p> <p>The company has a group department policy with document number 001/KG-BGA/CSV/04/2021/RO revision 0, dated June 4, 2021, which was approved by the Director of CHC and Director of CAP. This policy states that PT Bumitama and its subsidiaries are committed to the environment and committed to protecting, restoring, or jointly managing areas identified as having high conservation value.</p> <p>The company also has an HCV management plan that includes activities such as installing boundary markers, installing signboards, rehabilitation and</p> | <p>The HCV management plan was developed through public consultation, conducted concurrently with the Social Impact Assessment (SIA), involving relevant stakeholders. This is evidenced by the minutes of the Environmental and Social Management Review Meeting held in September 2024, which included discussions on the HCV management plan as one of the agenda items.</p> <p>The certification unit can also present a summary report on the monitoring and rehabilitation of conservation areas at PT Ladang Sawit Mas for the 2024 period, and the results of this report will inform the management plan for the following year.</p> <p>The company has a group department policy with document number 001/KG-BGA/CSV/04/2021/RO revision 0, dated June 4, 2021, which was approved by the Director of CHC and Director of CAP. This policy states that PT Bumitama and its subsidiaries are committed to the environment and committed to protecting, restoring, or jointly managing areas identified as having high conservation value.</p> <p>The company also has an HCV management plan that includes activities such as installing boundary markers, installing signboards, rehabilitation and</p> | |
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| | | <p>enrichment, outreach to communities and employees, and patrols for maintaining boundary markers.</p> <p>Field observations during the audit, such as in the HCV riparian area of the Kayong River in Block E27/F27 Division 5 BJYE and the HCV Bukit Rungau in Block E17/16 Division 2/1 CMJE, showed areas of HCV that have been encroached upon and planted with oil palm by the community.</p> <p>A review of the document on the implementation of the HCV management and monitoring report for the first semester of 2024 for PT GMS revealed that the occupied HCV areas have not been monitored. CAR#10.</p> | <p>enrichment, outreach to communities and employees, and patrols for maintaining boundary markers.</p> <p>Field observations during the audit, such as in the HCV riparian area of the Kayong River in Block E27/F27 Division 5 BJYE and the HCV Bukit Rungau in Block E17/16 Division 2/1 CMJE, showed areas of HCV that have been encroached upon and planted with oil palm by the community.</p> <p>A review of the document on the implementation of the HCV management and monitoring report for the first semester of 2024 for PT GMS revealed that the occupied HCV areas have not been monitored. CAR#10.</p> | |
| 7.12.5 | <p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> | <p>The company has a group department policy with document number 001/KG-BGA/CSV/04/2021/RO revision 0, dated June 4, 2021, which was approved by the Director of CHC and Director of CAP. This policy outlines that PT Bumitama and its subsidiaries are committed to the environment and to protecting, restoring, or jointly managing areas identified as having high conservation value (HCV).</p> <p>Field observations during the audit, for example, in the HCV riparian area of the Kayong River in Block E27/F27 Division 5 BJYE and in the HCV Bukit Rungau in Block E17/16 Division 2/1 CMJE,</p> | <p>The company has a group department policy with document number 001/KG-BGA/CSV/04/2021/RO revision 0, dated June 4, 2021, which was approved by the Director of CHC and Director of CAP. This policy outlines that PT Bumitama and its subsidiaries are committed to the environment and to protecting, restoring, or jointly managing areas identified as having high conservation value (HCV).</p> <p>Field observations during the audit, for example, in the HCV riparian area of the Kayong River in Block E27/F27 Division 5 BJYE and in the HCV Bukit Rungau in Block E17/16 Division 2/1 CMJE,</p> | <p><input type="checkbox"/> Conform</p> <p><input type="checkbox"/> Major Nonconformity</p> <p><input checked="" type="checkbox"/> Minor Nonconformity</p> <p><input type="checkbox"/> Opportunity for Improvement</p> <p><input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | indicated that there are HCV areas that have been encroached upon and planted with oil palm by the local community. CAR#11 | indicated that there are HCV areas that have been encroached upon and planted with oil palm by the local community. CAR#11 | |
| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. | The certification unit has presented the group department policy related to the management and monitoring of High Conservation Value (HCV) and High Carbon Stock (HCS) areas, dated June 4, 2021, which was approved by the Director of CHC and reviewed by the Group Head of Corporate Sustainability and CSR. This policy states that Bumitama is committed to the protection of species that are classified as protected and endangered, preventing hunting activities, and maintaining the balance of populations of other wildlife species that are part of the food chain for the protected species. Routine socialization activities regarding RTE (Rare, Threatened, and Endangered) species have been programmed and implemented by the company, such as the HCV socialization activities held in June 2024 for employees at the BTJE estate, and in August 2024 for employees at the Cemara Jaya estate. Based on interviews with workers at the BTJM and BTJE housing complexes, it is | The certification unit has presented the group department policy related to the management and monitoring of High Conservation Value (HCV) and High Carbon Stock (HCS) areas, dated June 4, 2021, which was approved by the Director of CHC and reviewed by the Group Head of Corporate Sustainability and CSR. This policy states that Bumitama is committed to the protection of species that are classified as protected and endangered, preventing hunting activities, and maintaining the balance of populations of other wildlife species that are part of the food chain for the protected species. Routine socialization activities regarding RTE (Rare, Threatened, and Endangered) species have been programmed and implemented by the company, such as the HCV socialization activities held in June 2024 for employees at the BTJE estate, and in August 2024 for employees at the Cemara Jaya estate. Based on interviews with workers at the BTJM and BTJE housing complexes, it is | <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>known that the workers are aware of the company's policy to protect RTE species. Additionally, socialization efforts regarding species protection can also be found in the office areas and company plantations, where posters of wildlife species and hunting prohibition signs are displayed.</p> | <p>known that the workers are aware of the company's policy to protect RTE species. Additionally, socialization efforts regarding species protection can also be found in the office areas and company plantations, where posters of wildlife species and hunting prohibition signs are displayed.</p> | |
| 7.12.7 | <p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> | <p>The management unit has conducted monitoring of HCV areas, peatlands, and RTE species in the PT LSM area. Some examples of monitoring activities include HCV area patrol reports, species monitoring, and the implementation report for HCV area management for the year 2024.</p> <p>Field observations during the audit, such as in the HCV river buffer areas of Kayong Block E27/F27 Division 5 BJYE and in the HCV Bukit Rungau Block E17/16 Division 2/1 CMJE, showed that some HCV areas have been encroached upon and planted with oil palms by local communities. Document reviews of the implementation of KBKT monitoring and management for</p> | <p>The management unit has conducted monitoring of HCV areas, peatlands, and RTE species in the PT LSM area. Some examples of monitoring activities include HCV area patrol reports, species monitoring, and the implementation report for HCV area management for the year 2024.</p> <p>Field observations during the audit, such as in the HCV river buffer areas of Kayong Block E27/F27 Division 5 BJYE and in the HCV Bukit Rungau Block E17/16 Division 2/1 CMJE, showed that some HCV areas have been encroached upon and planted with oil palms by local communities. Document reviews of the implementation of KBKT monitoring and management for</p> | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required) |

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| | | <p>PT GMS in the first semester of 2024 revealed that these encroached HCV areas have not been adequately monitored.</p> <p>In this regard, the audit team determined that CAR#10 issued under indicator 7.12.4 covers the company's failure to determine and prepare effective management and monitoring plans for HCV areas based on monitoring feedback.</p> | <p>PT GMS in the first semester of 2024 revealed that these encroached HCV areas have not been adequately monitored.</p> <p>In this regard, the audit team determined that CAR#10 issued under indicator 7.12.4 covers the company's failure to determine and prepare effective management and monitoring plans for HCV areas based on monitoring feedback.</p> | |
| 7.12.8 (C) | <p>Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> | <p>There has been progress in communication related to the RaCP status for PT LSM, PT LGI, PT GMS, and PT NAS, as evidenced by the approval of the Bumitama RaCP Plan by RSPO (rspocompensation@rspo.org) on January 9, 2023. This approval confirms that the RaCP process for Bumitama has been completed and that certification can proceed. The RaCP process for all Bumitama companies is divided into two phases: the first compensation phase includes 17 company entity with the addition of two new companies entity, PT GHL and PT TTL Extension, as follows:</p> <ul style="list-style-type: none"> • Compensation Type: Hectare-to-hectare – The compensation plan for FCL identified in 17 management units proposes compensation through ex-situ management, managed in social forestry areas allocated to two different village management units. | <p>There has been progress in communication related to the RaCP status for PT LSM, PT LGI, PT GMS, and PT NAS, as evidenced by the approval of the Bumitama RaCP Plan by RSPO (rspocompensation@rspo.org) on January 9, 2023. This approval confirms that the RaCP process for Bumitama has been completed and that certification can proceed. The RaCP process for all Bumitama companies is divided into two phases: the first compensation phase includes 17 company entity with the addition of two new companies entity, PT GHL and PT TTL Extension, as follows:</p> <ul style="list-style-type: none"> • Compensation Type: Hectare-to-hectare – The compensation plan for FCL identified in 17 management units proposes compensation through ex-situ management, managed in social forestry areas allocated to two different village management units. | <p><input checked="" type="checkbox"/> Conform <input type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/> Not Applicable (justification required)</p> |

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| | | <ul style="list-style-type: none"> • Project Locations: Belaban Tujuh Village Forest – Sungai Melayu Village, Gunung Tarak Village Forest – Simpang Tiga Sebelangaan Village. • Expected Compensation Area: 7,708 hectares (6,881.86 ha for this batch, with an additional 824.38 ha of compensation area to be added later for PT GHL and PT TTL Extension). <p>Although the total expected compensation area is 7,708 ha, the total collective area for this compensation plan for FCL is only 6,881.86 ha. Therefore, the company plans to use an additional 824.38 ha of compensation area, which will be adopted later for PT GHL and PT TTL Extension, which are also under Bumitama. The company can also provide evidence that PT LSM, PT LGI, and PT GMS are included in the 17 management units mentioned in the RaCP, with the RaCP status approved on January 9, 2023.</p> <p>However, regarding the RaCP status of PT NAS, this has not been approved yet, as it is still under review. This is because the RaCP status for PT NAS is included in Phase 2 of the RaCP document for PT Bumitama, which consists of 7 other PTs. Based on document review results, it is also known that PT NAS is still under a 3-year NPP sanction.</p> <p>Based on the verification results in this</p> | <ul style="list-style-type: none"> • Project Locations: Belaban Tujuh Village Forest – Sungai Melayu Village, Gunung Tarak Village Forest – Simpang Tiga Sebelangaan Village. • Expected Compensation Area: 7,708 hectares (6,881.86 ha for this batch, with an additional 824.38 ha of compensation area to be added later for PT GHL and PT TTL Extension). <p>Although the total expected compensation area is 7,708 ha, the total collective area for this compensation plan for FCL is only 6,881.86 ha. Therefore, the company plans to use an additional 824.38 ha of compensation area, which will be adopted later for PT GHL and PT TTL Extension, which are also under Bumitama. The company can also provide evidence that PT LSM, PT LGI, and PT GMS are included in the 17 management units mentioned in the RaCP, with the RaCP status approved on January 9, 2023.</p> <p>However, regarding the RaCP status of PT NAS, this has not been approved yet, as it is still under review. This is because the RaCP status for PT NAS is included in Phase 2 of the RaCP document for PT Bumitama, which consists of 7 other PTs. Based on document review results, it is also known that PT NAS is still under a 3-year NPP sanction.</p> <p>Based on the verification results in this</p> | |
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| | | surveillance, it is confirmed that the non-conformance on this indicator has been addressed. | surveillance, it is confirmed that the non-conformance on this indicator has been addressed. | |
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6. Summary of Audit Findings

| Summary of nonconformities and opportunities for improvement under the RSPO Principles & Criteria | | | | |
|--|----------|----------|-------------------------------|-------------------|
| Principle | Major | Minor | Opportunities for Improvement | Total No Findings |
| Principle 1: Behave Ethically and Transparently | | 1 | | 1 |
| Principle 2: Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction. | | 1 | 1 | 2 |
| Principle 3: Optimise productivity, efficiency, positive impacts and resilience (<i>Includes IP and/or MB Module</i>) | 2 | | | 2 |
| Principle 4: Respect Community and Human Rights and Deliver Benefits | 1 | | | 1 |
| Principle 5: Support Smallholder Inclusion | | | | 0 |
| Principle 6: Respect Workers Rights and Conditions | 2 | | 2 | 4 |
| Principle 7: Protect, Conserve and Enhance Ecosystems and the Environment | 3 | 1 | | 4 |
| Certification Systems Document | | | | |
| Total | 8 | 3 | 3 | 14 |

7. Nonconformity(ies) Issue in this Audit

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| Indicator Number | 1.1.5 Minor |
| Nonconformity Number | 01 |
| Nonconformity Category | <input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To <i>(when more than one site/member)</i> : PT. Ladang Sawit Mas | |
| Deadline: | <input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. |
| Nonconformity Statement: The list of stakeholders does not contain updated information | |
| Evidence: The company has a list of external and internal stakeholders of PT. Ladang Sawit Mas, created on October 7, 2024, by the CSR assistant. This list includes stakeholders such as village officials, FFB suppliers, contractors, vendors, government agencies, and internal parties. The audit team conducted sampling and made phone contact with stakeholders, such as the Department of Manpower, the Department of Agriculture, the Department of Environment, and the Department of Land Affairs, and found that the information listed, such as phone numbers, was accurate and aligned with the actual situation. Field observations during the audit revealed that there is land occupation by the local community/occupants. Additionally, a review of the FFB acceptance documents for the BTJM Mill for the period 2023-2024 showed that the POM accepts FFB from third parties, such as the Rungau Sejahtera Cooperative, Istana Pawan Mandiri Cooperative, Bukit Tunggal Sejahtera Cooperative, and the Lemha Natai Rimba Group. In this regard, the land occupants and FFB suppliers are not yet included in the stakeholder list owned by the company. | |
| Root Cause Analysis | |
| Correction(s) | |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | |
| Date of Response | DD Mmm YYYY |

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| Audit Team Conclusion <i>(including any evidence reviewed)</i> | |
| Status of Nonconformity | <input type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | DD Mmm YYYY |

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|---|---|
| Indicator Number | 2.3.2 Minor |
| Nonconformity Number | 02 |
| Nonconformity Category | <input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To <i>(when more than one site/member)</i> : PT. Ladang Sawit Mas | |
| Deadline: | <input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1. |
| Nonconformity Statement: The company has not been able to provide evidence of the legal status of the land of the FFB supplier farmers. | |
| Evidence: The mill receives FFB from outside the RSPO scope and has provided a list of direct and indirect FFB suppliers. Based on this list, one of the indirect FFB suppliers is PT Putra Djaya Perkasa. The company has provided the geolocation data for each supplying farmer. However, the company has not shown proof of land legality for each of the farmers. Additionally, the company has not reported to RSPO regarding the timeline for fulfilling Indicator 2.3.2, in accordance with the RSPO announcement on the RSPO website https://rspo.org/interim-measure-for-fulfilment-of-indicator-232-of-the-2018-rspo-principles-and-criteria-on-legality-of-indirect-ffb-supplies/ | |
| Root Cause Analysis | |
| Correction(s) | |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | |

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| Date of Response | DD Mmm YYYY |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | |
| Status of Nonconformity | <input type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | DD Mmm YYYY |

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|---|--|
| Indicator Number | 3.6.2 Major |
| Nonconformity Number | 03 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To <i>(when more than one site/member):</i> PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | The effectiveness of the H&S plan to address health and safety risks to people is monitored |
| Nonconformity Statement: There is insufficient evidence that the OHS (Occupational Health and Safety) plan has been effectively monitored. | |
| Evidence: The company has the document HIRAC Estate IBPR/BGA-K3/11/2023-R01 dated November 16, 2023, as part of the company's OHS (Occupational Health and Safety) plan, which regulates the storage of PPE (Personal Protective Equipment) in designated areas. Additionally, the company also has a PPE procedure document, BGA-SOP-CCS-1106.1-R0, effective from December 1, 2011, which in point 7.7.2 stipulates that PPE contaminated with hazardous chemicals is prohibited from being taken home. The Minister of Manpower Regulation No. 03 of 1986 concerning Safety and Health Requirements at Workplaces handling pesticides, in Article 2, Paragraph 2, point b, explains that PPE includes work clothing, high boots, gloves, protective glasses or face shields, and respiratory protection. The company has provided a wash house as a facility for storing work tools and PPE that have been exposed to toxins. However, based on field observations and employee interviews at NJYE and | |

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| BTJE, spraying employees do not store their PPE, such as boots and work clothing contaminated with pesticide toxins, in the designated storage areas. This is not in accordance with the HIRAC procedure and the existing PPE procedure. | |
| Root Cause Analysis | There is a lack of employee discipline in applying the PPE SOP, particularly regarding the storage of PPE in the washing facility. |
| Correction(s) | <ol style="list-style-type: none"> 1. A memo emphasizing the storage of PPE and work tools. 2. Socialization of the memo regarding the storage of PPE and work tools. 3. Monitoring of PPE storage by supervisors (foremen) |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | <ol style="list-style-type: none"> 1. Monitoring of PPE storage by supervisors (foremen). Routine inspections by the sustainability foreman. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>Verification on January 23, 2025 Root cause analysis, corrective actions, and preventive actions are acceptable. The company has shown improvements, including:</p> <ul style="list-style-type: none"> • Inter Office Memo (IOM) No. 002/RSPONT/XI/2024 dated November 6, 2024, issued by the Region Head of Nanga Tayap regarding the regulations on the use of Personal Protective Equipment (PPE), which stipulates that PPE must be maintained and stored at designated locations. • A Socialization Report of the IOM to all employees of Estate BJYE, BTJE, CMJE, NJYE, from November 7–11, 2024. • A Spray HSE Checklist Form. <p>But company are unable to shown implementation of PPE storage monitoring. CAR still OPEN</p> <p>Verification on January 26, 2025 The company has provided work instructions and a PPE storage monitoring form, which will be implemented. Based on this explanation, the non-compliance has been addressed.</p> |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 26 Jan 2025 |

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| Indicator Number | 3.8.16 Major | | | | |
| Nonconformity Number | 04 | | | | |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity | | | | |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | |
| Date of Nonconformity Issued | 01 Nov 2024 | | | | |
| Nonconformity Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | | | | | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting | | | | |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site | | | | |
| Standard Reference | Registration of Transactions : <ul style="list-style-type: none"> Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform. | | | | |
| Nonconformity Statement: | | | | | |
| The company has not been able to demonstrate that it has removed stock from RSPO PalmTrace for the sale of CSPK (Crude Sustainable Palm Kernel) through conventional channels. | | | | | |
| Evidence: | | | | | |
| Based on mass balance data period January 2023 – September 2024, shown that: | | | | | |
| | Month | Production PK | | Sales PK | |
| | | Certified | Noncertified | RSPO | Non RSPO |
| | Opening stock | 391 | 0 | | |
| | June 23 | 564 | 932 | 153 | 1,345 |
| | July 23 | 707 | 1,065 | 146 | 786 |
| | Aug 23 | 700 | 996 | 608 | 1,546 |
| | Sept 23 | 505 | 898 | 500 | 1,530 |
| | October 23 | 558 | 948 | 300 | 1,107 |
| | November 23 | 495 | 906 | 400 | 943 |
| | December 23 | 494 | 794 | 800 | 492 |
| | January 24 | 455 | 738 | 0 | 887 |
| | February 24 | 387 | 650 | 600 | 838 |
| | March 24 | 448 | 532 | 200 | 727 |
| | April 24 | 516 | 715 | 300 | 907 |
| | Mei 24 | 599 | 699 | 200 | 882 |
| | June 24 | 437 | 585 | 400 | 702 |

| | | | | |
|---------|-------|--------|-------|--------|
| July 24 | 653 | 621 | 450 | 790 |
| Aug 24 | 407 | 459 | 250 | 613 |
| Total | 8,316 | 11,538 | 5,307 | 14,095 |

Based on the table above, it is known that in the sample from June 2023 to August 2024 (both the previous and current licenses), the non-RSPO PK (Palm Kernel) sales are higher than the non-RSPO PK production, indicating that the non-RSPO PK sales are utilizing CSPK stock (conventional sales). However, based on the mill transaction data on PalmTrace for BTJM, it is found that there has been no "remove stock" transaction from 2023 to May 2024.

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| Root Cause Analysis | The monitoring of the production and sale of CSPO and CSPK products has not been effective because the monitoring is not conducted monthly. Also, because the PIC for monitoring was not appointed yet |
| Correction(s) | <ol style="list-style-type: none"> 1. Appointment of a PIC for monitoring the production and sale of CSPO & CSPK. 2. Mechanisms for recording and monitoring, as well as the stock removal process. 3. Documentation evidence of stock removal. |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | <ul style="list-style-type: none"> • Appointment of a PIC for monitoring the production and sale of CSPO & CSPK • Monthly monitoring by the PIC SCCS. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>Verification on January 22, 2025. Root cause analysis, corrective actions, and evidence of improvements have been accepted. The company has provided improvement documents, including:</p> <ul style="list-style-type: none"> • Appointment of a PIC for monitoring the production and sale of CSPO and CSPK, as stated in the SK Appointment Document No. 001/SK-BGA/CS-CST/01/2025. • Work instructions for Documenting Supply Chain Mass Balance No. BGA-IK-CST-1207.01-R0, approved on January 2, 2025, which outlines the responsibilities of personnel related to the supply chain. • Evidence of credit allocation for CSPO stock dated November 1, 2024. • Evidence of stock removal for CSPK carried out on November 1, 2024. <p>Based on this explanation, the non-compliance has been addressed.</p> |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 4.2.1 Major |
| Nonconformity Number | 05 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | The mutually agreed system is in place, open to all parties affected, resolve disputes in an effective, timely and appropriate manner, ensuring the anonymity of complainants, Human Rights Defenders, community spokespersons and whistleblowers, where requested, as long as the report is supported with sufficient preliminary evidences. The system ensures that there is no risk of reprisal or intimidation and follows the RSPO's policy for HRDs. |
| Nonconformity Statement: The company has not been able to provide evidence of a mutual agreement with the affected parties regarding the resolution of complaints. | |
| Evidence: The company has the following documents: Complaint handling procedure outlined in the SOP Complaint document No. LSM-SUST-SOP-45, approved on January 1, 2019. A system to protect human rights defenders covered under IOM No. 05/IOM/Reg-Nanga Tayap/VI/2019, dated June 16, 2019. A system to maintain anonymity and protect whistleblowers covered in the document LSM-SUST-SOP-09. However, based on an interview with the management of the Kayong Sekayok Cooperative, it was found that the management does not understand the complaint submission mechanism, and the company has never conducted socialization regarding the complaint submission mechanism to the cooperative. Furthermore, the company has not been able to provide evidence of agreements with other affected parties regarding the complaint resolution mechanism that the company has in place. | |
| Root Cause Analysis | There is a lack of control by the PIC from each stakeholder in ensuring that stakeholders understand and agree with the grievance mechanism from the certification unit. |
| Correction(s) | <ol style="list-style-type: none"> 1. Conduct a re-socialization with stakeholders regarding the grievance mechanism. 2. A report on the agreement related to the grievance mechanism with stakeholders. |

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| Corrective Action Implemented <i>(including any evidence submitted)</i> | 1. Semester monitoring by the Social PIC. 2. Annual review through management review meetings. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>Verification on January 23, 2025. Root cause analysis, corrective actions, and preventive actions are acceptable. The company has provided the socialization reports and mutual agreements related to the grievance mechanism, including:</p> <ul style="list-style-type: none"> • A report on the socialization activity and mutual commitment with the Kayung Sekayok Cooperative, conducted on November 5, 2024, with the cooperative's signature on the agreement. • A report on the socialization activity and mutual commitment with the Sungai Kelik Village, conducted on December 19, 2024, with the village representative's signature on the agreement. • A report on the socialization activity and mutual commitment with the Mitra Penjualan Permai Cooperative, conducted on December 23, 2024, with the cooperative representative's signature on the agreement. • A report on the socialization activity and mutual commitment with the Rungau Sejahtera Cooperative, conducted on December 23, 2024, with the cooperative representative's signature on the agreement. • A report on the socialization activity and mutual commitment with the Bukit Tunggal Sejahtera Cooperative, conducted on December 23, 2024, with the cooperative representative's signature on the agreement. • A report on the socialization activity and mutual commitment with the Istana Pawan Mandiri Cooperative, conducted on December 23, 2024, with the cooperative representative's signature on the agreement. • A report on the socialization activity and mutual commitment with the contractor PT Garyber Link Group, conducted on December 18, 2024, with the contractor's signature on the agreement. <p>Based on the explanation above, the non-compliance has been addressed.</p> |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 6.1.1 Major |
| Nonconformity Number | 06 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. |
| Nonconformity Statement: There is insufficient evidence that the certification unit has implemented a non-discrimination policy and equal treatment in the recruitment of new employees. | |
| Evidence: The company has a Human Rights Policy document dated June 16, 2019, signed by RH Nanga Tayap. In this document, point 3 states that the BGA Group Management for the Nanga Tayap Region provides equal treatment and job opportunities without discrimination based on ethnicity, race, religion, caste, nationality, disability, gender, sexual orientation, union membership, political affiliation, and age. However, based on the verification of the company's job vacancy documents, it was found that there are still discriminatory requirements, namely: The Admin Payroll job vacancy requires a maximum age limit of 25 years and specifies that the gender must be female. The Admin BAPP job vacancy requires a maximum age limit of 25 years and specifies that the gender must be female. | |
| Root Cause Analysis | There is a lack of understanding by the PIC (Person in Charge) of recruitment regarding the discrimination policy. |
| Correction(s) | Verification by HR Region |
| Corrective Action Implemented (<i>including any evidence submitted</i>) | 1. Socialization to the PIC regarding the discrimination policy. 2. A memo on the policy for recruitment publication. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion (<i>including any evidence reviewed</i>) | January 21, 2025 |

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| | The root cause, corrective actions, and preventive actions are acceptable. The company has provided Circular Letter No. 037/MEMO-BGA/HR-MBTR/XII/2024 regarding the Recruitment Process Mechanism, dated December 19, 2024. The company has also conducted a socialization of the Human Rights Policy on November 8, 2024. Therefore, the non-compliance is considered resolved. |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 6.2.3 Major |
| Nonconformity Number | 07 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements. |
| Nonconformity Statement: The company does not comply with overtime work regulations for employees in accordance with labor regulations. Government Regulation No. 35 of 2021, Article 26 on Overtime Work, states that overtime can only be carried out for a maximum of 4 (four) hours in one (1) day and 18 (eighteen) hours in one (1) week. | |
| Evidence: From the field visit to the Bukit Tunggul Jaya Palm Oil Mill (PKS) and interviews with the boiler operator (initial S), evidence was found that operational workers at the mill work in 2 shifts. The first shift is from 07:00 to 16:00, and the second shift is from 16:00 until the processing is completed. This is corroborated by attendance records and overtime data for the staff at the mill, for example: <ul style="list-style-type: none"> • Week I of July 2024: 40 hours of overtime • Week III of July 2024: 40 hours of overtime • Week II of August 2024: 29 hours of overtime | |

- Week IV of August 2024: 28 hours of overtime
- Week II of September 2024: 29 hours of overtime
- Week IV of September 2024: 28 hours of overtime
- Week II of October 2024: 46 hours of overtime

A visit to the primary clinic in Metro and the auxiliary clinic in the estate, along with interviews with medical staff (doctors, nurses, and midwives), revealed the working hours of the healthcare staff, who also work in 2 shifts: the first shift from 07:00 to 16:00 and the second shift from 16:00 to 07:00. According to the schedule review for the period of September-October 2024, healthcare worker H (initial H) worked the second shift from 16:00 to 07:00 on September 27 and 28, 2024. Meanwhile, healthcare worker A (initial A) worked the second shift from 16:00 to 07:00 from September 24 to 26, 2024.

The calculation of the working hours in the second shift above shows that the overtime worked by employees exceeds 4 hours per day and 18 hours per week, which is not in accordance with Government Regulation No. 35 of 2021, Article 26 (Overtime Work). This is further supported by interviews with the labor department, which confirmed that overtime exceeding 18 hours is not allowed by regulations, especially when such overtime is continuous.

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| Root Cause Analysis | There is a lack of control by the PIC to ensure that the actual overtime hours comply with the applicable regulations. |
| Correction(s) | <ol style="list-style-type: none"> 1. Report to the labor department (Disnaker) regarding deviations in working hours during a specific period. 2. Memo to reinforce regulations regarding overtime working hours and monitoring by the PIC. 3. Regulation of clinic working hours. 4. Overtime monitoring form by the payroll admin and mill section head. |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | <ol style="list-style-type: none"> 1. Monitoring by the payroll admin and section head. 2. Monitoring through Internal Audit |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>Verification on January 27, 2025.</p> <p>The root cause analysis, corrective actions, and improvements have been accepted. The company has provided the following improvement documents:</p> <ul style="list-style-type: none"> • Memo No. 038/Memo-BGA/RH-Nanga Tayap/XII/2024, dated December 23, 2024, regarding Overtime Working Hours Adjustment. • Clinic Duty Schedule 8B for November 2024 and Guard Schedule for November 2024. • Overtime Calculation Monitoring. • Report on Working Hour Deviations for Specific Periods, No. 002/BGA-NT/I/2025, dated January 24, 2025. • Overtime Agreement Letter for BTJM, dated November 12, 2024, explaining the agreement between workers and the company regarding overtime hours, acknowledged by the Ketapang District Labor Office. • Overtime Agreement Letter for the Clinic, dated November 15, 2024, explaining the agreement between workers and the company regarding overtime hours, acknowledged by the Ketapang District Labor Office. |

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| | Based on this explanation, the non-compliance has been addressed. |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 7.3.1 Minor raised to Major |
| Nonconformity Number | 08 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To <i>(when more than one site/member)</i> : PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations. |
| Nonconformity Statement: Waste management plan are not well implemented | |
| Evidence: The company has a domestic waste management procedure outlined in the LSM-SUST-SOP-41 revision 1, dated May 18, 2023, which states that: if the waste falls under the category of hazardous waste (B3), its management must adhere to the BGA CCS SOP No. 1101 on the management of hazardous waste. It is also stated that all employees and workers residing in the housing areas are required to dispose of waste in the designated trash bins. Field observations, such as at the TPSA CMJE Block E25, still found used lubricant containers disposed of at the TPSA, and during a field visit to the housing areas of Division 2 and 3, Block G40 BJYE, domestic waste was still piling up behind the housing units. Document review also showed that the same issue was raised as a finding under the same indicator during the RSPO ASA-3 surveillance audit conducted by the certification body, PT. Mutu Agung Lestari. Waste management socialization, such as for hazardous waste, was conducted by the company on September 5, 2024, for CMJE employees. However, the company has not shown progress toward corrective actions to prevent the same issue from recurring. | |

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| Root Cause Analysis | There is a lack of discipline among employees in implementing waste management in the housing areas. |
| Correction(s) | <ol style="list-style-type: none"> 1. Conducting hazardous waste collection at CMJE. 2. Cleaning up domestic waste in the housing areas. 3. Issuing a memo reinforcing housing area rules and regulations. 4. Socializing the housing area rules memo to employees. 5. Implementing a housing cleanliness program. 6. Appointing a PIC (Person in Charge) to monitor and supervise the implementation of housing area rules and regulations. |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | <ol style="list-style-type: none"> 1. Monitoring and supervision by the PIC (Person in Charge). 2. Inspections by the Sustainability Supervisor. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>January 22, 2025 Root cause analysis, corrective actions, and preventive actions are accepted. The company has provided the following documents as evidence of corrective actions:</p> <ul style="list-style-type: none"> • Intern Office Memo No. 001/RSPO-NT/XI/2024, dated November 4, 2024, issued to all estate and mill managers from the Region Head, explaining Region Nanga Tayap's commitment to maintaining cleanliness, health, and order in the housing environment, and outlining several rules such as: prohibition of indiscriminate waste disposal, burning of waste, and storage or use of B3 waste. • The Regional Head Decision No. 001/MANTHAB/REG Nanga Tayap/XI/2024, dated November 5, 2024, confirming the structure of the MANTHAB POC Regional Nanga Tayap, where one of the programs under MANTHAB is the housing cleanliness program (e.g., clean Friday activities, waste collection, and GIP inspections). • As part of the preventive action, the company also has a monitoring and supervision system carried out by the PIC and inspections by the sustainability supervisor. <p>Based on the above explanation, CAR #08 is considered Closed.</p> |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 7.3.3 Minor raised to Major |
| Nonconformity Number | 09 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | The unit of certification does not use open fire for waste disposal. |
| Nonconformity Statement: Waste management mechanism by zero burning not effectively implemented | |
| Evidence: The company has a domestic waste management procedure outlined in the LSM-SUST-SOP-41 revision 1, dated May 18, 2024, specifically in point 6.2, which states: "Each individual must control the waste generated by their household and is strictly prohibited from disposing of waste by burning it." Field observations, such as at the BTJM Mill housing in Block D, still found domestic waste burning activities carried out by the residents. Document review also revealed that the same issue was identified as a finding under the same indicator during the RSPO ASA-3 surveillance audit conducted by the certification body, PT. Mutu Agung Lestari. Waste management socialization, including for hazardous waste, was conducted by the company on September 5, 2024, for CMJE employees. However, the company has not demonstrated progress toward corrective actions to prevent the recurrence of this issue. | |
| Root Cause Analysis | There is a lack of discipline among employees in implementing waste management in the housing areas. |
| Correction(s) | <ol style="list-style-type: none"> 1. Re-socialization regarding the prohibition of burning waste. 2. Issuing a memo reinforcing housing area rules and regulations. 3. Implementing a housing cleanliness program to maintain order and cleanliness. 4. Appointing a PIC (Person in Charge) for monitoring and supervising the implementation of housing area rules and regulations. |

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| Corrective Action Implemented <i>(including any evidence submitted)</i> | <ol style="list-style-type: none"> 1. Monitoring and supervision by the PIC (Person in Charge). 2. Inspections by the Sustainability Supervisor to ensure compliance. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>January 22, 2025</p> <p>Root cause analysis, corrective action, and preventive action are accepted.</p> <p>The company has provided the following documents as evidence of corrective actions:</p> <ul style="list-style-type: none"> • Intern Office Memo No. 001/RSPO-NT/XI/2024, dated November 4, 2024, issued to all estate and mill managers from the Region Head, which outlines Region Nanga Tayap's commitment to maintaining cleanliness, health, and order in the housing environment. The memo also sets forth several rules such as: prohibition of indiscriminate waste disposal, burning waste, and storage or use of B3 waste. • Regional Head Decision No. 001/MANTHAB/REG Nanga Tayap/XI/2024, dated November 5, 2024, confirming the structure of the MANTHAB POC Regional Nanga Tayap. One of the programs under MANTHAB is the housing cleanliness program (e.g., clean Friday activities, waste collection, and GIP inspections). <p>As a preventive action, the company also has a monitoring and supervision system carried out by the PIC and inspections by the sustainability supervisor.</p> <p>Based on the explanation above, CAR #09 is considered Closed.</p> |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 7.12.4 Major |
| Nonconformity Number | 10 |
| Nonconformity Category | <input checked="" type="checkbox"/> Major Nonconformity <input type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Deadline: | <input checked="" type="checkbox"/> 3 months from date of closing meeting <input type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/ or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). |
| Nonconformity Statement: The company's management plan for conservation area management has not been effective in managing the HCV (High Conservation Value) areas occupied by the community. | |
| Evidence: The company has a group department policy with document number 001/KG-BGA/CSV/04/2021/RO, revision 0, dated June 4, 2021, which was approved by the Director of CHC and the Director of CAP. This policy outlines that PT. Bumitama and its subsidiaries are committed to the environment and are dedicated to protecting, restoring, or jointly managing areas identified as having high conservation value (HCV). The company has an HCV management plan that includes activities such as boundary marker installation, signboard installation, rehabilitation and enrichment, socialization to the community and employees, and patrols to maintain boundary markers. Field observations during the audit, such as in the HCV area along the Kayong River buffer zone Block E27/F27 Division 5 BJYE and in the HCV area at Bukit Rungau Block E17/16 Division 2/1 CMJE, showed that there are HCV areas that have been encroached upon and planted with oil palm by the local community. Document review of the KBKT (Environmental and Social Impact) monitoring and management implementation report for the first semester of 2024 for PT GMS revealed that the encroached HCV areas have not been monitored. | |

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| Root Cause Analysis | The management plan for conservation area management owned by the company has not been effective in managing HCV (High Conservation Value) areas occupied by the community. |
| Correction(s) | <ol style="list-style-type: none"> 1. Appoint a specific PIC to oversee and control activities around the HCV areas. 2. Create periodic reports on the progress and status of the occupied HCV areas. 3. Establish preventive and corrective actions if there are violations of the HCV management policy. |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | <ol style="list-style-type: none"> 1. Periodic monitoring in accordance with the BGA-SOP-EM-1111.01-R0 procedure and HCV management program. 2. Review during the management review meeting. |
| Date of Response | 23 Jan 2025 |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | <p>Verification on January 26, 2025 Root cause analysis, corrective actions, and preventive actions have been accepted.</p> <p>The company has taken corrective actions regarding the HCV areas occupied by the community with the following steps:</p> <ul style="list-style-type: none"> • Identification of HCV areas occupied by the community for each company unit as follows: PT.LGI 27.59 ha, PT NAS 0 ha, PT GMS 103 ha. • Monitoring and verification procedure for deforestation in concession areas with document number BGA-SOP-EM-1111.01-R0 dated April 12, 2023, prepared by the system development mitigation officer and conservation manager, approved by the Deputy Head of Corporate Sustainability and CSR, and the Director of CHC. The scope of this procedure includes identification, verification, and determining the causes of deforestation and vegetation loss. • Results of deforestation verification, for example, at PT.LGI (NJYE Division 3 Block G57G), with an area of deforestation of 2.03 ha (in an HCV area). • HCV area management plan for 2025, which includes the component of monitoring occupied areas within the HCV area, planned to be conducted three times a year: March 2025, July 2025, and October 2025. This management plan was created by Sustainability 8A&8B and approved by the RH Nanga Tayap. If there is deforestation confirmed by ground checks company will reporting this in “Berita acara peringatan lahan” and then develop implementation action plan • Minutes of the HCV management socialization to stakeholders and the community, document number 006/BJYE/XI/2024, dated November 19, 2024, held in Kayong Tuhe Village with participants such as Naga Tayap sub-district, Kayong Tuhe Village, Kayong Utara Village, and the communities of Kayong Tuhe and Kayong Utara. |

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| | <ul style="list-style-type: none"> Minutes of HCV management to the Nek Doyan hamlet party on January 10, 2024. <p>Based on the above explanation, the non-conformance CAR#10 is considered addressed, and the implementation of HCV area management occupied by the community will continue to be monitored by the audit team during the next assessment.</p> |
| Status of Nonconformity | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | 25 Jan 2025 |

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| Indicator Number | 7.12.5 Minor |
| Nonconformity Number | 11 |
| Nonconformity Category | <input type="checkbox"/> Major Nonconformity <input checked="" type="checkbox"/> Minor Nonconformity |
| Recurring Nonconformity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Date of Nonconformity Issued | 01 Nov 2024 |
| Nonconformity Issued To <i>(when more than one site/member)</i> : PT. Ladang Sawit Mas | |
| Deadline: | <input type="checkbox"/> 3 months from date of closing meeting <input checked="" type="checkbox"/> 12 months from date of closing meeting |
| Mode of Nonconformity Closure | <input type="checkbox"/> Onsite <input checked="" type="checkbox"/> Off-site |
| Standard Reference | Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. |
| Nonconformity Statement: The company has not provided evidence of an agreement on the management of HCV areas controlled by the community. | |
| Evidence: The company has a group department policy with document number 001/KG-BGA/CSV/04/2021/RO, revision 0, dated June 4, 2021, which was approved by the Director of CHC and the Director of CAP. This policy explains that PT. Bumitama and its subsidiaries are committed to the environment and are dedicated to protecting, restoring, or jointly managing areas identified as having high conservation value (HCV). | |

Field observations during the audit, such as in the HCV area along the Kayong River buffer zone, Block E27/F27 Division 5 BJYE, and in the HCV area at Bukit Rungau, Block E17/16 Division 2/1 CMJE, showed that there are HCV areas that have been encroached upon and planted with oil palm by the local community.

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| Root Cause Analysis | |
| Correction(s) | |
| Corrective Action Implemented <i>(including any evidence submitted)</i> | |
| Date of Response | DD Mmm YYYY |
| Audit Team Conclusion <i>(including any evidence reviewed)</i> | |
| Status of Nonconformity | <input type="checkbox"/> Closed <input type="checkbox"/> Open |
| Date of Closure: | DD Mmm YYYY |

8. Opportunity for Improvement (OFI) Issue in this Audit

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| Indicator Number | 2.1.1 Major |
| Opportunity for Improvement Number | 01 |
| Date of Opportunity for Improvement Issued | 01 Nov 2024 |
| Opportunity for Improvement Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Standard Reference | The unit of certification complies to relevant regulations |
| Opportunity for Improvement Statement: The company has the opportunity to manage practice permits and occupational health and safety (OHS) certifications for all medical personnel practicing at the company's area clinics. | |

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| Indicator Number | 6.2.4 Major |
| Opportunity for Improvement Number | 02 |
| Date of Opportunity for Improvement Issued | 01 Nov 2024 |
| Opportunity for Improvement Issued To (<i>when more than one site/member</i>): PT. Ladang Sawit Mas | |
| Standard Reference | The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. |
| Opportunity for Improvement Statement: The company may consider improving the sanitation of domestic waste disposal by using PVC pipes for all employee housing to prevent water stagnation at the back of the houses. This is based on a visit to the CMJE housing in Block F23, where it was observed that some houses use PVC pipes for domestic waste disposal, while others do not. | |

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| Indicator Number | |
| Opportunity for Improvement Number | |
| Date of Opportunity for Improvement Issued | |
| Opportunity for Improvement Issued To <i>(when more than one site/member):</i> | |
| Standard Reference | |
| Opportunity for Improvement Statement: | |

9. Nonconformities raised in the previous audit

| Indicator No | Nonconformity No | Evidence Observed / Nonconformity Raised | Auditee Response | Verification of Correction/ Corrective Action | Conclusion /Status |
|--------------|------------------|--|---|---|--------------------|
| | | | Correction / Corrective Action | | |
| 2.2.2 Minor | 01 | <p>Based on the results of the review of the contractor list documents as of November 2023, it is known that there are 3 contractors, where according to the results of sampling verification of compliance with regulations by the contractor, it is known that PT Garyber Link Grup (CPO Transport Contractor) with number 001-WIL 8A/LSM/SPK/VIII/2023 dated 03 August 2023 which is valid until August 2024. Companies can show proof of compliance with regulations by PT Garyber Link Group contractors such as:</p> <ul style="list-style-type: none"> • Payment of wages that are in accordance with the Ketapang UMK, for example wages on behalf of SMD for the period September 2023 with a total wage of IDR 4,278,288 • List of 56 employees • Proof of BPJS Employment payment for the September period for 56 people | <p>Conduct comprehensive review regarding third parties contract and its fulfilment evidence related to workers welfare specific clause such as : minimum payments requirements, payslip, insurance</p> | <p>Corrective action has been accepted</p> | <p>Closed</p> |

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| | | <ul style="list-style-type: none"> • Evidence of contractor evaluation for the period September 2023 with a score of 96 • Example of a driver's license, for example in the name of SMD with No. 820510201198 which is valid until 04 May 2023 • SPK PT GLG and its employees, for example SPK Number 018/GLG-HRGA/IN/VI/2023 dated 07 June 2023 between PT GLG and BPK SMD which is valid until 07 June 2024. • BPJS Kesehatan PBI Card for 5 participants, for example No. 0000877609102 in the name of ABN <p>Then, according to the results of the review of SPK document number 001-WIL 8A/LSM/SPK/VIII/2023 dated 03 August 2023 article 1 part f, it is stated that the contractor complies with the Employment Regulations, guarantees and includes all its workers in the BPJS Health and BPJS Employment programs. However, sufficient evidence cannot be shown that all workers have been included in the BPJS Health program.</p> | | | |
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| 3.6.1 Major | 02 | <p>The company has a Plantation Management System Policy which was approved by the Manager in January 2023, which regulates, among other things, prioritizing OHS in all aspects of work in order to prevent and reduce accidents by implementing SMK3/OHS management systems.</p> <p>The company has a HIRAC Document for the plantation and a HIRAC Document for the factory which was ratified on 23 July 2022 which was prepared by Sustainability 8A and ratified by RH Nanga Tayap. In the HIRAC document, the company has not identified the dangers and risks of several activities (but not limited to) as follows:</p> <p>Estates</p> <ul style="list-style-type: none"> • Harvest in low areas • Harvest in areas where there are electrical hazards • HGU Stake Upkeep Activities • Observation Activities at the Fire Tower • Activities at Landfill • Peat Area Measurement Activities <p>POM</p> <ul style="list-style-type: none"> • Receiving FFB at the security post | <ul style="list-style-type: none"> • Carry out a HIRAC evaluation according to applicable procedures • Monitoring through internal audit activities and management review meetings to ensure OHS implementation is in accordance with procedures | Corrective action has been accepted | Closed |
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| | | <ul style="list-style-type: none"> • Activities in the Sorting area • Activities at the CPO Despatch station • Activities at Hazardous Waste Storage • Activities at fuel filling stations | | | |
| 3.8.17 Major | 03 | <p>Bumitama Agri LTD has trademark license number 1-0043-07-100-00. Based on the results of a review of certified product sales documents, it is known that the company has included trademarks in several documents, for example:</p> <ul style="list-style-type: none"> • Minutes of Delivery of Goods number 010/BAPB-PK/BTJM/V/2023 dated 27 May 2023 • All CSPK sales weigh tickets with number DO 007/LSML/PK/IV/2023 <p>However, the use of trademarks is still not in accordance with the RSPO Rules on Market Communications and Claims 2022 which were approved by the BOG on 3 October 2022, including:</p> <ul style="list-style-type: none"> • Do not include trademark license numbers • Added the CSPK MB sentence in the trademark | <p>Revision of the trademark stamp in accordance with the provisions of RSPO Rule and Market Communications and claims 2022. Provide proof of improvement record related to the use of RSPO trademark for weight tickets at BTJM units</p> | <p>Corrective action has been accepted</p> | <p>Closed</p> |

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| 7.3.1 Minor | 04 | <p>The company has an SOP for Hazardous Waste Management listed in the Hazardous and Toxic Waste Management document with document number LSM-SUST-SOP-15 revision 1 dated 11 February 2023, which explains several things as follows:</p> <ul style="list-style-type: none"> • Hazardous waste is stored in a designated place, namely at a licensed Hazardous Waste Warehouse owned by the company. • Hazardous waste Log Book must be available in the Hazardous Waste Warehouse with the latest data. • Hazardous waste packaging must be given symbols and labels in accordance with the provisions regarding marking on Hazardous waste packaging. <p>The company has a Domestic Solid Waste Management SOP which is listed in the Residential and Office Waste Management document with document number LSM-SUST-SOP-41 revision 0 which explains several things as follows:</p> <ul style="list-style-type: none"> • Every housing complex, office, public facility or other facility must provide sufficient and sufficient number of rubbish bins. | | Certificate holder unable to shown consistency regarding standard requirements and its own procedure during Surveillance Audit 04 | Minor raised to Major |
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| | | <ul style="list-style-type: none"> • Temporary Waste Disposal Site is a place to temporarily store waste from housing before sending it to final disposal. Each Temporary Storage consists of two separate storage tanks for organic and inorganic waste. • Every waste sent from Temporary Waste Disposal Site to Final Waste Disposal Site must have the amount and type of waste recorded. • All employees and workers in housing, offices or other work facilities are required to dispose of rubbish in the rubbish bins provided. <p>Based on the results of the field visit, several things were found as follows:</p> <ul style="list-style-type: none"> • There is a lot of Hazardous waste scattered around several residential areas in Divisions 3 and 5 of Bukit Tunggal Jaya Estate • Some of Hazardous waste was found in the PT LSM TPSA hole in Block E29 BTJE • Two bottles of used brake fluid were found at the HCV Sungai Segagap location, Natai Jaya Estate Block E44 | | | |
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| | | <ul style="list-style-type: none"> • Found 1 used filter at the Land Application Block E22 location • There is a lot of Domestic solid waste scattered around several residential areas in Divisions 3 and 5 of Bukit Tunggal Jaya Estate. • There is a lot of Domestic solid waste scattered at several points in the Block B1 HJYE housing complex. • There is a lot of domestic solid waste scattered around several residential areas in divisions 2 and 3 of Natai Jaya Estate • There is a lot of domestic solid waste scattered around several residential areas in divisions 2 and 3 of Bengkirai Jaya Estate • Observation results at TPSA/TPA BTJE block E29 showed no separation between organic and inorganic waste, the waste was mixed in the same hole. Likewise, the results of observations at TPSA/TPA HJYE block G60, and at TPSA in block G46 F Natai Jaya Estate • There is a lot of domestic solid waste scattered around several residential areas in | | | |
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| | | <p>Divisions 2 and 3 of Bengkirai Jaya Estate.</p> <ul style="list-style-type: none"> The company cannot show record data on the amount and type of waste sent from TPS to TPSA/TPA from PT LSM, PT NAS, PT LGI. | | | |
| 7.3.3 Minor | 05 | <p>The company has a Domestic Solid Waste Management SOP which is listed in the Residential and Office Waste Management document with document number LSM-SUST-SOP-41 revision 0 which explains several things as follows:</p> <ul style="list-style-type: none"> Every housing complex, office, public facility or other facility must provide sufficient and sufficient number of rubbish bins. Temporary Waste Disposal Site is a place to temporarily store waste from housing before sending it to final disposal. Each Temporary storage consists of two separate storage tanks for organic and inorganic waste. Every waste sent from (Temporary Waste Disposal Site) to (Final Waste Disposal Site) must have the amount and type of waste recorded. All employees and workers in housing, offices or other work facilities are required to | | <p>Certificate holder unable to shown consistency regarding standard requirements and its own procedure during Surveillance Audit 04</p> | <p>Minor raised to Major</p> |

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| | | <p>dispose of rubbish in the rubbish bins provided.</p> <p>The company is also known to have a Zero Burning policy stated in Bumitama Agri Ltd's Sustainable Policy document, which states "Strict zero-burning policy for all new planting, replanting and other activities.</p> <p>Based on the results of the field visit, several things were found as follows:</p> <ul style="list-style-type: none"> • Traces of burnt waste were found in the PT LSM TPSA/TPA pit in Block E29 BTJE. • There are 4 burnt rubbish points in the Block B1 HJYE Housing Complex. • There is 1 point where organic waste has been burned, at the LA BTJE cottage block E22/E23. • There are 2 waste burning points in Housing Divisions 2 and 3 Natai Jaya Estate • There is 1 burn mark in Housing Division 2 & 3 Bengkirai Jaya Estate | | | |
| 5.5.2 time bound plan 5.5.3 partial certification | 06 | <p>The RSPO announcement on 11 January 2023 regarding the process flow for the time bound plan (TBP) Revision</p> | <ul style="list-style-type: none"> • Reviewing the Time Bound Plan together with related parties, | Corrective action has been accepted | Closed |

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| <p>Certification system</p> | | <p>explained that: Since the RSPO Certification System document became effective from 1 July 2018, existing RSPO members have 5 years from this date to comply with these requirements. This means that every grower member who has a management unit that has not been certified must ensure that the management unit that has not been certified has been certified no later than 30 June 2023.</p> <p>Changes in TBP due to deviations in the maximum time period. Applications for approval are sent to the RSPO via email using the TBP Revision Template which can be downloaded from the RSPO website.</p> <p>RSPO Certification System Clause 5.5.3 explains the requirements for management units that have not been certified as well as an assessment of compliance with these requirements carried out by internal companies or accredited CBs (partial certification).</p> <p>The company shows a time bound plan that was approved by the RSPO secretariat on 15 August 2023 and partial certification which was carried out in January 2022</p> | <p>namely Document & License and Partnership/plasma</p> <ul style="list-style-type: none"> • Request and obtain approval for changes to the Time Bond Plan from the RSPO • Carrying out a Partial RSPO Audit • Conduct joint reviews of the Time Bond Plan together with related departments such as Document and License and Partnership/Plasma at least once a year and carry out monitoring through internal audit activities and management review meetings to ensure the Time Bond Plan meets RSPO requirements | | |
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| | | and 2023, but there are still differences, namely : | | | | | | | | | | | | | | | | | | | | | | | |
|--|----------------|---|--------------|----------------|---------------|---------------|--|-------|--------------------------|-------|---------------------------------|----------|-----------------------------------|---|-----------------------------|-------|-----------------------------|-------|--------------------------|--------|--------------------------------|---|--|--|--|
| | | PARTIAL CERTIFICATION | | | | | | | | | | | | | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th>Name of Unit</th> <th>Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>Not available</td> <td>Not Available</td> </tr> <tr> <td>PT Windu Nabatindo Sejahtera Serawak Damai Estate (SDME)</td> <td>5,000</td> </tr> <tr> <td>PT Andalan Sukses Makmur</td> <td>3,092</td> </tr> <tr> <td>PT Agriplus (Bukit Raya Estate)</td> <td>2,748.83</td> </tr> <tr> <td>Riam Kepayang Sentosa Cooperative</td> <td>0</td> </tr> <tr> <td>PT Sentosa Prima Agro (SPA)</td> <td>4,417</td> </tr> <tr> <td>PT Wahana Hujau Indah (WHI)</td> <td>4,397</td> </tr> <tr> <td>PT Nabatindo Karya Utama</td> <td>575.59</td> </tr> <tr> <td>PT. Damai Agro Sejahtera (DAS)</td> <td>0</td> </tr> </tbody> </table> | Name of Unit | Hectarage (Ha) | Not available | Not Available | PT Windu Nabatindo Sejahtera Serawak Damai Estate (SDME) | 5,000 | PT Andalan Sukses Makmur | 3,092 | PT Agriplus (Bukit Raya Estate) | 2,748.83 | Riam Kepayang Sentosa Cooperative | 0 | PT Sentosa Prima Agro (SPA) | 4,417 | PT Wahana Hujau Indah (WHI) | 4,397 | PT Nabatindo Karya Utama | 575.59 | PT. Damai Agro Sejahtera (DAS) | 0 | | | |
| Name of Unit | Hectarage (Ha) | | | | | | | | | | | | | | | | | | | | | | | | |
| Not available | Not Available | | | | | | | | | | | | | | | | | | | | | | | | |
| PT Windu Nabatindo Sejahtera Serawak Damai Estate (SDME) | 5,000 | | | | | | | | | | | | | | | | | | | | | | | | |
| PT Andalan Sukses Makmur | 3,092 | | | | | | | | | | | | | | | | | | | | | | | | |
| PT Agriplus (Bukit Raya Estate) | 2,748.83 | | | | | | | | | | | | | | | | | | | | | | | | |
| Riam Kepayang Sentosa Cooperative | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| PT Sentosa Prima Agro (SPA) | 4,417 | | | | | | | | | | | | | | | | | | | | | | | | |
| PT Wahana Hujau Indah (WHI) | 4,397 | | | | | | | | | | | | | | | | | | | | | | | | |
| PT Nabatindo Karya Utama | 575.59 | | | | | | | | | | | | | | | | | | | | | | | | |
| PT. Damai Agro Sejahtera (DAS) | 0 | | | | | | | | | | | | | | | | | | | | | | | | |

10. Stakeholder Consultation Process

CB should ensure that all relevant stakeholders are consulted. The relevant stakeholders include but are not limited to statutory bodies, indigenous peoples, local communities (including women representatives, and displaced communities), workers and workers' organisations (including migrant workers), smallholders, and local and national NGOs.

Date of public announcement made: [Only for the case of IC or RC](#)

Summary of stakeholder's comments and the CB's responses and findings are presented in the table below:

10.1 For Audit Report

| No | Consulted Stakeholders <i>Name of Stakeholders</i> | Date of Consultation/ Comment Received | Method of Consultation/Comment received | Feedback/Comments/Issue Raised Received from Stakeholders | CB's Responses |
|----|---|---|---|---|---|
| 1 | <i>Sungai Kelik Village</i> | <i>28 Oct 2024</i> | <i>Phone Call</i> | <i>Land compensation process has been carried out with transparent process involving local communities No negative issues arise during 2023-2024 such as land disputes or environmental pollution</i> | <i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i> |
| 2 | <i>Tanjung Medan Village</i> | <i>28 Oct 2024</i> | <i>Phone Call</i> | <i>Relationship between company and community are well maintained, there is dedicated person in charge provides by company to assisting villagers request Company shown efforts to develop local communities by providing regular 3CSR programme, scheme smallholder development, and utilize local contractors</i> | <i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i> |
| 3 | <i>Nanga Tayap Village</i> | <i>29 Oct 2024</i> | <i>Phone Call</i> | <i>Nanga tayap village are consist of dominantly by dayaknese people</i> | <i>Based on feedback from stakeholders,</i> |

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|---|----------------------------------|-------------|------------|---|--|
| | | | | <p><i>There is a lot local people working for company now</i></p> <p><i>Scheme smallholder develop by company are running smoothly and managed transparently by company</i></p> <p><i>Company shown efforts to develop local communities by providing regular CSR programme, scheme smallholder development, and utilize local contractors</i></p> <p><i>Land compensation process has been gone through involving affected parties directly during compensation</i></p> | <p><i>there is no negative issues arise that need further clarification or verification</i></p> |
| 4 | Sepakat Jaya | 29 Oct 2024 | Phone Call | <p><i>Sepakat jaya village are consist of dominantly by dayaknese people</i></p> <p><i>There is a lot local people working for company now</i></p> <p><i>Scheme smallholder develop by company are running smoothly and managed transparently by company</i></p> <p><i>Land compensation process has been gone through involving affected parties directly during compensation</i></p> <p><i>Company shown efforts to develop local communities by providing regular CSR programme, scheme smallholder development, and utilize local contractors</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i></p> |
| 5 | Environmental Agency of Ketapang | 29 Oct 2024 | Phone Call | <p><i>No environmental issues rising during 2023-2024 by local communities/NGO</i></p> <p><i>Cooperation between and company and regulator are well maintained</i></p> <p><i>Permit regarding environmental such as hazardous waste storage and environmental document has been comply</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further</i></p> |

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|---|-------------------------------|-------------|------------|---|--|
| | | | | | clarification or verification |
| 6 | Plantation Agency of Ketapang | 29 Oct 2024 | Phone Call | PT Ladang Sawit Mas has comply with relevant regulations such as plantation business permit CSR programme has been realized via scheme smallholder programme FFB price are determined by plantation agency followed by company Relations between company and plantation agency are well maintained | Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification |
| 7 | Manpower agency of Ketapang | 29 Oct 2024 | Phone Call | Regular reporting regarding OHS such as P2K3 report are conducted regularly Company are comply with minimum wages regulation There is no issue related to fatality of workers | Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification |
| 8 | Land Agency of Ketapang | 29 Oct 2024 | Phone Call | Abandoned land doesn't exist in company areas No issue regarding land disputes with local communities Relation between company and land agency are well maintained | Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification |

10.2 For Public Summary Report

| No | Consulted Stakeholders <i>(Type of Stakeholders)</i> | Date of Consultation/ Comment Received | Method of Consultation/Comment received | Feedback/Comments/Issue Raised Received from Stakeholders | CB's Responses |
|----|---|---|---|---|--|
| 1 | Sungai Kelik Village | 28 Oct 2024 | Phone Call | Land compensation process has been carried out with transparent process involving local communities No negative issues arise during 2023-2024 such as land disputes or environmental pollution | Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification |
| 2 | Tanjung Medan Village | 28 Oct 2024 | Phone Call | Relationship between company and community are well maintained, there is dedicated person in charge provides by company to assisting villagers request Company shown efforts to develop local communities by providing regular 3CSR programme, scheme smallholder development, and utilize local contractors | Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification |
| 3 | Nanga Tayap Village | 29 Oct 2024 | Phone Call | Nanga tayap village are consist of dominantly by dayaknese people There is a lot local people working for company now Scheme smallholder develop by company are running smoothly and managed transparently by company | Based on feedback from stakeholders, there is no negative issues arise that need |

| | | | | | |
|---|----------------------------------|-------------|------------|---|--|
| | | | | <p><i>Company shown efforts to develop local communities by providing regular CSR programme, scheme smallholder development, and utilize local contractors</i></p> <p><i>Land compensation process has been gone through involving affected parties directly during compensation</i></p> | <p><i>further clarification or verification</i></p> |
| 4 | Sepakat Jaya | 29 Oct 2024 | Phone Call | <p><i>Sepakat jaya village are consist of dominantly by dayaknese people</i></p> <p><i>There is a lot local people working for company now</i></p> <p><i>Scheme smallholder develop by company are running smoothly and managed transparently by company</i></p> <p><i>Land compensation process has been gone through involving affected parties directly during compensation</i></p> <p><i>Company shown efforts to develop local communities by providing regular CSR programme, scheme smallholder development, and utilize local contractors</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i></p> |
| 5 | Environmental Agency of Ketapang | 29 Oct 2024 | Phone Call | <p><i>No environmental issues rising during 2023-2024 by local communities/NGO</i></p> <p><i>Cooperation between and company and regulator are well maintained</i></p> <p><i>Permit regarding environmental such as hazardous waste storage and environmental document has been comply</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i></p> |

| | | | | | |
|---|-------------------------------|-------------|------------|--|--|
| 6 | Plantation Agency of Ketapang | 29 Oct 2024 | Phone Call | <p><i>PT Ladang Sawit Mas has comply with relevant regulations such as plantation business permit</i></p> <p><i>CSR programme has been realized via scheme smallholder programme</i></p> <p><i>FFB price are determined by plantation agency followed by company</i></p> <p><i>Relations between company and plantation agency are well maintained</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i></p> |
| 7 | Manpower agency of Ketapang | 29 Oct 2024 | Phone Call | <p><i>Regular reporting regarding OHS such as P2K3 report are conducted regularly</i></p> <p><i>Company are comply with minimum wages regulation</i></p> <p><i>There is no issue related to fatality of workers</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i></p> |
| 8 | Land Agency of Ketapang | 29 Oct 2024 | Phone Call | <p><i>Abandoned land doesn't exist in company areas</i></p> <p><i>No issue regarding land disputes with local communities</i></p> <p><i>Relation between company and land agency are well maintained</i></p> | <p><i>Based on feedback from stakeholders, there is no negative issues arise that need further clarification or verification</i></p> |

Summary of workers interviewed, and the CB's responses and findings are presented in the table below:

| Total Workers in the Unit of Certification | | | 1887 | |
|--|--|-------------------------|---|---|
| Sampled Worker Consulted/ Interviewed in This Audit | | | 42 | |
| No | Type of Workers Consulted/ Interviewed | Interview Method | Feedback/Comments/Issue Raised/ Received from Workers | CB's Responses |
| | Permanent workers i.e : 2 securities workers BTJM, 2 weighbridge operator, 1 daycare keeper BTJE, 1 water treatment plant operator, 1 POME operator, 2 BTJM warehouse workers, 1 clinics workers, 4 harvester in BJYE, 3 harvester in NTJE, 5 harvester BTJE, 5 spraying workers in NJYE, 6 spraying workers in BTJE, 1 HR staff, 1 boilers operator BTJM, 2 engine room operator BTJM, 2 sterilizer worker BTJM, 3 grader BTJM | Direct interview | Overtime for boiler operators and paramedic exceeding regulation Proper PPE storage of spraying team not been demonstrated | CAR in indicator 3.6.2 and 6.2.3 Raised |

Consultation with Previous Land User

| | | | | |
|---|--|------------------------|---|---|
| Total Identified Previous Land User in the Unit of Certification | | | 3.373,78 Ha (82 previous land user and 2 land user group of combined compensation) | |
| Sampled Previous Land User in This Audit | | | 2 | |
| Name of Previous Land User | Contact Details (address/telephone/email) | Total Area (Ha) | Date of Consultation | Result of Discussion with Previous Land User |
| In this audit we can not reached out the previous land owner identified | | | | |

11. Time Bound Plan

| Name of the Management Unit | Country | Name of the Mills and Supply Bases | Total Managed Area (Ha) | Certification Status | Plan Year for Certification | Actual Certification Year | New Proposed Year for Certification |
|----------------------------------|------------------|--------------------------------------|-------------------------|----------------------|-----------------------------|---------------------------|-------------------------------------|
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Gunung Makmur Mill (GMKM)</i> | | Certified | 2014 | 2014 | |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Gunung Makmur Estate (GMKE)</i> | 3,832.07 | Certified | 2014 | 2014 | |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Bukit Daman Estate (BDME)</i> | 1,741.65 | Certified | 2014 | 2014 | |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Sungai Mentaya Estate (SMNE)</i> | 2,959.74 | Certified | 2014 | 2014 | |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Unit Desa Mekar Jaya</i> | 1,086.19 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Unit Desa Sekar Tani</i> | 946.49 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Unit Desa Lestari</i> | 1,000.18 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Usaha Bersama</i> | 892.42 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Makarti Jaya</i> | 1,003.24 | Not Certified | 2022 | | 2025 |

| | | | | | | | |
|----------------------------------|------------------|--|----------|---------------|------|------|------|
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Marga Rahayu</i> | 700.43 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Tani Santoso</i> | 1,049.78 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>PT Tanah Tani Lestari</i> | 4,293.95 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Hapakat (TTL)</i> | 510.67 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Rika Bersatu (TTL)</i> | 714.90 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Usaha Bersama (TTL)</i> | 447.25 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Eka Kaharap (TTL)</i> | 103.29 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Berkat Usaha Bersama (TTL)</i> | 245.62 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Koperasi Bina Tani (TTL)</i> | 626.64 | Not Certified | 2022 | | 2025 |
| <i>Gunung Makmur Mill (GMKM)</i> | <i>Indonesia</i> | <i>Independent Smallholders</i> | 277.90 | Certified | 2022 | 2021 | |

| | | | | | | | |
|------------------------------------|------------------|---|----------|---------------|------|------|------|
| | | <i>(Kelompok Tani Karya Bersama)</i> | | | | | |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Bukit Makmur Mill</i> | | Certified | 2019 | 2019 | |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Bukit Makmur Estate</i> | 3,173.28 | Certified | 2019 | 2019 | |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Bukit Kecubung Estate</i> | 3,393.50 | Certified | 2019 | 2019 | |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>PT Langgeng Makmur Sejahtera (LMS)</i> | 3,940.00 | Not Certified | 2022 | | 2025 |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Koperasi Telawang Bersatu</i> | 265.37 | Not Certified | 2022 | | 2025 |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Koperasi Hinje Ate</i> | 81.01 | Not Certified | 2022 | | 2025 |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Koperasi Waringin Jaya</i> | 1,000.00 | Not Certified | 2022 | | 2025 |
| <i>Bukit Makmur Mill (BMKM)</i> | <i>Indonesia</i> | <i>Koperasi Eka Kaharap (LMS)</i> | 617.90 | Not Certified | 2022 | | 2025 |
| <i>Pundu Nabatindo Mill (PNBM)</i> | <i>Indonesia</i> | <i>Pundu Nabatindo Mill</i> | | Certified | 2014 | 2014 | |

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|------------------------------------|------------------|--|----------|---------------|------|------|------|
| <i>Pundu Nabatindo Mill (PNBM)</i> | <i>Indonesia</i> | <i>Pundu Nabatindo Estate</i> | 2,769.44 | Certified | 2014 | 2014 | |
| <i>Pundu Nabatindo Mill (PNBM)</i> | <i>Indonesia</i> | <i>Independent Smallholders (Kelompok Tani Tenara)</i> | 223.92 | Certified | 2018 | 2018 | |
| <i>Pundu Nabatindo Mill (PNBM)</i> | <i>Indonesia</i> | <i>PT Fajar Bumi Nabati (FBI)</i> | 2,703.00 | Not Certified | 2022 | | 2025 |
| <i>Pundu Nabatindo Mill (PNBM)</i> | <i>Indonesia</i> | <i>PT Gemilang Subur Maju (GSM)</i> | 602.09 | Not Certified | 2022 | | 2025 |
| <i>Pundu Nabatindo Mill (PNBM)</i> | <i>Indonesia</i> | <i>Koperasi Harapan Abadi</i> | 5,207.18 | Not Certified | 2023 | | 2025 |
| <i>Katari Agro Mill (KAGM)</i> | <i>Indonesia</i> | <i>Katari Agro Mill</i> | | Certified | 2016 | 2016 | |
| <i>Katari Agro Mill (KAGM)</i> | <i>Indonesia</i> | <i>Katari Agro Estate</i> | 3,534.37 | Certified | 2016 | 2016 | |
| <i>Katari Agro Mill (KAGM)</i> | <i>Indonesia</i> | <i>Pelantaran Agro Estate</i> | 1,931.96 | Certified | 2016 | 2016 | |
| <i>Katari Agro Mill (KAGM)</i> | <i>Indonesia</i> | <i>Pantai Mas Estate</i> | 3,329.99 | Certified | 2016 | 2016 | |
| <i>Sungai Cempaga Mill (SCMM)</i> | <i>Indonesia</i> | <i>Sungai Cempaga Mill (SCMM)</i> | | Certified | 2022 | 2022 | |

| | | | | | | | |
|----------------------------|-----------|--|----------|---------------|------|------|------|
| Sungai Cempaga Mill (SCMM) | Indonesia | PT Windu Nabatindo Abadi (WNA) - 7656,99 Ha | 7,656.99 | Certified | 2022 | 2022 | |
| Sungai Cempaga Mill (SCMM) | Indonesia | PT Windu Nabatindo Abadi (WNA) - 310 Ha | 310.00 | Not Certified | 2022 | 2022 | 2025 |
| Sungai Cempaga Mill (SCMM) | Indonesia | PT Nabatindo Karya Utama (NKU) - 2005 Ha | 2,005.00 | Not Certified | 2022 | 2022 | 2025 |
| Sungai Cempaga Mill (SCMM) | Indonesia | PT Windu Nabatindo Abadi (WNA)- 103,68 ha the area which suspect into liability mechanism | 103.68 | Not Certified | 2023 | | 2025 |
| Sungai Cempaga Mill (SCMM) | Indonesia | KSU Sehati Pundu | 2,000.41 | Not Certified | 2022 | | 2025 |
| Sungai Cempaga Mill (SCMM) | Indonesia | PT Nabatindo Karya Utama (NKU) - 2720,04 Ha | 2,720.04 | Certified | 2022 | 2022 | |
| Sungai Cempaga Mill (SCMM) | Indonesia | PT Nabatindo Karya Utama (NKU) - 578,59 Ha the area which suspect into liability mechanism | 578.59 | Not Certified | 2023 | | 2025 |
| Sungai Cempaga Mill (SCMM) | Indonesia | Koperasi Koling Hapakat | 906.70 | Not Certified | 2023 | | 2024 |

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|---------------------------|------------------|---|----------|---------------|------|--|------|
| <i>Selucing Agro Mill</i> | <i>Indonesia</i> | <i>Selucing Agro Mill</i> | | Not Certified | 2022 | | 2025 |
| <i>Selucing Agro Mill</i> | <i>Indonesia</i> | <i>PT Windu Nabatindo Sejahtera</i> | 4,998.76 | Not Certified | 2022 | | 2025 |
| <i>Kotawaringin Mill</i> | <i>Indonesia</i> | <i>Kotawaringin Mill</i> | | Not Certified | 2024 | | |
| <i>Kotawaringin Mill</i> | <i>Indonesia</i> | <i>PT Bumitama Gunajaya Abadi</i> | 5,632.84 | Not Certified | 2024 | | |
| <i>Tonam Raya Mill</i> | <i>Indonesia</i> | <i>Tonam Raya Mill PT Bumitama Gunajaya Abadi</i> | | Not Certified | 2023 | | 2025 |
| <i>Tonam Raya Mill</i> | <i>Indonesia</i> | <i>PT Bumitama Gunajaya Abadi</i> | 5,632.84 | Not Certified | 2022 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>Lamandau Mill</i> | | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>PT Bumitama Gunajaya Abadi</i> | 5,632.84 | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>Koperasi Kompak Maju Bersama</i> | 4,075.39 | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>Koperasi Mitra Bahaum</i> | 5,117.48 | Not Certified | 2023 | | 2025 |

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|-------------------------|------------------|--------------------------------------|----------|---------------|------|------|------|
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>Koperasi Tanjung Biru</i> | 2,960.31 | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>PT Andalan Sukses Makmur</i> | 3,080.52 | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>Koperasi Seberang Jaya Sejati</i> | 884.05 | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>Koperasi Pulau Sejahtera</i> | 391.81 | Not Certified | 2023 | | 2025 |
| <i>Lamandau Mill</i> | <i>Indonesia</i> | <i>PT Investa Karya Bhakti</i> | 5,632.84 | Not Certified | 2023 | | 2025 |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Kendawangan Mill</i> | | Certified | 2015 | 2015 | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Mekar Utama Estate</i> | 3,045.92 | Certified | 2015 | 2015 | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Kendawangan Estate</i> | 1,722.90 | Certified | 2015 | 2015 | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Sungai Tapah Estate</i> | 993.70 | Certified | 2015 | 2015 | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Banjarsari Estate</i> | 2,216.78 | Certified | 2015 | 2015 | |

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|-------------------------|------------------|---|----------|---------------|------|------|------|
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>PT Gunajaya Karya Gemilang (GKG) - 523,422 Ha Additional HGU</i> | 523.42 | Not Certified | - | - | 2024 |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Seriam Jaya Estate</i> | 1,940.94 | Certified | 2015 | 2015 | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Membuluh Sejahtera Estate</i> | 3,521.66 | Certified | 2015 | 2015 | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Kelompok Tani Sawit Bersama</i> | 363.00 | Not Certified | 2024 | | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Koperasi Serba Usaha Bersama</i> | 800.92 | Not Certified | 2024 | | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Koperasi Serba Usaha Karya Bersama</i> | 505.65 | Not Certified | 2024 | | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Koperasi Binasari</i> | 581.83 | Not Certified | 2024 | | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Koperasi Perkebunan Fajar Mandiri</i> | 1,354.97 | Not Certified | 2024 | | |
| <i>Kendawangan Mill</i> | <i>Indonesia</i> | <i>Koperasi Rimba Sari</i> | 580.46 | Certified | 2022 | | |

| | | | | | | | |
|------------------------------|------------------|--|----------|---------------|------|------|------|
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Pembangunan Raya Mill</i> | | Certified | 2019 | 2019 | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Pembangunan Raya Estate</i> | 1,318.22 | Certified | 2019 | 2019 | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Bengkuang Raya Estate</i> | 2,304.58 | Certified | 2019 | 2019 | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Belaban Raya Estate</i> | 1,633.11 | Certified | 2019 | 2019 | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>PT Agro Sejahtera Manunggal (ASM) - 768,72 ha the area which suspect into liability mechanism</i> | 768.72 | Certified | 2023 | | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>PT Agro Sejahtera Manunggal (ASM) - 494,49 ha additional HGU</i> | 494.49 | Certified | 2020 | 2020 | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>KopBun Agro Seriam Mandiri (ASM) - HGU 914,77 Ha</i> | 960.80 | Certified | 2019 | 2019 | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>PT Gunajaya Harapan Lestari</i> | 1,973.45 | Certified | 2022 | | |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>PT Gunajaya Harapan Lestari - SHM 149,06 Ha</i> | 149.06 | Not Certified | 2024 | | 2025 |

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|------------------------------|------------------|---|----------|---------------|------|--|------|
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Koperasi Bawal Sejahtera Mandiri (GHL) - HGU 448,19 Ha</i> | 448.19 | Not Certified | 2024 | | 2025 |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Koperasi Bawal Sejahtera Mandiri (GHL) - SHM 174,81 Ha</i> | 174,81 | Not Certified | 2024 | | 2025 |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Koperasi Agro Seriam Mandiri (ASM) - SHM 405 Ha</i> | 405.00 | Not Certified | 2024 | | 2025 |
| <i>Pembangunan Raya Mill</i> | <i>Indonesia</i> | <i>Kelompok Tani Sawit Maju Sejahtera (ASM) - 1022,09 Ha</i> | 1,022.09 | Not Certified | 2024 | | 2025 |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>Sungai Rasau Mill</i> | | Not Certified | 2024 | | |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>PT Karya Bakti Agro Sejahtera</i> | 4,848.36 | Not Certified | 2024 | | |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>PT Karya Bakti Agro Sejahtera</i> | 2,865.00 | Not Certified | 2024 | | |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>KUD Rangkong Betuah</i> | 833.30 | Not Certified | 2022 | | 2025 |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>KUD Rasau Tiga Bersama</i> | 1,117.74 | Not Certified | 2022 | | 2025 |

| | | | | | | | |
|--------------------------------|------------------|--|----------|---------------|------|------|------|
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>Kelompok Tani Mitra Tama Sejahtera (KBAS) - 295 Ha</i> | 295.00 | Not Certified | 2022 | | 2025 |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>Agriplus</i> | 2,841.87 | Not Certified | 2022 | | 2025 |
| <i>Sungai Rasau Mill</i> | <i>Indonesia</i> | <i>Koperasi Riam Kepayang Sentosa (Agriplus) - SHM 761.52 Ha</i> | 761.52 | Not Certified | 2022 | | 2025 |
| <i>Bukit Tunggul Jaya Mill</i> | <i>Indonesia</i> | <i>Bukit Tunggul Jaya Mill</i> | | Certified | 2020 | 2020 | |
| <i>Bukit Tunggul Jaya Mill</i> | <i>Indonesia</i> | <i>Bukit Tunggul Jaya Estate</i> | 4,208.54 | Certified | 2020 | 2020 | |
| <i>Bukit Tunggul Jaya Mill</i> | <i>Indonesia</i> | <i>Hamparan Jaya Estate</i> | 1,510.09 | Certified | 2020 | 2020 | |
| <i>Bukit Tunggul Jaya Mill</i> | <i>Indonesia</i> | <i>KopBun Bukit Tunggul Sejahtera</i> | 728.27 | Not Certified | 2023 | | 2024 |
| <i>Bukit Tunggul Jaya Mill</i> | <i>Indonesia</i> | <i>KopBun Mitra Penjalaan Permai</i> | 592.85 | Not Certified | 2023 | | 2024 |
| <i>Bukit Tunggul Jaya Mill</i> | <i>Indonesia</i> | <i>PT Lestari Gemilang Intisawit (LGI) - 5548,32 Ha</i> | 5,548.32 | Certified | 2022 | | |

| | | | | | | | |
|-------------------------|-----------|---|----------|---------------|------|--|------|
| Bukit Tunggal Jaya Mill | Indonesia | PT Lestari Gemilang Intisawit (LGI) - 761,41 Ha the area which suspect into liability mechanism | 761.41 | Not Certified | 2023 | | 2024 |
| Bukit Tunggal Jaya Mill | Indonesia | Koperasi Kayong Sekayuk | 608.04 | Not Certified | 2022 | | 2024 |
| Bukit Tunggal Jaya Mill | Indonesia | Koperasi Mitra Sejati | 695.90 | Not Certified | 2022 | | 2024 |
| Bukit Tunggal Jaya Mill | Indonesia | PT Agro Manunggal Sawitindo (AMS) | 3,739.68 | Not Certified | 2022 | | 2024 |
| Bukit Tunggal Jaya Mill | Indonesia | Koperasi - Karya Gerunggang Bersatu | 618.75 | Not Certified | 2025 | | |
| Bukit Tunggal Jaya Mill | Indonesia | Koperasi - Pemahan Bersatu | 197.43 | Not Certified | 2025 | | |
| Bukit Tunggal Jaya Mill | Indonesia | PT Nabati Agro Subur (NAS) - 2227,5 Ha | 2,227.50 | Certified | 2022 | | |
| Bukit Tunggal Jaya Mill | Indonesia | PT Nabati Agro Subur (NAS) - 1027,82 Ha the area which suspect into liability mechanism | 1027,82 | Not Certified | 2023 | | 2024 |
| Bukit Tunggal Jaya Mill | Indonesia | PT Sejahtera Sawit Lestari (SSL) | 1,802.52 | Not Certified | 2023 | | 2024 |

| | | | | | | | |
|--------------------------------|------------------|--|----------|---------------|------|------|------|
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>PT Karya Makmur Langgeng (KML)</i> | 4,000.10 | Not Certified | 2023 | | 2024 |
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>Koperasi - Hasil Sikam Sekayok</i> | 603.93 | Not Certified | 2022 | | 2025 |
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>PT Gemilang Makmur Subur (GMS) - 2119,75 Ha</i> | 2,119.75 | Certified | 2022 | | |
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>PT Gemilang Makmur Subur (GMS) - 39,54 Ha the area which suspect into liability</i> | 39.54 | Not Certified | 2023 | | 2024 |
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>Koperasi Istana Pawan Mandiri</i> | 1,060.16 | Not Certified | 2023 | | 2024 |
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>Koperasi Rungau Sejahtera</i> | 680.90 | Not Certified | 2023 | | 2024 |
| <i>Bukit Tunggal Jaya Mill</i> | <i>Indonesia</i> | <i>PT Damai Agro Sejahtera (DAS)</i> | 9,436.00 | Not Certified | 2024 | | 2025 |
| <i>Sukadamai Mill</i> | <i>Indonesia</i> | <i>Sukda Damai Mill</i> | | Certified | 2019 | 2019 | |
| <i>Sukadamai Mill</i> | <i>Indonesia</i> | <i>Pendalian Estate</i> | 1,567.07 | Certified | 2019 | 2019 | |

| | | | | | | | |
|---------------------------|------------------|--|----------|---------------|------|------|------|
| <i>Sukadamai Mill</i> | <i>Indonesia</i> | <i>PT Masuba Citra Mandiri (MCM) - 326.04 ha the area which suspect inti liability mechanism</i> | 326.04 | Certified | 2022 | 2023 | |
| <i>Sukadamai Mill</i> | <i>Indonesia</i> | <i>Koperasi Karya Melayu Sejati</i> | 938.16 | Certified | 2019 | 2019 | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>Bukit Belaban Mill</i> | | Not Certified | 2024 | | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>PT Sentosa Prima Agro (SPA)</i> | 3,890.11 | Not Certified | 2024 | | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>Koperasi - Bukit Janji Bersama</i> | 442.36 | Not Certified | 2025 | | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>PT Raya Sawit Manunggal (RSM)</i> | 4,034.00 | Not Certified | 2024 | | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>Koperasi - Sandika Dwi Bakti</i> | 372.81 | Not Certified | 2025 | | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>PT Wahana Hujau Indah (WHI)</i> | 5,148.20 | Not Certified | 2024 | | |
| <i>Bukit Belaban Mill</i> | <i>Indonesia</i> | <i>PT Hungarindo Persada</i> | 3,100.00 | Not Certified | 2024 | | 2025 |

12. Requirements on Multiple Management Unit

| Requirement | Findings/Compliance |
|---|--|
| A time bound plan for certifying all its management units and/or entities, including the units where the organisation has management control and no or minor shareholding has been established by the certification unit. | Applicable |
| Was the time bound plan submitted during the initial audit? | Yes, Company provides time bound plan and its approved by RSPO on 27 December 2023 |
| Does the time bound plan contain a current list of all estates and mills? | Yes, for total 15 Palm Oil Mill and 116 estate supply base including scheme smallholders |
| Does the time bound plan include the certification of all estates and mills within five years after obtaining RSPO membership? | Yes |

| | |
|---|--|
| <p>Are there any new acquisitions of land done by the certification unit since the last audit?</p> <p>If YES, is the time bound plan updated to indicate that the newly acquired land is to be certified within a three year timeframe?</p> | <p>No, PT. Bumitama Agri Ltd. do not conduct any new land acquisition since 2024.</p> |
| <p>If there are any deviations from these maximum periods, did the Unit of Certification request approval from the RSPO Secretariat?</p> | <p>Yes, Company provides time bound plan and its approved by RSPO on 27 December 2023</p> |
| <p>Has the CB verified the progress of the time bound plan established by the Unit of Certification during the annual surveillance audit?</p> <p><i>Note: If the CB conducting the surveillance audit differs from the CB that initially accepted the time bound plan, the latter CB must assess the appropriateness of the time bound plan at the time of its first involvement and will only verify its continued appropriateness thereafter.</i></p> | <p>Yes, auditors has verified the progress of time bound plan established by company during this surveillance audits</p> |
| <p>Is there any revision made to the time bound plan?</p> <p>If YES, has the revised time bound plan been reviewed by the CB?</p> <p><i>Note: Changes to the time bound plan are allowed only if the organisation can provide evidence to the CB that these changes are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or Chamber of Commerce (or equivalent).</i></p> | <p>There is no revision on this approved time bound plan by RSPO</p> |

| | |
|--|---|
| <p>Are there any isolated lapses in the implementation of a time bound plan?</p> <p>If YES, a minor non-compliance shall be raised.</p> | <p>No isolated lapses of implementation of time bound plan</p> |
| <p>Is there any evidence of fundamental failure to proceed with the implementation of the plan?</p> <p>If YES, a major non-compliance shall be raised.</p> | <p>No fundamental failure to proceed with the current plan occurs</p> |

13. Requirements for Uncertified Management Units

| Requirement | Findings/Compliance |
|--|--|
| <p>Is there any replacement of primary forest or any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3 since 1st January 2010?</p> <p>If YES, did the CB verify that it complies with the RSPO New Planting Procedure (NPP)?</p> <p><i>Note: For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB</i></p> | <p>Based on internal audit results and evidence provided by company, previously all of subsidiaries of Bumitama Agri Ltd are in LUCA process and now during Dec 2023 all subsidiaries under group are waiting for RaCP approval such as Gunung Makmur mill and its supply base, bukit Makmur mill and its supply base, and pundu nabatindo mill and its supply base.</p> <p>Based on internal audit, indicates that Bumitama Agri Ltd are complied with RSPO NPP procedure, several evidence provides for examples PT. Investa Karya Bakti (Lamandau mill), NPP was completed and publish on October 04 2016</p> |
| <p>Are there any land conflicts reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member?</p> <p>If YES, has it been 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> <p><i>Note: In case of issues related to land conflicts identified by the CB, details of the status/ progress to resolve such matters shall be clearly explained.</i></p> | <p>Based on internal audit result shown that there is no land conflicts occurs</p> |
| <p>Is there any labour dispute reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member?</p> <p>If YES, is it being resolved through a mutually agreed process, per RSPO P&C criterion 4.2?</p> | <p>Previous Labor dispute has been identified and occur on PT. Bumitama Gunajaya Abadi. Based on RSPO website the status of dispute or closed for monitoring.</p> |


| | |
|--|---|
| <p><i>Note: In case of an issue related to labour dispute identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.</i></p> | |
| <p>Is there any legal non-compliance reported/ identified within any Un-Certified Management Unit belonging to the RSPO Member?</p> <p>If YES, has it been addressed through measures consistent with the requirements of RSPO P&C criterion 2.1?</p> <p><i>Note: In case of an issue related to legal non-compliance identified by the CB, details of the status/ progress to resolve such matter shall be clearly explained.</i></p> | <p>All of the uncertified management unit are still in HGU process, but company provides evidence that land legality are still undergoing right now. Progress for obtained HGY are documented by the company.</p> |
| <p>Has a positive assurance statement been provided based on their self-assessment (i.e., internal audit) regarding the requirements for Un-Certified Management Units?<i>Note:</i></p> <p><i>1. This would necessitate evidence of the self-assessment for each requirement.</i></p> <p><i>2. A POSITIVE ASSURANCE statement is MANDATORY to indicate the outcome of self-assessment.</i></p> | <p>Company has positive assurance based on self assessment conducted during December 2023 for uncertified management unit.</p> |

| | |
|---|---|
| <p>Did the CB conduct targeted stakeholder consultation (including consultation with the relevant NGO's) to evaluate the compliance related to Requirements on the Un-Certified Management Unit?</p> | <p>No, CB didnt conduct consultation to relevant stakeholders to evaluate the compliance related to uncertified management unit</p> |
| <p>Did the CB conduct desktop study on the Un-Certified Management Unit to identify risk of any potential non-compliances? <i>Note: (e.g. relevant complaints, labour disputes, land conflicts)</i></p> | <p>Yes, CB conducting desk study to any potential non compliance</p> |
| <p>Based on the result of the desktop study, did the CB decide to perform further stakeholder consultation or field inspection to assess the risk of any potential non-compliance with the requirements (as necessary)?</p> | <p>No</p> |

14. Audit Conclusion & Recommendation

| Audit finding | |
|-------------------------------------|--|
| <input type="checkbox"/> | No nonconformity recorded. |
| <input type="checkbox"/> | Minor nonconformity recorded. A corrective action plan has been accepted. Verification of the nonconformity(ies) to be carried out in the next audit. |
| <input checked="" type="checkbox"/> | Major nonconformity recorded. Evidence of implementation of the corrective actions have been accepted by the audit team. The nonconformity(ies) have been satisfactorily closed out. |
| Recommendation | |
| <input type="checkbox"/> | Certification (Initial Certification) |
| <input checked="" type="checkbox"/> | Continue certification (Annual Surveillance Audit) |
| <input type="checkbox"/> | Renewal for certification (Recertification) |
| <input type="checkbox"/> | Not recommended for certification. Reason: (<i>Please provide the reason/ justification</i>) |

15. Acknowledgment of Internal Responsibility and Formal Sign-off Assessment Findings

| Signing by the Management Unit | |
|--|---------------------------|
| <p>I the undersigned, being the most senior management representative of the operation seeking or holding certification, agree with the contents and audit findings presented in this document.</p> <p>Furthermore, I confirm the following:</p> <ul style="list-style-type: none"> · Acceptance of responsibility in execution of the instructions given. · That this company was made aware that the recommendation of the Audit Team is tentative, pending review and decision by the Certification Decision Maker assigned by the CB. · That during the closing meeting all agenda items were covered by the Audit Team Leader. | |
| Acknowledged by: | |
| Name | Erick Perdana Andreas |
| Position | Management Representative |
| Date | 06 Mar 2025 |
|  Signature | |



Signing by the Audit Team Leader

I, the undersigned, being the Audit Team Leader, confirm that this report accurately reflects the findings and proceedings of the closing meeting. Furthermore, I affirm that the summary of the findings presented in this report is a true and accurate representation of the actual findings of the Audit Team.

Acknowledged by:

Name

Steve Mualim

Position

Lead auditor

Date

18 Feb 2025



Signature

Signing by the Certification Decision Maker

I, the undersigned, being the Certification Decision Maker, confirm that the information and conclusions contained in this report have been prepared in good faith and that the certification decision has been made based upon this information.

Acknowledged by:

Name

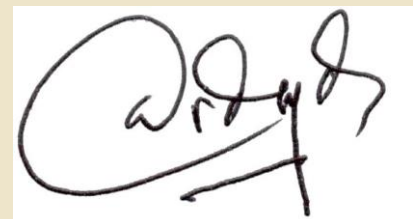
Ardiansyah

Position

RSPO Accreditation Manager

Date

19 Feb 2025



Signature



Appendix 1: Location Map Unit of Certification and Supply bases

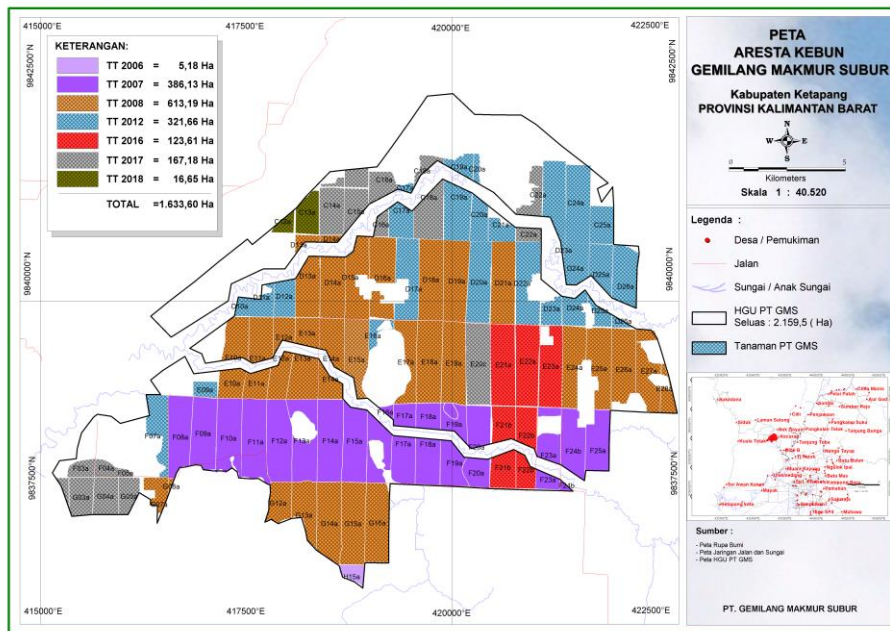
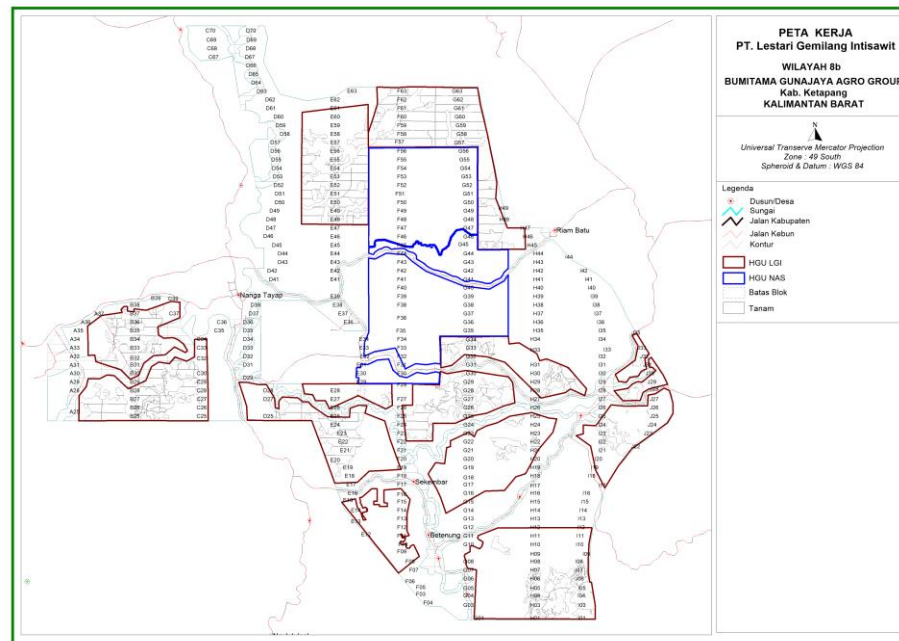
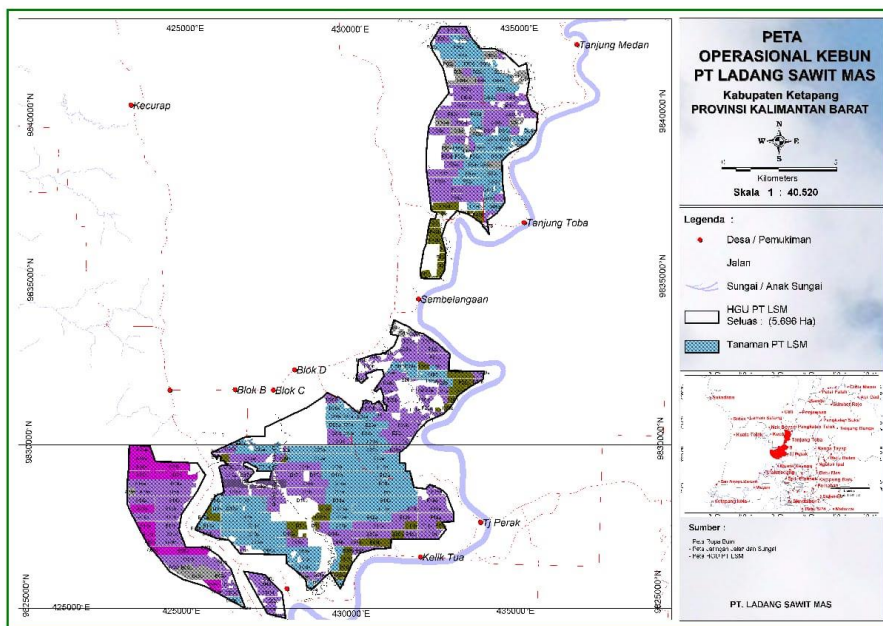


figure: Map of Unit of PT. Gemilang Makmur Subur

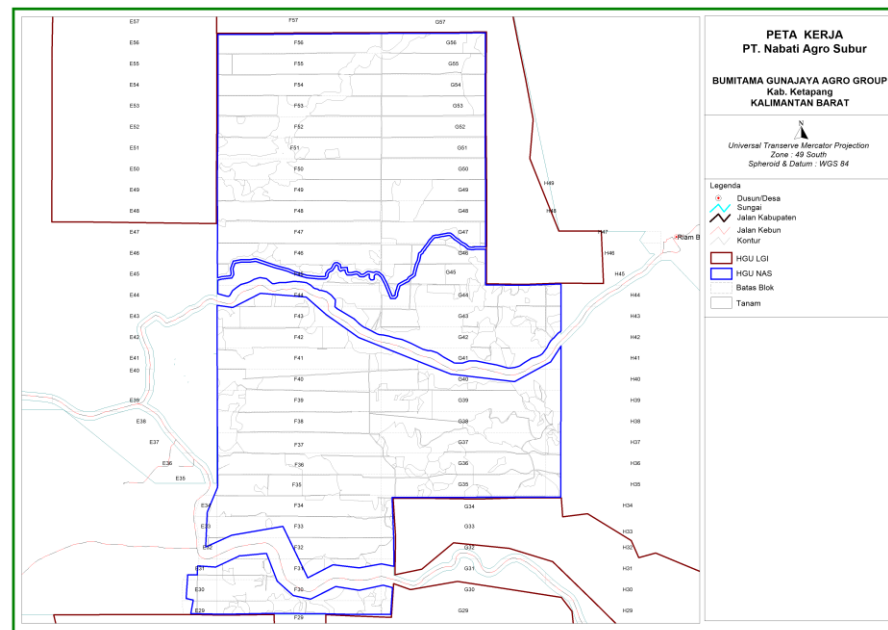


i.e. figure: Map of PT. Lestari Gemilang Intisawit





i.e. figure: Map of PT. Ladang Sawit Mas



i.e. figure: Map of PT. Nabati Agro Subur



Appendix 2: Greenhouse Gas (GHG) Reporting Summary

The GHG emissions produced by the Unit of Certification (POM and its supply bases) in the period of Jan 2024 until Dec 2024 have been calculated using the RSPO PalmGHG Calculator (version 4). The assessment team had verified the data input in the Palm GHG Calculator against operations records. The Certification Unit has selected the following options from the Palm GHG Calculator when preparing inputs for the GHG emissions calculations:

- Apply Full Version
- Exclude LUC Emissions

The summary of the Net GHG emitted in Jan-Dec 2024 for Bukit Tunggal Jaya POM and supply base are as following:

1. Summary of Emissions

| Description | tCO ₂ eq/t product |
|-------------|-------------------------------|
| CPO | 2.79 |
| PK | 2.79 |
| PKO | 0.00 |
| PKE | 0.00 |

| Extraction | tCO ₂ e/t product |
|------------|------------------------------|
| OER | 22.11 |
| KER | 4.62 |



2. Summary of Plantation/Field Emissions and Sink

| Land Use | Ha |
|-----------------------------|-----------------|
| OP Planted Area | 32100.70 |
| OP Planted on Peat | 2691.66 |
| Conservation (Forested) | 36.79 |
| Conservation (Non-Forested) | 3725.37 |
| Total | 34792.26 |

| Production | t/year |
|---------------|------------|
| FFB Processed | 316,877.00 |
| CPO Produced | 70,068.00 |



| | Own Crop | | Group | | 3rd Party | | Total |
|--|--------------------|-----------------------------|--------------------|-----------------------------|--------------------|-----------------------------|------------------|
| | tCO ₂ e | tCO ₂ e/ tFFB | tCO ₂ e | tCO ₂ e/ tFFB | tCO ₂ e | tCO ₂ e/ tFFB | |
| Land Conversion | 57269.03 | 0.71 | 140454.34 | 1.02 | 49651.04 | 0.00 | 247374.41 |
| CO ₂ Emission from Fertilizer | 3778.73 | 0.05 | 8452.73 | 0.06 | 8452.73 | 0.06 | 20055.30 |
| N ₂ O Emission | 13699.32 | 0.17 | 183.80 | 0.00 | 183.80 | 0.00 | 13883.12 |
| Fuel Consumption | 318.32 | 0.00 | 1876.98 | 0.01 | 1876.98 | 0.01 | 4130.94 |
| Peat Oxidation | 99920.71 | 1.24 | 1340.63 | 0.01 | 1340.63 | 0.01 | 101261.34 |
| Crop Sequestration | -52247.07 | -0.65 | -120616.53 | -0.87 | - 120616.53 | -0.87 | -222925.10 |
| Sequestration in Conservation Area | -84.55 | -0.00 | -170.79 | -0.00 | -170.79 | -0.00 | -255.34 |
| Total | 124369.17 | 1.54 | 35184.21 | 0.25 | 35184.21 | 0.25 | 176400.53 |

**Note: Includes both estates and smallholders (delete whichever not applicable)*



3. Summary of Mill Emission and Credits

| | tCO ₂ | tCO ₂ e/t FFB |
|--|------------------|--------------------------|
| Emission | | |
| POME | 62113.26 | 0.20 |
| Fuel Consumption | 418.39 | 0.00 |
| Grid Electricity Utilization | 86.79 | 0.00 |
| Credit | | |
| Export of Excess Electricity to Housing & Grid | -9.99 | 0.00 |
| Sales of PKS | -2420.00 | -0.01 |
| Sales of EFB | 0.00 | 0.00 |
| Total | 60188.45 | 0.19 |



4. Palm Oil Mill Effluent (POME) Treatment

| Description | % |
|-------------------------------|-------|
| Diverted to compost | 23.88 |
| Divert to anaerobic digestion | 76.12 |

5. POME Diverted to Anaerobic Digestion

| Description | % |
|--|-----|
| Diverted to anaerobic pond | 100 |
| Diverted to methane capture (Flaring) | 0 |
| Diverted to methane capture (electricity generation) | 0 |