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Roundtable on Sustainable Palm Oil

Public Summary Report

Report no. : RSPO P&C – 24190 –ASA-02

PT WINDU NABATINDO ABADI

Site Location:

Village of Tumbang Koling, Subdistrict of Cempaga Hulu
District of Kotawaringin Timur, Central Kalimantan

Date of assessment :

Remote Audit :	-
On-site Audit :	8-11 October 2024

Certification Body :

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Accreditation number : ASI-ACC-061 & 8 July 2024

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1.0 SCOPE OF CERTIFICATION ASSESSMENT

The 2nd surveillance assessment was carried out on 1 mill with and 5 estates with total area 11,059.30 Ha. There is part of areas exclude of the scope of assessment because of Land Use Rights (HGU) of PT Windu Nabatindo Abadi is still on process with total areas is 413.68 ha and RaCP approval of PT Nabatindo Karya Utama is still on process with total areas is 2,583.59 ha (if any).

1.1 Description of the Organization

Detail description of certification unit is mentioned below:

RSPO Registered Parent Company Name	Bumitama Agri Ltd.
RSPO Member ID	1-0043-07-000-00
Company/Organization Name	Sungai Cempaga Mill_PT Windu Nabatindo Abadi
Address	Head Office: Jalan Melawai Raya No. 10, Kebayoran Baru, Jakarta Selatan, 12160 Site Location: Village of Tumbang Koling, Subdistrict of Cempaga Hulu District of Kotawaringin Timur, Central Kalimantan
Email	Erick.perdana@bumitama.com Saeshaputi.rahmanita@bumitama.com
Telpon/Fax	+62 21 27838200
Certification Unit / Palm trace member ID (Name of mill)	Mill 1 : Sungai Cempaga POM / RSPO_PO1000009211 Mill 2 : N/A
Supply base name (scope of certification)	
Company owned Estate:	1. Sungai Cempaga Estate (PT Windu Nabatindo Abadi) 2. Sungai Bahaur Estate (PT Windu Nabatindo Abadi) 3. Bangun Koling Estate (PT Windu Nabatindo Abadi) 4. Banama Haring Estate (PT Nabantido Karya Utama) 5. Sungai Mirah Minting Estate (PT Nabantido Karya Utama)
Other operating estate owned by Company	1.-
Other Source	1.-
Supply Chain Model	<input type="checkbox"/> IP <input checked="" type="checkbox"/> MB
Mill Capacity (tonnes/hour)	Mill 1 60 Mill 2 N/A
Certificate Number	824 502 24190

1.2. Standards Applicable

<input checked="" type="checkbox"/> RSPO Principles & Criteria	<input checked="" type="checkbox"/> INA-NI 2020	<input type="checkbox"/> NG-NI,	<input type="checkbox"/> Generic, 2018
	<input type="checkbox"/> MY-NI, 2019	<input type="checkbox"/> GH-NI 2019	<input type="checkbox"/> CM-NI 2021
<input checked="" type="checkbox"/> RSPO P&C Certification System, year 2020			

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2.0 DESCRIPTION OF CERTIFICATION UNIT

2.1 Location

Figure 1 GPS locations for all estates and mills included in certification assessment

Name of mill and estate/SH/outgrower	Location	GPS locations	
		Latitude (N / S)	Longitude (E / W)
Sungai Cempaga Mill	Village of Tumbang Koling, Subdistrict of Cempaga Hulu District of Kotawaringin Timur, Central Kalimantan	1° 47' 52" S	112° 59' 05" E
Sungai Cempaga Estate (PT Windu Nabatindo Abadi)	Village of Tumbang Koling, Sub-district of Cempaga Hulu, Kotawaringin Timur, Central Kalimantan	1° 49' 6" S	113° 0' 47" E
Sungai Bahaur Estate Estate (PT Windu Nabatindo Abadi)	Village of Tumbang Koling, Sub-district of Cempaga Hulu, Kotawaringin Timur, Central Kalimantan	2° 49' 10" S	112° 1' 46" E
Bangun Koling Estate (PT Windu Nabatindo Abadi)	Village of Tumbang Koling, Sub-district of Cempaga Hulu, Kotawaringin Timur, Central Kalimantan	2° 48' 14" S	112° 58' 14" E
Banama Haring Estate (PT Nabantido Karya Utama)	Village of Tumbang Koling, Sub-district of Cempaga Hulu, Kotawaringin Timur, Central Kalimantan	1° 44' 27" S	112° 59' 24" E
Sungai Mirah Minting Estate (PT Nabantido Karya Utama)	Village of Tumbang Koling, Sub-district of Cempaga Hulu, Kotawaringin Timur, Central Kalimantan	1° 44' 16" S	112° 58' 5" E

Note :

Is there scheme/associate smallholder on table above ? Yes No

If Yes, please filling in table below :

Name of scheme/associate SH	Number of SH members
-	-

Note :

-

2.2 Maps

Figure 1. Location Map of PT Windu Nabatindo Abadi

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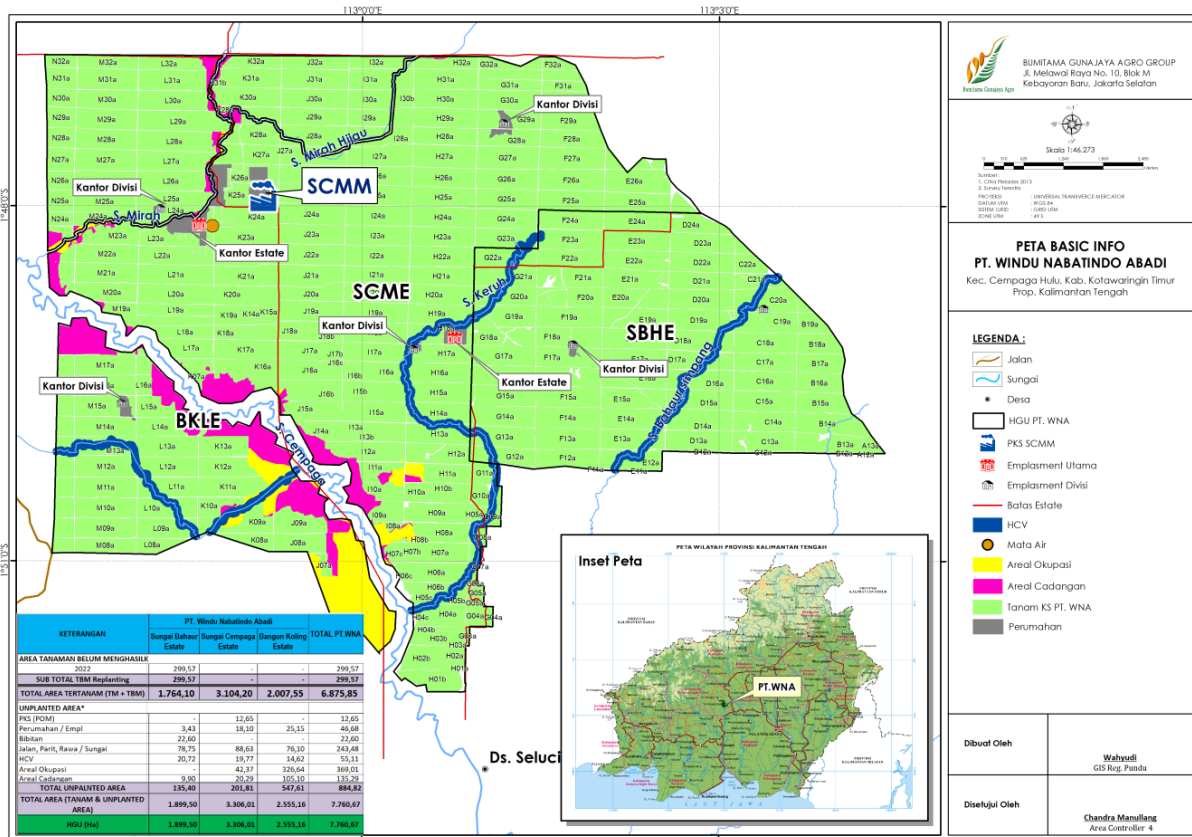
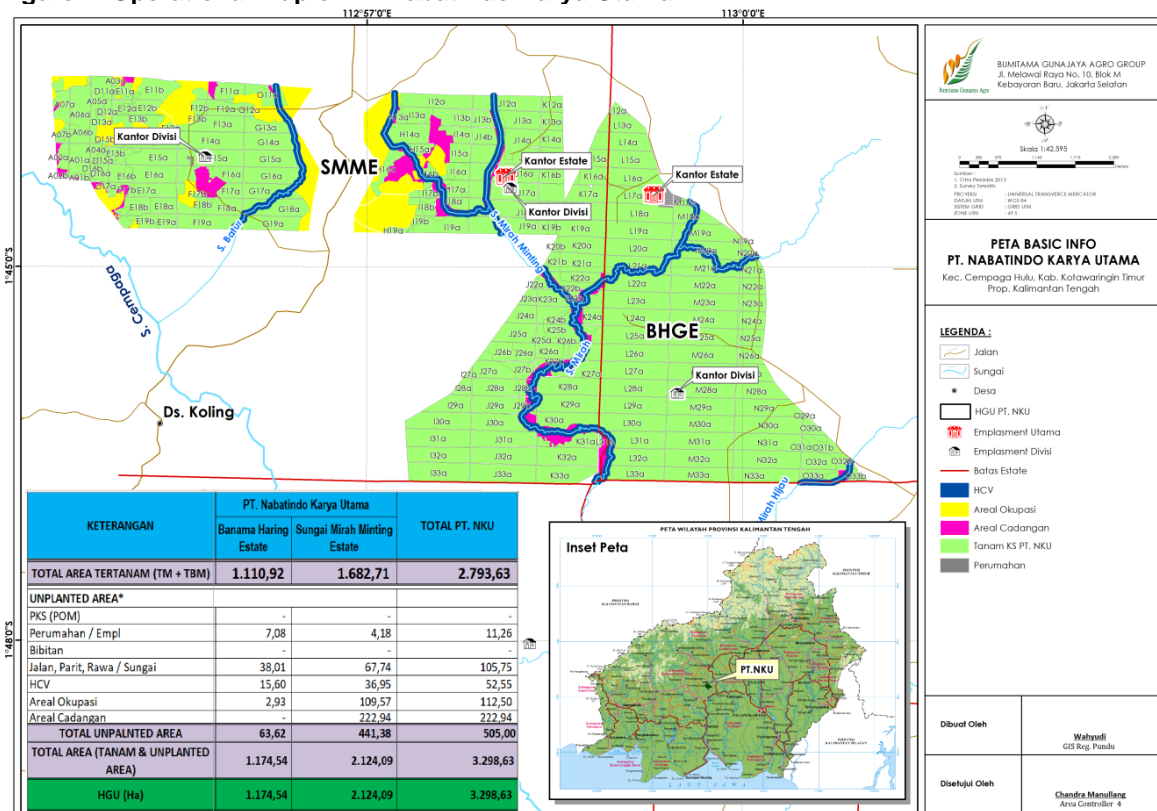


Figure 2. Operational Map of PT Nabatindo Karya Utama



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2.3 Supply Base Composition

Table 2 FFB Supply Base Composition for PT Windu Nabatindo Abadi – Sungai Cempaga POM

FFB Contributor	FFB supplied ^{*)}		Projection of FFB production or supplied for Next License ^{**)}	
	Tonnes	%	Tonnes	%
Certified category :				
Company owned estates :				
Bangun Koling Estate	42,181.46	17.92	43,748	18.92
Sungai Cempaga Estate	59,635.17	25.33	68,000	29.40
Banama Haring Estate	20,465.30	8.69	20,771	8.98
Sungai Mirah Membangun Estate	30,836.22	13.10	34,919	15.10
Sungai Bahaur Estate	106.22	0.05	19,950	8.63
Sub Total	153,224.37	65.08	187,388	81.03
SH/Outgrower :				
-				
Sub Total				
Other companies under company member/SH/Outgrower :				
-				
Sub Total				
Non-certified category :				
Bangun Koling Estate (uncertified area)	6,680.64	2.84	6,604	2.86
Sungai Cempaga Estate (uncertified area)	9,250.90	3.93	3,777	1.63
Banama Haring Estate (uncertified area)	47,028.59	19.98	23,971	10.36
Sungai Mirah Membangun Estate (uncertified area)	19,187.26	8.15	6,911	2.99
Sungai Bahaur Estate (uncertified area)	20.00	0.01	2,619	1.13
Selucing Agro Estate	14.75	0.01	0	-
Serawak Damai Estate	24.91	0.01	0	-
Sub Total	82,207.04	34.92	43,882	18.97
GRAND TOTAL	235,431.41	100.00	231,270	100.00

Note :

*) . Period of October 2023 to September 2024

**) . Period of October 2024 to September 2025

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Table 3 CPO and PK production and sold period of October 2023 to September 2024 and projected for period of October 2024 to September 2025

For single supply chain model

Remarks		Amount (mt)				
		FFB	CPO		PK	
Certified tonnage (license) ^{*)}	From Estate	168,000.00				
	From Independent Smallholder (ISH)	-	36,640.00		7,560.00	
	From Scheme or Associate SH/Outgrower	-				
Actual Production						
Actual OER and KER (%)		n.a	22.94		4.13	
Total production		235,431.41	53,914.54		9,743.37	
Total non-certified production		82,207.04	18,842.27		3,433.50	
Total certified production		153,224.37	35,072.27		6,309.87	
Actual Sold^{**)}						
Actual sold volume under RSPO scheme ^{****)}		n.a	PL 0.00	CL 0.00	PL 2,050.05	CL 2,282.21
Actual sold volume under other scheme certified (ISCC, etc)		n.a	0.00	0.00	0.00	0.00
Actual sold conventional		n.a	9,868.44	5,454.66	177.12	1,608.85
Book and Claim (If any)		n.a	35,978.00	20,659.00	0.00	0.00
New (Projected) Production						
OER and KER projection (%)		n.a	23		4	
Total production		231,270.00	53,192.10		9,250.80	
Total non-certified production		43,882.00	10,092.86		1,755.28	
Total certified production (RSPO Scheme)	From Estate	187,388.00				
	From Independent Smallholder (ISH)	-	43,099.24		7,495.52	
	From Scheme or Associate SH/Outgrower	-				

Note :

*) . There is no volume extension.

) : **PL: period is 01 October 2023 - 25 January 2024 (because there is extension time from 21 December 2023 - 25 January 2024) & **CL** period is 26 January 2024 - 30 September 2024

***): It is sold certified volume by physically only.

****): All of certified CPO product was downgraded to uncertified for selling under book & claim

2.4 Area of Plantation (Total, Planted and Mature)

Table 4 Oil Palm Planted Area Summary, FFB Production and Average yield/ha for PT Windu Nabatindo Abadi – Sungai Cempaga POM period of October 2023 to September 2024

Estate/SH/Outgrower Name	Total area (ha)	Oil Palm Planted area (ha)	Mature (Production) area (ha)	Immature (Non-production) area (ha)	FFB Production* (tonnes)	Average yield/ ha
Bangun Koling Estate	2,555.16	2,007.55	2,007.55	-	42,181.46	21.01
Sungai Cempaga Estate	3,306.01	3,104.20	3,104.20	-	59,635.17	19.21
Sungai Bahaur Estate	1,899.50	1,759.72	1,127.81	631.91	20,465.30	18.14
Banama Haring Estate	1,174.51	1,110.92	1,110.92	-	30,836.22	27.76
Sungai Mirah Minting Estate	2,124.12	1,682.71	1,682.71	-	106.22	0.06
TOTAL	11,059.30	9,669.48	9,033.19	631.91	153,224.37	16.96

Note :

*) . Volume of FFB production shall be getting from estate/SH/outgrower so that prohibited of get volume of FFB production from mill. If any, FFB estate distribute to more one mill so that informing name of mill and volume of FFB dispatch to each mill

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2.5 Dates of Plantings and Replanting Cycles

The company follows a replanting cycle of 25 years. Information on the dates of plantings are as per the table below:

Table 5 Age and year of plantings of company estate supplying to Sungai Cempaga POM periode of September 2024

Year of Plantings	Oil palm planted area at each estate/division (ha)				
	BKLE	SCME	SBHE	BHGE	SMME
1998			56.96		
2000			95.33		
2002			144.70		
2003			234.75		
2005			91.07		
2006	528.32	736.73	27.13		
2007	1,279.56	1,373.65	286.23		
2008	186.16	605.67	191.64	478.50	78.62
2009	13.51	198.56		547.79	
2010		35.01		51.43	62.65
2011				19.56	21.66
2012		30.98		13.64	91.55
2013		37.30			1,051.08
2014					240.36
2015		86.30			136.79
2022			299.57		
2024			332.34		
TOTAL	2,007.55	3,104.20	1,759.72	1,110.92	1,682.71

Table 6 Land use data for Sungai Cempaga POM period of September 2024

Estate Name	Total area (ha)	Oil Palm Planted Area (ha)	Other commodities (ha)	HCV/Potential HCV areas* (ha)	Land used for other purposes (ha)			
					Local Government office, Road, Housing, Drain, POM	Nursery	Cleared Area	Other Land
Bangun Koling Estate	2,555.16	2,007.55	-	14.62	101.25	-	-	431.74
Sungai Cempaga Estate	3,306.01	3,104.20	-	19.77	119.38	-	-	62.66
Sungai Bahaur Estate	1,899.50	1,759.72	-	20.72	86.56	22.60	-	9.90
Banama Haring Estate	1,174.51	1,110.92	-	15.60	45.09	-	-	2.93
Sungai Mirah	2,124.12	1,682.71	-	36.95	71.92	-	-	332.51

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Minting Estate								
TOTAL	11,059.30	9,665.10	-	107.66	424.20	22.60	-	839.74

Note :

*) HCV areas outside of estate/plantation areas

Table 7 Planned and actual oil palm replanting activities for PT WNA and PT NKU

Estate	Total planned replanting area (ha)	Total planned replanting area for each estate (ha)					Actual total area replanted (ha)
		2023	2024	2025	2026	2027	
Bangun Koling Estate	-	-	-	-	-	-	-
Sungai Cempaga Estate	-	-	-	-	-	-	-
Sungai Bahaur Estate	2,032.34	-	332.34	638	563	499	332.34
Banama Haring Estate	-	-	-	-	-	-	-
Sungai Mirah Minting Estate	-	-	-	-	-	-	-

2.6 Data & Information Relate of Employment & Social Issues

Table 8 Number of Employees Based on Workplace as of September 2024

	Full time		Temporary				Total Internal Employee		Contractor*		Total manpower (internal +Contractor)
	M**	F**	PKWT/Contract*		PHL/Casual*		M**	F**	M**	F**	
			M**	F**	M**	F**					
Sungai Cempaga Mill	97	10	-	-	-	-	97	10	10	-	117
Bangun Koling Estate	181	113	-	-	-	-	181	113	-	-	294
Sungai Cempaga Estate	235	137	-	-	-	-	235	137	-	-	372
Sungai Bahaur Estate	330	200	-	-	-	-	330	200	-	-	530
Banama Haring Estate	280	133	-	-	-	-	280	133	-	-	413
Sungai Mirah Minting Estate	245	84	-	-	-	-	245	84	-	-	329
Total	1,368	677	-	-	-	-	1,368	677	10	-	2,055

Note :

**), M = Male & F = Female

Table 9 Risk Assessment of Third Party/Contractor period of September 2024

Company Name	Risk factors					Risk mitigation factors				Risk evaluation	
	a	b	c	d	e	f	g	h	i		j

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PT Surya Mentaya Jaya	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Normal
CV Borneo Mulia Abadi	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Normal
PT. Semesta Langgeng Sentosa	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Normal
PT Cahaya Bumi Rezeki	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Normal

Note :

- a) Third-party is providing operational service (example transportation, independent storage, road maintenance, develop of building, etc) where it is non-processing activities and/or supplying labour
- b) More than 30% labor is outsourcing/subcontractor/non-permanent
- c) Third-party carrying out more dominant if compared with other third-parties for one activity segment/sector or more than 30% from allocation total of activity.
- d) No agreement between company and third-party
- e) Third party has not implemented occupation safety & health or social or labor issues
- f) Third party has audited by company against relevant of indicator in RSPO P&C standard and any non-conformity or third party has not audited by company
- g) Third party have not legal entity
- h) Third party has not carried out controlling relate of the implementation of occupation safety & health or social & labor or environment management.
- i) The contractor is an RSPO-certified organization that includes documented procedures for outsourcing services within the scope of certificate.
- j) Risk Assessment (please enter "**high**" or "**normal**", do not cross)

Calculate of Risk Category is Risk Factor x Risk Mitigation Factor (each parameter is 1 point) and Risk Category: Low Risk is =< 10 point & High Risk is > 10 point

3.0 ASSESSMENT PROCESS

Initial Certification Audi	1. SA	2. SA	3. SA	4. SA
Other CB	Other CB	Audit Date: 8-11 October 2024 Lead Auditor: Efrida Auditor team: 1. M. Rinaldi 2. Dwi Premadha Lestari 3. Dewi Akbari 4. Satria Adi Putra		
Recertification	1. SA	2. SA	3. SA	4. SA
Audit Date: Lead Auditor: Auditor team: 1. 2. 3.				

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3.1 Qualifications of Lead Assessor and Assessment Team

Name	Position	Qualifications / Experience
Efrida	Lead Auditor	<p>Education: Bachelor of Economics (Resources and Environmental Economics) – Bogor Agriculture University.</p> <p>Trainings attended: RSPO Lead Auditor Training, ISO 9001:2008 Lead Auditor training (IRCA), ISPO Lead Auditor Training (ISPO Commission), 5S and Social Workshop, Kuala Lumpur, SA8000 lead auditor training, ISO 45001 Lead Auditor training (2021), SCCS Lead Auditor Training (2022), Refreshment RSPO by Checkmark (2021 and 2024), and RSPO Independent Smallholder Standard Refreshment Training (2022).</p> <p>Working experience: Community Development Staff at Wilmar International Plantation-Central Kalimantan Project (2010-2012) and Technical Support Department Sustainability Assurance in PT TUV Rheinland Indonesia (2012-2016), Auditor ISPO (2016-current) and Auditor RSPO (2016-current)</p> <p>Scope: Social, Labor Welfare</p>
Muhammad Rinaldi	Auditor	<p>Education: Diploma of Oil Palm Plantation – Bogor Agriculture University</p> <p>Experience: Assistant Agronomy in PT SMART Tbk (2009-2013), RSPO, ISPO, ISCC Auditor & GHG scheme validator/verificator in PT Mutuagung Lestari (2014-2024), and Auditor in PT TUV Rheinland Indonesia (August 2024-present).</p> <p>Training: ISO/EC 17065 & 17021; ISO 22000 by PT Mutuagung Lestari (2014); Indonesian Sustainable Palm Oil (ISPO) by Komisi ISPO (2014); OHS Expert by Manpower Ministry (2014); OHS Auditor training by Manpower Ministry (2015); RSPO P&C Lead Auditor Course by Daemeter & Proforest (2016); Inhouse training: Palm Oil Mill Processing, Best Management Practices on Peat Area, Integrated Pest Management by PT Mutuagung Lestari (2016); RSPO SCCS Lead Auditor Course by BM Trada Exova (2018), ISCC Basic Training by ISCC GmbH (2019 & 2024), ISCC Waste & Residue by ISCC GmbH (2020); Refreshment training: ISPO by Mutu Institute (2021); training of ISO 9001:2015; ISO 14001:2015; ISO 45001:2018 by PT Mutuagung Lestari (2021); Refreshment training RSPO P&C by David Ogg & Partner Ltd (2021); ISO 17029:2019; ISO 14065: 2020; ISO 14064-1:2018; ISO14064-2:2019; ISO 14064-3:2019 by ALSI & Ambika (2021); RSPO ISH Training by RSPO secretariat (2022); ISCC GHG training by ISCC GmbH (2022).</p> <p>Scope: Contractor legal compliance, Legal of FFB Supplier, SCCS, FPIC, Land Use, Land Compensation, Land Conflict, HCV & HCS protection and management.</p>
Dwi Premadha Lestari	Auditor	<p>Education: Bachelor of Forestry, Bogor Agriculture University</p> <p>Trainings attended: IRQA-QMS ISO 9001:2015 by ForeFront, RSPO P&C Lead Auditor Course by Checked Mark, ISPO Auditor Course by LPP Agro, Refreshment RSPO by Checkmark (2024).</p>

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		<p>Working experience: Experienced in non government organization, External Auditor for Roundtable on Sustainable Palm Oil (RSPO), Indonesian Sustainable Palm Oil (ISPO) in PT SGS Indonesia and PT Mutu Agung Lestari until October 2023, an Auditor in TUV Rheinland Indonesia from November 2023 - Present.</p> <p>Scope: Environment, Best Practices, GAP</p>
Dewi Akbari	Auditor	<p>Education: Bachelor of Agriculture, Departement of Social and Economic of Agriculture, Sriwijaya University, Palembang.</p> <p>Trainings attended: RSPO Lead Auditor Training, Pekanbaru (August 2014). Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training (May 2002); ISO 9001:2008 IRCA Lead Auditor, ISO 14000:2004, OHSAS 18001:2007 trainings - OHSAS/SMK3 Lead Auditor based on PP No.50 /2012; ISCC Auditor Training, SCCS Lead Auditor Training, Refreshment RSPO by Checkmark, and RSPO Independent Smallholder Standard Refreshment Training (2022), SA8000 auditor training (2024).</p> <p>Working experience: Exprience in consulting, training and auditing Quality, Environmental, OHSAS of PT Surveyor Indonesia Pekanbaru (2000 – 2010), Lead Auditor : QMS 9001:2008, Auditor Indonesian Sustainable Palm Oil (ISPO) and Roundtable Sustainable Palm Oil (RSPO) for TUV Rheinland since 2013</p> <p>Scope: Social, Transparancy, Business Ethic, Fair Business</p>
Satria Adi Putra	Auditor	<p>Education: Diploma III in Oil Palm Plantation, Bogor Agricultural University, Indonesia.</p> <p>Training Attendaed: ISPO auditor training (ISPO Commission), RSPO Lead Auditor (Checkmark), RSPO SCCS (BM TRADA 2018), ISCC EU & Plus (2019), ISO 9001:2015, ISO 14001:2015, ISO 19011:2011, OHSAS 18001:2007, OHS Expert, ISO Lead Auditor 22000, Training ISO/TS 22002-1 to 3, HACCP Lead Auditor and Training FSSC 22000 V 6.0.</p> <p>Working experience: Operational and Sustainability Staff at a private Indonesian oil palm plantation (PT SMART Tbk, 2009 – 2016), Supervisor and Lead Auditor of ISPO, RSPO, Organic, HACCP and ISO 22000 at PT Mutuagung Lestari Tbk (2016 – 2024), auditor at PT TUV Rheinland Indonesia (2024 – present).</p> <p>Scope: Law Compliance, OHS and GHG</p>

Name of Peer review: N/A

3.2. Assessment Agenda

Date	Location	Actual Audit Activity
Tuesday, 8 October 2024	Regional Office and Cempaga POM	<p>Opening Meeting Verification of related documents of previous NCs Verification document related of RSPO P&C INANI 2020</p> <p>Interview with stakeholders:</p> <ul style="list-style-type: none"> - Public Figure of Tumbang Koling Village - Koling Hapakat Cooperative of Tumbang Koling Village - NGO of "Forum Bersama Kotawaringin Timur", PT Surya Mentaya Jaya (CPO Transporter).

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Date	Location	Actual Audit Activity
		<ul style="list-style-type: none"> - Land Agency of Kotawaringin Timur - Loading Ramp, Sungai Cempaga Mill - Sterilizer Area, Sungai Cempaga Mill - Engine Room, Sungai Cempaga Mill - Kernel Area, Sungai Cempaga Mill - Boiler Room, Sungai Cempaga Mill - Supplier FFB <i>Koperasi</i> Sehati Pundu for PT Windu Nabatindo Abadi - Supplier FFB <i>Koperasi</i> Koling Hapalkat for PT Nabatindo Karya Utama - Environment Agency and Agriculture Regency in division of Plantation in Kotawaringin Regency <p>Field Verification and interview: security post, weighbridge office, grading, loading ramp, CPO tank, Kernel Silo and Commercial Staff, housing, Chemical Warehouse Storage, PPE Warehouse Storage, Temporary hazardous waste, Water Treatment, Environmental management (<i>IPAL</i>) and Land Application</p>
<p>Wednesday, 9 October 2024</p>	<p>Sungai Bahaur Estate</p>	<p>Verification document related of RSPO P&C INANI 2020 Field visit to:</p> <ul style="list-style-type: none"> - Rinsing Room, Block F6, Divisi 2, Sungai Bahaur Estate. - Replanting Area (plan), Block B12/13a & Block D12/13a, Sungai Bahaur Estate - <i>Tempat Pengumpulan Sampah Akhir</i>, Block F19/20a, Sungai Bahaur Estate. - HCV Area (Sungai Bahaur Simpang), Block D15a, Sungai Bahaur Estate. - HCV Area (Sungai Mirah Hujan), Block B12/13a, Sungai Bahaur Estate. - HGU Pole (WNA 24), Block B13, Sungai Bahaur Estate. - HGU Pole (WNA 28), Block B13, Sungai Bahaur Estate.
	<p>Bangun Koling Estate</p>	<p>Field Verification:</p> <ul style="list-style-type: none"> - Boundary Mark No.69 at Division 1 Block K8, - Riparian area of Rege River & Boundary Mark No. 70 at Division 1 Block K10, - reserved area at Division 1 Block J9, - Occupation Area at Division 1 Block L13/14, - Fire Monitoring Tower at Division 3 Block N27, - Boundary Mark No. 11, 124 & 125 at Division 3 Block N32, - Boundary Mark No. 123 at Division 3 Block N31, - Riparian area of Mirah River at Division 2 Block L23/M23, - Landfill at Division 2 Block L21. - Employee housing (K3 & environmental aspects) - Chemical/fertilizer warehouse/center (OHS & environmental aspects) - Land fire facilities & infrastructure (OHS & environmental aspects) - Sanitation room, Day care (TPA) - Sprayer worker and Fertilizer worker in division 2, blok L21, and - Harvester worker in division 2, block M20 <p>Interview Transport Clerk at Division 1 Block K10</p>

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Date	Location	Actual Audit Activity
Thursday, 10 October 2024	Sungai Merah Minting Estate	Verification document related of RSPO P&C INANI 2020 Field visit to: <ul style="list-style-type: none"> - Landfill Area, Block I13/14, Sungai Mirah Minting Estate - Harvesting Area, Block J12-15, Sungai Mirah Minting Estate - HGU Pole (004), Block B13, Sungai Mirah Minting Estate - HGU Pole (005), Block B13, Sungai Mirah Minting Estate - Facilities and infrastructure in division 2 detail to: chemical warehouse storage, PPE warehouse storage, <i>Rumah Bilas</i> sprayer and fertilizer, Fire extinguisher warehouse, Clinic, daycare and housing of employee
	Banama Haring Estate	Field Verification: <ul style="list-style-type: none"> - Boundary Mark No. 51, 128 & 129 at Division 3 Block O32, - Riparian Area of Mirah Hujan River at Division 3 Block O33, - Fire Monitoring Tower at Division 3 Block M26, - Riparian area of Mirah River at Division 2 Block M20/21. - Chemical/fertilizer warehouse/center (OHS & environmental aspects) - hazardous waste temporary store (K3 & environmental aspects) - Employee housing (K3 & environmental aspects) - Sanitation room ((K3 & environmental aspects) - Day care / creche Interview with manuring worker at Division 2 Block M20, Foreman harvester and harvesters at Div II Block M21-22 (OHS & environmental aspects)
11 October 2024	Metro Pundu	<ul style="list-style-type: none"> • Interview with Land Previous Owner at PT WNA & NKU • Verification document related of RSPO P&C INANI 2020 • Closing meeting

Agenda for Verification of Closure of Major Non-conformities (if necessary)

Date	Location / Main sites	Auditor	Main activities
-	-	-	-

3.3 Assessment Methodology and Program

The surveillance assessment was conducted between 8-11 October 2024 as per the assessment program above (section 3.2). The assessment was carried out in accordance with PT TUV Rheinland Indonesia's RSPO audit procedure as well as the RSPO Certification Systems document. During assessment, the qualified TUV Rheinland assessors used the RSPO standard as endorsed for Indonesia and recorded their findings.

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Due to the location and proximity of the estates, combined with common management systems, it was possible to carry out both field and document assessments of all estates and the mill within the time frame without compromising the integrity of the assessment in anyway.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The total audit sampel are taken from sampel from company's owned estate and sample from scheme smallholders.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment.

As for the as sechme smallholders, the sample were determined following the were based on the formula $(y) \times (z)$; where y is total number of scheme smallholders where z is the multiplier defined by the risk assessment.

The multifier risk assessment for Low Risk is 0.8; Medium Risk is 1.2 and High Risk is 2.

Considering of risk parameter applied for the existing estate and smallholders, the risk of parameter can be defined: medium.

The following table would be used to identify the locations to be audited each year in the 5 year cycle.

Assessment Program					
Mill and supply based Name	Intial certi-fication	SA	SA	SA	SA
Mill			Sungai Cempaga		
Estate			Sungai Bahaur Estate, Bangun Koling Estate, Sungai Merah Minting Estate, Banama Haring Estate		
Smallholder			-		

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix 5.

Certification assessments will determine compliance or non-compliance with each P&C indicator. Non-compliances shall be graded as either minor (non-critical) or major (critical), in accordance with the status of the relevant indicator in RSPO P&C.

The assessment was based on random samples and therefore nonconformities may exist that have not been identified

4.0 STAKEHOLDER CONSULTATION AND STAKEHOLDERS CONTACTED

PT TUV Rheinland Indonesia has informed to respective stakeholder via email prior to conducting audit and were notified to make comments. Stakeholder consultation took place in the form of meetings and interviews. Meet-

ings with stakeholders were held to seek their views on the performance of the company with respect to the sustainability practices outlined in the RSPO Principles & Criteria, and to comment on aspects where improvements could be made. Meetings with local stakeholders/communities were held at their respective premises within and near the company's areas. Stakeholders included those immediately linked with the operation of the company as employees, outgrowers, the local government, NGO's, trade and labour unions and local communities. A stakeholder consultation meeting was also held on by phone during the audit.

In all the interviews and meeting, the objectives of the RSPO and the purpose of the assessment was clarified at the outset followed by an evaluation of the relationship between the stakeholders and the company before discussion proceeded to obtain the stakeholders feedback on the company's compliance to different aspects of the RSPO Principles & Criteria. Although several stakeholders were not familiar with RSPO but they agreed with its objective and expressed their willingness to collaborate in the promotion of sustainable palm oil in Central Kalimantan Province. In all interviews and meeting, the assessment team did not restrict discussion of both the positive and negative aspects of operations conducted by the company's estates and mill.

The stakeholder consultation meeting held with stakeholders during the audit was extensive and productive, with an attendance of more than 10. This was followed by site inspections, including visits to the local communities, interviews with land claimants, land ownership and contractor, and inspections of worker amenities and infrastructure. All stakeholder issues raised & interview result with land ownership were recorded in section 10.1.& appendix 5 and the list of stakeholders interviewed during the assessment is included as Appendix 5.

5.0 COMPLIANCE TO OTHER RSPO REQUIREMENT

5.1 Time Bound Plan for Other Management Units

The time frame laid out below is considered to be both challenging and realistic. The audit team is satisfied that the company conforms with the RSPO requirements for partial certification as laid out in Clause 5.5 of the RSPO Certification Systems document (year 2020).

Tabel 8 Time Bound Plan of Bumitama Agri Limited

No	Unit Management	Mill	Supply Base	Location	Status	Time Bound	Time Bound Rev
1	PT Windu Nabatindo Lestari (WNL)	Pundu Nabatindo Mill	PT Windu Nabatindo Lestari	Central Kalimantan	Certified 2014	2014	2014
			Koperasi Harapan Abadi		Non-certified	2022	2023
			Independent Smallholders (Kelompok Tani Tenera)		Certified 2018	2018	2018
			PT Fajar Bumi Nabati		Non-certified	2022	2025
		PT Gemilang Subur Maju					
2	PT Windu Nabatindo Lestari (WNL)	Katari Agro Mill	PT Windu Nabatindo Lestari	Central Kalimantan	Certified 2016	2016	2016
3	PT Karya Makmur Bahagia (KMB)	Gunung Makmur Mill	PT Karya Makmur Bahagia (KMB)	Central Kalimantan	Certified 2014	2014	2014
			Koperasi Unit Desa Mekar Jaya (KMB)		Non-certified	2022	2025
			Koperasi Unit Desa Sekar Tani (KMB)				
			Koperasi Unit Desa Lestari (KMB)				
			Koperasi usaha Bersama (KMB)				
			Koperasi Makarti Jaya (KMB)				
			Koperasi Marga Rahayu (KMB)				
			Koperasi Tani Santoso (KMB)				
			PT Tanah Tani Lestari (TTL)	Central Kalimantan	Non-certified	2022	2025
			Koperasi Hapakat (TTL)				
			Koperasi Rika Bersatu (TTL)				
			Koperasi Usaha Bersama (TTL)				
			Koperasi Eka Harahap (TTL)				
			Koperasi Berkat Usaha Besama (TTL)				
		Koperasi Bina Tani (TTL)					
		Independent Smallholders (Kelompok Karya Bersama)		Certified	2022	2021	

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No	Unit Management	Mill	Supply Base	Location	Status	Time Bound	Time Bound Rev		
4	PT Karya Makmur Bahagia (KMB)	Bukit Makmur Mill	PT Karya Makmur Bahagia (KMB)	Central Kalimantan	Non-certified	2022	2025		
			PT Langeng Makmur Sejahtera (LMS)		Non-certified	2022	2025		
			Koperasi Telawang Bersatu		Non-certified	2022	2025		
			Koperasi Hinje Are						
			Koperasi Eka Harahap (LMS)						
5	PT Windu Nabatindo Abadi (WNA)	Sungai Cempaga Mill	PT Windu Nabatindo Abadi (WNA)	Central Kalimantan	Non-certified	2022	2025		
			KSU Sehati Pundu		Non-certified	2022	2025		
			PT Nabatindo Karya Utama (NKU)		Non-certified	2022	2025		
			Koperasi Koling Hapakat		Non-certified	2022	2023		
6	PT Windu Nabatindo Abadi (WNA)	Selucing Agro Mill	PT Windu Nabatindo Sejahtera (WNS)	Central Kalimantan	Non-certified	2022	2025		
7	PT Bumitama Gunajaya Abadi	Kotawaringin Mill	PT Bumitama Gunajaya Abadi (BGB)	Central Kalimantan	Non-certified	2024	2024		
8	PT Bumitama Gunajaya Abadi (BGB)	Lamandau Mill	PT Bumitama Gunajaya Abadi (BGB)	Central Kalimantan	Non-certified	2022	2025		
			Koperasi Kompak Maju Bersama		Non-certified	2022			
			Koperasi Mitra Bahaum		Non-certified	2022			
			Koperasi Tanjung Biru		Non-certified	2022			
			PT Andalan Sukses Makmur (ASMR)		Non-certified	2022			
			Koperasi Seberang Jaya Sejati		Non-certified	2022			
			Koperasi Pulau Sejahtera		Non-certified	2022			
			PT Investa Karya Bhakti (IKB)		Non-certified	2022	2025		
9	PT Gunajaya Karya Gemilang (GKG)	Kendawangan Mill	PT Gunajaya Karya Gemilang (GKG)	West Kalimantan	Certified 2015	2016	2016		
			PT Gunajaya Ketapag Sentosa (GKS)		NPP was Completed				
			Koperasi Serba Usaha Bersama	West Kalimantan	Non-certified	2022	2023		
			Koperasi Serba Usaha Karya Bersama						
			Koperasi Binasari						
			Koperasi Perkebunan Fajar Mandiri						
Koperasi Rimba Sari									
10	PT Agro Sejahtera Manunggal (ASM)	Pembangunan Raya Mill	PT Agro Sejahtera Manunggal (ASM)	West Kalimantan	Certified 2019	2018	2019		
			KopBun Agro Seriam Mandiri		Certified 2019			2018	2019
			PT Gunajaya Harapan Lestari (GHL)		Non-certified			2022	2025
			Koperasi Bawal Sejahtera Mandiri		Non-certified			2022	2025
11	PT Karya Bakti Agro Sejahtera (KBAS)	Sungai Rasau Mill	PT Karya Bakti Agro Sejahtera (KBAS)	West Kalimantan	Non-certified	2022	2024		
			KUD Rangkong Betuah		Non-certified			2022	2025
			KUD Rasau Tiga Bersama		Non-certified			2022	2025
			PT Agriplus		Non-certified			2022	2025
12	PT Ladang Sawit Mas (LSM)	Bukit Tunggal Jaya Mill	PT Ladang Sawit Mas (LSM)	West Kalimantan	Non-certified	2022	2024		
			KopBun Bukit Tunggal Sejahtera		Non-certified			2022	2024
			KopBun Mitra Pejalalan Permai		Non-certified		2022	2024	
			PT Lestari Gemilang Intisawit (LGI)		Non-certified		2022	2024	
			Koperasi Kayong Sekayuk		Non-certified		2022	2024	
			Koperasi Mitra Sejati		Non-certified		2022	2024	
			PT Agro Manunggal Sawitindo (AMS)		Non-certified		2022	2024	
			PT Nabati Ago Subur (NAS)		Non-certified		2022	2024	
			PT Sejahtera Sawit Lestari (SSL)		Non-certified		2022	2024	
			PT Karya Makmur Langgeng		Non-certified		2022	2024	

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No	Unit Management	Mill	Supply Base	Location	Status	Time Bound	Time Bound Rev
			(KML)				
			PT Gemilang Makmur Subur (GMS)		Non-certified	2022	2025
			Koperasi Istana Pawan Mandiri		Non-certified		
			Koperasi Rungau Sejahtera		Non-certified		
			PT Damai Agro Sejahtera (DAS)		Non-certified		
13	PT Rohul Sawit Industri (RSI)	Suka Damai Mill	PT Masuba Citra Mandiri (MCM)	Riau	Certified 2019	2018	2019
			PT Masuba Citra Mandiri (MCM) Area Liability Conversation 326.04 ha		Certified 2023	2018	2023
			Koperasi Karya Melayu Sejati		Certified 2019	2018	2019
14	PT Sentosa Prima Agro (SPA)	Bukit Belaban Mill	PT Sentosa Prima Agro (SPA)	West Kalimantan	Non-certified	2022	2024
			PT Raya Sawit Manunggal (RSM)				
			PT Wahana Hijau Indah (WHI)				
			PT Hungarindo Persada (HPE)		Non-certified	2022	2024

5.2 Compliance to Rules for Partial Certification

Compliance of the uncertified management units of **Bumitama Agri Ltd** against the rules for partial certification according to RSPO Certification System clause 5.5.3 was assessed by desk study as well as web check on relevant complaints; verification to company's parent company, a positive assurance statement based upon company's self assessment completed with sufficient evidence against each requirement; consultation with targeted stakeholders including consultation with the relevant NGO, and or further stakeholder consultation and field inspection considering the risk assessment result of any non compliance with the requirements. A summary of findings is as stated below.

Partial Certification Requirements	Audit Findings
5.5.1 The registered RSPO member is the holding company or one of its subsidiaries	PT Masuba Citra Mandiri and PT Rohul Sawit Industri is a subsidiary of Bumitama Agri Ltd. Bumitama Agri Ltd is an RSPO member with ID No. 1-0043-07-000-00 since October 7, 2007. Bumitama Agri Ltd has beent provide result of the self-assessment for all units entering estate and mill at the time bound.
5.5.2 A challenging time-bound plan for certifying all its management units and/or entities is submitted to the Certification Body (CB) during the initial certification audit. The time-bound plan shall contain a current list of all estates and mills. <ul style="list-style-type: none"> As a minimum, all estates and mills shall be certified within five (5) years after obtaining RSPO membership. Any new acquisitions shall be certified within a three year time frame. Any deviations from these maximum periods requires approval by the RSPO secretariat Any revision to the time-bound plan, including for the scheme smallholders and outgrowers, shall be reviewed by the CB. Changes to the time-bound plan are permitted only if the organisation can demonstate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment the company is legally regis- 	Bumitama Agri Ltd has a time-bound plan to achieve RSPO certification for all relevant entities. For the period of 2023, the BGA Group's Time Bound plan has been revised. This is because there are still several units under the management of the BGA Group which until the end of 2022 are still in the process of certification (NPP process, RaCP process). This time bound plan has submitted to RSPO for approval.

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Partial Certification Requirements	Audit Findings
tered with the local notary or chamber of commerce (or equivalent)	
5.5.3 (a). No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) and HCS in accordance with RSPO P&C criterion 7.12. Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure*. For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB. *Any new plantings since this period must be reported to TUV Rheinland to conduct verification of compliance to the New Planting Procedure	There are several units under NPP process and some company unit was passing the NPP notification. The units include: <ul style="list-style-type: none"> • PT Nabatindo Karya Utama (PT NKU) • PT Andalan Sukses Makmur (PT ASMR) • PT Gunajaya Ketapang Sentosa (PT GKS) • PT Ladang Sawit Mas (PT LSM) • PT Gemilang Makmur Subur (PT GMS) For other units, HCV assessments have been carried out and there is no indication of land clearing in primary forest and / or HCV areas. The RaCP also present in the company subsidiary of BGA group and now under RSPO compensation panel review.
5.5.3 (b). Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Based on the self assessment document submitted by the BGA Group, it known that there is no significant land conflict in areas that have not been certified. However, some units still cannot provide information on maps of land conflicts.
5.5.3 (c). Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	The management has a mechanism that is open to all affected parties through Code of Conduct (BGA-COC-HC-333.1); Grievance Resolution (BGA-SOP-HC-311.1). Based on the self assessment document submitted by the BGA Group, it known that there is no significant labor dispute in areas that have not been certified.
5.5.3 (d) Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1	Based on the self assessment document, it is known that units that have not yet received certification have tried to fulfill the legal provisions that apply to oil palm plantation activities (for example: Location Permits, Environmental Permits, HGU etc.)

5.3. Compliance to other RSPO Procedure

RSPO NPP	No
RSPO Compensation and Remediation procedure	Yes
Areal Subject to sanction	No

5.4. Plan for certification of associated smallholders

The mill has not developed a plan for certification of associated smallholders.

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6.0 ASSESSMENT FINDINGS

6.1 Summary of Findings

The following is a audit findings made for the indicator listed in the RSPO Principles & Criteria INA-NI 2020 :

Note :

- YYYY & (YYYY + ZZZZ) : Generic 2018 & INA-NI, 2020 (revision/add)
- XXXXX : the result of Accreditation Body (AB) audit (it have to verify as top priority and submitting the evidence of compliances)
- R : Remote Audit; O : On-site Audit; R & O : Remote & On-site Audit;

CR	CHECKLIST	RESULTS OF VERIFICATION	COMPLIANCE STATUS
	Principle 1: Behave Ethically and Transparently		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
R	1.1.1 (C) Management documents that are specified in the RSPO P&C are made publicly available		
	<p>a. How are the management documents listed in (b) below made publicly available?</p> <p>b. Are the management documents related to the environmental, social and legal issues below made publicly available :</p> <ul style="list-style-type: none"> - Results of FPIC processes; - [SEIA / SEIA/AMDAL]; - Human Rights [policies / policy] including [policy / policies] on protection of human rights defenders (HRDs)/whistleblowers; - Social programmes [avoding / to avoid] or [mitigating / mitigate] negative social impacts; - [Social programmes advancing livelihoods / social programs to improve living standards]; - Figures of gender distribution within all workers categorised by management, administrative staff and workers (both permanent casual workers, piece rate workers); - [Partnership / cooperative] programmes for independent smallholders, education and health programs in the communities (where applicable) <p>c. Are the following management documents (but not necessarily limited to) made available upon request :</p> <ul style="list-style-type: none"> - [Land titles/user rights / certificate of land rights/cultivation rights] (Criterion 4.4) - Occupational health and safety plans (Criterion 3.6) - Plans and impact assessments relating to environmental and social impacts (Criterion 3.4) - HCV & HCS documentation (if relevant) (Criterion 7.12) - Pollution [prevention/mitigation] and reduction plans (Criterion 7.10) - Details of complaints and grievances (Criterion 4.2) - Negotiation procedures (Criterion 4.6) - Continuous improvement plans (Criterion 3.2) - Public summary of the certification assessment report - Human Rights Policy (Criterion 4.1) 	<p>Unit of certification has types of documents and information that can be accessed by the public listed in the “<i>SOP Komunikas</i>” No. BGA-SUST-SOP-09 Rev. 00 was approved by Regional Head 2 dated 08 September 2017. In the procedure, the part is “kebijakan pengendalian dokumen/informasi”, that documents that can be accessed by the public include:</p> <ul style="list-style-type: none"> • Land Use Tittle, Environmental Permit, and Environmental Management and Monitoring Plan. • Company Policies and Manuals. • HSE and social improvement programs. • HCV documents and SIA documents. • Details of grievance and complaints • Summary of general reports on the results of certification assessments. • Etc. <p>All public documents are placed in mill and estate office. For example, unit of certification also provides information to relevant stakeholder routinely, for example mandatory reports have been delivered to relevant agency and it has been confirmed during public consultations with relevant agencies.</p> <p>Based on interviews with related departments, for example the Manpower Agency, Plantation Agency, Traditional Council Dayak, Dewan Adat Dayak (Previous land owner) community (Tumbang Koling village), it is known that they already know the procedures for conveying information to companies.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	1.1.2 Information is provided in the official language used in the area in which the unit of certification is located and accessible to relevant stakeholders		
	<p>a. Are the documentation including information provided to stakeholder and communication with stakeholder done in appropriate languages?</p> <p>b. Are stakeholders aware of the type of information available and how to get access to the information?</p> <p>c. How and where is the information disseminated?</p> <p>d. From the audit evidences, what type of information is provided to the stakeholders?</p>	<p>All relevant documents including information provided to stakehodker and communication with stakeholders was carried out in Bahasa, so easy to understand by all related stakeholders. There is sufficient evidence that the relevant stakeholders aware of the type of information available and how to get access to the information, for example information request come from various stakeholders.</p> <p>Some records of information dissemination are available, i.e.</p> <ul style="list-style-type: none"> - Minutes of socialization about Procedure of Code od conduct and <i>Peraturan Perusahaan</i> No.004/BHGE/VII/2024 on 29 July 2024 attended by 28 participants/workers at Banama Haring Estate - Minutes of socialization about Procedure of Code od conduct and <i>Peraturan Perusahaan</i> 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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CR	CHECKLIST	RESULTS OF VERIFICATION	COMPLIANCE STATUS
		<p>No.004/SMME/VII/2024 on 29 July 2024 attended by 14 participants/workers at Sungai Mirah Minting Estate</p> <p>The UoC has provided information to authority agencies regularly as required by the regulation and provided any information upon request. Some documents were reviewed during this audit, for example:</p> <ul style="list-style-type: none"> - Report of RKL RPL on Semester I of 2024 dated 13 July 2024 to the Environment Agency of Kotawaringin Timur District by online system. - Bussines Plantation Progress report (LPUP) or <i>Laporan Kemajuan Kegiatan Perkebunan Besar Swasta (PBS)</i> PT Windu Nabatindo Abadi and PT Nabatindo Karya Utama period quarter 2nd, 2024 dated 7 July 2024 to the Plantation Agency of Kotawaringin Timur District. - Land use report period of 2023 dated 12 February 2024 for PT Nabatindo Karya Utama to National Land Agency of East Kutai District, letter number 0056/NKU-Dirut.JS/II/2024 - Land use report period of 2023 dated 12 February 2024 for PT Windu Nabatindo Abadi to National Land Agency of East Kutai District, letter number 003/NKU-Dirut.JS/II/2024 - etc 	
R	1.1.3 (C) Records of requests for information and responses are maintained		
	<p>a. Are records of requests for information and responses maintained? Please indicate the type of records reviewed</p> <p>b. Does the company have an SOP to ensure constructive response to stakeholders?</p> <p>c. Is there a clear time frame for response to request for information?</p> <p>d. [Who is the personnel in charge (PIC) for receiving and responding to request / who is officers can be contacted by concerned external parties] ?</p>	<p>Unit of certification has documented incoming and outgoing letter from external stakeholder in "Incoming Letter Book". Based on that document, there were incoming letter in kind of request of information, fund and meeting invitation. Unit of certification also records the response of incoming letter. Based on document verification, unit of certification has responded to all incoming mails in accordance with its procedure which is no more than 15 days. For example, incoming letter and its respond by unit of certification have shown below:</p> <ul style="list-style-type: none"> • Letter on 17 May 2024 from Selucing village about request for assistance of <i>Suka Cita Tomas Desa Selucing</i> and was responded by unit of certification on 17 May 2024 amount IDR 5.000.000. • Letter on 01 August 2024 from Cempaga Hulu Sub District about request for assistance of support Independent day and responded by 05 August 2024 amount IDR 36.000.000 • Letter on 05 August 2024 from Koling Village about request for assistance of <i>pemindahan pemakamman Desa Koling</i> and responded by 08 August 2024 amount IDR 2.500.000 <p>Based on the results of the verification of SOP procedure documents and the results of interviews with auditees during the audit process, the PIC in charge of providing feedback on the request for information is from each department and is recapitulated by the department's community relations team.</p> <p>The company has record of request and response information from stakeholders. The company has Personnel in charge (PIC) for communication and consultation with the relevant stakeholders, e.i. Khairul Amri (CSR Assistant Region Pundu) as stated in letter degree No. 201/BGA.WNA/RH.SK/III/2024 dated on 01 March 2024.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	1.1.4 (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official		

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	<p>a. Is there SOP being developed by the unit of certification for consultation and communication between the company and all relevant stakeholders?</p> <p>b. Has the SOP been communicated to the relevant stakeholders and understood by these parties? If yes, how was it done?</p> <p>c. Who in the company is appointed to be responsible for communication and consultation with the relevant stakeholders?</p> <p>d. Is the position made official with clear and proper job description?</p> <p>e. Are the relevant stakeholders aware of and know how to contact the person in charge?</p> <p>f. Are the relevant stakeholders aware of the established SOP? Please interview the relevant stakeholders?</p> <p>g. Are there records of actions taken in response to input from stakeholders?</p> <p>h. Has the certificate holder (CH) communicated about RSPO P&C requirements and or the complaint from external party to relevant stakeholders/affected parties ?</p>	<p>Procedure for communication and consultation is listed on SOP of Communication authorized by the Regional Head on 08 September 2017. In the procedure, the flowchart of the consultation/dialogue mechanism with the community is explained. The Management Unit submits a plan of consultation/dialogue with the community in writing through the Village Head/Customary Chair/Community Leader or local government apparatus, then the response from the Village Head/Customary Chair/Community Leader or Mediator (Government Apparatus), Head Office Management/related parties provide written positive responses (at most 15 days), consultation/dialogue forums facilitated by PAD/CSR/Unit Management, meeting results are distributed to relevant parties by the relevant Management Unit, follow up on the results of consultations/dialogues with the community by PAD/CSR/Management Units related to the interests.</p> <p>The company has Personnel in charge (PIC) for communication and consultation with the relevant stakeholders, e.i. Khairul Amri (CSR Assistant Region Pundu) as stated in letter degree No. 201/BGA.WNA/RH.SK/III/2024 dated on 01 March 2024. The letter also described job description for each position. Based on interview with stakeholder known that the relevant stakeholders aware of and know how to contact the person in charge</p> <p>Procedures for consultation mechanisms have been socialized to workers and the surrounding community, as for example was carried out in 23 July 2024 to surrounding community including Cempaga Hulu District representatives and its workers. Besides, based on field observation result, socialization is carried out in form of banners installment equipped with pictures of consultation and communication flowcharts in unit. Based on the results of consultations with internal dan external stakeholder, they have been aware of consultation and communication mechanism with unit of certification</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	1.1.5 There is a current list of contact and details of stakeholders and their nominated representatives / An up-to-date list of contacts and detailed stakeholder information is available along with designated representative]		
	<p>a. Is there a list of contact and details of stakeholders and their nominated representatives?</p> <p>b. What details are included in the list?</p> <p>c. When was the list last updated?</p> <p>d. Are the listed contacts exist? Auditor to verify by contacting the listed stakeholders randomly</p>	<p>Unit of certification has list of stakeholders which is issued on 02 October 2024 which informs the PIC and telephone number that can be contacted. External stakeholders are on the list including local government agency, <i>Muspika</i> Cempaga Hulu, surrounding village representatives, cooperative, supplier, contractor NGO, testing partner (MCU, SIO, laboratory, etc), mass media, and surrounding unit of certification representatives. There also internal stakeholder on the list including school, worker cooperative, gender committee, emergency response, OHC committee, and worker organization. This list will be updated if there are changes to stakeholders. Auditor verified by conducting a public consultation using the telephone number registered in the stakeholder list, and it was known that the number could be contacted by the auditor, such as village representatives, local contractor, etc.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
1.2	The unit of certification commits to ethical conduct in all business operations and transactions		
R & O	1.2.1 A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts		
	<p>a. Is there a written policy committing to a code of ethical conduct and integrity in all operations and transactions, including recruitment and contracts?</p> <p>b. Does the policy include as a minimum :</p> <ul style="list-style-type: none"> - A respect for fair conduct of business? - A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources? - A proper disclosure of information in accordance with applicable regulations and accepted industry practices? 	<p>The company has code of conduct document for all operational activities that listed on Document No. BGA-COC-HC- 333.1-R0, dated October 28, 2014. Code of conduct explain Code of Conduct Principles, Conflict of Interest, Bribery and Illegal or Unethical Practices, Entertainment and Gifts, Misuse of Position, Insider Trading, Confidentiality, Restriction on Solicitation, Media Relations, Trade Union, Political and Social Activities, Installation of Illegal Computer Software, Anti Money Laundering, Trade Compliance & Export Controls and Sanctions, and Commitment to Human Rights.</p> <p>The company shows documentation of socialization of policies and regulations that apply in company to relevant stakeholders, some examples include:</p> <ul style="list-style-type: none"> a. Minutes of socialization about Procedure of Code od conduct and Peraturan Perusahaan No.004/BHGE/VII/2024 on 29 July 2024 attended by 28 participants/workers at Banama Haring Estate b. Minutes of socialization about Procedure of Code od conduct and Peraturan Perusahaan No.004/SMME/VII/2024 on 29 July 2024 attended by 14 participants/workers at Sungai Mirah Minting Estate 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<p>c. Minutes of socialization about Procedure of Code of conduct and <i>Peraturan Perusahaan</i> No.0114/CSR-Reg2/VII/2024/VII/2024 on 23 July 2024 attended by 33 participant vendor/Kontractor, supplier FFB and the surrounding community.</p> <p>Based on interview with Koperasi Sehati Pundu Abadi, Catur Borneo Abadi and PT Surya Mentaya Jaya, it is known that the company has conducted socialization related to the code of ethics applicable in the company's operational area, which includes the following: prohibition on employing children, prohibition of forced labour and human trafficking, protection of reproductive rights, as well as fair treatment without discrimination to all employees.</p>	
R & O	1.2.2 A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice		
	<p>a. What is the mechanism in place to monitor the compliance and implementation of the policy and overall ethical business practice?</p> <p>b. Has the mechanism been effectively implemented?</p>	<p>The company has code of conduct No. BGA-COC-HC-333.1-R0, dated October 28, 2014. This policy regulates about the guideline behavior for BGA worker, such as not allowed to accept and/or give gifts, souvenirs, business meals or other facilities that can affect decision making in violation of applicable provisions in the company. This policy is implemented in all operation unit, therefore the whistle blowing complaint channel is a system for monitoring the implementation of business ethics policies.</p> <p>The company also has mechanism to monitor the compliance and implementation of the policy and overall ethical business through performance assessment. The Performance assessment was conducted to company personnel (employees) or third party (contractors) regularly. The results of the performance assessment will deliver to the Administration Dept Head from each department.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
Principle 2 : Operate legally and respect rights - Implement legal requirements as the basic principles of operation in any jurisdiction			
2.1	There is compliance with all applicable local, national and ratified international laws and regulations		
R & O	2.1.1 (C) The unit of certification complies with applicable legal requirements		
	<p>a. Is the complete list of legal requirements available?</p> <p>b. When was the list updated?</p> <p>c. Is there evidence of compliance to the applicable legal requirements</p>	<p>Organization has a complete list of legal requirements such as:</p> <p>OHS Aspect</p> <ul style="list-style-type: none"> - Occupational Health and Safety Committee (OHS committee): has an OHS committee organizational structure and emergency response that has been approved by the <i>Dinas Tenaga Kerja Kabupaten Kotawaringin Timur</i>, has a OHS committee program, organizes Occupational Health and Safety training programs, quarterly OHS committee reports, has procedures related to OHS and Emergency Response, etc. - Provision of Personal Protective Equipment (PPE) from the company for all workers and regulate the use of PPE according to the type of work based on the pre-determined HIRAC. Provision of PPE from the company for all workers and regulate the use of PPE according to the type of work based on the pre-determined HIRAC. - Conduct a general medical check-up (Medical Check Up) every year for all workers and special examinations (cholinesterase and audiometry) according to the level of risk / danger for a particular job. - Having a license/competence for several special jobs that require more expertise such as OHS experts, boiler operators, diesel engine operators, welders, wheel loader operators and others in accordance with the requirements contained in the legislation. - Giving Insurance and social security facilities for all workers. - Provision and fulfillment of first aid kits and facilities in each unit in accordance with applicable regulations. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	2.1.2 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 / evidence on evaluation of legal compliance] of all contracted third parties, recruitment agencies, service providers and labour contractors.		

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	<p>a. Is there a documented system which includes the following?</p> <ul style="list-style-type: none"> - Personnel in charge to identify the legal requirements and ensure compliance; - Comprehensive list of international, national, sub-national and provincial laws which details the requirements of specific to the mill and estate operations. - Relevant sections within the law that is identified and linked to activities within the unit of certification. <p>b. How legal compliance is verified and assessed?</p> <p>c. Is there a documented methodology (e.g.: personnel in charge (PIC), source of info, frequency of update) for tracking changes and communication of changes to relevant sections of the legislation?</p>	<p>There is no change related of Procedure of Identification law registration evaluation presented in document No: SUST-WNL-LAW-53, dated 1 March 2018 mentioned that sustainability officer has responsibility to arranged and monitored legal related laws and/or regulation. Internal audit of regulations compliance is conducted annually as example on 16 June 2023. The procedure mentioned that to monitor and update of laws and/or regulations, the sustainability officer required to actively check and make coordination with Government Agencies or Institutions.</p> <p>The implementation of this procedure is the issuance of a law register document containing regulations that must be fulfilled and relevant to the company's operational activities, including for third parties working with the company (contractors). The law register is divided into several aspects, namely: Occupational safety and health, the environment, employment, and plantations. To ensure whether there are additions and subtractions to relevant regulations, a review is conducted every once a year with the latest updated on 11 April 2023</p> <p>To ensure compliance with the Company and third-party laws in the Company, routine monitoring is carried out once a year by means of compliance audit / internal audit. The last internal audit for RSPO and SCCS was conducted on August 24 2023. In addition to going through a compliance audit/internal audit, the company conducts monitoring and evaluation of third parties (contractors) through contractor evaluation activities which are conducted at least once a year. The types of evaluations carried out include contract compliance, contractor quality and performance, accuracy of work completion, compliance with labor regulations, OHS, housekeeping and the environment.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	2.1.3 Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries		
	<p>a. Is there a map showing location of boundary markers?</p> <p>b. Is there physical presence of boundary markers?</p> <p>c. How does the company maintained its boundary markers?</p> <p>Note to auditor : Ground verification of boundary markers using GPS should be conducted. Priority should be on boundaries with other estates, community areas, protected area and rivers</p> <p>d. Any planting beyond these legal or authorised boundaries? How was this verified?</p>	<p>Consistent with previous audit, procedure of legal boundary poles monitoring, and maintenance is presented in document No. WNL-GIS-SOP-01, dated 27 July 2017. Procedure mentioned that maintenance was carried out by division assistant, Geographic Information System staff, Estate Manager and Legal Manager. Monitoring the boundaries of the HGU is done every 4 months.</p> <p>Based on Monitoring Patok HGU (PT WNA & PT NKU) in 2024 with period March 2024, June 2024 & September 2024 with the result all boundaries' stone are in good conditions. Beside that, based on field visit and observation at blok B12/13a (Pole No. 24) and block D12/13a (Pole No. 28 (Pole No. 28) Sungai Cempaga Estate, its know that poles were clearly the sighted poles are in well maintained and appropriate with coordinate points.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
2.2	All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.		
R	2.2.1 A list of contracted parties is [maintained / available]		
	<p>a. Is each of the site maintained a list of contracted parties?</p> <p>b. Is the list included the following :</p> <p>i. contractor providing operational services to the site?</p> <p>ii. Labour including the following :</p> <ul style="list-style-type: none"> - Temporary employment - Short-term contracts; renewable contract - Fixed-term, project, task-based contracts or casual work <p>iii. FFB suppliers</p>	<p>The list of contractors is presented in document "Daftar Kontraktor" that updated on 02 October 2024 per each, which informes stakeholder category, name of PIC, relation, address and contact number. Currently, the company has 3 contractors and 1 transporter of hazardous waste consist of:</p> <ul style="list-style-type: none"> - PT Surya Mentaya Jaya as CPO transporter - CV Borneo Mulia Abadi as PK transporter - PT. Semesta Langgeng Sentosa as hazardous waste transporter. - PT Cahaya Bumi Rezeki as replanting contractor. <p>Beside that, there are list of FFB direct supplier informing there are 2 Smallholder Cooperative that supplied FFBs to mill that are <i>Koperasi Sehati Pundu</i> and <i>Koperasi Koling Hapakat</i>.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting [applicable / relevant] legal requirements, and this can be demonstrated by the third party.		

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	<p>a. Are there contractual agreements between the Company and the third party listed in 2.2.1?</p> <p>b. Is the agreement requires the third party to comply with applicable legal requirements and to provide evidence of its compliance?</p> <p>c. How does the organization ensure that compliance is met by third party?</p>	<p>Based on verification to work agreements, for example agreement No. 001/WNA/SPK/XII/2023 dated 9 December 2023 with PT Surya Mentaya Jaya (CPO Transporter) and Agreement No. 002/WNA/SPK/VI/2023 dated 9 December 2023 with CV Borneo Mulia Abadi (PK Transporter), it is known that the work agreement has covered several things, among others</p> <ol style="list-style-type: none"> a. Implementation of sustainability certification system. b. Personal protective equipments (PPE). c. Prohibition on hazardous material disposal. d. Manpower protection. e. Law puruance and human rights. <p>Sample legal requirement demonstrated by the third party for example:</p> <ul style="list-style-type: none"> - PT Surya Mentaya Jaya was shown the worker agreement as non-permanent workers, payment slip period September 2024 was paid according to minimum wage, payment of working assurance (BPJS <i>Ketenagakerjaan & Kesehatan</i>). - PT Cahaya Bumi Rezeki was shown the agreement as permanent worker, payment slip period September 2024. <p>Monitoring of law or regulation pursuance by contractors is presented in document of evaluation of contractor and form of evaluation and contractor. Evaluation of contractors was done before starting or renewing the contract.</p> <p>Based on the results of interviews with the contractor of PT Surya Mentaya Jaya, CPO transporter information was obtained that once a year the certification unit has conducted outreach regarding OHS, compliance with labor regulations, environmental management, etc. to contractors and contractor workers. As a form of compliance with applicable policies, the certification unit also carries out work evaluations of contractors in the company's operational areas regarding compliance with applicable laws and regulations in Indonesia.</p> <p>However, there are non-conformities for legal compliance of contractors and has become Non-Conformity No. RSPO06078 under indicator 2.2.2, that are:</p> <ol style="list-style-type: none"> 1. During a field visit to Division 2 Block I12 of the Sungai Mirah Minting Estate, it was observed that contract workers were scattering empty palm fruit bunches under conditions not adhering to the use of Personal Protective Equipment (PPE). They were accompanied by toddlers and lacked a clear work agreement for their activities in Division 1 of SMME. From interviews with the workers scattering the empty bunches, it was disclosed that the payment they receive is IDR 4,000 per tree. However, there has been no verification to confirm whether this wage is in compliance with the Minimum Wage Regulations (UMK) of Kotawaringin Timur. <p>Furthermore, it was noted in the contract documentation that the subcontracting is carried out by an individual (under the name Aziz Pujianto) rather than a legal entity, which does not align with the regulation stipulated in Law No. 6 of 2023.</p> <ol style="list-style-type: none"> 2. The company has not yet been able to provide evidence that all evaluations regarding contractor compliance to regulations have been carried out, such as: <ol style="list-style-type: none"> a. Reporting of PKWT workers from PT Surya Mentaya Jaya to the Labor Office in accordance with Government Regulation No. 35 of 2021. b. PT Cahaya Bumi Rezeki has not shown proof that their workers are enrolled in BPJS Employment and Health, which serves as insurance for the workers. <p>In addition, Unit of certification already has cooperation contract with KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat as FFB suppliers of as shown in the following documents:</p> <ul style="list-style-type: none"> • Agreement between the <i>Koperasi Serba Usaha</i> (KSU) Sehati Pundu and PT Windu Nabatindo Abadi No. 01/KSU-SP/III/2006 and No. 02/PKS-WNA/III/2006 concerning Development and Management of Oil Palm Cultivation through Partnership Business with KKPA Patterns covering an area of 2,000 ha which was agreed on March 22, 2006 and is valid for 20 years. • Agreement between <i>Koperasi Produksi</i> Koling Hapakat and PT Nabatindo Karya Utama No. 02/PK-KH/IV/2018 and No. 02/PK-NKU/IV/2018 concerning the Development and Management of Oil Palm 	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO06 078</p>

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		<p>Plantation Partnership Pattern which was agreed on 3 April 2018 and is valid for 30 years. This co-operation applies to the development and management of oil palm cultivation with a partnership pattern of ±336 ha.</p> <p>Cooperatives are fully managed by PT WNA and PT NKU, therefore operational and worker are direct managed by certificate unit. Therefore, worker welfare, implementation of regulation, wage and policy of work accident are same with the worker on certified unit.</p> <p>Based on the description above, the certification unit has its own clause regarding the fulfilment of related legal obligations, and can be proven by the relevant third party.</p>	
R	2.2.3 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 protection.		
	<p>a. Are the contractual agreements between the Company and the third party listed in 2.2.1 contain clauses disallowing child, forced and trafficked labour to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection?</p> <p>b. How does the company ensures that the third party comply with the above requirements?</p>	<p>Based on verification to work agreements, for example agreement No. 001/WNA/SPK/XII/2023 dated 9 December 2023 with PT Surya Mentaya Jaya (CPO Transporter) and Agreement No. 002/WNA/SPK/VI/2023 dated 9 December 2023 with CV Borneo Mulia Abadi (PK Transporter), it was known that clauses of disallowing child, forced and trafficked labor has been explained in the agreement.</p> <p>Based on the results of interviews with the contractor of PT Surya Mentaya Jaya, it was known that socialization towards pursuance regulation on safety and manpower has delivered during contract agreement.</p> <p>The company has presented a Work Agreement (SPK) with the contractor, including with PT Cahaya Bumi Rezeki No. 128-RPLANT/WNAL-SBHE/JKT/01/2024 dated January 2, 2024 as contractor of re-planting activities. The contract stipulates that the employment of underage children is prohibited; however, it does not yet regulate against the use of forced labor and workers from human trafficking. This become Non-Conformity No. RSPO06079 under indicator 2.2.3</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO06 079</p>
2.3	All FFB supplies from outside the unit of certification are from legal sources.		
R	2.3.1 (C) For all directly sourced FFB, the mill requires : - 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 / if relevant], valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB		
	<p>a. Has the mill maintained a list of directly and indirectly sourced FFB suppliers?</p> <p>b. Has the mill identified the geo-locations of FFB origins of its FFB suppliers?</p> <p>c. How does the mill tracked the geo-locations?</p> <p>d. Has the mill obtained the proof of the ownership status or the right/claim to the land of their FFB suppliers?</p> <p>e. Where applicable, has the suppliers provided the mill of their valid planting/ operating/ trading license, or is part of a cooperative which allows the buying and selling of FFB?</p>	<p>Company has shown the list of direct FFB Supplier informing name of supplier, address, coordinate, land ownership status and operational permit. Based on the list, there are 2 direct FFB suppliers with details:</p> <ul style="list-style-type: none"> Cooperative of Sehati Pundu addressed at Pundu village with operational permit according to letter decree of Ministry of <i>Koperasi dan Pembinaan Pengusaha Kecil RI</i> No.: 634/BH/KDK.154/XII/1999 on 24 December 1999 Cooperative of Koling Hapakat addressed at Tumbang Koling village with operational permit according to letter decree of Ministry of <i>Agraria/Kepala Badan Pertanahan Nasional</i> No. 14 – XI – 1998 on 31 August 1998. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	2.3.2 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 PROCEDURAL NOTE : For Implementation Procedure for 2.3.2 refer to Annex 4		
	<p>a. Is there evidence that the mill is complying to indicator 2.3.1 above?</p> <p>b. Is there any smallholders identified as supplier to the mill?</p> <p>c. If yes to (b), are the the requirements in indicator 2.3.1 been met?</p> <p>d. If no to (b), has the mill established a timeline to fulfilled the requirements?</p> <p>e. Is the timeline meeting the requirements of Annex 4 of P&C 2018, i.e. for existing certified mill, 3 years from 15</p>	<p>The unit of certification does not receive FFB indirectly, all FFB processed within the scope of Sungai Cempaga Mill originally own estate and scheme smallholders. Hence, this indicator is not applicable.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A</p> <p>NCR No :</p>

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	November 2018, and for newly certified mill, 3 years from the Initial Certification																																																								
Principle 3 : Optimise productivity, efficiency, positive impacts and resilience																																																									
3.1	There is an implemented management plan for the unit of certification that aims to achieve longterm economic and financial viability																																																								
R & O	3.1.1 (C) A business or management plan (minimum three years) is documented [that includes / and], where applicable, a jointly developed business case for Scheme Smallholders																																																								
	<p>a. Is there a documented business or management plan with a minimum planning period of 3 years?</p> <p>b. Is the business or management plan contain :</p> <p>i. Attention to quality of planting materials?</p> <p>ii. Crop projection = Fresh Fruit Bunches (FFB) yield trends?</p> <p>iii. Mill extraction rates = Oil Extraction Rate (OER) and Kernal Extraction Rate (KER) trends?</p> <p>iv. Cost of production = cost per tonne of Crude Palm Oil (CPO) trends?</p> <p>v. Forecast prices?</p> <p>vi. Financial indicators?</p> <p>c. Is the business or management plan approved by the top management?</p> <p>d. For smallholder schemes, has the scheme management provided their members with information on business or management plan and its progress?</p>	<p>The company shows a 5 years financial projection document which explains the company's operational projections, including explaining:</p> <table border="1"> <thead> <tr> <th></th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Wide (Ha)</td> <td>8,330.83</td> <td>7,421.64</td> <td>6,973.18</td> <td>6,942.14</td> <td>7,164.95</td> </tr> <tr> <td>Yield (ton/Ha)</td> <td>26.00</td> <td>26.47</td> <td>25.89</td> <td>25.38</td> <td>26.36</td> </tr> <tr> <td>Tonnage</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>FFB (ton)</td> <td>216,783</td> <td>196,481</td> <td>179,903</td> <td>176,193</td> <td>188,857</td> </tr> <tr> <td>KER (%)</td> <td>4.50</td> <td>4.50</td> <td>4.50</td> <td>4.50</td> <td>4.50</td> </tr> <tr> <td>OER (%)</td> <td>23.90</td> <td>24.00</td> <td>24.00</td> <td>24.50</td> <td>24.50</td> </tr> <tr> <td>Kernel (ton)</td> <td>9,755</td> <td>8,842</td> <td>8,096</td> <td>7,929</td> <td>8,499</td> </tr> <tr> <td>CPO (ton)</td> <td>51,594</td> <td>47,155</td> <td>43,177</td> <td>43,167</td> <td>46,270</td> </tr> </tbody> </table> <p>Based on the description above, it is concluded that the company already has a long-term planning document that includes the feasibility of a jointly developed business for plasma farmers through the purchase of FFB from plasma farmers.</p>		2023	2024	2025	2026	2027	Wide (Ha)	8,330.83	7,421.64	6,973.18	6,942.14	7,164.95	Yield (ton/Ha)	26.00	26.47	25.89	25.38	26.36	Tonnage						FFB (ton)	216,783	196,481	179,903	176,193	188,857	KER (%)	4.50	4.50	4.50	4.50	4.50	OER (%)	23.90	24.00	24.00	24.50	24.50	Kernel (ton)	9,755	8,842	8,096	7,929	8,499	CPO (ton)	51,594	47,155	43,177	43,167	46,270	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
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R	3.1.2 An annual replanting programme projected for a minimum of five years with yearly review, is available.																																																								
	<p>a. Is there a documented annual replanting programme projected for a minimum of five years?</p> <p>b. Is the progress of implementation monitored and recorded?</p> <p>c. Is there evidence of a yearly review of the replanting programme?</p>	<p>The company has a Replanting plan for the core plantation of PT. Windu Nabatindo Abadi which is described in the following table:</p> <p>Replanting Program (Ha)</p> <table border="1"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="2">2023</th> <th colspan="2">2024</th> <th colspan="2">2025</th> <th colspan="2">2026</th> </tr> <tr> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>SBHE (ha)</td> <td>-</td> <td>-</td> <td>332.34</td> <td>332.34</td> <td>638</td> <td>-</td> <td>563</td> <td>-</td> </tr> </tbody> </table> <p>Based on the table above, knowing that the company annual replanting program projected for a minimum of five years with yearly review, is available.</p> <p>The results of field observations in the immature area Block D.15A and Block D,16,A Div 6 with a planting year of 2024 show that no burn marks found. The wicket area has been planted with nuts and EFB has been applied at a dose of 40 tons/ha/year. Turnera ulmivolia has been planted on the edge of the block as an application for IPM. The results of the interviews revealed that the plant population was 1437 oil palm trees/ha</p>	Estate	2023		2024		2025		2026		Plan	Actual	Plan	Actual	Plan	Actual	Plan	Actual	SBHE (ha)	-	-	332.34	332.34	638	-	563	-	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :																												
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SBHE (ha)	-	-	332.34	332.34	638	-	563	-																																																	
R & O	3.1.3 The unit of certification holds management reviews at planned [intervals appropriate / term according] to the scale and nature of the activities undertaken.																																																								

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	<p>a. Has the unit of certification conducted management review at planned intervals?</p> <p>b. Has the agenda included the following minimum items:</p> <ul style="list-style-type: none"> i. Results of internal audits? ii. Customer feedback? iii. Process performance and product conformity? iv. Status of preventive and corrective actions? v. Follow-up actions from management reviews? vi. Changes that could affect the management system? vii. Recommendations for improvement? <p>c. When was the management review conducted?</p> <p>d. Is there minutes of meeting?</p> <p>e. What are the outcome of the review?</p> <p>f. Are the actions been implemented?</p>	<p>The company showed the Minutes of the Management Review Meeting Results of RSPO, SCCS PT WNA and PT NKU Sungai Cempaga Palm Oil Mill on 30 September 2024 which discussed:</p> <ul style="list-style-type: none"> - Internal audit results - Follow up on RSPO – SCCS findings (Internal and eksternal audit) - Complaints from stakeholders - SCMM process and product performance - Performance of external suppliers - Program to increase understanding of plasma farmers - Review HCV Management Plan periode 2023-2024 - Program to increase understanding of plasma/independent farmers - Implementation program of social management matrixReplanting program - Recommendations for improvements <p>To monitor and review economic, social and environmental performance, the company has carried out an RSPO internal audit which is carried out once a year by the Company's RSPO internal auditor team, including the RSPO internal audit which was carried out on 22 to 27 July 2024 , 2023 with the results of 7 nonconformity findings. , then all non-conformities are closed with resolution through quick repairs, identification of the root of the problem and corrective action. This non-compliance was closed on September 2024. Apart from environmental aspects, the company has implemented a commitment to reduce environmental impacts for continuous improvement, including: management and monitoring of the quality of liquid waste, WWTP pools, B3 waste management, solid waste management, air quality testing and testing surface water quality (river water). The company has also continued its beneficial plant propagation activities according to targets per estate, conducting pest control cost analysis until the population is below the economic threshold.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
3.2	The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.		
R & O	3.2.1 (C) 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>a. Are there action plans for 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) emissions (Criterion 7.10) vi. Impacts on communities, workers and smallholders (Principle 6) vii. Integrated management of HCV-HCS, peatland and other conservation areas (Criteria 7.7 and 7.12) <p>b. Are the action plans included the PIC for implementation and monitoring?</p> <p>c. Are records of implementation of the action plan available?</p> <p>d. What are the examples and evidence of continual improvements that have been implemented.</p>	<p>The certification unit has defined action plan for continual improvement in order to optimising yield of the supply base, reduction of use of pesticides, environmental impacts, reduction waste, protection of environmental, prevention of pollution, GHG, impacts on communities, workers and smallholders, HCV management, and other conservation areas</p> <p>The company shows evidence of implementation for continuous improvement which is shown as follows:</p> <ul style="list-style-type: none"> - The existence of OHS Committee which is running well is proven by regular monthly meetings - Use of owls and <i>Turnera sp.</i> to control pest attacks - Use fertilizer according to the recommended dose - No longer using paraquat pesticide - Precision TPP Creation in Immature Plantation Area - Improved Governance of Dystrudept (Kaolin) Area at BHG Estate <p>The company also has an internal audit mechanism. Based on the internal audit report carried out on 22 – 27 July 2024, there were 7 non-conformities related to HIRAC, HCV, Hazardous and Toxic Waste, First Aid . legal boundry and Supply Chain. Based on this document, these discrepancies have been fulfilled on October 3, 2023</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	3.2.2 As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.		
	<p>a. Is the RSPO metrics template filled and completed accordingly?</p> <p>b. Who is responsible to fill the template?</p> <p>c. Is the data traceable to the source of information?</p>	<p>The certification unit had filled out RSPO metrics template completely by Sustainability team of the organization. The data in metric template, such as certified palm oil production, FFB production from suppliers, number of LTA and number of workers. Those data records had been reviewed and traced to the source information.</p> <p>It was confirmed that the metric template has been filled in and completed according to a valid data source.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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CR	CHECKLIST	RESULTS OF VERIFICATION	COMPLIANCE STATUS
3.3	Operating procedures are appropriately documented, consistently implemented and monitored.		
R	3.3.1 (C) Standard Operating Procedures (SOPs) for the unit of certification are in place.		
	<p>a. Are the SOPs for mills and plantation documented?</p> <p>b. Are the SOPs appropriate and adequately cover all estate and mill processes and activities? Provide examples of SOPs established in the estate and mill</p> <p>c. Are the SOPs dated and approved by the management?</p> <p>d. Is a copy of the latest version of the SOP available on site and is it documented in an appropriate language?</p> <p>e. Are the SOPs made available at the appropriate location accessible by the workers?</p> <p>f. Is there evidence that SOPs are implemented and understood by workers?</p>	<p>Organization had a SOP for Plant Cultivation contained in the Standard Operational Procedure (Oil Palm Agronomy) document which was approved by the Director on 27 May 2011, consisting of 3 volumes, namely:</p> <ul style="list-style-type: none"> BGAAGRKS-SOP-01 Volume 1: Seeding (SOP-01), Land Preparation (SOP-02), Construction and Maintenance of Roads and Bridges (SOP-03), Construction and Maintenance of Ditches (SOP-04), Soil and Water Conservation (SOP-05), Planting Nuts (SOP-06), Planting Palm Oil (SOP-07). BGAAGRKS-SOP-01 Volume 2: Weed Control (BGAAGRKS-SOP-08), Fertilization (BGAAGRKS-SOP-09), Pest and Disease Control (BGAAGRKS-SOP-10). BGAAGRKS-SOP-I Volume 3: Castration and Canopy Management (BGAAGRKS-SOP-11), Staple Census and Production (SOP-12), Harvest (SOP-13), Pesticide Management (SOP-14), Transport Management (SOP -15), Marginal Land Management (SOP-16), Rejuvenation (SOP-17). <p>There is no change related 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 despatch.</p> <p>All the SOP was documented in an appropriate language (Bahasa Indonesia) and located on appropriate place and accessible by the workers.</p> <p>Based on the results of field visits and interviews, it is known that: (1). There were no spray masks in the lockers in the rinse house area (conditions where there was no spraying activity) (2). Based on the results of field visits to the SCMM, SMME and BHGE Warehouses, it was known that the stock of PPE in each warehouse was running out (such as earplugs, earmuffs, green helmets, rubber gloves and masks). (3). There is a work activity document explaining the working hours (chemical applicator) from 05.00 – 13.00 (exposure allocation 5 hours). However, based on interviews, it is known that spraying activities started at 06.00 – 13.30. Those conditions are raised as a nonconformance under NCR No. RSPO06080.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO0 6080.</p>
O	3.3.2 A mechanism to check consistent implementation of procedures is in place.		
	<p>a. What are the mechanisms established to check consistent implementation of procedures (including activities who done by contractors/other parties example re-planting operations, maintenance activities, etc) in the unit of certification?</p> <p>b. Are the mechanisms implemented?</p>	<p>Organization has a mechanism for checking the consistent implementation of procedures that stated on Internal Audit SOP No. WNA-SUST-SOP-35, this document explains that the scope of supervision carried out by Internal Audit includes audits of RSPO - SCCS, RSP, ISPO, ISO 9001, ISO 14001, OHSAS 18001 in PT WNA operating units. Each audit is carried out at least once a year or is carried out based on the interest status of the area to be audited.</p> <p>The results of the internal audit will then be discussed in a management review meeting in accordance with Management Review Meeting procedures. The company also has a Quality Assurance division, which is tasked with checking every month the quality of operational work results (Mill and Estate).</p> <p>The mechanism already implemented (including for contractor and replanting operator) such as:</p> <ul style="list-style-type: none"> CPO Transport Contractor Evaluation (SPK: 001/WNA/SPK/XII/2023), with score 93/100 point (pass). PK Transport Contractor Evaluation (SPK: 002/WNA/SPK/XII/2023), with score 91/100 point (pass). <p>The results of the internal audit will then be discussed in the management review meeting according to the procedures for the Management Review Meeting.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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CR	CHECKLIST	RESULTS OF VERIFICATION	COMPLIANCE STATUS
R & O	3.3.3 Records of monitoring and any actions taken are maintained and available.		
	<p>a. Are the following records maintained?</p> <p>i. Measurements or results of internal control and monitoring activities</p> <p>ii. Records of corrective actions and improvement undertaken</p> <p>b. <i>If any activities carried out by other parties/contractor, is there the monitoring record for some activities carried out by other parties/contractor relate of the performance of major activity and other requirements (PPE, first aid kit, working equipment, work insurance, employee bring his/her wife/families to help with their job and his/her child in working areas, etc) ?</i></p> <p>c. <i>Are there the record of follow-up action from the monitoring result) ?</i></p>	<p>The company has an internal audit mechanism. Based on the internal audit report carried out on August 24 2023, there were 6 non-conformities related to HIRAC, HCV, Hazardous and Toxic Waste, First Aid and Supply Chain. Based on this document, these discrepancies have been fulfilled on October 3, 2023.</p> <p>The company carries out routine PPE inspections every month. Based on the 2023 PPE use discipline monitoring report, it is known that the average score until September 2023 is 88.2 or in the good category.</p> <p>The company also showed the Minutes of the Management Review Meeting Results of ISPO, RSPO, SCCS PT WNA and PT NKU Sungai Cempaga Palm Oil Mill on October 6 2023 which discussed:</p> <ul style="list-style-type: none"> - Internal audit results - Follow up on ISPO findings - Complaints from stakeholders - SCMM process and product performance - Performance of external suppliers - Program to increase understanding of plasma farmers - Recommendations for improvements 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
3.4	A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operation, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.		
R & O	3.4.1 (C) SEIA 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 / <i>is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented</i>]. A copy of the executive summary of the SEIA and Environmental and Social Management Plan is deposited at the Town Hall.		
	<p>a. Is there any new plantings or operations, or expanding existing ones by the company? If Yes, what is the size of the new development i.e. new planting area or operation or expansion?</p> <p>b. Has an independent social and environmental impact assessment (SEIA) been documented for the new plantings or operations (i.e. existing planting)?</p> <p>c. <i>Has an SIA been conducted ? When was the last SIA or SIA review conducted ?</i></p> <p>d. Are the impact assessments prepared by accredited independent experts?</p> <p>e. Are all environmental and social impact (positive and negative) adequately identified?</p> <p>f. Is the SEIA undertaken based on the scope of operation or <i>all activities in plantation and mill (including replanting and nursery activity, etc) ?</i></p> <p>g. Is the SEIA undertaken in a participatory manner, including the relevant affected stakeholders?</p> <p>h. Is the SEIA assessment include and as a minimum :</p> <p>i. Assessment of the impacts of all major planned activities, including land clearing, planting, replanting, pesticide and fertiliser use, mill operations, roads, drainage and irrigation systems and other infrastructure</p> <p>ii. Assessment of the impacts on HCVs, biodiversity and RTE species, including beyond concession boundaries and any measures for the conservation and/or enhancement of these</p> <p>iii. Assessment of potential effects on adjacent natural ecosystems of planned developments, including whether development or expansion will increase pressure on nearby natural ecosystems</p> <p>iv. Identification of watercourses and wetlands and assessment of potential effects on hydrology and land subsidence of planned developments. Measures should be planned and implemented to maintain the quantity, quality and access to water and land resources</p> <p>v. Baseline soil surveys and topographic information, including the identification of steep terrain, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and flooding</p>	<p>The unit of certification was confirm that no new planting during periode 2023 and no schemesmallholder engagement with the unit of certification.</p> <p>EIA has been documented for exixting operation as below:</p> <p>PT Windu Nabatindo Abadi (PT WNA):</p> <ul style="list-style-type: none"> • Environmental management and monitoring document (DPPL) of PT Windu Nabatindo Abadi (PT WNA) approved by Bupati Kotawaringin Timur number 264 year 2010 dated on September 08, 2010, with total scope of assesment 11.900 HA. The documents explained all activities for preconstruction, construction, operation, and post operation covered the palm oil mill and estates activities. • Eligibility Decision Letter Environmental and monitoring document (DPPL) approved by Bupati Kotawaringin Timur number 2862 year 2010 dated on August 18, 2010, with total scope of assessment 11.900 HA. • Document of Environmental Management and Monitoring (UKL-UPL) of Windu Nabatindo Abadi (PT WNA) approved by Bupati Kotawaringin Timur no. 188.45/789/Ek.SDA-BLH/2014 dated on October 2014, with total scope of assessment mill capacity 90 tons FFB/hour <p>PT Nabatindo Karya Utama (PT NKU):</p> <ul style="list-style-type: none"> • Environmental management and monitoring document (DPPL) of PT Nabatindo Karya Utama (PT NKU) approved by Bupati Kotawaringin Timur nomor 496 year 2009 dated on October 31, 2009, with total scope of assesment 11.000 HA. The documents explained all activities for preconstruction, construction, operation, and post operation covered the palm oil mill and estates activities <p>The EIA identified all environmental aspects during operation for both plantation and mill, such as clearing of remaining natural vegetation, pests and diseases palms management, manuring, harvesting, road management, FFB processing, and management of mill effluent. The main environmental impacts identified are land erosion and degradation of soil fertility, air pollution, water pollution, social economic & culture and public health. Information about identified environmental impact and its mitigation measures are listed in the matrix of Environmental Management Plan (RKL) - Environmental Monitoring Plan (RPL) document that approved by authority institution and Environmental Management Efforts (UKL) and Environmental Monitoring Efforts (UPL).</p> <p>Social Impact Assessment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	<ul style="list-style-type: none"> vi. Analysis of type of land to be used (forest, degraded forest, peatlands, cleared land, etc.) vii. Assessment of land ownership and user rights <i>(including Traditional or customary rights owned by the local community (if identifiable) in SIA document)</i> viii. Assessment of current land use patterns ix. Assessment of impacts on people's amenity x. Assess impacts on employment, employment opportunities or from changes of employment terms <i>(including Welfare of workers/labour and women, children and vulnerable group in SIA document)</i> xi. A cost-benefit analysis on social aspects xii. Assessment of potential social impacts on surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus long-term residents <i>and Contribution to the local development, including improvement of human resources, local and customary communities</i> xiii. Assessment of salient risk of human rights violations xiv. Assessment of the impacts on all dimensions of food and water security including the right to adequate food, and monitoring food and water security for affected communities xv. Assessment of activities which may impact air quality or generate significant GHG emissions i. Are there schemed smallholders/outgrowers involved? j. Are they considered and involved in the whole process of the SEIA? k. What are the main impacts affecting these smallholders/outgrowers? l. Is the assessment involved consultation with the affected parties? Who are the affected parties? <i>(external & internal parties) ?</i> m. What are the main findings of the assessment? n. <i>Is the process in conducting the SIA and the findings documented (including the meeting or stakeholder consultancy record) ?</i> o. Are the findings of the SEIA found any negative impacts? If yes, is there a management and monitoring plan developed to mitigate the negative impacts? 	<p>Unit of certification established two social impact assessment documents that consist of:</p> <ul style="list-style-type: none"> • PT WNA in collaboration with Ecotrop has carried out an SIA assessment in November 2020-February 2021. The field assessment was carried out on 10 November 2020-10 February 2021. The areas that were studied were Tumbang Koling, Selucing and Pundu villages. There are notes and minutes of interviews with village communities in Tumbang Koling, Selucing and Pundu villages with a total of 25 respondents conducted in November 2020. • PT NKU in collaboration with Ecotrop has conducted an SIA assessment in November 2020-February 2021. The areas that are the study locations are Tumbang Koling Village and Selucing Village. There are notes and minutes of interviews with village communities in Tumbang Koling and Selucing villages with a total of 19 respondents, conducted in November 2020. <p>Based on document verification, it is known the management plan and monitor the social impact that has been implemented by the unit of certification based on participatory results with affected parties. The program has included an issues management schedule and PIC. During audit, unit of certification has shown document of social impact management and monitoring plan activities for the period 2023-2024. All issues and impacts that arise (including Replanting activity) from the results of social impact management and monitoring plan has been studied and reviewed.</p> <p>Unit of certification already has also social impact management and monitoring plan for the 2023 – 2024 period. Unit Certification has managed social impacts several potential negative impacts identified from the results of the previous review. Based on the information above, it can be concluded that the company already has the relevant documents assessment of social and environmental impacts and their management and monitoring plans by involving the participation of affected stakeholders.</p> <p>Social and environmental management and monitoring plan has been developed with participation of affected stakeholders. The involvement of affected stakeholders based on notes and minutes of interviews with village communities in Tumbang Koling, Selucing and Pundu villages with a total of 15 respondents conducted in 12 April 2024 . Based on result of interview with representatives of surrounding community (Tumbang Koling Village and Pundu Village), relevant agency (Environmental Agency of Kotawaringin Timur Rgeency), and internal stakeholders (Gender Committee and Labor Union of PT WNA and PT NKU), it is known that unit of certification has identified and done</p>	
R	<p>3.4.2 For the unit of certification, a SEIA is available and social and environmental management and <i>its</i> monitoring plans have been developed with participation of affected stakeholders.</p>		
	<ul style="list-style-type: none"> a. Is the SEIA management and monitoring plan developed with participation of affected stakeholders <i>(external and internal parties) ?</i> b. <i>Are adequate plan of monitoring and management of social impact to avoid or reduce of negative impact and promote of positive impact ?</i> c. Is the above plan implemented? d. Is there any documented record to outline the plan on mitigation, implementation and monitoring according to the SEIA report? 	<p><u>Environmental Impact Assesment (EIA).</u></p> <p>Environment management and monitoring plan are sighted on document RKL – RPL and UKL – UPL that have been approved by authority institution as explained in 3.4.1. The management and monitoring plan are consisting of measures to mitigates negative impacts, periode implementation, monitoring requirements, responsible person(s) and its reporting and evaluation frequency.</p> <p>The environment management and monitoring plan is adaptive to operational changes, be reviewed if current practices change or there are any additional activities. The plan has been implemented and reported to authorized institution every 6 (six) month periodically.</p> <p><u>Social Impact Assessment</u> PT Windu Nabatindo Abadi</p> <p>Company has a management plan and social monitoring that refers to the results of the SIA study conducted at PT WNA in 2021. Management and monitoring recommendations have considered the negative and positive impacts of the company's existence. The recommendations have included management plans, monitoring, priority levels, stakeholder engagement, PIC and timelines. The issues identified during the study were:</p> <ul style="list-style-type: none"> • Improvement of local and regional economy • Alternative livelihoods for the community 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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CR	CHECKLIST	RESULTS OF VERIFICATION	COMPLIANCE STATUS
		<ul style="list-style-type: none"> • Accessibility openness • Increased public interest in cultivating oil palm plantations • Negative perception of the community towards the company is due to the high expectations of the community for cooperation in trading dirty oil and POM waste • Negative perception of the community towards the company is due to the high expectations of the community regarding the assistance program and social responsibility • Social jealousy • Rising rates of theft and drug use • River silting and water pollution • Air and noise pollution <p>PT Nabatindo Karya Utama Company has a management plan and social monitoring that refers to the results of the SIA study conducted at PT WNA in 2021. Management and monitoring recommendations have considered the negative and positive impacts of the company's existence. The recommendations have included management plans, monitoring, priority levels, stakeholder engagement, PIC and timelines. The issues identified during the study were:</p> <ul style="list-style-type: none"> • Improvement of local and regional economy • Alternative livelihoods for the community • Accessibility openness • Increased public interest in cultivating oil palm plantations • Negative perception of the community towards the company is due to the high expectations of the community regarding the assistance program and social responsibility • Social jealousy • Increased rates of theft and drug use • River silting and water pollution • Air and noise pollution <p>There are notes and minutes of interviews with village communities in Tumbang Koling, Selucing and Pundu villages with a total of 25 respondents conducted in November 2020.</p> <p>Based on document verification, it is known the management plan and monitor the social impact that has been implemented by the unit of certification based on participatory results with affected parties. The program has included an issues management schedule and PIC. During audit, unit of certification has shown document of social impact management and monitoring plan activities for the period 2023-2024. All issues and impacts that arise (including Replanting activity) from the results of social impact management and monitoring plan has been studied and reviewed.</p> <p>Unit of certification already has also social impact management and monitoring plan for the 2023 – 2024 period. Unit Certification has managed social impacts several potential negative impacts identified from the results of the previous review. Based on the information above, it can be concluded that the company already has the relevant documents assessment of social and environmental impacts and their management and monitoring plans by involving the participation of affected stakeholders.</p> <p>Social and environmental management and monitoring plan has been developed with participation of affected stakeholders. The involvement of affected stakeholders based on notes and minutes of interviews with village communities in Tumbang Koling, Selucing and Pundu villages with a total of 15 respondents conducted in 12 April 2024 . Based on result of interview with representatives of surrounding community (Tumbang Koling Village and Pundu Village), relevant agency (Environmental Agency of Kotawaringin Timur Rgeency), and internal stakeholders (Gender Committee and Labor Union of PT WNA and PT NKU), it is known that unit of certification has identified and done</p>	
R & O	3.4.3 (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		

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CR	CHECKLIST	RESULTS OF VERIFICATION	COMPLIANCE STATUS
	<p>a. Is the review of the management and monitoring plan conducted regularly? How frequent was the review?</p> <p>b. Was the review done internally or externally?</p> <p>c. Is the plan updated as necessary (i.e. in cases where the review has concluded that changes should be made to current practices)?</p> <p>d. Is there evidence that the review has been done in a participatory way (external & internal parties) ?</p> <p>e. When was the last reviewed done?</p> <p>f. Was the process recorded/documentated?</p>	<p>Unit of certification has made efforts to implement the management and monitoring of social and environmental impacts as described in indicator 3.4.2. In addition, unit of certification also periodically updates the administration in a participatory manner. Some documentary evidence of the actions that have been made are as follows:</p> <p>Social Impact Assessment (SIA)</p> <p>Unit of certification has shown evidence of implementing the social impact management plan, reviewed, and updated in a participatory manner with affected stakeholders. This review has been conducted annually. Based on the results of social and environmental discussion document regarding the action plan and monitoring of social and environmental impacts in 2023 – 2024 , which was carried out on 12 April 2024, to surrounding community in Cempaga Hulu District. Based on this document, management and monitoring of social plan of 2023 - 20024 which has been reviewed, such as social jealousy, increased rates of theft and drug use, river silting and water pollution, air and noise pollution, replanting activity etc.</p> <p>Environmental Impact Assesment (EIA)</p> <p>The unit of certification has implemented and review the UKL-UPL regularly once in semester (6 months). The last implementation report was period of January – June, 2024, the evidence shown by unit of certification is:</p> <ul style="list-style-type: none"> • Environment Management and Monitoring (RKL-RPL) Report of PT WNA for first semester 2024 with no. 002/EXT/Sust/WNA/VII/2024 submitted to Environment Agency dated on July 13, 2024 to Environment Agency Kotawaringin Regency; • Environment Management and Monitoring (UK-UPL) Report of PT WNA for first semester 2024 with no. 001/EXT/Sust/WNA/VII/2024 submitted to Ministry of Environment Agency dated on July 13, 2024 to Environment Agency Kotawaringin Regency; • Environment Management and Monitoring (RKL-RPL) Report of PT WNA for first semester 2024 with no. 1728637627-6051 submitted to Ministry of Environment and Forestry, Environment Center Kalimantan Province, and Environment Agency Kotawaringin Timur, dated on August 10, 2024 by SIMPLE. • Environment Management and Monitoring (RKL-RPL) Report of PT KNU for first semester 2024 with no. 1728638399-18446 submitted to Ministry of Environment and Forestry, Environment Center Kalimantan Province, and Environment Agency Kotawaringin Timur, dated on August 11, 2024 by SIMPLE. <p>Based on the reports, evidence that environment monitoring implemented effectively, All Estate and POM on periode January - December, 2024 has physical and chemical components, soil fertility management, population numbers and distribution, disease transmission, clean water quality, surface water quality, fire potential, disruption of flora and fauna, wildlife, social, economic and cultural components, management and monitoring of the impact of replanting activities, river water quality, etc.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
3.5	A system for managing human resources is in place		
R	3.5.1 Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.		
	<p>a. Are there SOPs for recruitment, selection, hiring, promotion, retirement and termination of workers established? Please indicate the SOPs reference number</p> <p>b. Is the company explicitly stated the indiscriminatory policy during the recruitment selection, hiring and promotion process?</p> <p>c. Are the SOPs communicated in appropriate languages and made available to the workers and their representatives?</p> <p>d. What types of employment arrangements are there in the company? (E.g. contractual, outsourced, apprenticeships, direct hires, piecemeal basis, etc.)</p>	<p>The company has an HR management system which aims to manage the workforce in accordance with existing legal provisions in Indonesia as follows:</p> <ul style="list-style-type: none"> • Employee recruitment SOP (BGA-SOP-HC-304.1-R0) Procedure–Employee Recruitment and Selection approved on March 23rd, 2011 by the Director • The payroll system is regulated in the Operational Wages Payment SOP document with number BGA-Sop-HC-312.2 R0 effective on 1 October 2014 which was approved by the CFO, CSO and COO. This document explains employee payroll procedures which include payment of overtime/premiums in overtime, and the wage scale • Retirement and work termination are regulated in the Company Regulation approved by the Director of Industrial Relations and Labor Social Security No. KEP. 4/HI.00.00/00.0000.230618012/B/VII/2023, on 24 July 2024 for PT Nabatindo Karya Utama. Also No. 4/HI.00.00/00.0000.230618004/B/VIII/2023, on 8 August 2024 for PT Windu Nabatindo Abadi • Procedure of Performance Appraisal No. BGA-SOP-HC-306.1-R0 approved on March 23rd, 2011 by the Director • Procedure of Employee Promotion No. BGA-SOP-HC-307.1-R0 approved on March 23rd, 2011 by the Director 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<ul style="list-style-type: none"> Procedure of Employee Transferred No. BGA-SOP-HC-307.2-R0 approved on March 23rd, 2011 by the Director <p>All workers are permanent employees. Based on interviews with labor union representatives and workers during field observation on mill and estates, it is known that workers understand labor regulations.</p> <p>Based on the description above, it shows that the company has procedures for recruitment, selection, acceptance, promotion, retirement and termination of employment documented and available to workers and their representatives in accordance with applicable laws and regulations</p>	
O	3.5.2 Employment procedures are implemented and records are maintained. <i>[If necessary, there are calls for applications favouring the recruitment of local residents with equal competence].</i>		
	<p>a. Are the employment procedures implemented?</p> <p>b. Are records of implementation of the procedures been maintained?</p>	<p>There are some samples of implementation regarding employment procedures as follow:</p> <ul style="list-style-type: none"> Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of medical check-up, and work agreement letter. For example recruitment for BS (Sungai Cempaga Mill) as warehouse clerk with application letter date 8 May 2024, for Y (Bangun Koling Estate) as harvester with application letter date 31 July 2024, for AW (Sungai Bahaur Estate) as harvester with application date 30 August 2024 Work transfer (<i>mutasi</i>) as seen on Personnel Action Report on behalf AS from manuring at BHGE to transporter of fertilizer at SMME per 21 June 2024, with decree No, 008/SK Mutasi/NKU-BHGE/IV/2024. Work transfer (<i>mutasi</i>) as seen on Personnel Action Report on behalf HS from Division Foreman at SCME to Division Foreman at BHGE per 21 March 2024, with decree No, 03/PAR-Mutasi/SCME-WI-4/III/2024. <p>Based on this explanation, the company has been able to show evidence of the implementation of the employee assessment</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
3.6	An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.		
R	3.6.1 (C) All operations [are risk assessed to identify H&S issues / <i>activities risks assessed to identify the H&S issues</i>]. Mitigation plans and procedures are documented and implemented.		
	<p>a. Is there a health and safety policy in place?</p> <p>b. Is there any SOP to conduct risk assessments of all its operations? Please indicate the reference number.</p> <p>c. Are risk assessments conducted for all company's operations, processes and activities where health and safety is an issue (including working tools used, age plant (mature and or immature) and unsafe condition or potential risk as example the angle of descent and the risers and treads of stairways in the mill) ?</p> <p>d. Is there documented mitigation plan for the identified issues in the risk assessments?</p> <p>e. <i>Are the plans been implemented, monitored and reported?</i></p> <p>f. Is the risks assessment and the actions plan reviewed when accidents & incidents occurred to prevent further recurrence?</p> <p>g. <i>If it has included, does the result of identification of source of hazard and risk control revised because considering the actual accidents & incidents that occurred ?</i></p> <p>h. Are accidents & incidents recorded?</p> <p>i. Are all precautions attached to products properly observed and applied to the workers?</p>	<p>The company has shown Risk Assessment document dated January 17 2023 for the estate. The Risk Assessment has covered all activities in the estate. For example, spraying activity involving spaying has the potential danger of exposed to airborne chemicals. Based on this document, it is known that risk control takes the form of a safety briefing on how to spray safely and wearing a mask.</p> <p>Then the company also showed the HIRARC document for POM which was approved by the POM manager on August 1, 2023. The document has covered all activities in POM. For example, activities at the boiler station have the danger of breaking/damaging the measuring glass which can cause burns. Based on this document, it is known that by making protective glasses, training, and using leather gloves.</p> <p>Based on field observations and interviews, for example at Mill and Estate, it is known that workers are aware of HIRAC in their respective work areas. Workers have also received outreach regarding HIRAC.</p> <p>Beside that, the company has an OHS management program for 2024 including hazard source identification and risk assessment and control, establishment of OHS Policy, preparation of OHS work program, OHS monthly meeting, identification of PPE needs, identification of training needs, PPE procurement, inspection of emergency response equipment, internal audit and work evaluation.</p> <p>The program has been implemented and monitored as well reported in document of quarterly report of "Laporan P2K3" which include minute of meeting monthly meeting of P2K3 commission, record of monthly accidents (if any). The last report of P2K3 on July 2024.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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	<p>j. Are the workers aware of the risks associated with their work activities?</p> <p>k. Is there plan included targets for improving occupational health and safety?</p>		
O	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
	<p>a. What are the evidences of implementation of the H&S plan?</p> <p>b. Is the effectiveness of the health and safety plan monitored?</p> <p>c. Is the health and safety plan made publicly available?</p> <p>d. Is there an action taken if targets are not achieved?</p> <p>e. Has the company identified the responsible person/persons to implement and monitor the H&S plan?</p> <p>f. Is adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting, etc?</p>	<p>The company has an OHS management program for 2024 including hazard source identification and risk assessment and control, establishment of OHS Policy, preparation of OHS work program, OHS monthly meeting, identification of PPE needs, identification of training needs, PPE procurement, inspection of emergency response equipment, internal audit and work evaluation.</p> <p>Based on document evaluation dan realization OHS Program 2023 it has been reported the implementation of program, with information program type activity, target and objective, schedule, number of persons, follow up actions, remarks (explanation) of achievement per type of activity, such as the monthly meeting of P2K3. Medical care for workers and customer workers, work environment inspection (see 6.7) This evaluation result as became feedback for planning OHS programme for 2024, which informed about type of program, target objective, timetable, and responsible person</p> <p>Based on interviews with the spraying operator, socialization about the OHS policy, the risk at works, the discipline in using PPE has been reminded by foreman and sometime assistant during morning briefing prior working, beside the work target, and block location work.</p> <p>Based on the results of interviews with workers at mill and estate, it is known that workers have received socialization regarding OHS such as the use of PPE, evacuation routes, and procedures for using First Aid. Workers also know about the existence of P2K3 in the company, one of which is through morning roll call activities.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
3.7	All staff, workers, Scheme smallholders, outgrowers and contract workers are appropriately trained.		
R & O	3.7.1 (C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders, outgrowers and subcontractors, 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>a. Is the company maintained a list of staff, workers, scheme smallholders, outgrowers and contract workers whom training must be provided to?</p> <p>b. Is there a formal training programme in place that covers all aspects of the RSPO Principles and Criteria that includes :</p> <p>i. Regular assessment of training needs of all staff, workers, smallholders and contract workers;</p> <p>ii. Training for workers on scheme smallholder and ourgrower plots;</p> <p>iii. Documentation of all the training assessment needs, formal training conducted and the list of participants attending these formal training</p> <p>c. Who is responsible for the development of training programme, scheduling and the conduct of training?</p> <p>d. Are the training for workers cover, at minimum, the following:</p> <p>i. the health and environmental risks of pesticide exposure;</p> <p>ii. recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women);</p> <p>iii. ways to minimise exposure to workers and their families;</p> <p>iv. International and national instruments or regulations that protect workers' health;</p> <p>v. Productivity and best management practice;</p> <p>vi. relevant SOPs</p> <p>e. Are all workers involved in the operation appropriately trained in safe working practices</p> <p>f. Are the training provided in a form understood by the workers?</p> <p>g. Are there assessment of training for the workers?</p>	<p>The unit of certification has identified and developed a training program related to aspects of the RSPO P&C for all staff, workers, smallholders and local stakeholders (in 2024). The following are the results of the identification and training program plans listed in the Training Calendar year of 2024, among others:</p> <ul style="list-style-type: none"> - Operational Training such as harvesting, spraying, manuring, pruning, pest and disease census, training on types of pesticides, supply chain requirements, first aid, OHS, PPE, HIRAC, fire simulation, fire extinguisher, hazardous toxic and waste, and company policy for plantation workers. - Training on operator work techniques (OHS training of steam aircraft, production aircraft, welders, etc), first aid, PPE, HIRAC, fire extinguisher, emergency response, and company policy for mill workers. - Training and socialization of RSPO, ISPO, company policy and communication and complaint procedures for contractor workers, smallholders, stakeholders and communities around the company. <p>Based on interviews with workers, contractors and village community representatives (Tumbang Koling Village), it is known that every year the company organizes training and outreach programs to all parties around the company. Beside that, based on interview with harvesting worker at Block J18 & J19 (Sungai Mirah Minting Estate), the workers understood the results of the training activities such as mechanism of FFB placement, frond placement and cutting the FFB stalk.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	Note to auditor : To interview staff, workers, smallholders and contract workers to verify that the implementation of the training programme and the effectiveness of the training		
R & O	3.7.2 Records of training are maintained, where appropriate on an individual basis.		
	<p>a. Are documentation of all the training assessment needs, formal training conducted and the list of participants attending these formal training been maintained?</p> <p>b. Are training records maintained for each employee, where appropriate?</p>	<p>The unit of certification shows the minutes document for the realization of the 2024 training program,</p> <ul style="list-style-type: none"> - Integrated pest management training on 20 July 2024 to 24 workers (held on Immature Area of Sungai Bahaur Estate) - Management and Monitoring of HCV Area training on 2 August 2024, that attended by 10 workers, supervisor and staff. - Pesticide used, PPE, MSDS and Calibration Test Training was held on 24 May 2024, that attended by 20 spraying operator, supervisor and staff. <p>Based on the results of interviews with workers, contractors, and village community representatives (Tumbang Koling Village), it is known that every year the company organizes training and outreach programs to all parties around the company.</p> <p>Based on interview with spraying and manuring operator in Block J18 (Sungai Mirah Minting Estate), it is known that all workers had received training such as spraying & manuring mechanism, calibration method and selective spraying.</p> <p>Organization has implemented a training activity for all staff, workers, plasma smallholders and stakeholders. Records of training activities have been maintained in the minutes document.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	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>a. Are there specific personnel carrying out tasks for effective implementation of the supply chain?</p> <p>b. Are the job descriptions for each of the personnel identified above defined and communicated?</p> <p>c. Are there evidence that specific training was provided and relevant to the task performed?</p> <p>d. When was the last training on SC conducted and to whom?</p> <p>e. Through interviews with the relevant personnel involved in the SC, are the persons knowledgeable and competent in implementing the supply chain procedures?</p>	<p>The management unit has conducted periodic training related to SCCS, some documentation of the training that has been carried out includes:</p> <ul style="list-style-type: none"> - SCCS training at the Sungai Cempaga Mill on 29 July 2024 which was attended by 25 participants. - SCCS training at the BHGE which was carried out for 8 workers on 5 December 2023 consisting of cleck, assistant, and RSPO PIC and etc. - SCCS training at the BKLE which was carried out for 7 workers on 6 December 2023 consisting of cleck, assistant, and RSPO PIC and etc. - SCCS training at the SBHE which was carried out for 7 workers on 8 December 2023 consisting of cleck, assistant, and RSPO PIC and etc. - SCCS training at the SCME which was carried out for 7 workers on 7 December 2023 consisting of cleck, assistant, and RSPO PIC and etc. - SCCS training at the SMME which was carried out for 8 workers on 4 December 2023 consisting of cleck, assistant, and RSPO PIC and etc. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
3.8 Supply chain requirements for mills			
R	<p>3.8.1 (C) A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p> <p>Note : Definition Identity Preserved Mill</p>		
	<p>a. Are all FFBs sourced from certified estates within the unit of certification?</p> <p>b. Are there FFBs from other certified estates (not within the certified unit)? If yes, how do you confirm that the supplying estates are certified?</p> <p>c. How do you confirm that the mill only process certified FFB?</p>	<p>Not applicable. The Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :

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	<p>d. Are there any FFB processed from non-certified sources?</p> <p>e. Is the mill assure that certified PO is kept separate from non-certified PO and PO from other certified mills, including during transport and storage?</p>																		
R	<p>3.8.2 (C) A mill is deemed to be MB if the mill process FFB from both RSPO certified & uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>Note : Definition Mass Balance Mill</p>																		
	<p>a. Are the certified and non-certified FFB been monitored?</p> <p>b. How is the monitoring of incoming certified and non-certified FFB been conducted?</p>	<p>The Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the FFB and products (CPO and PK) from certified and uncertified sources. The Mill only claims certified products from certified sources</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>																
R	<p>3.8.3 (C)</p> <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (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>Note : Explanation (Volume and Product Integrity)</p>																		
	<p>a. Has the projected certified volume for CPO and PK been appropriately determined by the mill?</p> <p>b. What was the basis for determining certified volume?</p> <p>c. For previous license volume, how was the actual production volume as compared to certified volume?</p>	<p>The mill has projected certified volume for CPO and PK base on projection of FFB production from own estate and percentage of OER and KER for next year with information for period October 2024 – September 2025 is: FFB production: 187,388 ton CPO production: 43,099.24 ton OER: 23% PK Production: 7,495.52 ton KER: 4%</p> <p>The mill also was recorded the volume actual production for previous year in the form of Production Statement with information:</p> <table border="1" data-bbox="1498 1270 2602 1543"> <thead> <tr> <th>Products</th> <th>Projected Certified Volume (26 Jan 24 – 21 Dec 24) (MT)</th> <th>Current Year Certified Volume (26 Jan 24 to 30 September 2024) (MT)</th> <th>Last Year Actual Certified Volume (01 Oct 2023 to 30 Sept 2024) (MT)</th> </tr> </thead> <tbody> <tr> <td>FFB Certified (MT)</td> <td>168,000</td> <td>102,839.91</td> <td>153,224.37</td> </tr> <tr> <td>CSPO (MT)</td> <td>36,640</td> <td>23,414.29</td> <td>35,072.27</td> </tr> <tr> <td>CSPK (MT)</td> <td>7,560</td> <td>4,020.75</td> <td>6,309.87</td> </tr> </tbody> </table> <p>Projected production for period and actual data production & selling was inform on public summary report on the data table 3 (above).</p>	Products	Projected Certified Volume (26 Jan 24 – 21 Dec 24) (MT)	Current Year Certified Volume (26 Jan 24 to 30 September 2024) (MT)	Last Year Actual Certified Volume (01 Oct 2023 to 30 Sept 2024) (MT)	FFB Certified (MT)	168,000	102,839.91	153,224.37	CSPO (MT)	36,640	23,414.29	35,072.27	CSPK (MT)	7,560	4,020.75	6,309.87	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
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R & O	<p>3.8.4 (C)</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform</p> <p>Note : Explanation (Volume and Product Integrity)</p>																		
	<p>a. What is all transactions has registered through RSPO IT platform for the appropriate supply chain ?</p> <p>b. What is all transactions has reported through RSPO IT platform for the appropriate supply chain ?</p>	<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: PT Windu Nabatindo Abadi - Bumitama Core Product: Palm Oil Member ID: RSPO_PO1000009211 RSPO Membership Number: 1-0043-07-000-00 (BUMITAMA AGRI LTD) Type of Business: Oil Mill Supply chain model: Mass Balance 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>																

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		All transaction has been announced to RSPO IT Platform and confirmed shipped. During license it was known there is product sold as RSPO certified and non-certified/conventional as described in indicator 3.8.8 and 3.8.16	
R	<p>3.8.5 (C)</p> <p>The mill shall have written procedures and/or work instructions equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following :</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records) • Identification of the role of the person having 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 • The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill <p>Note : Documented Procedure</p>		
	<p>a. Are the following procedures established? :</p> <p>i. receiving and processing of certified and non-certified FFB?</p> <p>ii. SOPs as required under the SCC requirements?</p> <p>iii. Training procedure?</p> <p>b. Are the procedures complete to cover the supply chain requirements?</p> <p>c. Has the organization identified relevant person(s) responsible for the implementation of the RSPO SC?</p> <p>d. Are the roles, responsibility and authority been defined and are the personnel aware of their roles?</p> <p>e. Where are the procedures kept and are they accessible by the personnel involved in the SC implementation?</p> <p>f. Are the personnel involved in the SC implementation knowledgeable and able to demonstrate awareness of the organization's procedures?</p>	<p>The Mill has had procedures related supply chain, such as SOP of RSPO Supply Chain (No. SUST-WNA-SOP-43, revision R2 dated 23 July 2021). These procedures have referred to the latest RSPO Supply Chain System. The procedure has covered all aspects in SCCS MB model, such as receiving and recording that identify the traceability of RSPO certified and uncertified source and products, FFB processing, the announcement in RSPO Palmtrace, key persons such as security, weight bridge clerk, dispatch/kernel officer, production clerk, Administration Head, as well as the training.</p> <p>Based on the results of interviews with weighbridge officers, it is known that these officers understand the supply chain</p> <p>The company has also conducted SCCS and weighing training on July 29th, 2024, which was attended by 25 people consisting of Factory Clerk, Purchasing Clerk, laboran and Weighting Bridge Clerk. Beside that, company also give a training for the transportation clerk at estate for example SMME was conducted on 04 December 2023, SBHE conducted on 8 December 2023 and BKLE on 06 December 2023.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	<p>3.8.6 (C)</p> <ul style="list-style-type: none"> • The mill shall have a written procedure to conduct annual internal audit to determine whether the mill : <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Requirement for mills and the RSPO Role on Market Communications and Claims. b. Effectively implements and maintains the standard requirements within its organisation • Any non-conformities found as part of the internal audit shall be issued & 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 mill shall maintain the internal audit records and reports <p>Note : Internal Audit</p>		
	<p>a. Is there SOP for conducting internal audit? How regular is the internal audit?</p> <p>b. Has the internal audit assessed the organization conformance to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents?</p> <p>c. When was the internal audit conducted and was the internal audit done by competent auditor(s)?</p> <p>d. Are there non-conformities raised? If yes, has it been responded in a timely manner?</p> <p>e. Are the outcomes of the internal audit and corrective actions of the non-conformities been reviewed in the management review?</p> <p>f. Are all the audit records and reports been maintained?</p> <p>g. Did the internal audit show that the organization effectively implements and maintains the standard requirements within its organization?</p>	<p>The procedure to conduct supply chain internal audit already set in the SOP of supply chain. In the SOP mentioned that internal audit will be conducted annually. Internal audit of RSPO supply chain conducted simultaneously with P&C audit on 22-27 July 2024. All of supply chain standard and rules on market communication and claim has been assessed, and the CARs have been complied.</p> <p>Management Review of RSPO SCCS implementation conducted on 30 September 2024. The management review discussion has covered the input from internal audit result, correction and corrective action, customer feedback, process Performa and product compliance, follow up of previous management review, and recommendation for improvement. Internal audits demonstrate that an organization effectively implements and maintains standard requirements within its organization. Internal audit results and corrective actions for nonconformities have been reviewed in management reviews.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	<p>3.8.7 (C)</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage</p>		

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	iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents Note : Purchasing/Good In																																																																		
	a. Is the mill conduct verification and document the tonnage and sources of certified and the tonnage of non-certified FFBs received? b. Where is it recorded? c. Is there overproduction? If yes, did the mill inform the CB? d. What is the mechanism in place for handling of non-conforming products?	<p>The company has procedures related to the management of certified and non-certified products, namely in document No. SUST-WNA-SOP-43 Revision 02, among other things, explains that the identification of the status of raw materials (FFB) originating from RSPO certified plantations is marked by the use of the FFB Certified stamp on each Fruit Delivery Letter.</p> <p>The mill has verified and documented the volumes of certified with information for period Oct 2023 – Sept 2024 are:</p> <table border="1" data-bbox="1498 646 2309 1228"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">FFB (ton)</th> <th rowspan="2">Total</th> </tr> <tr> <th>Certified</th> <th>Non-Certified</th> </tr> </thead> <tbody> <tr><td>Oct-23</td><td>12,984.23</td><td>9,334.23</td><td>22,318.46</td></tr> <tr><td>Nov-23</td><td>12,806.82</td><td>8,991.13</td><td>21,797.95</td></tr> <tr><td>Dec-23</td><td>11,375.70</td><td>8,375.74</td><td>19,751.44</td></tr> <tr><td>Jan-24</td><td>13,217.71</td><td>6,323.91</td><td>19,541.62</td></tr> <tr><td>Feb-24</td><td>12,020.16</td><td>5,558.05</td><td>17,578.21</td></tr> <tr><td>Mar-24</td><td>11,834.87</td><td>5,826.15</td><td>17,661.02</td></tr> <tr><td>Apr-24</td><td>12,267.82</td><td>5,875.18</td><td>18,142.99</td></tr> <tr><td>May-24</td><td>14,148.54</td><td>6,764.25</td><td>20,912.78</td></tr> <tr><td>Jun-24</td><td>14,255.38</td><td>6,463.98</td><td>20,719.36</td></tr> <tr><td>Jul-24</td><td>13,297.57</td><td>6,150.35</td><td>19,447.92</td></tr> <tr><td>Aug-24</td><td>12,826.80</td><td>6,615.76</td><td>19,442.56</td></tr> <tr><td>Sept-24</td><td>12,188.77</td><td>5,928.33</td><td>18,117.10</td></tr> <tr> <td>Total</td> <td>153,224.37</td> <td>82,207.04</td> <td>235,431.41</td> </tr> </tbody> </table> <p>Data for FFB receive was get from FFB Delivery Note and weighbridge ticket per each truck, for example: Delivery Note No. 01034W0224 on 30 September 2024</p> <ul style="list-style-type: none"> • Estate Name: BKLE • Division: 2 • Truck No.: DT 17 • Block: L-20 • Total FFB: 351 • Stamped with certified information <p>Weighbridge Ticket No. A1524137021 on 30 September 2024</p> <ul style="list-style-type: none"> • Estate Name: BKLE • Truck No.: DT 017 • Total bunches: 351 bunches • Net weigh: 6,350 Kg • FFB Delivery Note No.: 01034W0224 <p>The mill also was recorded the volume actual production for current license in the form of production statement and was known that actual production still under the certificate projected volume with information:</p> <table border="1" data-bbox="1498 1816 2398 1984"> <thead> <tr> <th>Products</th> <th>Projected Certified Volume (26 Jan 24 – 21 Dec 24) (MT)</th> <th>Current Year Certified Volume (26 Jan 24 to 30 September 2024) (MT)</th> </tr> </thead> <tbody> <tr> <td>FFB Certified</td> <td>168,000</td> <td>102,839.91</td> </tr> </tbody> </table>	Month	FFB (ton)		Total	Certified	Non-Certified	Oct-23	12,984.23	9,334.23	22,318.46	Nov-23	12,806.82	8,991.13	21,797.95	Dec-23	11,375.70	8,375.74	19,751.44	Jan-24	13,217.71	6,323.91	19,541.62	Feb-24	12,020.16	5,558.05	17,578.21	Mar-24	11,834.87	5,826.15	17,661.02	Apr-24	12,267.82	5,875.18	18,142.99	May-24	14,148.54	6,764.25	20,912.78	Jun-24	14,255.38	6,463.98	20,719.36	Jul-24	13,297.57	6,150.35	19,447.92	Aug-24	12,826.80	6,615.76	19,442.56	Sept-24	12,188.77	5,928.33	18,117.10	Total	153,224.37	82,207.04	235,431.41	Products	Projected Certified Volume (26 Jan 24 – 21 Dec 24) (MT)	Current Year Certified Volume (26 Jan 24 to 30 September 2024) (MT)	FFB Certified	168,000	102,839.91	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
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R	<p>3.8.8 (C)</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 document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation) :</p> <ul style="list-style-type: none"> • The name and address of the buyer ; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • RSPO Supply chain certificate number; • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • A unique identification number; <p>Note : Sales and goods out</p>																										
	<p>a. Is there any document accompanying the certified oil palm products delivery?</p> <p>b. On which document/documents does the mill put the supply chain model and the SCC certificate number?</p> <p>c. Do all documents sampled meet the requirements of this clause? Verify the documents</p>	<p>Based on document verification book keeping the selling RSPO product in last 12 months (October 2023 – September 2024) informed:</p> <table border="1"> <thead> <tr> <th></th> <th align="center" colspan="2">Dispatch period (MT)</th> </tr> <tr> <th></th> <th align="center" colspan="2">October 2023- September 2024</th> </tr> </thead> <tbody> <tr> <td>CSPO sold under RSPO Scheme</td> <td align="center">-</td> <td></td> </tr> <tr> <td>CSPO sold under others scheme</td> <td align="center">-</td> <td></td> </tr> <tr> <td>CSPO sold as conventional</td> <td align="right">35,982.10</td> <td></td> </tr> <tr> <td>CSPK sold under RSPO Scheme</td> <td align="right">4,332.26</td> <td></td> </tr> <tr> <td>CSPK sold under others scheme</td> <td align="center">-</td> <td></td> </tr> <tr> <td>CSPK sold as conventional</td> <td align="right">1,785.96</td> <td></td> </tr> </tbody> </table> <p>Unit Certification was shown accompanying documents for certified transaction in the form of Contractor, Delivery Order, Product Dispatch List, Covering Letter, Weighbridge Docket, Truck Tank Checking Form. Those documents was covered the information in SCCS requirements, for example</p> <p>1. PK Shipping announcement of Transaction TR-2d64275e-25d9</p> <ul style="list-style-type: none"> • Name of Seller: Sungai Cempaga Mill _ PT Windu Nabati Abadi • palm trace ID of Seller: RSPO_PO1000009211 • Name of Buyer: PT Sinar Alam Permai • palm trace ID of Buyer: RSPO_PO1000000395 • Seller Contract Number: 1140083962 • Seller Reference Number: 1140083962 • Product: CSPK • SCC Model: MB • Volume: 299.38 MT • Transportation Medium: Land • Departure address (seller): Central Kalimantan, Indonesia • Arrival Address (buyer): Central Kalimantan, Indonesia • B/L date: 31-08-2024 		Dispatch period (MT)			October 2023- September 2024		CSPO sold under RSPO Scheme	-		CSPO sold under others scheme	-		CSPO sold as conventional	35,982.10		CSPK sold under RSPO Scheme	4,332.26		CSPK sold under others scheme	-		CSPK sold as conventional	1,785.96		<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
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		<ul style="list-style-type: none"> • Creation date: 10-09-2024 • Confirmation date: 01-10-2024 <p>The other transaction document to cover the transaction are:</p> <p>a. Contract Agreement with No. 1140083962 on 07 June 2024 informing:</p> <ul style="list-style-type: none"> • Name of buyer: PT Sinar Alam Permai • Name of seller: Bangun Bandar Unit • Hand Over Location: Franco at Bagendang Bulking • Type of material: PK RSPO Certified • Amount of material: 300 ton • Date of delivery: 25.06.2024-15.07.2024 <p>b. <i>Berita Acara Penyerahan Barang</i> No. 002/BAPB-KERNEL/PT.WNA-PT.SAP/VIII/2024 on 31 August 2024 informing that the product was delivered with total 30 trucks from 14-30 August 2024 with total 300 ton.</p> <p>c. Weighbridge Ticket No. A1524131829 on 21 August 2024 informing No. of truck: KH8463FN, type of product: PK; amount of product: 9,400 Kg;. All the covering letter and weighbridge docket was stamp with information RSPO Certified (MB) and No. Certificate: 824 502 24190.</p> <p>There is no physical transaction for CPO product, transaction only under book & claims.</p>	
R	<p>3.8.9 (C)</p> <p>i. The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding certificate shall ensure that the independent third party complies with the requirements of this RSPO Supply Chain Certification.</p> <p>Note : Outsourcing Activities</p>		
	<p>a. Are there outsourced activities to independent third parties? Please list down the outsourced activities</p> <p>b. Is there agreement in place with the third party service providers?</p> <p>c. Is the agreement included the requirement that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard?</p> <p>d. Are there outsourced facilities that were deemed risky and visited?</p>	<p>The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Only transportation of certified products (CPO & PK) is outsourced to the third parties. Currently, there is 1 contractor for PK transport and 1 contractor for CPO transport, for instance as shows through several Work Order Letter as follows CV Borneo Mulia Abadi (PK transporter), agreement No. 002/WNA/SPK/XII/23 on 29 September 2023 valid thru December 2024</p> <p>To ensure the contractors complies with the RSPO Supply Chain, in the agreement, there is a letter of commitment from each contractor stating that they are committed to supporting the implementation of the RSPO SCCS system including the willingness to provide proper access to accredited CBs in order to be able to access their operations and systems along with any information in their possession, if the audit is notified in advance.</p> <p>Based on interview with CPO transporter (PT Surya Mentaya Jaya) regarding the clausal in the contract that allow CB to access the contractor, they acknowledge and understand about the provisions</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	<p>3.8.9 (C)</p> <p>ii. The mill shall ensure the following :</p> <p>a. The mill has legal ownership of all input material to be included in outsourced processes;</p> <p>b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification bodies (CBs) 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 their respective operations, systems, and all information, when this is announced in advance;</p> <p>Note : Outsourcing Activities</p>		
	<p>a. Is the agreement signed with independent third party legally enforceable?</p> <p>b. Is the legal ownership of the materials included in outsourced processes clearly defined in the agreement?</p> <p>c. Are these companies RSPO certified? If not, do they have to be verified?</p> <p>d. Is there SOP for outsourced process been established and communicated to the relevant contractor?</p> <p>e. Is there mechanism to ensure that outsourced activities are in compliance to RSPO SC requirements and facili-</p>	<p>Based on contract with CV Borneo Mulia Abadi, it was ensure that contractors complies with the RSPO Supply Chain, in the agreement, there is a statement stating that they are committed to supporting the implementation of the RSPO SCCS system including the willingness to provide proper access to accredited CBs in order to be able to access their operations and systems along with any information in their possession, if the audit is notified in advance. During surveillance audit, it was known that the contractors can be contacted and willing to be audited.</p> <p>Furthermore, Mill also was conducted socialization to the contractor on August 2024 regarding the SCCS</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	ty's Standard Operating Procedure (SOP)? f. Has the third party contractor maintained records and available to the CB during the audit? Is this requirement included in the agreement?	implementation, regulation implementation, PPE and others policy of company.	
R	3.8.10 (C) The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products Note : Outsourcing Activities		
	a. Is there a list of contractors (used for the processing or physical handling of certified oil palm products) with names and contact details? b. When was the list last updated?	The Mill has the record of details of the contractor, covers the contractor company profile, address, contract number, contact person, and phone number, contract agreement and period. The list of contractors informing that there are 2 transporter that are CV Borneo Mulia Abadi and PT Surya Mentaya Jaya	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
R & O	3.8.11 (C) The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products Note : Outsourcing Activities		
	a. Are there new contractors appointed by the company for the processing or physical handling of RSPO certified oil palm products? If yes, is the list of contractor been updated? b. Is there agreement in place?	Until this surveillance audit is carried out, there are no new contractors handling RSPO certified products. The contractor used is still the same as the previous assessment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
R & O	3.8.12 (C) 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 Note : Record Keeping		
	a. Is there accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements? b. Who are responsible for maintaining the records?	The company has up-to-date records and reports that are kept in the mill office, complete, accurate, and up to date. All the records can be accessed by the auditor, such as records of certified product shipping, sales contracts, delivery orders and invoices, production reports, and product sales.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
R & O	3.8.12 (C) ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months Note : Record Keeping Note for auditor : Records for the previous license period and the new license period needs to be verified		
	a. What is the retention period, and is it complying with the legal and regulatory requirements? b. Are there records showing the FFB input and the products produce and sold by the mill available? c. Is the organization able to confirm the certified status of raw materials or products in stock? Check PalmTrace & Accounting system of certified products	Based on document verification on supply chain procedures, retention time for all records and reports regarding the supply chain is 5 years.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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R & O	<p>3.8.12 (C)</p> <p>iii. For IP 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 MB module, the mill :</p> <p>a) shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis</p> <p>b) All volumes of certified CPO & 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> <p>Note : D.5.1 & E.5.1</p>	<p>Company was shown the Bookkeeping informing record all certified palm oil and palm kernel oil volumes purchased (input) and claimed (output) for a period of 9 months before the audit (Oct 23– Sept 2024):</p> <table border="1"> <thead> <tr> <th colspan="6">CPO</th> </tr> <tr> <th rowspan="2">Month</th> <th colspan="2">Production CPO (ton)</th> <th colspan="3">CPO Despatch (ton)</th> </tr> <tr> <th>Certified</th> <th>Non-Certified</th> <th>RSPO</th> <th>Other Scheme</th> <th>Non-Certified</th> </tr> </thead> <tbody> <tr> <td>Oct 23 - Sept 24</td> <td>35,07 2.27</td> <td>18,842.2 7</td> <td>0</td> <td>-</td> <td>35,982.10</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="6">PK</th> </tr> <tr> <th rowspan="2">Month</th> <th colspan="2">Production PK (ton)</th> <th colspan="3">PK Despatch (ton)</th> </tr> <tr> <th>Certified</th> <th>Non-Certified</th> <th>RSPO</th> <th>Other Scheme</th> <th>Non-Certified</th> </tr> </thead> <tbody> <tr> <td>Oct 23 - Sept 24</td> <td>6,309. 87</td> <td>3,433.50</td> <td>4,332.26</td> <td>-</td> <td>1,785.96</td> </tr> </tbody> </table> <p>The company has shown Bookkeeping Documents informing the FFB received, FFB processed, CPO & PK production, sales and product stock. However, there are errors in the data, including:</p> <ol style="list-style-type: none"> There has been no maximum balancing of 3 months. This can be seen from the stock at the beginning of the month, where there is still a minus amount in uncertified stock. The total stock at the end of the month for CPO (non-certified and certified) in September 2024 was minus (-198.40 mt) Supporting data for CPO shipments to buyers has not been shown Evidence of CPO stock in LBBS for the period October 2023 – September 2024 has not been shown. <p>This is become non-conformity No. RSPO06081 under indicator 3.8.12.</p>	CPO						Month	Production CPO (ton)		CPO Despatch (ton)			Certified	Non-Certified	RSPO	Other Scheme	Non-Certified	Oct 23 - Sept 24	35,07 2.27	18,842.2 7	0	-	35,982.10	PK						Month	Production PK (ton)		PK Despatch (ton)			Certified	Non-Certified	RSPO	Other Scheme	Non-Certified	Oct 23 - Sept 24	6,309. 87	3,433.50	4,332.26	-	1,785.96	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO06 081</p>
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R	<p>3.8.13 (C)</p> <p>OER & KER shall be applied to provide a reliable estimate of the amount of certified CPO & PK from the associated inputs. Mill shall determine and set their own extraction rates which shall be based upon past experience, documented and applied consistently.</p> <p>Note : Conversion Factors</p> <p>a. What was the conversion rate used for the estimation of certified volume of CSPO and CSPK?</p> <p>b. Is the conversion rate applied provide a reliable estimate for the amount of certified output available from the associated inputs?</p> <p>c. Is the conversion ratio periodical reviewed?</p>	<p>The conversion rate of production of CPO (OER) and PK (KER) was based on actual daily, monthly, and yearly production. The extraction rate follows the actual data for a 12-month period from Oct 2023 until Sept 2024, i.e., OER 22.94% and KER 4.15%. Periodically updated extraction is actual extraction</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>																																														
R	<p>3.8.14 (C)</p> <p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>																																																

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	Note : Conversion Factors								
	a. Was the conversion rate following the actual performance or industry average?	The conversion rate of production of CPO (OER) and PK (KER) was based on actual daily, monthly, and yearly production. The extraction rate follows the actual data for a 12-month period from Oct 2023 until Sept 2024, i.e., OER 22.94% and KER 4.15%. Periodically updated extraction is actual extraction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :						
R & O	3.8.15 (C) For IP 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 product including during transport and storage to strive for 100% separation. Note : Processing								
	a. For IP mill, is there SOP for managing the certified oil palm products separated from non-certified oil palm product including during transportation and storage (to strive for 100% separation)? b. Are there documented procedures established to ensure no contamination during transport and storage for its RSPO certified oil palm product from non-certified materials?	SCCS module used in Sungai Cempaga Mill is Mass Balance (MB), because the mill receives FFB from the estate and from third party that non-certified RSPO	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :						
R & O	3.8.16 (C) i. Shipping Announcement in the RSPO IT platform shall be carried out by the mill when RSPO Certified product are sold as certified to refineries, crusher & traders not more than three months after dispatch with the dispatch with the dispatch date being the Bill of Lading or the dispatch document date 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. Note : Registration of Transaction								
	a. Is the shipping announcement carried out in accordance with the internal SOP requirements? b. Is the confirmation from the buyer conducted in the RSPO IT Platform? c. Is tracing conducted at least annually? d. Is volume sold under other scheme or conventional being remove from the certified volume?	The RSPO IT Platform member registration number for Sungai Cempaga POM is RSPO_PO1000009211. The mill will carry out shipping announcements on the RSPO IT platform when RSPO-certified products are sold as certified to buyer not more than three months after dispatch. For example: PK Shipping announcement of Transaction TR-2d64275e-25d9 <ul style="list-style-type: none"> • Seller: Sungai Cempaga Mill _ PT Windu Nabati Abadi • palm trace ID: RSPO_PO1000009211 • Buyer: PT Sinar Alam Permai • palm trace ID: RSPO_PO1000000395 • Seller Contract Number: 1140083962 • Seller Reference Number: 1140083962 • Product: CSPK • SCC Model: MB • Volume: 299.38 MT • Transportation Medium: Land • B/L date: 31-08-2024 • Creation date: 10-09-2024 • Confirmation date: 01-10-2024 Based on Bookkeeping, Company also selling credit of product through Book & Claim with details information:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :						
		<table border="1"> <thead> <tr> <th>Product</th> <th>Current License (27 Jan 24 – 30 Sept 24)</th> </tr> </thead> <tbody> <tr> <td>CSPO</td> <td>20,659</td> </tr> <tr> <td>CSPK</td> <td>0</td> </tr> </tbody> </table> Company also has shown the proof of selling under Book & Claim for example transaction No. 14934 on 29 July 2024 with type "Off Market Accepted" with buyer ACT Commodities B.V. with quantity 5,000 ton.	Product	Current License (27 Jan 24 – 30 Sept 24)	CSPO	20,659	CSPK	0	
Product	Current License (27 Jan 24 – 30 Sept 24)								
CSPO	20,659								
CSPK	0								

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		Otherwise, company also was shown proof of removing stock for previous license due to certified product sold as conventional with transaction No. ST-TR-ccf9b434-b696 on 11 October 2023 with total quantity removed is 3,465.71 ton of CSPK.	
R & O	3.8.17 (C) 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. Note : Claims		
	a. Is the mill making claims? If yes, has the claim following the RSPO Rules on Market Communications and Claims	Based on the field visit and document review, there is no indication that company using logo and claim as ruled on RSPO Rules on Market Communications and Claims	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
Principle 4 : Respect Community and Human Right and Deliver Benefits			
4.1	The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders		
R & O	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. This policy is documented and communicated to all levels of workforce, operations, supply chain and local communities.		
	a. Is there a written policy or commitment made by the senior management on Human Rights including prohibiting retaliation against Human Rights Defenders (HRD) or a stand alone policy to protect HRD? b. Is the policy included the prohibition of intimidation and harassment by the unit of certification and contracted services, including contracted security forces? c. How was the policy communicated to all levels of the workforce, operations, supply chain and local communities? When was the last communication conducted? d. What evidence is available to demonstrate that all levels of workforce, supply chain and local communities been informed of the above? e. Based on interview with the workers, supply chain and local communities who have been communicated, are they aware of the policy?	The company has a Labor and Human Rights Policy document which states its commitment to comply with laws and regulations in the field of labor and uphold human rights in order to develop sustainable palm oil plantations. The document was signed by Regional Head Pundu in January 2023. Several points contained in the document are: <ul style="list-style-type: none"> • Providing equal employment opportunities without distinction of race, religion, degree, etc • Protect female workers from sexual harassment, acts of violence etc Respect and appreciate the right of every worker to form or become a member of a trade union <ul style="list-style-type: none"> • Do not use underage workers • Respect human rights, protect whistle blowers, and also commit to not carrying out extrajudicial intimidation/violence in any form against human rights defenders, including the use of military/security forces • Support employees to form employee cooperatives. During the audit carried out, the team auditor has been trying to ensure this policy has been communicated and implemented through stakeholder consultation. Interview with workers, the surrounding community (Tumbang Koling Village Head, <i>Dewan Adat Dayak</i> and smallholder's representative), and contractors known that the company has socialized company policies regularly including policies on human rights. Socialization is done by sticking to the policy in office, socializing in the housing, and socializing with workers during the morning briefing before the activities started. Communication of policy records given by company on 2024 were also shown as follow: a. Minutes of socialization No.004/BHGE/VII/2024 on 29 July 2024 attended by 28 participants/workers at Banama Haring Estate b. Minutes of socialization No.004/SMME/VII/2024 on 29 July 2024 attended by 14 participants/workers at Sungai Mirah Minting Estate c. Minutes of socialization No.0114/CSR-Reg2/VII/2024/VII/2024 on 23 July 2024 attended by 33 participants from vendor/contractor, supplier FFB and surrounding community. Based on field observations and interviews with workers at mills and estates, it is known that there is no intimidation or violence when carrying out work.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	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 / any form of intimidation in its operations]		

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	<p>a. Is there mercenaries and paramilitaries use in the operations of the company? If yes, what is the scope of their work?</p> <p>b. Does the interviews with the relevant stakeholders (workers and local communities) or online search reveal use of violence by/in the unit of certification?</p> <p>c. If there are reported cases or interviews reveal used of violence by/in the unit of certification, please verify with relevant stakeholders.</p>	<p>The Company has a Complaint SOP with SOP document number WNA-SUST-SOP-10. The procedure is a reference in receiving and resolving complaints from external and internal parties. Meanwhile, the personnel responsible for receiving and documenting complaints from the parties are Corporate Affairs. Complaints that exist will be reviewed and consulted with the parties for resolution. It was further explained that each reporter's identity (anonymity/ whistleblower) is kept/ confidential, the company has installed a bulletin board at the front of the office area in each work unit, for example in the plantation and factory offices. The main points of the notification are the address of the complaint (phone number & email) and the guarantee of confidentiality and protection for the complainant.</p> <p>If the complaint is not resolved by deliberation and consensus, then the company and the party submitting the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at the location of the third party or other agreed place of neutrality.</p> <p>Based on interview with community representatives known that during land acquisition process, all villager (land-owner) is free to deliver their comments or objection regarding to land acquisition process.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
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.		
O	4.2.1 (C) The mutually agreed system is in place , open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring the anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, as long as the report is supported with sufficient preliminary evidences . The system ensure that there is [without / no] risk of reprisal or intimidation and follows the RSPO policy for HRDs		
	<p>a. Is there a system in place to deal with complaints and grievances for all affected parties?</p> <p>b. Does the system allow for the complainant to agree on the process of the grievance mechanism?</p> <p>c. Does the system allow for the protection of the anonymity of the complainant if requested?</p> <p>d. How is a complaint or grievance investigated, addressed and resolved?</p> <p>e. what is all complaints and grievances submitted to personal/section which responsible to receive complaints and grievances by affected parties via existing system ?</p> <p>f. If existing system is the use of gradual mechanism, are there the record of compliant and grievance on the foreman/supervisor because he/she is the PiC of receiving complaint & grievance in first level ?</p> <p>g. Is the system effective to ensure complaints or grievances are addressed or resolved in an effective, timely and appropriate manner?</p> <p>h. Is there a non-retaliation or non-reprisal policy that protects complainants or whistle-blowers?</p> <p>i. Does the complainant know that his/her anonymity will be protected if requested?</p> <p>j. Where a resolution is not found mutually, is there a process for complaints to be brought to the next level e.g. RSPO Complaints System?</p>	<p>The company has a Complaint SOP with SOP document number WNA-SUST-SOP-10. The procedure is a reference in receiving and resolving complaints from external and internal parties. Meanwhile, the personnel responsible for receiving and documenting complaints from the parties are Corporate Affairs. Complaints that exist will be reviewed and consulted with the parties for resolution. It was further explained that each reporter's identity (anonymity/ whistleblower) is kept/ confidential, the company has installed a bulletin board at the front of the office area in each work unit, for example in the plantation and factory offices. The main points of the notification are the address of the complaint (phone number & email) and the guarantee of confidentiality and protection for the complainant.</p> <p>If the complaint is not resolved by deliberation and consensus, then the company and the party submitting the complaint want a resolution through the Mediation Forum. The Mediation Forum meeting must take place at the location of the third party or other agreed place of neutrality.</p> <p>Based on interview with community representatives known that during land acquisition process, all villager (land-owner) is free to deliver their comments or objection regarding to land acquisition process.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	4.2.2 Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		
	<p>a. Are there procedures to ensure the above system is understood by the affected parties, including the illiterate parties?</p> <p>b. How was the system made known and communicated to all parties including Illiterate parties? When was the</p>	<p>The company has established a system for handling complaints and complaints for all affected parties which is documented in the Grievance Handling and Complaints Procedure with document number WNA-SUST-SOP-10. There are additional provisions regarding the implementation of communication and consultation procedures to stakeholders, where 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 procedure states that all complaints must be registered in the Complaint Form in clear and easy to understand language. All complaint</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	<p>last communication been carried out?</p> <p>c. Is there evidence that the system is known/understood by all parties including the illiterate parties?</p>	<p>forms will be collected and registered monthly into the Grievance Register Book. Company will respond to each complaint within 14 days from the date the complaint request was received.</p> <p>The procedure has been socialized to estate and mill workers as well as Minutes of socialization No.0114/CSR-Reg2/VII/2024/VII/2024 on 23 July 2024 attended by 33 participant the surrounding community</p>	
R & O	<p>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.</p>		
	<p>a. Is the complaints or grievance resolution process documented?</p> <p>b. Does the grievance mechanism requires the company to keep parties informed of its progress against an agreed timeframe?</p> <p>c. Is the progress of the resolution process been informed to the parties to a grievance?</p> <p>d. Are outcomes or decisions communicated to the parties?</p>	<p>Based on verification document of internal and external complaint in 2024 revealed that there were no recorded complaints. This is similar with the results of interviews with <i>LKS Bipartite</i> representatives and the surrounding community that no complaints have been submitted to the company in 2024 until the audit activity takes place. It was further explained by the management that if there are complaints from both internal and external, the company through Community Development will inform and update the status of complaint handling to related parties</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	<p>4.2.4 The conflict resolution mechanism includes the option of access to independent legal and technical advice [./] [the ability for / the] complainants have the freedom to choose individuals or groups to support them and/or act as observers [./] [as well as the option of a third-party mediator / The parties can choose the option to engage a third-party mediator].</p> <p>Note : Auditor need to interview with the grievance parties to determine the process.</p>		
	<p>a. Does the conflict mechanism include the option of access to independent legal and technical advice, the 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?</p> <p>b. Has there been a case of the above occurred? If yes, what is the outcome?</p>	<p>The company has a communication procedure No. WNA-SUST-SOP-10. The procedure aims to provide assurance to whistleblowers who have a good will to report suspected abuse or divergent practices. Whistleblowers will be protected from retaliation or actions that may harm the whistleblower. Furthermore, regarding Confidentiality, it is explained that the company encourages the whistleblower to write a clear and complete identity when reporting irregularities that occur. All forms of reporting irregularities will be guaranteed confidentiality by the company. If the complaint cannot be resolved by consultation, it can follow up the next step or go through the process to the RSPO. In the procedure also explained that if the settlement of the complaint is not agreed by both parties, the complaint can be resolved by a technical or independent mediator or a third party who legitimate.</p> <p>The company already has officers who are responsible for handling complaints so that they continue to get further information related to the progress of complaint resolution, in this case the Assistant Public Relations/ CSR. The procedure also explained that the response time related to complaints was 2 weeks after the complaint was submitted.</p> <p>Based on interview with Tumbang Koling and Pundu Head of Village sighted that if any conflict resolution, they have access to independent legal and technical advice</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
4.3	<p>The unit of certification contributes to local sustainable development as agreed by local communities.</p>		
O	<p>4.3.1 Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>		
	<p>a. Have the local development needs been identified in consultation with local communities?</p> <p>b. Are there any contributions made to the local development? If yes, are they in accordance with what have been agreed during the consultation?</p>	<p>Unit of certification is committed to the development of community which has been proved by establishing CSR Programs annually. The program covers social aspects (social assistance), health (basic aid and medical equipment), education (teaching staff honorarium, scholarships), to infrastructure (road repairs). The program was prepared based on the results of discussions with community representatives, this was in line with the explanations of community head representatives in Cempaga Hulu District. For example, CSR Program of 2024 has been developed by participatory manner based on discussion with representatives of Cempaga Hulu District and Kotawaringin Timur Regency representatives on 12 April 2024. Based on the document review and also an explanation by management representatives, unit of certification has a partnership that is supporting the operational activities of the plantation.</p> <p>For the CSR program in year 2024 (January – September), the company arranged a CSR program</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<p>in the fields of Economy, Environment, Education, and social culture. The company has also shown the CSR realization record to the communities. For example:</p> <ul style="list-style-type: none"> • Education sector <i>Sekolah Desa Berdaya Bumitama, Sekolah Kejar Paket C, Village Library, Improved access to BPDPKS scholarships, Increased basic skills of teachers, and Internalisasi Budaya & Kearifan Lokal</i> • Economic sector : <i>Bimbingan Teknis (Klinik Berdaya Sawit) , Ekonomi Produktif (Inventaris Petani Binaan, cluster pertanian, cluster peternakan and cluster UMKM.</i> • Infrastructure sector : <i>Development of village infrastructure & facilities</i> <p>Based on interview results with representative of Tumbang Koling village, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs</p>									
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.										
R	4.4.1 (C) 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>a. Are there documents showing legal ownership or lease of the land available? (e.g. land titles, lease documents)</p> <p>b. Is there legitimate claim from the stakeholders?</p> <p>c. Has the claim been identified and assessed through the FPIC process?</p> <p>d. Are there documents showing history of land tenure available? (e.g. legal documents showing land status change, SIA and EIA reports, HCV assessment reports)</p> <p>e. Who was the previous land owner of the unit of certification?</p>	<p>The concession area of PT WNA and NKU is in the village of District of Cempaga Hulu, Kotawaringin Timur Regency, Province of Kalimantan Tengah . Since the company obtained location permits from the Regent of Kotawaringin Timur (24 May 1997 for PT WNA and 15 August 2005 for PT NKU), the land acquisition process has been carried out by the company by engaging/approaching with the landowner / elderly and village head in the permit area.</p> <p>In addition, Unit certification has the Land Use Right (HGU) under Decree of HGU consist of:</p> <ul style="list-style-type: none"> • The company has shown HGU Decree No. 17/HGU/KEM-ATR/BPN/2016 dated 7 April 2016 concerning the Granting of HGU in the Name of PT Nabatindo Karya Utama, on Land in Kotawaringin Timur Regency, Kalimantan Tengah Province for covering HGU Certificate No. 00090 & 00091. • The company has shown HGU Decree No. 37/HGU/BPN RI/2014 dated 5 February 2014 concerning Granting of HGU in the Name of PT Windu Nabatindo Abadi, Land in Timur Kotawaringin Regency, Kalimantan Tengah Province for covering HGU certificate No. 0065 • The company has shown HGU Decree No. 48/HGU/KEM-ATR/BPN/2015 dated 20 May 2015 concerning Granting of HGU in the Name of PT Windu Nabatindo Abadi, Land in Timur Kotawaringin Regency, Kalimantan Tengah Province for covering HGU certificate No. 0084, 0085, 0086 and 0087. <p>Furthermore, from the HGU Decree, the Company has shown the following HGU certificate:</p> <p>a. PT WNA with total area of 7,760.67 Ha.</p> <ul style="list-style-type: none"> - HGU Certificate No. 0065, covering an area of 19,878,000 M2 - HGU Certificate No. 0084, covering an area of 6,838,400 M2 - HGU Certificate No. 0085, covering an area of 3,345,800 M2 - HGU Certificate No. 0086, covering an area of 36,066,100 M2 - HGU Certificate No. 0087, covering an area of 11,478,400 M2. <p>b. PT NKU with total area of 3,298.63 Ha.</p> <ul style="list-style-type: none"> - HGU Certificate No. 00090, covering an area of 25,298,100 M2 - HGU Certificate No. 00091, covering an area of 7,688,200 M2 <p>Based on documents verifications and interviews with managements the total owned area is 11,059.3 Ha consist of PT NKU 7,760.67 Ha and PT WNA 3.298,63 Ha. However, according to first initial certification, the certificate area only covering area with no liability due to process RACP with total area 10,377.03 ha .with detail liability area of PT WNA is 103.68 Ha and PT NKU is 578.59 Ha.</p> <p>Otherwise, from total area of 10,377.03 Ha, there are also sanction area for not conducting NPP for area cleared after 2010 covering 259.98 Ha in Sungai Cempaga Estate and 39.37 Ha in Bangun Koling Estate.</p> <p>During audit also found the area outside the scope of certification due to areal still on process to get land use right (HGU) and area of smallholders (full manage area), with detail area:</p> <ul style="list-style-type: none"> - PT WNA 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>								
		<table border="1"> <thead> <tr> <th data-bbox="1498 1927 1608 1980">Unit</th> <th data-bbox="1608 1927 1982 1980">Certified Area</th> <th data-bbox="1982 1927 2472 1980">Non-Certified Area</th> <th data-bbox="2472 1927 2605 1980">Total</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Unit	Certified Area	Non-Certified Area	Total					
Unit	Certified Area	Non-Certified Area	Total								

CR	CHECKLIST	RESULTS OF VERIFICATION								COMPLIANCE STATUS		
			Others Area	HGU PT. WNA	Total	PT.GS M	Small-holder of Sehati Pundu	HGU Process	Total			
		SBHE	135.40	1,764.10	1,899.50	-	2,000.41	207.96	2,208.37	4,107.87		
		SCME	201.81	3,104.20	3,306.01		-	8.04	8.04	3,314.05		
		BKLE	547.61	2,007.55	2,555.16	48.32	-	-	48.32	2,603.48		
		Total	884.82	6,875.85	7,760.67	48.32	2,000.41	216.00	2,264.73	10,025.40		
		- PT NKU										
			Certified Area			Non-Certified Area			Total			
		Unit	Others Area	HGU PT. NKU	Total	New Cadastral Area	Smallholder of Koling Hapakat	Total				
		BHGE	63.59	1,110.92	1,174.51	1,893.50	-	1,893.50		3,068.01		
		SMME	441.41	1,682.71	2,124.12	111.82	906.70	1,018.52		3,142.64		
		Total	505.00	2,793.63	3,298.63	2,005.32	906.70	2,912.02		6,210.65		
		<p>Furthermore, unit certification was have Operational Permit in the form of Plantation Operational Permit (IUP), that are:</p> <ul style="list-style-type: none"> - Plantation Operational Permit of PT WNA with No. 525.26/677/XI/EKBANG/2005 on 28 November 2005 with total area ±11,900 Ha - Plantation Operational Permit of PT NKU with No. 525.26/678/XI/EKBANG/2005 on 28 November 2005 with total area ±11,000 Ha 										
O	<p>4.4.2 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 / within community], with [particular / specific] assurance that vulnerable, minorities' and gender groups are [consulted / asked for their opinions], and that information has been provided to all affected groups, including in it information [on / about] the steps [that are...the sentence has deleted on INA-NI] taken to involve them in decision making</p> <p>b) Evidence that the unit of certification has respected communities [' decisions...the word has deleted on INA-NI] 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>a. Are copies of negotiated agreements with affected parties available?</p> <p>b. Is there evidence that the agreement was established through a proper FPIC process?</p> <p>c. Does the agreement contain the following :</p> <ol style="list-style-type: none"> An action plan developed through consultation with all affected parties, is inclusive and evidence that members of affected parties are well informed and involved in the decision making process Evidence of options to give or withhold consent for development Evidence that members of the affected communities understand and accept the implication involved in permitting/rejecting oil palm development on their land (E.g.: legal Status, social, environmental, economic) Evidence that the negotiated agreement was entered voluntarily without coercion by all parties Evidence that adequate time was given for customary decision making and iterative negotiations Clause which states that the negotiated agreement is legally binding 	<p>As a guidance during land compensation the company has had an 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</p> <p>The company has acquired a plantation area from the acquisition of PT Surya Barokah, but some are areas still must be compensated by the Company after the acquisition from PT Surya Barokah. The Company has been able to show evidence of FPIC for compensation to the previous landowners with a total of 489 plots covering 6,273.76 Hectares for PT WNA and a total of 152 plots covering 2,904.97 Hectares for PT NKU. The land acquisition documentation is in the form of:</p> <ul style="list-style-type: none"> A Land Declaration Letter which explains the Location, land area, land boundaries signed by the previous landowner and witnesses from the village head and sub-district head. A Letter of Release of Managing Over Land and Plantations signed by the previous landowner, the Company's representative and witnesses from the village head and sub-district head. An Agreement Letter that informs the location area, area size, area boundaries, price per Hectare, and total payment signed by the landowner and witnesses from the village head and sub-district head. Payment Receipt and map of the compensated land area. <p>Here are examples of land compensation from PT WNA and PT NKU:</p> <ul style="list-style-type: none"> Persil No. NKU-037 owned by Landuk, residing in the village of Tumbang Koling, with an area of 39.73 Hectares located at I32-33 and J32-33 on the 24th of August, 2013. Persil No. SCE-004 owned by During, residing in the village of Sungai Buluh, with an area of 92.6 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>									

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		<p>Hectares located at Sungai Cempaga Estate I21-23 on the 12th of July, 2006.</p> <ul style="list-style-type: none"> Persil No. T-022 owned by Usgy G., residing in the village of Tumbang Koling, with an area of 15.8 Hectares located at PT WNA L13-14 on the 11th of April, 2006. <p>Based on interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the payment and the completion of the land compensation agreement documents signed.</p> <p>Based on document verification Social Impact Assessment report and HCV Identification report that knows in the company area there was no land under customary right. The evidence of compensation to landowner in each estates and the participation of head of village as witnessed was documented in each estate. Overall of compensation document was keep as historical of land acquisition by company. All of document was signed by company representation early landowner and included of government in village and sub district level.</p>	
R	<p>4.4.3 (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>Note to auditor : Actual ground verification showing the accuracy of the dispute map should be conducted</p>		
	<p>a. Is there a map of the extent of legal, customary or user rights? Is this map of appropriate scale?</p> <p>b. Was the map produced through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities)?</p> <p>c. Are the maps accepted by the relevant communities?</p>	<p>The company can show a map showing legal rights in the form of a HGU boundary map with a scale of 1: 50,000 contained in the HGU certificate issued by the Land Office.</p> <p>Furthermore, in every land compensation the area will be measure and has a map that witnessed by surrounding landowners. The recap maps of land compensation area was covered on the Map of Indemnity Planting and Area (GRTT) with scale 1: 42,582 for PT NKU and scale 1:46,273 for PT WNA informing total area of estate, number plot of compensated land and conservation area.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	<p>4.4.4 All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements</p> <p>a. Is there evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and languages, understood and accessible to affected parties?</p>	<p>Based on verification document, the land acquisition documentation is in the form of:</p> <ol style="list-style-type: none"> A Land Declaration Letter which explains the Location, land area, land boundaries signed by the previous landowner and witnesses from the village head and sub-district head. A Letter of Release of Managing Over Land and Plantations signed by the previous landowner, the Company's representative and witnesses from the village head and sub-district head. An Agreement Letter that informs the location area, area size, area boundaries, price per Hectare, and total payment signed by the landowner and witnesses from the village head and sub-district head. Payment Receipt and map of the compensated land area. <p>All of documents was using appropriate languages that is Bahasa.</p> <p>These the examples of land compensation from PT WNA and PT NKU:</p> <ol style="list-style-type: none"> Persil No. NKU-037 owned by Landuk, residing in the village of Tumbang Koling, with an area of 39.73 Hectares located at I32-33 and J32-33 on the 24th of August, 2013. Persil No. SCE-004 owned by During, residing in the village of Sungai Buluh, with an area of 92.6 Hectares located at Sungai Cempaga Estate I21-23 on the 12th of July, 2006. Persil No. T-022 owned by Usgy G., residing in the village of Tumbang Koling, with an area of 15.8 Hectares located at PT WNA L13-14 on the 11th of April, 2006. <p>Based on interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		payment and the completion of the land compensation agreement documents signed.	
○	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.		
	<p>a. Who is the representative of the community in the negotiation process?</p> <p>b. Is the representative appointed by the community?</p> <p>c. Is the record of appointment to represent the community available and shared with the affected parties?</p>	<p>As a guidance during land compensation the company has had an 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</p> <p>Based on interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the payment and the completion of the land compensation agreement documents signed.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
○	4.4.6 There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. Note to auditor : interviews with affected parties to be conducted to verify the occurrence of the process		
	<p>a. Is there evidence that the implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties?</p> <p>b. When was the reviewed conducted?</p>	<p>Based on interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the payment and the completion of the land compensation agreement documents signed.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
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.		
	<p>a. What are the documents showing identification of legal, customary and user rights?</p> <p>b. Does the SEIA include the identification and assessment of legal, customary and user rights of the area?</p>	<p>There is no land expansion activity during this audit. Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants' list and photographs.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A</p> <p>NCR No :</p>
○	4.5.2 (C) FPIC is obtained for all oil palm development through a comprehensive 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 / and community have] option of resourced access to independent third-party advice through a documented, long-term and two-way process of consultation and negotiation.		
	<p>a. Is comprehensive FPIC process carried out for all oil palm development including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions?</p> <p>b. What evidences are available to support (a)?</p>	<p>As informed on 4.5.1, There is no new land expansion activity during this audit.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A</p> <p>NCR No :</p>
○	4.5.3 Evidence is available that affected local peoples understand they have the right to say 'agree or not agree' 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 / are] non-coercive and entered into voluntarily and carried out prior to new operations.		

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	<p>a. Has it been communicated to the community that they have the right to say 'no' to the proposed development at all stages, up until the agreement with company is signed? What evidence was sighted?</p> <p>b. Is there evidence to demonstrate that the consent/agreement has been given prior to new operations?</p> <p>c. Is the negotiated agreements made without coercion and entered into voluntarily and carried out prior to new operations? If yes, what documents to support this?</p>	As informed on 4.5.1, There is no new land expansion activity during this audit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
○	4.5.4 To ensure local food and water security, as part of the FPIC process, [participatory SEIA / SEIA participation] 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>a. Has the company conducted a participatory SEIA and participatory land-use planning with local peoples prior to new planting?</p> <p>b. During the process, has the impact on food and water security for local people, full range of food and water provisioning options identified, discussed and agreed with the local people?</p> <p>c. Are there any measures proposed for implementation in b, and are these documented?</p> <p>d. Is there transparency of the land allocation process?</p>	As informed on 4.5.1, There is no new land expansion activity during this audit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
○	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.		
	<p>a. What are the records to show that the community and rights holders have freedom to access information and independent advisor(s) concerning the legal, economic, environmental and social implications of the proposed operations on their lands?</p>	As informed on 4.5.1, There is no new land expansion activity during this audit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
○	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.		
	<p>a. Did the communities (or their representatives) give consent to the initial planning phases of the operations prior to the new issuance of a concession or land title?</p> <p>b. What evidences were sighted for (a) above?</p>	As informed on 4.5.1, There is no new land expansion activity during this audit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
○	4.5.7 After 15 November 2018, New lands will not be acquired for plantations and mills [after 15 November 2018 as a result of recent ([2005 or later / after November 2005]) expropriations in the national interest (eminent domain) without [consent (eminent domain) / FPIC process], except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.		
	<p>a. Is there any new land acquired after 15/11/2018 for plantations and mills?</p> <p>b. Have the local communities consented and/or compensated prior to acquisition of the land?</p>	As informed on 4.5.1, There is no new land expansion activity during this audit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
○	4.5.8 (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. Note to auditor : There should be direct verification of above with the local communities		
	<p>a. Is there any community in voluntary isolation being identified?</p> <p>b. Is there any new land acquired in area with communities in voluntary isolation?</p>	As informed on 4.5.1, There is no new land expansion activity during this audit.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A

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			NCR No :
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. Note to auditor : There should be direct verification of above with the affected parties		
	<p>a. Is there documented system in place for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation?</p> <p>b. Is the documented system agreed by the affected parties?</p>	<p>As a guidance during land compensation the company has had a 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</p> <p>Based on document verification Social Impact Assessment report and HCV Identification report that knows in certifications area there was no land under customary right. The evidence of compensation to land owner in each estate and the participation of head of village as witnessed was documented in each estate. Overall, of compensation document was keep as historical of land acquisition by company. All of document was signed by company representation early land owner and included of government in village and sub district level.</p> <p>The Company has been able to show evidence of FPIC for compensation to the previous land-owners with a total of 489 plots covering 6,273.76 Hectares for PT WNA and a total of 152 plots covering 2,904.97 Hectares for PT NKU. The land acquisition documentation is in the form of:</p> <ul style="list-style-type: none"> • A Land Declaration Letter which explains the Location, land area, land boundaries signed by the previous landowner and witnesses from the village head and sub-district head. • A Letter of Release of Managing Over Land and Plantations signed by the previous landowner, the Company's representative and witnesses from the village head and sub-district head. • An Agreement Letter that informs the location area, area size, area boundaries, price per Hectare, and total payment signed by the landowner and witnesses from the village head and sub-district head. • Payment Receipt and map of the compensated land area. <p>Here are examples of land compensation from PT WNA and PT NKU:</p> <ul style="list-style-type: none"> • Persil No. NKU-037 owned by Landuk, residing in the village of Tumbang Koling, with an area of 39.73 Hectares located at I32-33 and J32-33 on the 24th of August, 2013. • Persil No. SCE-004 owned by During, residing in the village of Sungai Buluh, with an area of 92.6 Hectares located at Sungai Cempaga Estate I21-23 on the 12th of July, 2006. • Persil No. T-022 owned by Usgy G., residing in the village of Tumbang Koling, with an area of 15.8 Hectares located at PT WNA L13-14 on the 11th of April, 2006. <p>Based on interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the payment and the completion of the land compensation agreement documents signed.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
○	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.		
	<p>a. Does the company have a documented system in place to calculate and distribute fair and gender-equal compensation (monetary or otherwise)?</p> <p>b. Is the documented system agreed by the affected parties</p>	<p>As a guidance during land compensation the company has had a 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</p> <p>Based on sample land compensation documentation, there is no differences of compensation price</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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	c. Does the system include participative monitoring and evaluation with the affected parties and the corrective action was taken into consideration?	conducted by company. This can be shown on the compensation documentation that the price is same between men and women landowners. For example compensation for Persil No. T-022 owned by Usgy G. (women). Based on interviews with the Land Previous Owners, it was explained that The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process of compensation.	
○	4.6.3 Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings (if possible based on local law, customs and/or agreement).		
	a. What are the evidence that demonstrates equal opportunities were provided to both men and woman to hold land titles for smallholdings?	As mentioned on 4.6.2, the compensation process is equal between men and women.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
○	4.6.4 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.		
	a. Is the process and outcome of any compensation claims documented and made publicly available to the affected parties? b. What evidence was sighted for (a) above and was it done with the participation of affected parties?	As mentioned on 4.6.1, The land acquisition documentation is in the form of: <ul style="list-style-type: none"> • A Land Declaration Letter which explains the Location, land area, land boundaries signed by the previous landowner and witnesses from the village head and sub-district head. • A Letter of Release of Managing Over Land and Plantations signed by the previous landowner, the Company's representative and witnesses from the village head and sub-district head. • An Agreement Letter that informs the location area, area size, area boundaries, price per Hectare, and total payment signed by the landowner and witnesses from the village head and sub-district head. • Payment Receipt and map of the compensated land area. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
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.		
	a. Does the company have a documented system or procedure in place to identify people and/or community groups entitled to compensation? b. Is the procedure agreed by the affected parties?	As a guidance during land compensation the company has had a 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 interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the payment and the completion of the land compensation agreement documents signed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
○	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. Note to auditor : There should be direct verification of above with the affected parties		
	a. Does the company has documented system to calculate and distribute fair compensation? b. Is the documented system agreed by the affected parties and made available to them?	As a guidance during land compensation the company has had a 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 interviews with the Land Previous Owners, it was explained that the Company along with village representatives contacted the Land Previous Owners and explained that their area was included within the Company's HGU (Land Use Right) and offered to the landowners to be compensated. The	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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		compensation price was determined by the Company, but there was no coercion for the landowners to proceed with the compensation process or not. If the landowner agrees with the set price, the next process is joint measurement conducted by the landowner, the Company's representatives, local village representatives, and also the surrounding landowners. Once all processes are completed, the payment and the completion of the land compensation agreement documents signed.	
○	4.7.3 Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.		
	<p>a. Does the company provide communities that have lost access and rights to land for plantation expansion opportunities to benefit from plantation development?</p> <p>b. What are the evidences to a above?</p>	As part of the company's development, the 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. With the existence of this access road, it is easier to access from villages / hamlets that now can pass through the company's access road. this information has been verified through public consultation with village head and government agency as well as workers who still live around the company.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
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.		
○	<p>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.</p> <p>Note to auditor :</p> <ul style="list-style-type: none"> • Due diligence should be conducted on the management to provide evidence that there has been no historical or current land dispute • There should be direct verification of above with the affected parties 		
	<p>a. Are there, or have there been any land disputes?</p> <p>b. If there are or have been disputes, are there :</p> <p>i. Documents to proof legal acquisition?</p> <p>ii. Records of FPIC process including resolution of the dispute?</p> <p>c. If there has been acquisition involving compensation, are there :</p> <p>i. Records that fair compensation has been provided and accepted by parties involved?</p> <p>ii. Records that all affected parties are consulted and represented?</p> <p>iii. Documents of negotiations/discussion available?</p>	<p>As a guidance to settlement land dispute the company has had Land Conflict Handling procedure no. BGA-SOP-GL-901.5-RO. This procedure is a reference in resolving cases of land conflicts between management units and other parties. The claim settlement process is carried out by involving various parties, including: former land owner/land acquirer, village government, and other parties involved. land owners, witnesses, village government and sub-district governments.</p> <p>Based on the results of interviews with surrounding village and NGO, until the audit was carried out, there was no written complaint from the community regarding the land dispute.</p> <p>Although PT WNA and PT NKU has gained land rights legally but there are still many people using and cultivating in permit Area. The company has had the Area Statement map who described various land use in permit Area, included occupation area width. That's area managed by community are palm oil, rubber, or horticulture.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
○	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.		
	<p>a. Does the company have cases of land conflict? (i.e. preventing the company from operating normally)</p> <p>b. If the company has cases of conflict, are records of the following available?</p> <p>i. Status of land conflict</p> <p>ii. SOP/ mechanism for conflict resolution</p> <p>iii. Implementation of SOP/mechanism</p> <p>iv. Acceptance of the procedures by all parties</p> <p>v. Records of conflict resolution</p>	As mentioned on 4.8.1, there is no land dispute for past 1 year until audit conducted. Although PT WNA and PT NKU has gained land rights legally but there are still many people using and cultivating in permit Area. The company has had the Area Statement map who described various land use in permit Area, included occupation area width. That's area managed by community are palm oil, rubber, or horticulture.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
○	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).		
	a. Is there evidence that the land has been acquired through dispossession or forced abandonment of customary and user rights prior to the current operations?	Not applicable. As mentioned on 4.8.1, there is no land dispute for past 1 year until audit conducted. Although PT WNA and PT NKU has gained land rights legally but there are still many people using and cultivating in permit Area. The company has had the Area Statement map who described various land use in permit Area, included occupation area width. That's area managed by community are palm	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A

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	<p>b. Are there any parties who can establish legitimate rights on the land?</p> <p>c. If so, are the requirements in 4.4.2, 4.4.3 and 4.4.4 been met?</p>	oil, rubber, or horticulture.	NCR No :
O	<p>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 and indigenous people where applicable). Note to auditor : Actual ground verification showing the accuracy of the dispute map should be conducted</p>		
	<p>a. Is there an SOP for participatory mapping of disputed area?</p> <p>b. Is the disputed area mapped?</p> <p>c. Is there documented evidence of involvement and acceptance by the affected parties?</p>	Not applicable. As mentioned on 4.8.1, there is no land dispute for past 1 year until audit conducted. Although PT WNA and PT NKU has gained land rights legally but there are still many people using and cultivating in permit Area. The company has had the Area Statement map who described various land use in permit Area, included occupation area width. That's area managed by community are palm oil, rubber, or horticulture.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
Principle 5 : Support Smallholder Inclusion			
5.1	The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.		
R	5.1.1 Current and previous period prices paid for FFB are publicly available and accessible by smallholders		
	<p>a. Is there any information on current and previous price paid for FFB available during the audit?</p> <p>Note : Recommended good practice to maintain for 12 months of previous</p> <p>b. Has the mill made available the information (current and previous prices) to the smallholders? If yes, how was it done?</p> <p>c. Are the smallholders aware of such information is available?</p>	<p>Related to scheme smallholder FFB purchase, unit of certification has shown document of the Results of the Team Meeting for the Determination of Purchase Prices of Palm Oil FFB Production Sales of Planters in Kalimantan Tengah Province in July, August and September 2024. Unit of certification made a payment to the cooperation referring to the minutes. Based on the company's agreement with the cooperative, the determination of the price of FFB purchased refers to the provisions contained in the Regulation of the Minister of Agriculture regarding the Guidelines for Determining the Purchase Price of Fresh Fruit Bunches for Palm Oil Production by Smallholders (<i>KSU Sehati Pundu</i> (PT WNA) and <i>Koperasi Produksi Koling Hapakat</i> (PT NKU)).</p> <p>Based on observation to the mill and cooperative office and interview with member representative of <i>KSU Sehati Pundu</i> (PT WNA) and <i>Koperasi Produksi Koling Hapakat</i> (PT NKU), smallholders aware of the FFB information. The mil always sending information of FFB prices to smallholders and cooperatives officers directly by phone and WhatsApp, so that the officer can displayed the prices in the office to be seen by all members. Information in provided every time there is a price change.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	5.1.2 (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders		
	<p>a. What evidence is available to show that the mill has regularly explained the FFB pricing to smallholder?</p> <p>b. What was the mechanicm used to explain the FFB pricing to smallholders?</p> <p>c. How often is the mechanism being implemented?</p>	<p>The company has shown the FFB price document referring to the FFB price stipulation letter every 1 week from the Plantation Office of Kalimantan Tengah Province. The FFB price fixing is always known by <i>KSU Sehati Pundu</i> (PT WNA) and <i>Koperasi Produksi Koling Hapakat</i> (PT NKU), because every week when there is an update on the FFB pricing the company always provides information to the head of the cooperative to inform all of its members. This is in line with the results of consultations with cooperative management which stated that information related to FFB pricing is known every week via telephone.</p> <p>Based on the result of interview with representative of the management of <i>KSU Sehati Pundu</i>, FFB price information is given from the company to cooperative if any FFB price change via telephone or text message. The price of FFB has referred to the price determined by the local government of Kalimantan Tengah Province. In addition, the FFB price is also posted in front of POM office and will be updated whenever there is price change.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	5.1.3 (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented		
	<p>a. How is the price of FFB determined?</p> <p>b. Was the price equal to or above the prices established by the government or government endorsed initiatives?</p> <p>c. In the case of FFB price is not fix by the government, what is mechanism used to determe the price?</p>	<p>Based on the results of interviews with representatives of management representative of <i>KSU Sehati Pundu</i>, FFB price information is given from the company to cooperative if any FFB price change via telephone or text message. The price of FFB has referred to the price determined by the local government of Kalimantan Tengah Province. Unit of certification already has cooperation contract with <i>KSU Sehati Pundu</i> and <i>Koperasi Produksi Koling Hapakat</i> as FFB suppliers of as shown in the following documents:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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	<p>d. Has the price been agreed with the smallholders in the supply base? Please interview smallholders involved</p> <p>e. Is there any documented agreement between the company and the smallholders on the fair pricing?</p> <p>f. Was there any complaints on FFB pricing? If yes, how was the complaint handled and what was the solution?</p>	<ul style="list-style-type: none"> Agreement between the <i>Koperasi Serba Usaha</i> (KSU) Sehati Pundu and PT Windu Nabatindo Abadi No. 01/KSU- SP/III/2006 and No. 02/PKS-WNA/III/2006 concerning Development and Management of Oil Palm Cultivation through Partnership Business with KKPA Patterns covering an area of 2,000 ha which was agreed on March 22, 2006 and is valid for 20 years. Agreement between <i>Koperasi Produksi</i> Koling Hapakat and PT Nabatindo Karya Utama No. 02/PK-KH/IV/2018 and No. 02/PK-NKU/IV/2018 concerning the Development and Management of Oil Palm Plantation Partnership Pattern which was agreed on 3 April 2018 and is valid for 30 years. This cooperation applies to the development and management of oil palm cultivation with a partnership pattern of ±336 ha. <p>Based on the agreements, the agreed FFB price is at least in accordance with price established by local government which is determined monthly.</p>	
O	<p>5.1.4 (C) 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>Based on the results of interviews with representatives of management representative of KSU Sehati Pundu, FFB price information is given from the company to cooperative if any FFB price change via telephone or text message. The price of FFB has referred to the price determined by the local government of Kalimantan Tengah Province. Unit of certification already has cooperation contract with KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat as FFB suppliers it is known that the cooperative has understood the contract/MoU with the company and there is no coercion from the company. The cooperation with the company has been going well and the Cooperative has the authority to make decisions, and there is no gender exclusion in decision making between suppliers and companies.</p> <p>Unit of certification has shown proof of payment for the purchase of FFB from smallholders. For example, unit of certification which is shown proof of payment of in the following documents:</p> <ul style="list-style-type: none"> Minutes of Delivery of Remaining Money from KSU Sehati Pundu for the period from April – June 2024 on 31 July 2024 as agreed by both parties Minutes of Submission of Remaining Money from <i>Koperasi Produksi</i> Koling Hapakat for the period from April – June 2024 on 31 July 2024 as agreed by both parties. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	<p>5.1.5 Contracts are fair, legal and transparent and have an agreed timeframe</p>	<p>Unit of certification already has cooperation contract with KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat as FFB suppliers of as shown in the following documents:</p> <ul style="list-style-type: none"> Agreement between the <i>Koperasi Serba Usaha</i> (KSU) Sehati Pundu and PT Windu Nabatindo Abadi No. 01/KSU- SP/III/2006 and No. 02/PKS-WNA/III/2006 concerning Development and Management of Oil Palm Cultivation through Partnership Business with KKPA Patterns covering an area of 2,000 ha which was agreed on March 22, 2006 and is valid for 20 years. Agreement between <i>Koperasi Produksi</i> Koling Hapakat and PT Nabatindo Karya Utama No. 02/PK-KH/IV/2018 and No. 02/PK-NKU/IV/2018 concerning the Development and Management of Oil Palm Plantation Partnership Pattern which was agreed on 3 April 2018 and is valid for 30 years. This cooperation applies to the development and management of oil palm cultivation with a partnership pattern of ±336 ha. <p>Based on result of document review, cooperation agreement has been fair, legal and transparent and has an agreed term. The result of interview with the certification unit and representatives of KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat indicate that the parties understand the contract agreement that has been made</p> <p>Document verification during audit found that the agreement has complied with the provisions as evidenced by the agreement between both parties, has a time period, is transparent, and has been known</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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R	5.1.6 (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given		
	<p>a. How are payments made to the smallholders or their appointed representative?</p> <p>b. What is the mode of recording/documenting transactions between millers with smallholders and/or their appointed representative?</p> <p>c. Are the receipts dated, specified the price, weight, deductions and amount to be paid?</p> <p>d. Have agreed payments been made in a timely manner as agreed in the contract?</p>	<p>Unit of certification has shown proof of payment for the purchase of FFB from smallholders. For example, unit of certification which is shown proof of payment of in the following documents:</p> <ul style="list-style-type: none"> Minutes of Delivery of Remaining Money from KSU Sehati Pundu for the period from April – June 2024 on 31 July 2024 as agreed by both parties Minutes of Submission of Remaining Money from <i>Koperasi Produksi</i> Koling Hapakat for the period from April – June 2024 on 31 July 2024 as agreed by both parties. <p>Based on the result of the document review and interviews with representatives of KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat, the details of quarterly payments have been completed with date, price determination, weight, discount, and amount to be paid. In addition, payments are made on time as agreed in the contract</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
R	5.1.7 Weighing equipment is verified by an independent third party on a regular basis [(this can be government)		
	<p>a. Is there evidence that the weighing equipment been calibrated or verified by third party? If yes, when was it last conducted and who performed the calibration/verification?</p> <p>b. How regular is the calibration/verification been conducted?</p>	<p>Unit of certification has shown evidence that the weighing equipment is calibrated or verified by a third party which is carried out annually. The last calibration/verification was carried out on 8 February 2024 and carried out by Trade and Industry Agency of Kotawaringin Timur Regency with the following information:</p> <ul style="list-style-type: none"> Certificate of Testing Result No. 510.63/135/DPP/SKHP/MET/II/2023 for a weigh bridge with serial number 133450118 and capacity of 40,000 Kg Class III. The scales will be recalibrated on 8 February 2024. Certificate of Testing Result No. 510.63/136/DPP/SKHP/MET/II/2023 for a weigh bridge with serial number 133450533 and capacity of 40,000 Kg Class III. The scales will be recalibrated on 8 February 2024. 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	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 / owns] and sells the certified materials		
	<p>a. Is the units of certification supports the ISH with certification, where applicable? If yes, what is their rol</p> <p>b. Is there an agreement between the unit of certification and the ISH group to go for certification? If yes, when was it signed?</p> <p>c. Has the agreement defined the roles of the unit of certification e.g. who runs the ICS, holds the certificates, and who holds and sell the certified material?</p>	<p>Results of interview with the certification unit and representatives of KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat, management of cooperative is carried out entirely by unit of certification</p> <p>The certification unit has a partnership program with the KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat. The auditor team has also conducted interviews with representatives of the KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat and it is known that the company supports smallholders to take part in RSPO certification and the company has also conducted HCV studies and socialized the RSPO to KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
R	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		
	<p>a. Is there a mechanism to deal with complaints and grievances from smallholders and all affected parties?</p> <p>b. Is the existence of the system been made known and communicated to all parties? If yes, how was it done?</p> <p>c. Are there any grievances reported and are they dealt in a timely manner?</p>	<p>Unit of certification Unit of certification has had SOP related to complaint mechanism in SOP of Communication authorized by the Regional Head on 08 September 2017. In the SOP it explains objectives, responsibilities, procedures, documentation and exceptions. The period of complaint settlement is 15 days for each part. Based on document review of complaint book, there is no complaint from KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
5.2	The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains		
O	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 support to improve their livelihoods and their interest in RSPO certification		
	<p>a. Is there a list of all smallholders including women and other partners in their supply base?</p> <p>b. Has the unit of certification consults with the above stakeholders to assess their needs for support to improve</p>	<p>Unit of certification supports the improvement of interested smallholders' level of livelihood and participation in sustainable palm oil explained by cooperation agreement for the development of smallholder plantations in the form plasma plantation. Unit of certification already has cooperation</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A

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	<p>their livelihoods and their interest in RSPO certification? If yes, when and where was the consultation carried out?</p> <p>c. Is there minutes of meeting available and minuted the need to support?</p> <p>d. Has there been any action taken to follow up on the issues highlighted in the consultation?</p>	<p>contract with KSU Sehati Pundu and <i>Koperasi Produksi</i> Koling Hapakat as FFB suppliers of as shown in the following documents:</p> <ul style="list-style-type: none"> • Agreement between the <i>Koperasi Serba Usaha</i> (KSU) Sehati Pundu and PT Windu Nabatindo Abadi No. 01/KSU- SP/III/2006 and No. 02/PKS-WNA/III/2006 concerning Development and Management of Oil Palm Cultivation through Partnership Business with KKPA Patterns covering an area of 2,000 ha which was agreed on March 22, 2006 and is valid for 20 years. • Agreement between <i>Koperasi Produksi</i> Koling Hapakat and PT Nabatindo Karya Utama No. 02/PK-KH/IV/2018 and No. 02/PK-NKU/IV/2018 concerning the Development and Management of Oil Palm Plantation Partnership Pattern which was agreed on 3 April 2018 and is valid for 30 years. This cooperation applies to the development and management of oil palm cultivation with a partnership pattern of ±336 ha. 	<p>NCR No :</p>
○	<p>5.2.2 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 has recently developed a separate standard for independent smallholders and the Cameroon NI Working Group has decided to make it applicable to all independent smallholders in Cameroon</p>		
	<p>a. Is there any programmes developed by the unit of certification to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder)?</p> <p>b. What are the content of the programmes?</p> <p>c. Has the programmes been implemente (example via RSPO SH Trainer Acedamy)? When was the last programme held?</p> <p>d. Are there efforts been made to improve the farming practices of smallholders?</p> <p>e. Where there are smallholders, have efforts and/or resources been allocated to improve smallholder productivity?</p>	<p>Unit of certification has shown programs to improve the level of livelihoods, including at least an increase in the ability to increase productivity, quality, and organization management. Besides, company has attached evidence that the certification unit provides livelihood improvement programmers to scheme smallholders in the following documents:</p> <ul style="list-style-type: none"> • Minutes of Socialization or training on 23 July 2024 , which was attended by 33 participant of : <ul style="list-style-type: none"> - Introduction to oil palm plant physiology, - Effect of fertilization on increasing production, - Oil Palm Harvest Management, - Financial and administrative management of oil palm cultivation - FFB price, - RSPO Certification for ISH or Scheme - Pesticide handling - Conservation Area /HCV <p>Socialization / training which was attended by 33 participant as : KSU Sehati Pundu , <i>Koperasi Produksi</i> Koling Hapakat , Poktan Mendeg Hapakat, Poktan Ekahapakat, Poktan Langgeng Abadi, etc.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
○	<p>5.2.3 Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production</p>		
	<p>a. Where applicable, is there any programmes to support smallholders to promote legality of FFB production?</p> <p>b. What are the supports provided?</p>	<p>Unit of certification has attached evidence that the certification unit provides support to smallholders such as by conducting socialization of support for independent smallholder to participate in certification of RSPO which was participated by 23 July 2024 . Besides, company has shown evidence of cooperation with KSU Sehati Pundu dan <i>Koperasi Produksi</i> Koling Hapakat in the context of developing and managing oil palm plantation project with a main estate-plasma partnership pattern.</p> <p>The Company has any programmes to support smallholders to promote legality of FFB production, as explained in 2.3.1 above Information regarding geo locations, proof of ownership and valid operating licenses (legal requirements) has been presented during audit.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
○	<p>5.2.4 (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling</p>		
	<p>a. Is there scheme smallholders in the unit of certification?</p> <p>b. Is there evidence that the unit of certificaiton trains the Scheme Smallholders on pesticides handling?</p> <p>c. When was the training provided and how many participated?</p>	<p>Unit of certification has attached evidence that the certification unit provides training on handling pesticides to Scheme Smallholders. For example, socialization/training to KSU Sehati Pundu showed in the following documents:</p> <ul style="list-style-type: none"> • Minutes of Socialization or training on 23 July 2024 , which was attended by 33 participant of : <ul style="list-style-type: none"> - Introduction to oil palm plant physiology, - Effect of fertilization on increasing production, - Oil Palm Harvest Management, - Financial and administrative management of oil palm cultivation 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<ul style="list-style-type: none"> - FFB price, - RSPO Certification for ISH or Scheme - Pesticide handling - Conservation Area /HCV <p>Socialization / training which was attended by 33 participant as : KSU Sehati Pundu , <i>Koperasi Produksi</i> Koling Hapakat , Poktan Mendeg Hapakat, Poktan Ekahapakat, Poktan Langgeng Abadi, etc.</p>	
O	5.2.5 The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme		
	<ul style="list-style-type: none"> a. Has the unit of certification reviews the progress of the smallholder support programmes? b. When was the last review done? c. Was the progress of the support programmes reported and made publicly available? How regular was it done? 	Based on results of interviews with KSU Sehati Pundu, it is known that the development and maintenance of smallholdings has been done well. Based on production data, it is known that there is FFBS from plasma sent to mill in period of this assessment. Company regularly reviews and publicly report on the progress of the smallholder programmed which is included in plantation business activity report (LPUP) each semester.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
Principle 6 : Respect Workers Rights and Conditions			
6.1	Any form of discrimination is prohibited		
R	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		
	<ul style="list-style-type: none"> a. Is there a company policy on non-discrimination and equal opportunities? Does it at least cover the items mentioned in the criteria (6.1.1)? b. Is the policy publicly available to the relevant stakeholders? c. Is there evidence that the policy has been implemented? d. <i>Are there reduce of casual worker/long term temporary/daily worker by gradual and the change of status be permanent employee ?</i> e. <i>Do casual worker/long term temporary/daily worker have equal opportunities to become permanent worker ?</i> 	<p>The company has an Employment Policy established on 21 June 2024 which one of the points states that PT WNA and PT NKU are committed to providing equal employment opportunities by not distinguishing race, religion, degree, ethnicity, gender, skin colour, body disability, sexual orientation, affiliation politics, organizational membership, and age. Based on the employee registration document, company has provided equal opportunities and treatment in employment opportunities.</p> <p>Based on interview with estate and mill workers for job vacancies that have been published by the company, there are no requirements that refer to discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief, so indirectly the company has implemented a non-discrimination policy and also equal opportunity. This is evidenced by the diversity of ethnic accepted to work.</p> <p>Based on interviews with estate and mill workers, representatives of the gender committee and <i>LKS Bipartite</i> also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	6.1.2 (C) 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 Note: When recruiting, the rights and needs of persons with disabilities and vulnerable persons must be taken into account		
	<ul style="list-style-type: none"> a. What evidence is available to support that workers and groups including local communities, women, and migrant workers have not been discriminated against? Evidence may include job advertisement, job description, appraisal, and/or information obtained via interviews with relevant stackholders b. For migrant workers, is there evidence that the workers are not paying recruitment fees during the recruitment process? Please check the contract between employer and agency, and contract between worker and agency c. For migrant workers, is there evidence that they are not paying anything that a local worker is not required to pay, unless mandated by the law? d. Are there complaints against the company on issues relating to discrimination? If yes, what actios have been taken? 	<p>The company has a policy to respect human rights which was ratified in 21 June 2024 by RH Pundu, including that the company will fulfill its responsibility to respect human rights by implementing relevant articles from the UN guiding principles on human rights and business such as providing equal employment opportunities without discriminating against race. , religion, degree, ethnicity, gender, skin color, disability, sexual orientation, political affiliation, protecting female workers from sexual harassment, acts of violence, and rights related to women's reproduction, not employing children under 18 years old, none forced labor or labor from human trafficking. The company is committed to recruiting ethically and providing a healthy and safe work environment for all employees, contractors and visitors</p> <p>At PT NKU & PT WNA no person may experience discrimination in employment, including recruitment, compensation, promotion, training, disciplinary action, termination of employment or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, gender identity, nationality, political opinion, social group, ethnic origin, reproductive rights or other forms of discrimination.</p> <p>Based on interviews with labor representatives, gender committees and employees at SCMM, BKLE, BHGE, SBHE and SMME, the same information was obtained that so far everyone has had the same treatment in getting job opportunities, for example shown by the openness of information when job vacancies are published publicly. transparent. From the updated employee list for the September 2024 period, it is also known that the current employee demographics are diverse, not limited to religion, ethnicity</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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		<p>and certain groups.</p> <p>Examples of job vacancy announcements that have been submitted openly have been shown, for example job vacancies for some positions for period 2024 on social media. In these vacancies there are no work requirements that indicate discrimination against certain groups. Thus it can be concluded that the company has implemented a policy regarding equal opportunities and treatment to obtain employment opportunities</p>	
R & O	6.1.3 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>a. Are the company's employees recruited and promoted based on skills, capabilities, qualities, and medical fitness necessary for the job?</p> <p>b. What are the evidences to show this compliance?</p>	<p>Based on verification of employee personal files and interviews with the company's HR staff, it shows that the recruitment process for all employees is carried out through the same process where prospective workers must meet the requirements in the form of: application letter, photocopy of personal and family identity, medical check-up results and obtaining an acceptance letter.</p> <p>There are examples of the application of an equal opportunity employment policy for all workers to ensure that workers are protected from discrimination at all stages of the employment relationship. For example recruitment documents for BS (Sungai Cempaga Mill) as warehouse clerk with application letter date 8 May 2024, for Y (Bangun Koling Estate) as harvester with application letter date 31 July 2024, for AW (Sungai Bahaur Estate) as harvester with application date 30 August 2024</p> <p>The appointment of employees is based on the results of an evaluation that is carried out periodically every month, with aspects assessed including discipline, quantity of work, cooperation, work attitude, and responsibility. In addition, the results of verification of the Employee List show that workers come from various ethnicities, religions, education and ages.</p> <p>Based on the description above, it shows that selection, recruitment, employment, access to training, and promotions are carried out on the basis of employee skills and abilities</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	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>a. Is the unit of certification conducting pregnancy test? Was it required under the law?</p> <p>b. Is pregnancy testing conducted as a discriminatory measure?</p> <p>c. Does the company provide alternative equivalent employment for pregnant woman?</p>	<p>Pregnancy tests for workers are carried out only to ensure that pregnant workers are not allowed to work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a job that is safer but remains the same in terms of wages and other benefits, so there is no discriminatory action. This was clarified by the results of interviews with female spray workers at SBHE, BKLE, BHGE, SMME as well as representatives of the gender committee which stated that female workers are required to take a monthly pregnancy test at the clinic to ensure that no female worker in a pregnant/breastfeeding condition is work exposed to chemicals.</p> <p>In addition, based on the results of a review of employee recruitment documents, it was found that there was no obligation for prospective female workers to take a pregnancy test when recruiting workers, but only to carry out physical health tests, administration and interviews.</p> <p>Based on the description above, it shows that there is no pregnancy test which is a discriminatory measure.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	6.1.5 (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women		
	<p>a. Has the company formed a Gender Committee to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women?</p> <p>b. Is there a list of the members sitting in the committee?</p> <p>c. When was the last gender committee meeting held?</p> <p>d. Who attended and what issues were discussed?</p> <p>e. Is there any records of discussion?</p>	<p>The company has gender committees in each units that has been formed and chaired by the chair of the committee and coordinators in several sections and there are representatives in each unit. The gender committee structure only consists of female workers, but for builder and supervisors it consists of male representatives, namely unit managers and assistant managers. For Sungai Cempaga Estate and Mill chairwoman is EY, chairwoman for Banama Haring Estate is Sn, chairwoman for Sungai Bahaur Estate is SS, chairwoman for Sungai Mirah Minting Estate is Sm, and chairwoman for Bangun Koling Estate is MM.</p> <p>The main purpose of establishing a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (women and men), as company partners in carrying out socialization activities related to gender and other policies related to workers' reproductive rights.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	f. Were issues highlighted in the meeting resolved?	<p>Further explained that the gender committee provides support for female and male employees, including protection and maintenance of women's health, maintenance of family life and welfare, protection from sexual harassment and violence, providing continuing education that gender equality exists in the company.</p> <p>Company also showed the policy against sexual harassment, violence, and reproductive rights. It stated that company committed to support the reporting of all incidents of sexual harassment, violence, abuse, and violations of reproductive rights experienced by any individual (regardless of gender and age).</p> <p>Some of the gender committee activities include an internal meeting held on :</p> <ul style="list-style-type: none"> - 20 August 2024 with activity of Integrated health service for BKLE and SCMM female workers and kids - 16 July 2024 with activity of Integrated health service for BHGE female workers and kids - 6 January 2024, internal meeting to discuss work program 2024 at SCMM <p>Based on interviews with the management of the gender committee revealed that the management and members of the gender committee have understood issues related to reproductive rights and gender-based violence that often occur in plantation areas where management and members are constantly monitoring and discussing in each unit where until now there has been no violation on reproductive rights and gender based violence.</p>	
R & O	6.1.6 There is evidence of equal pay for the same work scope		
	<p>a. Is there a wage structure for each level work?</p> <p>b. Is there a pay condition for each job scope?</p> <p>c. Is there any evidence that employees for the same work scope of all genders are being paid equally?</p>	<p>The company shows policies related to wages, namely:</p> <ol style="list-style-type: none"> 1. Company Regulations 2023-2025 based on the decision of the Director General of Industrial Relations Development and Social Security for Workers with Decree Number: KEP. 4/HI.00.00/00.0000.230618012/B/VII/2023, on 24 July 2024 for PT Nabatindo Karya Utama and No. 4/HI.00.00/00.0000.230618004/B/VIII/2023, on 8 August 2024 for PT Windu Nabatindo Abadi concerning ratification of PT BGA company regulations, Article 3 explains that Wages are Workers' Rights which are received and expressed in the form of money as compensation from the entrepreneur or employer to Workers which is determined and paid according to a work agreement, employment agreement or statutory regulations, including fixed allowances for workers for work and/or services that have been or will be performed 2. Internal Memo No. 490/MEMO-BGA/HC-POP/XII/2023 on 11 December 2023 from HC Group Dept. Head, explained that the <i>PTH (Pekerja Tetap Harian)</i> Wage is IDR. 3,341,890. The <i>PTB (Pekerja Tetap Bulanan)</i> wage structure consists of employees in groups P1 to U8 and the wage scale starts from Rp. 3,416,890. 3. Decree of Governor of Central Kalimantan No. 188.44/552/2023 about District Minimum Wage in 2024, for Kotawaringin Timur District is Rp 3.341,890 per month. <p>Based on the interview with workers during field visit in mill and estates and also document review to 28 employee pay slips for period July-September 2024 and confirmed that the salary given by company is already in accordance with government's and company's regulations.</p> <p>Based on Government Regulations Republic of Indonesia No. 36 of 2021 concerning Wages in article 24 explains that the Minimum Wage applies to Workers with a working period of less than 1 year and Workers with a working period of 1 year or more, guided by the wage scale structure.</p> <p>The company has an approved plan of new salary scale for Permanent Daily Workers with range start District Minimum Wage+ Rp 250 for 0-1 year work period and up to UMK+Rp 1750 for above 7 years work-period, as seen on Memo of Human Capital Group Dept. Head No. 015/MEMO-BGA/HC/06/2024 dated 6 June 2024. Opportunity for improvement for company to give socialization regarding the salary range to all workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
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)		
R	6.2.1 (C) [Applicable labour laws, union and/or other collective agreements and documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand		

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	<p>a. Are there Labour laws , union and/or other collective agreements detailing payments and other conditions, made available in the languages understood by the workers or explained to them by a management official?</p> <p>b. What types of employment arrangements are there in the company? (E.g. contractual, outsourced, apprenticeships, direct hires, piecemeal basis, etc.)</p> <p>c. Is there documentation of pay and conditions for each employee?</p> <p>d. Do the workers understood the pay documentation and the conditions?</p> <p>e. <i>is there labor contract signed for family members which bring by harvesters to help with loose fruits collection ?</i></p> <p>f. <i>are there the record of vendor/contractor evaluation and their support document regarding the compliance of Manpower regulation ?</i></p> <p>g. <i>are there punishment or correction action to vendor/contractor company by certificate holder because vendor/contractor company not compliance to manpower regulation ?</i></p> <p>h. <i>If any casual worker or daily worker, are they working 20 days or more than 20 days during 3 months ? does changing status from casual worker to permanent worker for casual worker has worked more than 20 days during 3 months ?</i></p> <p>i. <i>Especially in Indonesia, did the collective labor agreement/company regulation registered in local government ? and is it in Indonesian language ?</i></p> <p>j. <i>Especially in Indonesia, did the collective labor agreement/company regulation explained by the management or labor union to worker ?</i></p> <p>k. <i>Especially in Indonesia, are the employees understand regarding the right and obligation inside the collective labor agreement/company regulation ?</i></p>	<p>The company has documentation of wages, which is indicated in Governor of Central Kalimantan No. 188.44/552/2023 about District Minimum Wage in 2024, for Kotawaringin Timur District is Rp 3.341,890 per month.</p> <p>Payment of fair wages has been made by the unit of certification by considering ability, performance, expertise, years of service, and other factors as the basis for remuneration. So that the payment of wages given is in accordance with the burden, duties and type of work of each. This is stated in the attached document to Human Capital Group Dept. Head No. 490/MEMO-BGA/HC-POP/XII/2023 concerning PT NKU and PT WNA Permanent Employee Wages Structure and Scale for 2024.</p> <p>The company has identified a living wage by calculating updated wages, facilities and benefits received by employees. The company has set a minimum wage starts IDR 3,341,890. Employees are given other wages in accordance with their position and title, including work premiums, work attendance incentives, length of service incentives, <i>BPJS</i> facilities, housing, transportation, education, daycare, sports facilities, electricity and clean water.</p> <p>Companies can also show documentation of wages in accordance with their work results. Based on the interview with workers during field visit in mill and estates and also document review to 28 employee pay slips for period July-September 2024 and confirmed that the salary given by company is already in accordance with government's and company's regulations.</p> <p>In the work agreement document, the terms and conditions of work are stated, including workers must use PPE according to the risks of their work, workers must comply with labor regulations, comply with company business ethics, prohibit child employment, forced labor and workers from human trafficking. Based on the results of interviews with workers, it is known that employees understand the minimum salary as already regulated in company's regulation.</p> <p>Based on the description above, it shows that the company has documented records of wages and working conditions in accordance with applicable labor regulations</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
<p>R & O</p>	<p>6.2.2 (C) 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. Remuneration must be based on the position held and length of service must be taken into account for the evolution of the level of the salary step</p>		
	<p>a. Is the pay and conditions of employment clearly detailed in the employment or service contracts? (E.g. working hours, deductions, overtime, sick leaves, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.)</p> <p>b. Is the contract prepared in languages understood by the workers, explained to workers by management officials, and signed by both the authorised signatory of the company and employee?</p> <p>c. Does the pay and conditions provided in labour laws, union agreements or direct contracts of employment comply with :</p> <ul style="list-style-type: none"> • The decent living wage as provided in the National Interpretation for the country; or • The local legal requirements in meeting the minimum wage; or • The industry minimum standard for a similar position or work responsibilities <p>d. Does the payroll documents give accurate information on compensation for all work performed, including work done by family members?</p> <p>e. Is the pay received by the employee consistent with the terms of the contract and the law</p> <p>f. Through interviews with workers, are there any issues raised by the workers regarding the payment and conditions which does not meet the terms of contract of employment?</p>	<p>The company has copies of employment relationship documents with its employees in accordance with applicable employment regulations. Verification to 28 work agreements from all units (mill and estates) were checked during the audit.</p> <p>The work agreements contains information including the name of the person acting as management representative and company address, worker information in the form of name and other personal information, worker position, employee work location, reporting, work duties and responsibilities, work agreement period, probation period, salary and other benefits. The work agreements have been signed by representatives of management and workers.</p> <p>The company also shows supporting documents indicating that the company has provided a copy of the work agreement in the amount of 1 (one) copy to the worker. This is shown in the form of a receipt document for submitting a copy of the work agreement. Based on the results of interviews with SMME up-keep workers, the company has provided a copy of the Agreement Letter at the beginning of hiring workers. Apart from that, workers also understand the contents of the work agreement, confirmed by interview during field verification. Workers also understand about company's regulation period 2023-2025 which were based on the decision of the Director General of Industrial Relations Development and Social Security for Workers with Decree Number: KEP. 4/HI.00.00/00.0000.230618012/B/VII/2023, on 24 July 2024 for PT Nabatindo Karya Utama and No. 4/HI.00.00/00.0000.230618004/B/VIII/2023, on 8 August 2024 for PT Windu Nabatindo Abadi concerning ratification of PT BGA company regulations, Article 3 explains that Wages are Workers' Rights which are received and expressed in the form of money as compensation from the entrepreneur or employer to Workers which is determined and paid according to a work agreement, employment agreement or statutory regulations, including fixed allowances for workers for work and/or services that have been or will be performed</p> <p>Based on the description above, it shows that companies can show work agreements along with related documents that regulate detailed wages and work conditions and salary detail documents that provide in-</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	g. Does remuneration based on the position held and length of service of the level to salary?	formation regarding compensation for work performed.	
R	6.2.3 (C) 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>a. Are the regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal and period of notice in accordance with the legal and other labour requirements?</p> <p>b. What evidences available in the company to support the legal compliance on the above issues?</p>	<p>The company has proof of legal compliance with regular working hours, overtime, sick leave, vacation entitlements, maternity leave, notice periods before termination of employment, and other employment provisions.</p> <p>Sample of leaves taken by workers and showed as referred in company's regulation:</p> <ul style="list-style-type: none"> - Annual leave records for worker AWS (18060060/ SMME) from 03 Oct 2024 until 10 October 2024, for worker BS (18020364/ SCMM) from 10-12 August 2024, for worker HNA (SCME) from 28-29 June 2024, for worker S (10004595/ SBHE) on 23 July 2024, for worker MES (361720133/ BKLE) from 12-22 August 2024, and for worker FP (302020124/BHGE) from 29 July 2024 until 5 August 2024. All samples showed the annual leaves were based on approval from direct supervisor few days prior to the leaves. - Sick leave records for worker S (301620012/SMME) on 2 September 2024 based on approval by direct supervisor, and for worker PS (non staff of SCMM) on 1-4 July 2024 based on recommendation of medical service. - Maternity leave records for worker S (302320042/ BHGE) for 3 months since 17 Sept 2024 until 15 Dec 2024, and worker VW (362320134/ SCMM) for 3 months since 21 August 2024 until 18 Nov 2024. based on recommendation of medical service unit. <p>Meanwhile, regarding overtime implementation, based on the results of interviews with workers of the Sungai Cempaga POM at Process Section, shift II is generally carried out until the processing process is completed with overtime of more than 4 hours per day or 18 hours per week. Checking the overtime recapitulation documents for several sample workers of the process section, WTP and kernel plant and the results of interviews with the workers of the Sungai Cempaga POM process section found that the realization of overtime was more than 4 hours a day and 18 hours per week. This is not in accordance with the provisions of overtime in PP 35/2021 Article 26. So that this condition is raised as a nonconformance under NCR NO. RSPO06082.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO06 082</p>
O	6.2.4 (C) The unit of certification provides adequate housing, sanitation facilities, drinking water supplies, electricity, 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>a. Has the unit of certification provided the basic necessities such as that listed below to national standards or above, where no such public facilities are available or accessible?</p> <ul style="list-style-type: none"> • adequate housing; • sanitation facilities; • adequate electricity; • access to medical services; • access to children education • welfare amenities <p>b. Through interviews with workers, are there any complaints on the above?</p> <p>c. What is sanitation facilities in mill and plantation (including employee housing) still can be used and good condition/hygiene ?</p> <p>d. Has the company acquired new non-certified units? If yes, is there a plan developed to maintain or upgrade the infrastructure within 5 years?</p>	<p>The company has provided welfare facilities for its residents in the form of housing, clinics, water supply, electricity, education, transportation, places of worship (mosques & churches), sports facilities and others. The results of field visits to the housing areas of Sungai Cempaga POM, Sungai Bahaur Estate, Bangun Koling Estate, Sungai Mirah Minting Estate and Banama Haring Estate, it is known that workers are provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there is a daycare for children and a nursing room. The house is occupied by 1 family and specifically for unmarried workers, 1 house will be filled by 2-3 workers.</p> <p>The company also has a source of water from reservoirs and wells which are never short of supply. The company also has clinics and medical staff who are competent and certified. In addition, there is good access to attend kindergarten, elementary school, junior high school and senior high school for children of company employees with free bus transport to schools. In general, the facilities provided by the company are suitable for use by workers and their families.</p> <p>Based on the description above, it shows that the Unit of Certification provides decent housing, sanitation facilities, water supply, medical needs, education and public facilities.</p> <p>Sungai Bahaur Estate: 7 mosques, 2 churches, 5 creche, 6 sport spaces, 1 clinic, 1 meeting point, and 348 house units.</p> <p>Sungai Mirah Minting Estate: 3 mosques, 3 creches, 1 football yard, 1 clinic, and 24 house units.</p> <p>Bangun Koling Estate: 3 mosques, 3 creches, 3 sport spaces, 1 clinic, 1 meeting point, and 33 house units.</p> <p>Sungai Cempaga Mill: 73 houses and 1 mosque.</p> <p>Banama Haring Estate: 344 houses, 1 church, 6 mosques, 4 schools, 1 school bus, 1 badminton yard.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food		

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	<p>a. What are the efforts made by the unit of certification to monitor and improve workers' access to adequate, sufficient and affordable food?</p>	<p>The unit of certification has made it easier for workers and their families to obtain food sources by providing an employee cooperative that sells workers' daily needs and providing access to vegetable traders to sell in workers' housing areas. Apart from that, there are also workers who open small business stalls to sell daily needs in every housing complex.</p> <p>Based on interviews with workers (harvesters, sprayers, maintenance operators and mill operators), residents of housing, trade unions and gender committees, it is known that workers do not experience difficulties in obtaining food sources because the company's location is near markets and sources of daily needs, and there are vegetable sellers who given access to sell around the housing.</p> <p>Based on the description above, it shows that the Unit of Certification seeks to improve workers' access to proper, sufficient, and affordable food.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
<p>R & O</p>	<p>6.2.6 A DLW is paid to all workers in accordance with applicable regulations, [including those on piece rate/quotas / including workers who work on a piece rate/quota basis], [for whom the calculation is based on achievable quotas during regular work hours / the calculation of which is based on a quota that can be achieved during regular working 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>a. Is there an RSPO endorsed living wage country benchmark available?</p> <p>b. For countries with available benchmark</p> <p>Does the prevailing wage meet the GLWC Living wage standard?</p> <p>If the prevailing wage does not meet the GLWC standard, Is there an implementation plan with specific targets and phase implementation plan including :</p> <ul style="list-style-type: none"> - Updated assessment on prevailing wages and in-kind benefits - There is annual progress on the implementation of living wages - Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment - The unit of certification may to choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>c. For countries without available Benchmark</p> <p>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage</p> <p>Once the benchmark is available, this procedural note is no longer applicable. UoC shall have implementation plan with specific targets, and phased implementation process including :</p> <ul style="list-style-type: none"> - Updated assessment on prevailing wages and in-kind benefits - There is annual progress on the implementation of living wages - Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment - The UoC may to choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation 	<p>In Indonesia there were no living wage standard is established, so UoC still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage 2019.</p> <p>UoC has the determination of assessment prevailing wage and all kinds of benefit for Living Wage simulation in 2024 has been included in the calculation of minimum wage, food costs, housing facility costs, transportation, educational cost, daycare facility, sport facility, health cost, electricity, and water costs. The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage IDR. 3,474,797 for single status and IDR. 3,625,484 per month for employee with married status.</p> <p>Based on interview with works and document verification, the calculation data of prevailing wages is rational in accordance with the local price</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
<p>O</p>	<p>6.2.7 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 or seasonal</p>		

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	<p>a. Has the company identified what are the core work activities in the unit of certification?</p> <p>b. Are all the core work activities performed by permanent, full-time employed workers?</p> <p>c. Are there casual, temporary and day labour been employed? If yes, what is the scope of employment?</p>	<p>Based on document verification of the employee list for the September 2024 period, it is known that all employees have permanent employee status. Based on interviews with HC staff, it is known that since 2020 there have been no employees with contract status.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
6.3	<p>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</p>		
R	<p>6.3.1 (C) A published statement recognising freedom of association and right to collective bargaining in the official language used in the area in which the unit of certification is located is available and is explained to all workers in languages that they understand, and is demonstrably implemented</p>		
	<p>a. Has the company published a statement in local language or language understood to all workers recognising their rights to freedom of association and collective bargaining?</p> <p>b. What evidence to show that the above statement has been explained to all workers in languages that they understand? What are the evidences to support this?</p> <p>c. Are the employees including migrant, transmigrant and contract workers given an avenue to negotiate with the employer on the terms of their contract?</p>	<p>The company has a published statement recognizing freedom of association and the right to collective bargaining in the national language, which among other things is contained in the Human Right Policy which was ratified by the RH Pundu on January 2023.</p> <p>The company is committed to respecting and ensuring the fulfillment of the rights of all workers, in accordance with applicable laws and regulations with reference to international initiatives and standards. The company does not prohibit, hinder, or limit workers from forming or not forming trade unions in terms of realizing freedom of association and assembly for every worker. The company also does not interfere in the process of selecting union officials. Trade unions have a function as a party in drafting collective labor agreements and settling industrial relations disputes.</p> <p>Evidence of the implementation of this policy includes that the company already has a workers' union and has been registered by the District Manpower and Transmigration Office. Complete with proof of registration, including:</p> <ul style="list-style-type: none"> Decree No. 560.565/606/Disnakertrans/X/2022 Concerning the Appointment of the Management of the <i>LKS Bipartit</i> PT NKU by the Head of Labor Agency Kotawaringin Timur District on October 11th, 2013 valid until 3 years later (2025) Decree No. 560.565/605/Disnakertrans/X/2022 Concerning the Appointment of the Management of the <i>LKS Bipartit</i> PT WNA by the Head of Labor Agency Kotawaringin Timur District on October 11th, 2013 valid until 3 years later (2025) <p>Based on interviews with workers in mill and estates, it is known that workers understand the freedom to become members of a worker union.</p> <p>Based on the description above, it shows that the company has made a published statement, which recognizes freedom of association and the right to collective bargaining in the national language. The statement is explained to all workers in a language they understand and can be proven to be implemented</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	<p>6.3.2 Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in the official language used in the area in which the unit certification is located and made available upon request</p>		
	<p>a. Are there documented minutes of meetings between the company and main trade unions or workers representatives?</p> <p>b. When was the last meeting held?</p> <p>c. Are the minutes made readily available to employees upon request?</p>	<p>Bipartite meeting records between company and workers' representatives as follow:</p> <ul style="list-style-type: none"> Dated 22 May 2024 at PT WNA attended by 10 representatives discussed about completing personnel details of workers, and labor insurance account Dated 21 May 2024 at PT NKU attended by 16 representatives discussed about prevention of online gambling, and completing workers details. <p>Meanwhile, there is no evidence that PT WNA and PT NKU have reported the Bipartite meetings record of 2024 to the local manpower agency in accordance with Permenaker 32/2008 Article 17 (2). This condition is raised as a nonconformance under NCR No. RSPO06083.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO0 6083</p>
O	<p>6.3.3 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>a. How do you confirm that the 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>The company does not interfere in the selection or organization of Labor Union activities. This is evidenced by the results of interviews with representatives of workers and union officials who stated that in the process of selecting/making decisions and planning activities, members provide input/aspirations to their respective representatives. to make selections/decisions. The process of forming a Labor Union is described in indicator 6.3.1</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		Based on the description above, it shows that management does not interfere with the formation or activities of registered organizations/workers' unions	
6.4	Children are not employed or exploited		
R	6.4.1 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>a. Has the unit of certification established a formal policy for the protection of children including prohibition of child labour and remediation?</p> <p>b. Are the requirements (i.e. prohibition of child labour and remediation) included into service contracts and supplier agreements?</p> <p>c. Has the unit of certification communicated the policy to their supplier and contractors?</p>	<p>The company has a human rights policy ratified on 21 June 2024, including not employing children under 18 years old, no forced labor or workers from human trafficking. The company and its suppliers/sub-contractors must ensure that all workers are paid a minimum wage equal to the applicable minimum wage. The company is committed to ethical hiring and providing a healthy and safe work environment for all employees, contractors and visitors. The company strongly supports government programs and therefore strictly does not allow anyone to employ child labor outside the provisions of the applicable law. To ensure that no child labor is used, the Company determines the age of applicants or prospective employees of at least 18 (eighteen) years as evidenced by an <i>E-KTP</i> (Electronic Identity Card) or a Birth Certificate / Birth Identification Certificate and Family Card.</p> <p>In addition, based on the results of field observations at the mill and workers it was found that there were no internal workers as child workers. This is also in accordance with the information provided by the Head of the Labor Union, as well as representatives from the Manpower Agency in Sampit that there is no issue of child labor in the company.</p> <p>Based on the description above, it shows that companies can show formal policies regarding child protection, including the prohibition of child labor, and this policy is included in service contract documents and agreement documents with suppliers.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
R	6.4.2 (C) [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 / Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available]		
	<p>a. Is the minimum working age for workers clearly defined in the company's recruitment policy? If Yes, is the minimum age not less than stated under national regulations?</p> <p>b. Are workers employed above the minimum school leaving age of the country or who are at least 15 years of age?</p> <p>c. Does ground verification and review of personnel files show evidence of employment of workers below the minimum working age?</p>	<p>The company shows the employee list for the period September 2024 and there are no children under 18 years old. The policy regarding the prohibition of child labor is contained in the Sustainability Policy which was approved by the RH Pundu, it is stated that the Unit of Certification is committed to Child Protection, prohibiting child labor and forced labour.</p> <p>Based on interviews with HC staff, it was explained that in the process of recruiting employees, identity checks (<i>e-KTP</i> or Birth Certificate) will be carried out to ensure that the age requirements of workers are met and not violated. This is also in accordance with the results of field verification that found no child laborers working in the company.</p> <p>Based on the description above, it shows that companies can show evidence of fulfilling the minimum age requirements of workers in accordance with applicable regulations. Youngest worker as listed in database of worker period September 2024 is YT, Worker ID 362420263/ SBHE, born 7 July 2006 and joined to work 29 August 2024.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	6.4.3 (C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work		
	<p>a. Has the company employes workers above 15 and below 18 years old?</p> <p>b. Where are young workers assigned to work?</p> <p>c. Is the work classified as hazardous or non-hazardous?</p>	<p>According to indicator 6.4.1 regarding the policy that applies to the minimum age of workers and the employee recruitment process as well as the results of field observations, it is known that there are no young workers and at the time the Audit was carried out there were no students carrying out field work practices for the needs of fulfilling the school curriculum.</p> <p>Based on the description above, it shows that the company does not use young workers in its operational activities</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	6.4.4 The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live		
	<p>a. What evidence is available to demonstrate that the unit of certification has communicated to its supervisors and other key staff, smallholders, FFB suppliers and communities where workers live about its 'no child labour' policy and the negative effects of child labour, and promotes child protection?</p>	<p>The company has conducted outreach regarding the prohibition of child labor verbally and symbolically. For example, on 29 July 2024 attended by 28 participants/workers at Banama Haring Estate, on 29 July 2024 attended by 14 participants/workers at Sungai Mirah Minting Estate, on 23 July 2024 attended by 33 participant vendor/Kontraktor, supplier FFB and the surrounding community. In addition to verbal socialization, the company also conducts visual socialization, including by posting warnings prohibiting the employment of children under 18 years old and the prohibition of bringing chil-</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A

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	b. When was the communication last held and to whom?	<p>dren to the work area. These warnings were posted at the Division offices, Esatate Offices and all employee housing at SCMM, SCME, SBHE, BKLE, BHNE, and SMME.</p> <p>Based on the description above, it shows that the unit of certification can prove the delivery of a 'prohibition of child labour' policy.</p>	NCR No :
6.5	There is no harassment or abuse in the workplace, and reproductive rights are protected		
R	6.5.1 (C) A policy to prevent sexual and all other forms of harassment and violence is documented , implemented and communicated to all levels of the workforce		
	<p>a. Does the company has a policy to prohibit any form of sexual and all other forms of harassment and violence?</p> <p>b. Has this policy been implemented and communicated clearly to all levels of the workforce?</p> <p>c. Is there any case of sexual and all other forms of harassment and violence being reported? If yes, what actions have been taken?</p>	<p>The company has a policy on preventing sexual harassment and violence and other forms of which are listed in the Sustainability Policy on 21 June 2024 which states that this policy is a tool to increase the awareness of all employees and educational facilities in preventing sexual harassment in the workplace. The company does not tolerate any form of harassment and abuse of authority including physical, sexual, psychological or verbal violence. Everyone must be treated with respect and dignity. Any disputes with local communities must be handled in accordance with the principle of equality and free from intimidation, violence and harassment. In addition, the UoC also had an SOP concerning procedures for handling sexual harassment No. SOP HC No. BGA-SOP-HC-311.1-R0. It stated about the mechanism for reporting any forms of violence or harassment from the common case to the severe case.</p> <p>This policy has been disseminated to all employees, for example on 29 July 2024 attended by 28 participants/workers at Banama Haring Estate, on 29 July 2024 attended by 14 participants/workers at Sungai Mirah Minting Estate, on 23 July 2024 attended by 33 participant vendor/Kontraktor , supplier FFB and the surrounding community.</p> <p>Based on interviews with the gender committee, it is known that so far there has never been an incident of sexual harassment against workers. This is also in accordance with the results of interviews with spray workers and fertilizer workers in the field.</p> <p>Based on the description above, it shows that the unit of certification has carried out socialization regarding company policies regarding the prevention of sexual harassment and violence and other forms and communicated them to all employees</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	6.5.2 (C) A policy to protect the reproductive rights of all, especially of women, is documented , implemented and communicated to all levels of the workforce		
	<p>a. Is there a policy to protect the reproductive rights of all, especially of women?</p> <p>b. Has this policy been implemented and communicated clearly to all levels of the workforce?</p> <p>c. Based on interview with workers (permanent & temporary worker) that are they worries about safety of her position after pregnancy as legally ?</p> <p>d. Are there internal policies or guidelines for such cases above ?</p>	<p>The company has a policy regarding reproductive rights listed in the Sustainability Policy on 21 June 2024. The document explains that no person may experience discrimination in employment, including reproductive rights and other forms of discrimination. The company has established a Gender Committee. In addition to gender and reproductive aspects, the gender committee also covers social, religious, health and child protection. The company has conducted outreach regarding this policy in each unit. The company has also conducted socialization regarding reproductive rights and reproductive health including the socialization which was carried out on on 29 July 2024 attended by 28 participants/workers at Banama Haring Estate, on 29 July 2024 attended by 14 participants/workers at Sungai Mirah Minting Estate, on 23 July 2024 attended by 33 participants from vendor/contractor, supplier FFB and the surrounding community.</p> <p>Based on the description above, it shows that the company already has a company policy regarding the protection of reproductive rights, especially for women</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Cemeroon.		
	<p>a. Has the management assessed the needs of new mothers? How was the needs assessed?</p> <p>b. When was the needs assessed and has the needs been documented for follow-up?</p> <p>c. Are actions been taken to address the needs that have been identified?</p> <p>d. Has the company provided adequate space and paid breaks to enable new mothers with infants 24 months or younger to breastfeed or express and store breastmilk with privacy?</p>	<p>The company has conducted an assessment of the needs of new mothers by asking for their opinion as seen on filled questionnaires "Kuesioner Kebutuhan Ibu Baru" dated 30 August 2024 for 1 female worker in Sungai Bahaur Estate, dated 15 August 2024 for 1 female worker in Sungai Cempaga Mill, dated 21 August 2024 for 1 female worker in Sungai Cempaga Estate, dated 21 August 2024 for 1 female worker in Banama Haring Estate, and dated 27 August 2024 for 1 female worker in Sungai Mirah Minting Estate, as well as taking action to meet the needs that have been identified in accordance with applicable regulations in Indonesia. The company has facilitated the knowledge of pregnant women workers through pregnant women class training</p> <p>In addition, the Company has fulfilled the needs of new mothers, such as:</p> <ul style="list-style-type: none"> • Treatment after childbirth 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<ul style="list-style-type: none"> • Counseling and baby care treatment • Nursing rooms in offices, daycare and clinics • Allowing time for breastfeeding • Children under 1 years old can be treated at Daycare • Education children 2 years old. <p>Based on interviews with the female workers of spraying and manuring at Banama Haring Estate, Bangun Koling Estate, Sungai Mirah Minting Estate and Sungai Bahaur Estate, it is known that employees can be given permission if they are going to breastfeed their babies. However, based on field observations of spray and fertilization workers, none of the workers were still breastfeeding their children.</p> <p>Based on the description above, it shows that the company has assessed the needs of new mothers by asking for their opinion, as well</p>	
O	6.5.4 Grievance mechanism, which respects anonymity and protects complainants where requested, [is established / as long as complaint is supported with adequate information,] documented, implemented and communicated to all levels of the workforce		
	<p>a. Does the company have a mechanism to handle employment grievances, that respects anonymity and protects complainants where requested?</p> <p>b. Does the mechanism provide a way for workers to report a grievance against a supervisor to someone other than that supervisor?</p> <p>c. Is the mechanism documented, implemented and communicated clearly to all levels of the workforce?</p> <p>d. Has the company identified personnel who will be responsible to receive and manage complaints received from the workforce?</p>	<p>The company showed the procedure to accommodate complaints and grievances from employees specifically in sexual harassment and violence. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistle-blower). Information regarding mechanism of whistle blowing system also noticed on signboard in front of main offices of mill and estates.</p> <p>Besides that, the company has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of gender committee, or their foreman. Based on interview with the board of gender committee, the company provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, company give special breast-feeding time for female worker, but prohibit the worker from working with chemical material.</p> <p>Records of socialization regarding the complaint mechanism:</p> <ul style="list-style-type: none"> - Dated 25 July 2024 attended by workers of Banama Haring Estate (20 participants) - Dated 21 July 2024 attended by workers of Sungai Merah Minting Estate (24 participants) - Dated 30 July 2024 attended by workers of Bangun Koling Estate (29 participants) - Dated 23 July 2024 attended by 33 participants from vendor/contractor, supplier FFB and the surrounding community 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
6.6	No forms of forced or trafficked labour are used		
R & O	6.6.1 (C) All work is voluntary and following are prohibited : <ul style="list-style-type: none"> • Retention of identity documents or passports or international vaccinations cards • Payment of recruitment fees by the job seeker • Contract substitution without worker's consent • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement. • Debt bondage • Withholding of wage • The suppression of the right to annual leave 		
	<p>a. Are all migrant workers legally recruited?</p> <p>b. Are migrant workers asked to sign a contract upon arriving in the receiving country? If yes, is that contract identical to the one signed in the country of origin?</p> <p>c. Have workers entered into employment voluntarily and freely, without the threat of a penalty, and have freedom to terminate employment without penalty given reasonable notice as per agreement?</p> <p>d. Are workers given a copy of their employment contracts? If yes, is the contract identical to the one signed at the</p>	<p>Unit of certification had a policy concerning the ethical codes in all operational activities and transactions. This policy is stated in the Sustainability Policy updated on 21 June 2024 validated by RH Pundu. This policy generally explained that the group committed to provide workers and communities welfare by respecting and recognizing the rights in the workplace including respecting employee rights, no forced labor, no child labor, providing safe and healthy workplace, etc. UoC also committed to respecting the rights of indigenous and local communities and facilitating the inclusion of smallholders into the supply chain.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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	<p>time of recruitment?</p> <p>e. Is there evidence of contract substitution occurring?</p> <p>f. Who keeps the workers passports or identity documents?</p> <p>g. If the document is kept by the company for safekeeping purpose, where is it kept and was it voluntarily done? Does the company returned to the workers upon request?</p> <p>h. What are the penalties imposed if the workers were terminated or fired before their contract expires?</p> <p>i. Confirm with workers on the following whether the following occurs :</p> <ul style="list-style-type: none"> - any involuntary overtime? - debt bondage? - withholding of wages? - lack of freedom to resign? - payment of recruitment fees? - suppression of the right to annual leave? <p>j. What is the process if a worker wants to terminate their employment before their contract expires? Is the process in accordance with the employment contract?</p>	<p>UoC also showed the SOP of workers management (No. SSOP 2 BGA-SOP-HC-304.1-R09) concerning on recruitment system validated on March 23rd, 2011 which stated that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents</p> <p>In addition, based on interviews with workers, it is known that company employees are employees with permanent status. Workers come voluntarily to apply for jobs that are available free of charge and without storage of identity documents, and the majority come from local communities around the company. Overtime is monitored by the company, and workers are given the freedom to choose to work overtime by signing an overtime order if there is work that requires overtime. In addition, there are no penalty for termination of employment if they want to terminate to work.</p> <p>Based on the information above, it shows that the company can prove that employees accept work voluntarily and freely</p>	
R & O	<p>6.6.2 (C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of [implemented / implementation] is available</p>		
	<p>a. What is the company's policy and procedures for temporary or migrant workers?</p> <p>b. Does the special labour policy include :</p> <ul style="list-style-type: none"> - Statement of the non-discriminatory practices? - No contract substitution? - Post-arrival orientation programme with emphasis on language, safety, labour laws, cultural practices, etc? - The provision of decent living conditions? <p>c. Have the policies and procedures been implemented?</p>	<p>There are no migrant workers who work in the company's operational area. All workers come from within one country (although from various regions). In addition, each worker has been provided with a clear work contract. The rights and obligations of workers are also clearly stated in company regulations, and in work agreements. Based on the employee list, it is known that all employees are permanent employees.</p> <p>Based on the description above, it shows that there is an employment policy for temporary workers along with evidence of its implementation. In addition, there are no migrant workers employed.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
6.7	<p>The unit of certification ensures that the working environment under its control is safe and without undue risk to health</p>		
R & O	<p>6.7.1 (C) 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>a. Who has been appointed as the responsible person(s) for H&S in the unit of certification?</p> <p>b. is there worker (no staff and no mandor/supervisor) as safety committee member ? (note : the result of compliance audit in PT Perkebunan Milano)</p> <p>c. Are meetings between the responsible persons and workers conducted on a regular basis, or as required by law, if any? When was the last meeting carried out?</p> <p>d. Are minutes of meeting recording attendees and issues discussed available?</p> <p>e. Are concerns of all parties about health, safety and welfare discussed at these meetings?</p> <p>f. Are there recommendations after safety committee meeting ? if any, is it considering accident record ?</p> <p>g. Does the safety committee implementing/following up recommendations of the result of safety committee meeting ?</p> <p>h. Does the safety committee effectively implement measures to reduce accident ?</p> <p>i. Are actions taken on the issues raised?</p>	<p>The company has an OHS organization in the form of an OHS Committee (Occupational Safety and Health Development Committee) in each unit as follows:</p> <ul style="list-style-type: none"> - WNA: The company has an OHS organization in the form of OHS Committee OHS Committee in each unit which has been approved by the local labor service, namely: Decree of the Head of the Central Kalimantan Province Manpower and Transmigration Service with number Kep.180 /DISNAKERTRANS/X/2023 concerning Ratification of the Occupational Safety and Health Advisory Committee of PT Windu Nabatindo Abadi. Ratified on 10 October 2023. The OHS Committee organizational structure consists of: Chief Executive of OHS Committee, Secretary, Head of Division and Members. <i>SKP AK3</i> General in the name of Andika Akbar Pratama as Secretary, with No. 5/7170/AS.01.03/VI/2023 is valid until 5 June 2026. - NKU: Then the Company indicated the Decree of the Head of the Manpower and Transmigration Service of Central Kalimantan Province No. KEP. 179/Disnakertrans/X/2023 concerning Ratification of the PT Nabatindo Karya Utama Occupational Safety and Health (<i>P2K3</i>) Advisory Committee on 7 October 2022. Based on this document it is known that PT NKU has an OHS Committee structure which is valid for 3 years with secretary a.n Rikki Andri Yanto Simanjuntak. The company also showed a general <i>AK3</i> certificate, a general OHS expert authority card, and the Republic of Indonesia Minister of Manpower's Decree No. 5/16418/AS.01.03/XI/2022 concerning the Appointment of General OHS Experts on 1 November 2022 and is valid for 3 years. <p>The company shows the schedule for regular monthly OHS Committee meetings such as:</p> <ul style="list-style-type: none"> - Meeting plan on June 2024 with realization on 29 June 2024 attended by 11 OHS Committee administrators. The meeting discussed OHS Plan, reduce the accident, OHS socialization (in- 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<p>cluding HIRAC) and etc. (OHS Meeting at PT WNA)</p> <ul style="list-style-type: none"> - Meeting Plan on 30 April 2024 with realization on 4 May 2024 attended by 10 OHS Committee administrators. The meeting discussed OHS Plan, reduce the accident, OHS socialization (including HIRAC), PPE Inspection and monitoring and etc. (OHS Meeting at PT NKU) <p>The company shows the Minutes of Delivery of OHS Committee Report Documents for Quarters I & II on 2024. The implementation such as:</p> <ul style="list-style-type: none"> - OHS Committee Report PT NKU to the Central Kalimantan Province Manpower and Transmigration Agency (Second Quarter) on 3 July 2024. - OHS Committee Report PT NKU to the Central Kalimantan Province Manpower and Transmigration Agency (First Quarter) on 4 April 2024. - OHS Committee Report PT WNA to the Central Kalimantan Province Manpower and Transmigration Agency (Second Quarter) on 3 July 2024. - OHS Committee Report PT WNA to the Central Kalimantan Province Manpower and Transmigration Agency (First Quarter) on 4 April 2024. 	
R & O	6.7.2 Accident and emergency procedures 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 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>Procedure for Handling Work Accidents and Emergencies contained in SOP WNA-NKU-SUST-SOP-23, dated 27 October 2017, concerning instructions for handling and preventing emergencies as well as recovery efforts.</p> <p>First Aid Officer</p> <p>Organization has shown the First Aid Training to the workers such as:</p> <ul style="list-style-type: none"> - Certificate No. 5/0080190624/AS.01.04/VI/2024 on 19 June 2024 (PT WNA with initial name AS) - Certificate No. 5/0075190624/AS.01.04/VI/2024 on 19 June 2024 (PT NKU with initial name JKG) <p>Organization has also conducted first aid training for the worker such as:</p> <ul style="list-style-type: none"> - First Aid training on 24 September 2024 (at SCMM), attended by 11 workers - First Aid training on 9 October 2024 (at BKLE), attended by 15 workers - First Aid training on 31 July 2024 (at BKLE), attended by 30 workers <p>Based on site visit, it is known that the first aid equipment available at worksites such as at the office division, warehouse, temporary hazardous waste, etc. The first aid kits adequately stocked and regularly checked by PIC of First Aid (every month). The records of all accidents kept and periodically reviewed, as seen on Document of "Perhitungan Accident Frequency Rate and Lost Time Accident year of 2023 and 2024.</p> <p>Organization has paramedics who have taken part in Hiperkes training with the initials AH (No. 25.827/DBK3-PM/II/XI/2018) established in November 2018 and initial DW (No. 46.072/X/DBK3-PM/07/IV/2023 on 28 July 2023).</p> <p>Based on field observations at Pundu POM and offices, it is also known that there is an evacuation route that leads to the gathering point in case of an emergency. Fire extinguishers and hydrants are available in ready-to-use condition. The test results for the hydrant at Pundu POM also functioned well.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers [at the place of work / in the workplace,] 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>Organization has a SOP regarding PPE with code No. BGA-SOP-CCS-1106. These procedures regulate, among other things, identification of PPE, procurement of PPE, distribution of PPE in accordance with work risks (IBPR), frequency of replacement of PPE, replacement of damaged PPE, as well as disciplinary sanctions for those who do not wear PPE/violate procedures.</p> <p>Based on the results of field observations and interviews with workers at the Mill and Estate, it is known that workers have used PPE in accordance with the requirements in the IBPR document and it was conveyed that all PPE is provided by the company and will be replaced if the PPE is no longer suitable or no longer provides adequate protection.</p> <p>The results of field observations at the rinse house also found that sanitation facilities were provided by the company for workers who used pesticides so that workers could remove PPE, clean themselves and wear personal clothing in functional condition and in adequate quantities.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
	<p>a. Are there SOPs for handling of accidents and emergency?</p> <p>b. Are the accident procedures available in appropriate language of the workforce?</p> <p>c. Are the SOPs cover all major potential emergencies, such as, but not limited to fire, chemical spillage, and potential natural disasters specific for the region, e.g. earthquakes, volcanoes, etc.?</p> <p>d. Are accidents investigated and action taken to prevent recurrence?</p> <p>e. Are accident reported to the local authority in accordance with local legal requirements</p> <p>f. Are the instructions on emergency procedures clearly understood by all workers?</p> <p>g. Are there evacuation map, sign of evacuation routes and assembly point ?</p> <p>h. What is evacuation map and sign of evacuation routes still easy readable at worksites ?</p> <p>i. Is the condition of assembly point still safe or maintained ?</p> <p>j. Are assigned operators trained in First Aid present in both field and other operations?</p> <p>k. Is there records of training of the first aiders? When was the last training conducted?</p> <p>l. Is first aid equipment available at worksites? Is the equipment available during conduct of field manual work?</p> <p>m. Is the content of the first aid kits carried by foreman/supervisor at worksites adequate if referring to the local regulation ?</p> <p>n. Are first aid kits adequately stocked and regularly checked in accordance with legal requirements?</p> <p>o. Are records of all accidents kept and periodically reviewed? When was the last review carried out?</p>		

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	<p>h. Are workers observed to be wearing appropriate PPE at the worksite?</p> <p>i. Does the organization monitoring on effectiveness and suitability of the use of PPE ? especially for respiratory mask which used in spraying & fertilizing activity; rubber shoes, gloves and safety glasses which used in harvesting activity; and safety shoes in POM</p> <p>j. does the management/employer done the management of PPE (refer to article 7 – Minister of Man Power and Transmigration Regulation no. PER.08/MEN/VII/2010) ?</p> <p>k. Are Safety Data Sheet (SDS) for pesticides used readily available for easy reference?</p> <p>l. Are there sanitation facilities available for workers handling pesticides to change out of PPE, wash and put on their personal clothing?</p> <p>m. How is the wastewater from the sanitation facilities handled to avoid land or water pollution?</p>		
O	<p>6.7.4 (C) 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 / applicable regulations] or by the unit of certification [where national law does / if applicable regulation do] not offer protection</p>		
	<p>a. Is there evidence that all workers are provided with medical care and covered by accident insurance by the company? For contract workers (temporary worker or casual worker) and contractor worker/labor, the contract/agreement between the company and contract worker (temporary worker or casual worker) or the company and the contractor company shall be in compliance with regulation.</p> <p>b. For accidents that have occurred, is there evidence that the affected workers received appropriate medical treatment, and was able to claim and receive compensation under the insurance policy (if relevant)</p> <p>c. Is there evidence that the insurance policies are valid?</p> <p>d. Was there evidence that cost incurred from workrelated 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 enrolled all employees in BPJS Health and Labor insurance for both permanent and non-permanent employees. The following is proof of the latest payment for BPJS Labor and BPJS Health. The implementation of payment for BPJS employment and Health was paid on August 2024 such as:</p> <ul style="list-style-type: none"> - BPJS Employment (August 2024) with reference number 202409121446792067 for PT WNA - BPJS Employment (August 2024) with reference number 202409121447792720 for PT NKU - BPJS Health (August 2024) with reference number 202408071521702461 for PT WNA - BPJS Employment (August 2024) with reference number 202408071521703124 for PT NKU <p>In addition, the company also has a polyclinic that can be accessed by employees for free if they are sick or have an accident.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	<p>6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA) metrics</p>		
	<p>a. Is there a system in place to record the LTA?</p> <p>b. Are the records been monitored and regularly reviewed?</p> <p>c. Who records the LTA? Was he/she been trained?</p> <p>d. When was the last reviewed on LTA been carried out?</p>	<p>Organization has a system to record LTA as seen in the Document Calculation of Accident Frequency Rate (FR) and Saferity Rate (SR) year 2023 and 2024. The document records FR and SR monthly by the per-son who has been trained.</p> <p>Sungai Cempaga Mill on 2023 (FR= 9.2, SR= 13.8) Sungai Mirah Minting Estate on 2023 (FR= 33.2, SR= 5.8) Bangun Koling Estate on 2023 (FR= 57.7, SR= 18.2) Sungai Bahaur Estate on 2023 (FR= 26.2, SR= 50.7) Sungai Cempaga Estate on 2023 (FR= 52.7, SR= 4.0)</p> <p>The records have been monitored regularly and review every month by the OHS Expert. The last review on LTA was conduct in September 2024.</p> <p>Organization has a record related of accident and investigation, such as:</p> <ul style="list-style-type: none"> - On 4 September 2024, Harvesting Worker at SBHE (initial KK) was slashing work and pierced by bamboo branch, with 0 working days lost, root cause identification and corrective actions were taken. - On 2 September 2024, Harvesting Worker at SCME (initial J) was right stomach hit by palm fruit, with 0 working days lost, root cause identification and corrective actions were taken. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
<p>Principle 7 : Protect, Conserve and Enhance Ecosystems and the Environment</p>			
7.1	<p>IPM plans are implemented and monitored to ensure effective pestcontrol</p>		
R & O	<p>7.1.1 (C) IPM plans are implemented and monitored to ensure effective pest control</p>		
	<p>a. Is there a documented IPM plan?</p> <p>b. Does the IPM plan include among others the following? - identification of potential pests and thresholds</p>	<p>The unit of certification has program of integrated pest management (IPM) in all estate for periode 2024 has refers to procedure of Control and Observation Plant Pest Ogrnaisms with document no. BGAAGRKS-PTKS-PHT and BGAAGRKS-PTKS-PG for weed control. They mention to consist of:</p> <ul style="list-style-type: none"> - Control is carried out based on detection and census results that exceed the economic threshold. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p>

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	<ul style="list-style-type: none"> - the techniques used (cultural, biological, mechanical and physical methods)? - the native species used as part of the biological control method? - help in reducing the use of chemicals over a period of time? - Prophylactic use of pesticides - Minimization of pesticide use - Review on the plans to suit the present condition such as replanting? <p>c. Is there an SOP to implement the plan and monitor its effectiveness?</p> <p>d. Is there records of pest occurrence and control?</p> <p>e. Is there any sign of fire use for pest control?</p> <p>f. Is there any sign of rat pest dropping in the area?</p> <p>g. Is there training conducted on IPM?</p>	<ul style="list-style-type: none"> - Explanation regarding control can be carried out using biological, chemical or mechanical techniques such as biological techniques using natural enemies such as owls or the use of beneficial plants <i>Turnera subulata</i> as a place for fire caterpillar predators to live. Control with chemical techniques by applying pesticides to control termites and herbicides to control weeds. - Among them includes a rat pest control system with a baiting system. If the bait eaten is < 5% then the baiting campaign is stopped. <p>Realization of IPM according to review the document, (example) as follow:</p> <ul style="list-style-type: none"> - Training of IPM has conducted in Areal Replantin Sungai Bahaur Estate, dated on July 20, 2024 and attended by 24 participants, and in BHGE was concucted on August 27, 2024 and attended by 9 participants. - Census monitoring record in all estate in PT WNA and PT NKU, as detected oryctes rhinoceros through census on May 2024, and it is still under threeshold. - Record of program and realization periode 2024 planting of Tunera Subulata as living place of leaf eating caterpillar (LEC) in PT WNA (all estate) is 10,72 KM and PT NKU (all estate) is 40,05 KM; <p>Sighted house of owl on the estate which expected to control rat population per block, and based field observation in division 2, in Bangun Koling Estate, house of owl the condition is good and active owl.</p>	<p>NCR No :</p>
R	<p>7.1.2 [Species referenced in the Global Invasive Species Database and CABI.org / Invasive species] are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented. The unit of certification sets up a control mechanism for invasive species, for example for <i>mucuna</i> spp. <i>aumania</i> spp, etc.</p>		
	<p>a. Is the company personnel aware of [the Global Invasive Species and CABI.org / Minister of Environment and Forestry Regulation No.P.94/MENLHK/SEKJEN/KUM.1/12/2016 concerning invasive species] ?</p> <p>b. Are the listed species not used in the area? If in used, are the plans to prevent and monitor their spread implemented?</p> <p>c. Is there monitoring been carried out?</p>	<p>Based on document review, the unit of certification does not used the species listed in the Minister of Environment and Forestry Regulation No. P.94/MENLHK/SEKJEN/KUM.1/12/2016 concerning Invasive Species as well as in the Global Invasive Species Database and CABI.org. The identification of species used has been documented in the document "<i>Daftar Nama Tanaman/Hewan Musuh Alami Kelapa Sawit</i>", consist of <i>tyto alba</i>, <i>antigonon leptosus</i> and <i>turnera subulata</i>. this species is not classified as invasive in Indonesia, as refers to Minister of Environment and Forestry Regulation (PermenLHK) No. 94 in 2019.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	<p>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 prior approval of government authorities.</p>		
	<p>a. Is there SOP for pest control established? If yes, is the procedure included the handling of pest during normal and exceptional situation?</p> <p>b. Is the procedure specified fire is not used for pest control, unless it is permitted by authorities?</p>	<p>Based on record of the implementation IPM plan (see indicator 7.1.1) and interview with management was known that the unit of certification did not used fire for pest control. Pest control was carried out manually, biological and using pesticide if the result of pest monitoring/EWS above the threshold attack and its application referred to Sustainability Policy 2022 Bumitama Agri Ltd.</p> <p>They mention to consist of:</p> <ul style="list-style-type: none"> - Maintains a strict zero burning policy for all new planting, replanting and other activities. - Early warning system through field monitoring, weekly global telling, census and analysis towards pest incidence; - Pest population management control through biological, physical and chemical methods and evaluation of action taken; <p>Unit of certification was conducted the training Integrated pest management (IPM) that mention prohibition fire for implementation IPM dated on July 20, 2024 and attended by 24 participants, and in BHGE was concucted on August 27, 2024 and attended by 9 participants. Observed during the audit field visit, there is not found indication using fire for pest control.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
7.2	Pesticides are used in ways that do not endanger health of workers, families, communities or the environment		
R & O	7.2.1 (C) Justification of all pesticides used is demonstrated. Selective products (peticides approved by the State of Cameroon) and application methods that are specific to the target pest, weed or disease are prioritised		
	<p>a. Is the justification of all pesticides used been demonstrated?</p> <p>b. Is there SOP for use of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species? Is the procedure included the following :</p> <ul style="list-style-type: none"> • Measures to avoid the development of resistance (such as pesticide rotation) are identified and applied, where possible • List of all pesticide with target species and justification of the use • Consideration of using less harmful alternatives <p>c. Is there evidence of implementation of SOP on the ground?</p>	<p>The unit of certification has shown the recommendation of pesticide used, in document no Inter Office Memo no. 028/IOM/RSC-BGA/VII/2020 dated on July 28, 2020. That recommendation mention To support the BGS team revitalization program and the completion of the bush area by one stop services. Therefore, the division assistant is required to identify the dominant weed groups that live in the planned spray block tomorrow (D-1) so that they can bring various parent solutions to the field in addition to the work of spraying the pikul market disk according to the target weeds to be controlled. Guidelines for dosage, materials and making parent solutions are attached.</p> <p>Based on record pesticide used, the list of pesticides used are in accordance with document of recommendation pesticide usade periode 2023, which informes brand name of of pesticide, active ingredient, target, LD50, and WHO Class.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		Based on interview with pesticides operators, it was known that herbicide only applied on palm circle, harvesting path and FFB platform on the field. For example, pesticides used was "Bio Up" with active ingredients is IPA-glyphosate for narrow leaf weed control. Furthermore, biological method founded during observation are planting of beneficial plants (<i>Turnera subulata</i>)																																																																																																																			
○	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 made available by the unit of certification	<p>Unit of certification has record of pesticide usage year 2023 and active ingredients applied per HA were as follow:</p> <p><u>PT WNA - Sungai Bahaur Estate:</u> Period of 2023</p> <table border="1"> <thead> <tr> <th>No</th> <th>Merk</th> <th>Active Ingridianc e</th> <th>LD50</th> <th>Total Usage (L)</th> <th>Active Ingredi ent (L/Ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Penta Up-Z 480 SL (Glyphosate)</td> <td>48%</td> <td>4230</td> <td>1834</td> <td>0.463</td> </tr> <tr> <td>2</td> <td>Primafuluron 20 WG (Metil Metsulfuron)</td> <td>20%</td> <td>>5000</td> <td>80</td> <td>0.020</td> </tr> <tr> <td>3</td> <td>Fascinate 150 SL (Amonium Glufosinat)</td> <td>15%</td> <td>>1500</td> <td></td> <td>0</td> </tr> <tr> <td>4</td> <td>Garlon 670 EC (Triklampir)</td> <td>60%</td> <td>710</td> <td>298</td> <td>0.075</td> </tr> <tr> <td>5</td> <td>Cyperin 250 EC (Sipermetrin)</td> <td>25%</td> <td>250</td> <td>1022</td> <td>0.258</td> </tr> </tbody> </table> <p>Period of January – September 2024</p> <table border="1"> <thead> <tr> <th>No</th> <th>Merk</th> <th>Active Ingridianc e</th> <th>LD50</th> <th>Total Usage (L)</th> <th>Active Ingredi ent (L/Ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Penta Up-Z 480 SL (Glyphosate)</td> <td>48%</td> <td>4230</td> <td>2788</td> <td>0.704</td> </tr> <tr> <td>2</td> <td>Primafuluron 20 WG (Metil Metsulfuron)</td> <td>20%</td> <td>>5000</td> <td>125</td> <td>0.031</td> </tr> <tr> <td>3</td> <td>Fascinate 150 SL (Amonium Glufosinat)</td> <td>15%</td> <td>>1500</td> <td>261</td> <td>0.066</td> </tr> <tr> <td>4</td> <td>Garlon 670 EC (Triklampir)</td> <td>60%</td> <td>710</td> <td>85</td> <td>0.021</td> </tr> <tr> <td>5</td> <td>Cyperin 250 EC (Sipermetrin)</td> <td>25%</td> <td>250</td> <td>767</td> <td>0.194</td> </tr> </tbody> </table> <p><u>PT WNA – Bangun Koling Estate:</u> Period of 2023</p> <table border="1"> <thead> <tr> <th>No</th> <th>Merk</th> <th>Active Ingridianc e</th> <th>LD50</th> <th>Total Usage (L)</th> <th>Active Ingredi ent (L/Ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Penta Up-Z 480 SL (Glyphosate)</td> <td>48%</td> <td>4230</td> <td>2863</td> <td>1.393</td> </tr> <tr> <td>2</td> <td>Primafuluron 20 WG (Metil Metsulfuron)</td> <td>20%</td> <td>>5000</td> <td>590</td> <td>0.287</td> </tr> <tr> <td>3</td> <td>Garlon 670 EC (Triklampir)</td> <td>60%</td> <td>710</td> <td>170</td> <td>0.083</td> </tr> </tbody> </table> <p>Period of January – September 2024</p> <table border="1"> <thead> <tr> <th>No</th> <th>Merk</th> <th>Active Ingridianc e</th> <th>LD50</th> <th>Total Usage (L)</th> <th>Active Ingredi ent (L/Ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Penta Up-Z 480 SL (Glyphosate)</td> <td>48%</td> <td>4230</td> <td>760</td> <td>0.370</td> </tr> <tr> <td>2</td> <td>Primafuluron 20 WG (Metil Metsul-</td> <td>20%</td> <td>>5000</td> <td>102</td> <td>0.049</td> </tr> </tbody> </table>	No	Merk	Active Ingridianc e	LD50	Total Usage (L)	Active Ingredi ent (L/Ha)	1	Penta Up-Z 480 SL (Glyphosate)	48%	4230	1834	0.463	2	Primafuluron 20 WG (Metil Metsulfuron)	20%	>5000	80	0.020	3	Fascinate 150 SL (Amonium Glufosinat)	15%	>1500		0	4	Garlon 670 EC (Triklampir)	60%	710	298	0.075	5	Cyperin 250 EC (Sipermetrin)	25%	250	1022	0.258	No	Merk	Active Ingridianc e	LD50	Total Usage (L)	Active Ingredi ent (L/Ha)	1	Penta Up-Z 480 SL (Glyphosate)	48%	4230	2788	0.704	2	Primafuluron 20 WG (Metil Metsulfuron)	20%	>5000	125	0.031	3	Fascinate 150 SL (Amonium Glufosinat)	15%	>1500	261	0.066	4	Garlon 670 EC (Triklampir)	60%	710	85	0.021	5	Cyperin 250 EC (Sipermetrin)	25%	250	767	0.194	No	Merk	Active Ingridianc e	LD50	Total Usage (L)	Active Ingredi ent (L/Ha)	1	Penta Up-Z 480 SL (Glyphosate)	48%	4230	2863	1.393	2	Primafuluron 20 WG (Metil Metsulfuron)	20%	>5000	590	0.287	3	Garlon 670 EC (Triklampir)	60%	710	170	0.083	No	Merk	Active Ingridianc e	LD50	Total Usage (L)	Active Ingredi ent (L/Ha)	1	Penta Up-Z 480 SL (Glyphosate)	48%	4230	760	0.370	2	Primafuluron 20 WG (Metil Metsul-	20%	>5000	102	0.049	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
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			uron)					
		3	Garlon 670 EC (Triklpir)	60%	710	39	0.019	
		PT NKU – Banama Haring Estate:						
		Period of 2023						
		No	Merk	Active In-gridiance	LD50	Total Usage (L)	Active Ingre-dient (L/Ha)	
		1	Penta Up-Z 480 SL (Glypho-sate)	48%	4230	2188	0.728	
		2	Primaforon 20 WG (Metil Metsul-furon)	20%	>5000	116	0.039	
		3	Garlon 670 EC (Triklpir)	60%	710	284	0.095	
		Period of January – September 2024						
		No	Merk	Active In-gridiance	LD50	Total Usage (L)	Active Ingre-dient (L/Ha)	
		1	Penta Up-Z 480 SL (Glypho-sate)	48%	4230	742	0.247	
		2	Primaforon 20 WG (Metil Metsul-furon)	20%	>5000	38	0.013	
		3	Garlon 670 EC (Triklpir)	60%	710	70	0.023	
		PT NKU – Sungai Mirah Minting Estate:						
		Period of 2023						
		No	Merk	Active In-gridiance	LD50	Total Usage (L)	Active Ingre-dient (L/Ha)	
		1	Penta Up-Z 480 SL (Glypho-sate)	48%	4230	2134	0.790	
		2	Primaforon 20 WG (Metil Metsul-furon)	20%	>5000	162	0.060	
		3	Garlon 670 EC (Triklpir)	60%	710	132	0.049	
		Period of January – September 2024						
		No	Merk	Active In-gridiance	LD50	Total Usage (L)	Active Ingre-dient (L/Ha)	
		1	Penta Up-Z 480 SL (Glypho-sate)	48%	4230	665	0.246	
		2	Primaforon 20 WG (Metil Metsul-furon)	20%	>5000	24	0.009	
		The company also has information related LD50, area treated, amount of active ingredintas applied per HA and number of application that stated on <i>Analisa Pemakaian Bahan Active per Hektar</i> for all estate. Based on observation at Pesticide Storage in Central Warehouse of each estate, it was known that there is no stock of paraquat.						
O	7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans							
	a. Is there evidence of IPM plan being implemented?	The company also implements the BGS (BGA Ground Management System) system which aims to reduce the use of pesticides and increase sources of organic matter for plant maintenance activities, in-						<input checked="" type="checkbox"/> Yes

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	<p>b. Are there records showing that the use of pesticides have been minimised, eliminated where possible, in accordance with Integrated Pest Management (IPM) plan?</p>	<p>cluding by pruning <i>Nephrolepis Biserrata</i>. In several blocks in each estate, NonChemist blocks are also implemented, meaning that for areas that are protected from weeds, pesticide applications are reduced by reducing spray rotations from 1 to 2 spray rotations per year.</p> <p>To find out the need for spray volume per hectare, the company calibrates the sprayer, nozzle, and road speed so that the dosage and volume of the spray solution is correct and not excessive. To suppress weed growth, the company developed the <i>Tunera Subulata</i>.</p> <p>As for controlling pests and plant diseases, the company prioritizes biological methods, namely through the development of Beneficial Plants of the <i>Turnera Subulata</i> and <i>Antigonon Leptopus</i> types as results of field observations of these plants include growing in all estate PT WNA and PT NKU.</p> <p>Realization of IPM according to review the document, (example) as follow:</p> <ul style="list-style-type: none"> - Training of IPM has conducted in Areal Replantin Sungai Bahaur Estate, dated on July 20, 2024 and attended by 24 participants, and in BHGE was conducted on August 27, 2024 and attended by 9 participants. - Census monitoring record in all estate in PT WNA and PT NKU, as detected oryctes rhinoceros through census on May 2024, and it is still under threeshold. - Record of program and realization periode 2024 planting of <i>Tunera Subulata</i> as living place of leaf eating caterpillar (LEC) in PT WNA (all estate) is 10,72 KM and PT NKU (all estate) is 40,05 KM; <p>Sighted house of owl on the estate which expected to control rat population per block, and based field observation in division 2, in Bangun Koling Estate, house of owl the condition is good and active owl.</p>	<p><input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
O	<p>7.2.4 There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines</p>		
	<p>a. Has there been prophylactic use of pesticides? If so, any justification provided? b. Is justification provided in accordance to national best practices guidance?</p>	<p>Based on document reviews and interviews with management, there was no prophylactic use of pesticide.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	<p>7.2.5 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional 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 b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) [What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>		
	<p>a. Is there a policy, procedure or management plan committing to minimise and eliminate use of these pesticides and paraquat? b. Is the pesticides used in the company been cross checked with the WHO class 1A, class 1B, and Stockholm or Rotterdam Conventions pesticide? c. Does physical verification of inventory in the chemical store match with the inventory records? d. Are there records of minimisation of pesticides and paraquat use? e. Where there is the use of the above pesticides or paraquat, has justification in line with national best practice guidelines been documented?</p>	<p>Unit of certification has policy to minimise and or stopped using pesticides that are categorised as WHO Class 1A or 1B, or listed by the Stockholm or Rotterdam Conventions, and paraquat as stated in Sustainability Policy PT BGA, regarding pesticide management. This SOP regulates the classes of pesticides used, procedures for preventing accidents due to poisoning, and protecting the environment by using pesticides responsibly.</p> <p>Based on the list of pesticide review used during 2023/2024, as well as observation to pesticide store in chemical store and interview with pesticide worker it was known that pesticides used by estate management were only herbicides and one type of insecticides. There is no use of rodenticide, due to very low pest incidence (below threshold limit). Based on WHO classification, it was known that LD-50 figures of all pesticide used by the unit of certification were generally classified as Class II and Class III or moderately hazardous and slightly hazardous, respectively. Moreover, all pesticides used were listed on www.pestisida.id by Department of Agriculture, Republic of Indonesia.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	<p>7.2.6 (C) 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 / conduct.]</p>		
	<p>a. Is there SOP for chemicals/pesticides handling? b. Is there a training plan and training records for workers who apply or handle pesticides? c. Is there evidence that training has been conducted and understood by the workers? d. Are pesticides handled, used or applied only by persons who have completed the necessary training? e. Are the workers involved in chemical handling or application able to demonstrate understanding of the hazards</p>	<p>The unit of certification has procedure related chemical/pesticides handling and proven methods that minimise risk and impacts as seen on documented in procedure of pest and disease management BGAAGRKS-PTKS-PPS dated on June 3, 2010.</p> <p>Pesticides hazards and its countermeasures has been identified and mentioned in the Hazard Identification, Risk assessment and Determine Control document that updated on January 2024. Based inter-</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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	<p>and risks related to chemicals used when interviewed?</p> <p>f. Are pesticides always applied in accordance with the product label?</p> <p>g. Are Safety Data Sheet (SDS) for pesticides used readily available for easy reference?</p> <p>h. Is appropriate safety and application equipment provided and used?</p> <p>i. Is PPE used appropriate according to recommendations in any risk assessments done?</p> <p>j. Is appropriate PPE provided and used, and can the PPE be easily replaced if damage?</p>	<p>viewed with a sparyer at afdelling PT WNA and PT NKU (all estate), appropriate safety (PPE, such as: carbon mask, helm with faceshield, AP Boots and apron) and application equipment have been provided and used. The workers also were knowledgeable on all safety precautions attached to the products labels as well as agrochemical waste handling, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as chemical usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, as well as PPE's to be used and its management.</p> <p>During observation to several riparian buffer zone (exampel) in buffer zone Bangun Koling Estate and Sungai Mirah Minting Estate, it was known that there were no indication of herbicide application on the riparian areas and there is a red mark on the tree as a sign of a spray prohibition.</p> <p>Unit of certification has conducted training related to chemical application for the employee who apply or handle pesticide PT WNA was conducted on May 24, 2024 attended by 30 participants. And for training PT NKU was conducted on May 27, 2024 attended by 27 participants</p>	
○	<p>7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices</p> <p>Note to auditor : refer to the safety data sheet on storage and disposal</p>		
	<p>a. Is the storage of all pesticides followed the recognised practices?</p>	<p>Based on field observation at chemical storage, the company has provided a special chemical storage. Chemical storage areas has complied with relevant regulations (Ministry of Environment No. 13 of 2014 regarding Symbol and Label Hazardous Material). In the chemical storgae was as found that all pesticides stored according to recognised best practiices, the storage room is protected from the rain, good air ventilation, avalaible pallets for storgae the pesticide. And also found MSDS for each pesticide and emergency procedures emergency response facilities (fire extinguisher, eye wash, alarm, first aid kits, etc), label and hazardous material symbol.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
○	<p>7.2.8 All pesticide containers [are properly / that are] disposed of and/or [handled responsibly may not be reused for the same purpose or, for example, for mixing.</p>		
	<p>a. Is the storage of all pesticides followed the recognised practices?</p> <p>b. Is there evidence that empty pesticide containers are properly stored and disposed off and not used for other purposes?</p> <p>c. Is there evidence observed in the field that pesticide containers are indiscriminately disposed (in dump site) or used for other purposes, .e.g. as waste containers, flower pots?</p>	<p>Unit of certification has been identified waste product and sources of pollution in procedure no. SOP BGA-SUST-SOP-21 dated on May 12, 2018. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for PT Windu Nabatino and PT Nabatino Karya Utama, such as:</p> <ul style="list-style-type: none"> - Genset House, waste type: Used oil, pollution air, used oil cans, used filter, ex sperpart, Used Majun cloth, etc. - Workshop waste type: Used oil, accu wasted, used filter, used majun cloth, Old metal, used paint cans, oil cans, used gloves, used lamps, used TL lamps, residual welding rust, etc. - Chemical storage, waste type: Herbicide packaging, used majun cloth, used oil drums, used chemical jerry cans, pesticide packaging, etc. - Spraying, waste type: Used chemical cans, used chemical cans, used masks, used gloves. - Fertilizer, waste type: Used fertilizer sacks, plastic in fertilizer sacks, used PPE - Officee, waste type: Printer ink ribbons, used TL lamps, plastic, cartridge injection solution, cartridges - Laboratorium, waste type: Rinse water, used packaging, Expired materials, natural gas vapor, TL bulbs - Housing and guest house, waste type: Plastic, leftover food, broken glass, TL bulbs, - Mill operation, waste type: Shells, pile water, liquid waste - Composting plane, waste type: tangkos, compost residue, liquid waste <p>Unit of certification has a procedure of waste handling is presented in several procedure, as follow:</p> <ul style="list-style-type: none"> - Procedure no. WNA-KNU-SUST-SOP-13 dated on June 04, 2023, about that B3 management must provide MSDS before B3 material are used, equipped with symbols, given signs indicating restrictions and potential dangers and designed to maintain 110% of the container; - Procedure no. WNA-KNU-SUST-SOP-15 dated on December 14, 2022, about that is not permitted to utilize the LB3 procedured and that all B3 waste is handled and stored in the B3 waste TPS; <p>For the implementation unit of certification has maintains all recods of chemical and hazardous waste disposal as found in the following documents:</p> <ul style="list-style-type: none"> • Log book of hazardous waste (including chemical container) at temporary storage, • Balance sheet (monthly) of incoming and outgoing waste (Neraca LB3), • Hazardous waste manifest, and • Hazardous Waste Report. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		Based on field verification to temporary storage of hazardous and toxic waste seen that unit of certification handling all of pesticide containers properly, that all containers were collected and placed at licensed temporary hazardous waste storage (TPS LB3) before disposed to third party that has a license to manage the hazardous and toxic waste. For more detail please see criteria 7.3. Observed during field observation to housing to emplacement POM and Estate not found evidence that pesticide container utilized dump in to garbage or as flower pot etc.	
R & O	7.2.9 (C) 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 spraying		
	<ul style="list-style-type: none"> a. Has aerial spray been applied? If yes, is there documented justification and approval by the government authority? b. Is the impact and risk associated with aerial application documented and made available? c. Are the identified affected communities informed of impending aerial pesticide applications and are the information given at least 48 hours prior to application of aerial spraying? d. What are the information given to local communities and how was it communicated? 	<p>Not Applicable.</p> <p>Based on documents review, information from management and observed during site visit, it was confirmed there is no aerial spraying method for pesticides application. All pesticides have applied through spraying manually.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
O	7.2.10 (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated		
	<ul style="list-style-type: none"> a. Is there an updated list of pesticide operators (permanent and or temporary and or casual worker)? b. Is there records of annual medical surveillance of pesticide operators? c. is there record of medical surveillance of pesticide operators every 6 month (especially for Indonesia) ? how is the result ? d. Is there initial medical test for the new spraying team members ? how is the result ? e. Has all operator pesticides done medical test ? f. Is there evidence of documented action taken to treat related health condition? g. Are there any trends of workers being absent due to incident related to pesticide usage? h. If any the result of medical test is un-normal so is there the record of follow-up treatment of medical results ? 	<p>Unit of certification has conducting special medical surveillance such as cholinesterase and spirometry to all employee that works related to agrochemical application, The list of pestides worker such as:</p> <p>PT Windu Nabatindo Abadi</p> <ul style="list-style-type: none"> - Bangun Koling Estate has 14 pesticide workers, and all worker are female; - Sungai Bahaur Estate has 20 pesticide workers, and all worker are female; <p>PT Nabatindo Karya Utama</p> <ul style="list-style-type: none"> - Banama Haring Estate has 12 pesticide workers, and all worker are female; - Sungai Mirah Minting has 19 pesticide workers, and all worker are female; <p>The test was conducted on July 4 – 5 July, 2024 with third parties PT. Cahaya Purnama Krisnako (Pusat Pangkalan Bun). All result cholinesterase test state are under threshold and fit to work.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	7.2.11 (C) [No work with pesticides is undertaken by persons under the age of 18, pregnant or breast feeding women or other people that have medical restrictions and they are offered alternative equivalent work / No pesticide related work is carried out by pregnant or breastfeeding women, or people with medical limitation and they are offered other equivalent work alternatives]		
	<ul style="list-style-type: none"> a. Is there a policy/SOP preventing persons under the age of 18, pregnant and breast-feeding women from handling pesticides? b. Is there a lists of female workers handling pesticides? c. What is the mechanism established to identify pregnant and breast-feeding women? d. Is there evidence showing person under the age of 18, pregnant and breast-feeding women are not allowed to handle pesticides? 	<p>Unit of certification has a policy to preventing persons under the age of 18, pregnant and breast-feeding women from handling pesticides as stated in Sustainability Policy PT BGA year 2020, regarding that all female pesticide applicators are required to take a pregnancy test every month at the company's clinic</p> <p>. Based on the document review, there are the results of a pregnancy test on August 2024, such as:</p> <ul style="list-style-type: none"> - On August 26, 2024 at PT WNA - SCME there were 22 pesticide management employees with negative results - On August 28, 2024 at PT NKU - BHGE there were 20 pesticide management employees with negative results <p>Based on interview with pesticide applicators (in during audit applicator working manual) in all estate (division 2 block L21 Bangun Koling Estate, division 1 block M22a Sungai Mirah Minting Estate, and it was known that pregnancy test has conducted every month by paramedics on company clinic. And said who identified pregnant will immediately transferred to manual upkeep works.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
7.3	Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner		
R	7.3.1 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.		
	<ul style="list-style-type: none"> a. Is the list of waste products produced identified? b. Is the waste management plan available ? c. Is the plan included management and operation prescriptions for reduction, recycling, reusing of the waste? d. Is there evidence of implementation of the plan? e. Are domestic waste properly handled ? f. are domestic waste from houses dumped into open waste bin with using garbage bag ? g. Are the domestic waste separate organic and unorganic waste in house/waste bin, transporting to final disposal and final disposal areas ? 	<p>Unit of certification has been identified waste product and sources of pollution in procedure no. SOP BGA-SUST-SOP-21 dated on May 12, 2018. Based on document verification shown company has implemented waste management accordance with waste identification source and management plan for PT Windu Nabatino and PT Nabatino Karya Utama, such as:</p> <ul style="list-style-type: none"> - Genset House, waste type: Used oil, pollution air, used oil cans, used filter, ex sperpart, Used Majun cloth, etc. - Workshop waste type: Used oil, accu wasted, used filter, used majun cloth, Old metal, used paint cans, oil cans, used gloves, used lamps, used TL lamps, residual welding rust, etc. - Chemical storage, waste type: Herbicide packaging, used majun cloth, used oil drums, used chemical jerry cans, pesticide packaging, etc. - Spraying, waste type: Used chemical cans, used chemical cans, used masks, used gloves. - Fertilizer, waste type: Used fertilizer sacks, plastic in fertilizer sacks, used PPE 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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	<p>h. Are the design of waste bin covered attracted flies and produced unpleasant odor and the rubbish collectors easier to empty the waste bins ?</p>	<ul style="list-style-type: none"> - Officee, waste type: Printer ink ribbons, used TL lamps, plastic, cartridge injection solution, cartridges - Laboratorium, waste type: Rinse water, used packaging, Expired materials, natural gas vapor, TL bulbs - Housing and guest house, waste type: Plastic, leftover food, broken glass, TL bulbs, - Mill operation, waste type: Shells, pile water, liquid waste - Composting plane, waste type: tangkos, compost residue, liquid waste <p>Unit of certification has a procedure of waste handling is presented in several procedure, as follow:</p> <ul style="list-style-type: none"> - Procedure no. WNA-KNU-SUST-SOP-13 dated on June 04, 2023, about that B3 management must provide MSDS before B3 material are used, equipped with symbols, given signs indicating restrictions and potential dangers and designed to maintain 110% of the container; - Procedure no. WNA-KNU-SUST-SOP-15 dated on December 14, 2022, about that is not permitted to utilize the LB3 procedred and that all B3 waste is handled and stored in the B3 waste TPS; - Procedure no. SUS-WNA-NKU-SOP-41 dated on December 22, 2022, about that waste management in housing and office, and mention that garbace in the housing, office and other facilitation must provide sufficient and adequate quantities. <p>Unit of certification can show document on the management and utilization of waste in accordance with the plans it has, been carried out during 2023, such as:</p> <ul style="list-style-type: none"> - Solid waste from processing of Sungai Cempaga POM such as shell, fiber used to make renewable fuel in the POM with total utilization in periode 2023 as much 4.070 ton (shell) and EFB utilized to be application to land periode 2023 as much 141.770 m3 and utilized to be composting as much 12.849 m3; - Domestic waste has been carried out accordance with the properly waste from housing area, then disposed dump up of in the landfill area. <p>For manage of hazardouse waste management unit of certification has carried out accordance with the procedures and regulations, the company has temporaray hazardouse waste storage that have a permitted, as follow:</p> <ul style="list-style-type: none"> - PT Windu Nabatino Abadi (PT WNA) has a Temporary Storage Permit for B3 Waste in accordance with the Decree of the Regent of Kotawaringin Timur 660/814/DLH-Ek.SDA/XI/2017 dated on November 21, 2017 concerning PT's B3 Waste Temporary Storage Permit validity period of 5 years. Location of TPS LB3 for: <ul style="list-style-type: none"> - Sungai Cempaga Estate with coordinate S= 01' 49' 05' 0", E= 113' 00' 43' 5", with areas 6 m x 12 m; - Sungai Cempaga POM with coordinate S= 01' 47' 54.6", E= 112' 59' 07.2", with areas 4 m x 4 m; - Bangun Koling Estate with coordinate S= 01' 48' 11,9", E= 112' 58' 31' 4", with areas 4 m x 3 m - PT Nabatindo Karya Utama (NKU) has a Temporary Storage Permit for B3 Waste in accordance with the Decree of the Regent of Kotawaringin Timur 660/815/DLH-Ek.SDA/XI/2017 dated on November 21, 2017 concerning PT's B3 Waste Temporary Storage Permit validity period of 5 years. Location of TPS LB3 for PT Nabatindo Karya Utama with coordinate S= 01' 44' 22.0", E= 112' 59' 24.5", with area 3 m X 4 m. <p>Information was obtained that the last transportation was carriedout on October 02, 2024, so the condition of the warehouse during the visit was relatively empty and based on observation field to temporary hazardous waste in POM and Estate, the condition of temporary hazardous waste is a good with installing emergency response facilities such as fire extinguishers, first aid boxes, alarm, eye wash, showers and other equipment such as coordinate points, warning boards as well as installing symbols and labels appropriate to the type of B3 waste being stored.</p> <p>The results of the visit to the chemical storage warehouse area also showed that the company had equipped emergency response facilities, and for detail please seen indicator 7.2.7</p> <p>The unit of certification has carried out accordance with the procedures and regulations, the hazardous waste manage hazardous waste with the companys whose have a licensed, i.e:</p> <ul style="list-style-type: none"> - PT Windu Nabatindo Abadi In collaboration with PT Semesta Langgeng Sentosa with agreement Addendum I no. 02/MOU/WNA-SLS/Add I/III/2023 dated on Febuary 02, 2024 valid unitil March 01, 2025; - PT Nabatindo Karya Utama In collaboration with PT Semesta Langgeng Sentosa with agreement 	

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		<p>Addendum I no. 03/MOU/WNA-SLS/Add I/III/2023 dated on Febuary 19, 2024 valid unutil March 01, 2025;</p> <p>PT SLS as a Management and utilization of B3 waste and PT SLS as a Transporter hazardous wasted. The second party has a B3 waste management permit from the Ministry of Environment and Forestry Directorate General of Waste Management, Waste and Hazardous Materials no. S.478/PSLB3-VPLB3/PPLB/PLB.3/12/2021 valid until December 20, 2026. Transportation of recommendation from Ministry of Environment and Forestry Directorate General of Waste Management, Waste and Hazardous Materials no. S.160/PSLB-VPLB3/PPLB3/PLB.3/06/2020 valid until June 20, 2025, etc.</p> <p>Unit certification has shown the evidence fastronic of waste transportation from Ministry Environment and Forestry third semester, such as:</p> <p>PT Windu Nabatindo Abadi, with transport KH8004GM</p> <ul style="list-style-type: none"> - SCME - with no fastronic AZG20240918-2643, code B104d, Used packaging for hazardous and toxic materials 0,321 ton, dated on September 18, 2024; - SCMM - with no fastronic AZG20240830-2366, code B102d, Used ACCU materials 0,034 ton, dated on August 30, 2024; - SCMM - with no fastronic AZG20240830-2486, code B110d, Used Rags materials 0,07 ton, dated on August 30, 2024; - SCMM - with no fastronic AZG20240830-2486, code B105d, Used Oil materials 0,36 ton, dated on August 30, 2024; <p>PT Nabatindo Karya Utama, with transport KH8721GM</p> <ul style="list-style-type: none"> - Fastronic AZG20240830-0050, code B105d, Used Oil materials 0,36 ton, dated on August 30, 2024; - Fastronic AZG20240830-0053, code B104d, Used packaging for hazardous and toxic materials 0,163 ton, dated on Agustus 30, 2024; - Fastronic AZG20240830-0058, code B110d, Used rags materials 0,001 ton, dated on Agustus 30, 2024; <p>Unit of certification has a properly of handling domestic waste. Based on field verification on housewere of employee in all estate and POM, no evidence that traces of burning domestic waste were found in the workers' housing area or traces of hazardous materials being reused as waste bin and will be transported twice a week as schedule in each unit of certification. Based on interviewed with spouse of worker who life at houseing, they are aware of prohibition on burning garbage and must store garbage in accordance with the place provided by the company to be transported twice a week and disposed of in final disposal.</p>	
O	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated	<p>Unit of certification has a procedure of waste handling is presented in several procedure, as follow:</p> <ul style="list-style-type: none"> • Procedure no. WNA-KNU-SUST-SOP-13 dated on June 04, 2023, about that B3 management must provide MSDS before B3 material are used, equipped with symbols, given signs indicating restrictions and potential dangers and designed to maintain 110% of the container; • Procedure no. WNA-KNU-SUST-SOP-15 dated on December 14, 2022, about that is not permitted to utilize the LB3 proceudred and that all B3 waste is handled and stored in the B3 waste TPS; • Procedure no. SUS-WNA-NKU-SOP-41 dated on December 22, 2022, about that waste management in housing and office, and mention that garbace in the housing, office and other facilitation must provide sufficient and adequate quantities. <p>For the implementation unit of certification has maintains all recods of chemical and hazardous waste disposal as found in the following documents:</p> <ul style="list-style-type: none"> • Log book of hazardous waste (including chemical container) at temporary storage, • Balance sheet (monthly) of incoming and outgoing waste (Neraca LB3), • Hazardadous waste manifest, and • Hazardous Waste Report. <p>Unit of certification can show document on the management and utilization of waste in accordance with the plans it has, been carried out during 2023, such as:</p> <ul style="list-style-type: none"> • Solid waste from processing of Sungai Cempaga POM such as shell, fiber used to make renewable fuel in the POM with total utilization in periode 2023 as much as 4.070 ton (shell) and EFB utilized to be application to land periode 2023 as much 141.770 m3 and utilized to be compost- 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<p>ing as much 12.849 m3;</p> <ul style="list-style-type: none"> Domestic waste has been carried out accordance with the properly waste from housing area, then disposed dump up of in the landfill area. Utilization of POME for application to land with a total application on to land periode 2023 of 335.764 M3, and The hazardous waste has pickup by license hazardous collected, where the latest pickup was on October 02, 2024. <p>And also has carried out socialization and refreshment regarding waste management procedures to workers from the employee level to staff and managers, some examples of socialization that have been carried out include:</p> <ul style="list-style-type: none"> The socialization of management waste domestic in areal housing PT WNA - SCMM was conducted on March 06, 2024 and attended by 33 workers; The socialization of management waste domestic in areal housing PT NKU - BHGE was conducted on March 14, 2024 and attended by 15 workers; <p>Based on observation field to temporary hazardous waste in POM and Estate, information was obtained that the last transportation was carriedout on October 02, 2024, so the condition of the warehouse during the visit was relatively empty.</p>	
O	7.3.3 The unit of certification does not use open fire for waste disposal		
	a. Is there evidence that waste has not been disposed off using open fire?	Unit of certification has a properly of handling domestic waste. Based on field verification on housewere of employee in all estate and POM, no evidence that traces of burning domestic waste were found in the workers' housing area or traces of hazardous materials being reused as waste bin and will be transported twice a week as schedule in each unit of certification. Based on interviewed with spouse of worker who life at houseing, they are aware of prohibition on burning garbage and must store garbage in accordance with the place provided by the company to be transported twice a week and disposed of in final disposal	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
7.4	Practice maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimsl and sustianed yield		
R & O	7.4.1 Good agriculture practices, as contained in SOPs, are followed to manage soil fertilty to optimise yield and minimise environmental impacts is documented		
	a. Are there SOPs for Good Agricultural Practices included managing soil fertilty to optimise yield and minimise environmental impacts ? b. Is there evidence that the SOPs have been implemented and monitored? c. Is there any comparison made from the previous year with regard to the implementation of GAP? If yes, was the information used to optimise yield and minimise the environmental impact?	<p>The Unit of Certification has procedures for managing soil fertilty which issued dated on May 25, 2011, such as:</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>The company has implemented practices to optimize production results in accordance with established procedures, including:</p> <ul style="list-style-type: none"> Sampling of soil and leaves periodically to ensure the elements needed by plants can produce optimally. The results of the analysis of the tested soil and leaves will be the basis for determining the dose of fertilization in each Estate; Use of empty leaves and compost. Use of EFB is 59,192 tonnes and compost is 19,969 tonnes during 2023; The company's commitment to no longer use herbicides with the active ingredient paraquat since 2015; The company also showed monitoring documents for owl cages at SMME and BHGE in August 2023. Based on these documents, it is known, for example, that at SMME there are 50 owl cages with a total of 18 active cages. Based on a field visit to block I12 SMME, it is known that the owl cage is in good condition and active. <p>Based on field verification, documentation of fertilizer record and information of management, it is known that fertilizing applied only to the immature and mature oil palm tree. The implementation of fertilizer is based on SOP. The record of fertilizer applied has been explained in P&C 7.4.4.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
R	7.4.2 [Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertilty and plant health / health is documented.]	Analysis of tissue samples (e.g leaves) and soil on a regular basis to monitor and manage changes in soil fertilty and plant	

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	<p>a. Are there records of tissue and soil analysis?</p> <p>b. How regular is this been done and when was the last analysis done? Note to auditor : to compare the analysis against the previous year</p> <p>c. Are the results of the analysis incorporated into the fertilizer program?</p>	<p>Leaf and soil sampling analysis was conducted by Analytical Laboratory Research Departement PT BGA. The foliar sampling is carry out annualy and the soil sampling is every 5 years. Estate management shows the latest anlysis results which used for annual fertilizer recommendation for period 2024, as shows through several documents, as follows for (PT Windu Nabatindo Abadi (PT WNA) and PT Nabatindo Karya Utama (PT NKU), as follow:</p> <ul style="list-style-type: none"> - Leaf sampling test result no. 0138L/AL-BGA/Int/VIII/2024, conducted on August 12 – 14, 2024 for 8 sample.; - Soil sampling test result no. 0034S/AL-BGA/INT/IV/2024, conducted on April 8 – 19, 2024 for 40 sample. <p>Among parameters measured for leaf analysis are macro and micronutrient (N, P, K, Mg, Ca, B, etc.) content from Frond (leaflets and rachis) number 17. Furthermore, for soil analysis, parameter measured are pH, texture, organic-C, C/N ratio, available P and sation exchange capacity (CEC) for several nutrients such as K, Mg, Ca and Na.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>																																								
R & O	<p>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</p>																																										
	<p>a. Is there a nutrient recycling strategy in place?</p> <p>b. Is the strategy included the recycling of EFB, POME, palm residues and optimal use of inorganic fertilisers?</p> <p>c. Are there records of application?</p>	<p>Unit of certification can show document on the management and utilization of waste in accordance with the plans it has, been carried out during 2023, such as:</p> <ul style="list-style-type: none"> • Solid waste from processing of Sungai Cempaga POM such as shell, fiber used to make renewable fuel in the POM with total utilization in periode 2023 as much 4.070 ton (shell) and POME utilized to be application to land periode 2023 as much 141.770 m3 and utilized to be composting as much 12.849 m3; • Domestic waste has been carried out accordance with the properly waste from housing area, then disposed dump up of in the landfill area. <p>For periode January – September 2024, such as:</p> <ul style="list-style-type: none"> • Solid waste from processing of Sungai Cempaga POM such as shell, fiber used to make renewable fuel in the POM with total utilization in periode until september 2024 as much 3.555 ton (shell) and EFB utilized to be application to land periode 2023 as much 101.510 m3 and utilized to be composting as much 7.473 m3; • Domestic waste has been carried out accordance with the properly waste from housing area, then disposed dump up of in the landfill area. 	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>																																								
O	<p>7.4.4 Records of fertiliser inputs are maintained</p>																																										
	<p>a. Are records of fertiliser inputs maintained?</p> <p>b. Is the fertiliser program linked to the agronomic report? If not are there any justification?</p> <p>c. Are there records of fertilizer usage per tonne of FFB production being monitored (in Summary Table, specific types of fertilizers)?</p>	<p>Unit of certificaion shows record of fertilizer application. For example, realization of manuring programme during January to December 2023 and January – September 2024, is presented in the following Table:</p> <p>PT WNA - Sungai Bahaur Estate:</p> <p>Periode 2023</p> <table border="1" data-bbox="1498 1438 2457 1717"> <thead> <tr> <th rowspan="2">Fertilizer Name</th> <th colspan="2">Sungai Bahaur Estate</th> </tr> <tr> <th>Fertilizer usage (Kg)</th> <th>Fertilizer (Kg)/ tFFB</th> </tr> </thead> <tbody> <tr> <td>RP</td> <td>295,386</td> <td>4.4893</td> </tr> <tr> <td>HGFB</td> <td>24,985</td> <td>0.3797</td> </tr> <tr> <td>Dolomite</td> <td>254,050</td> <td>3.8611</td> </tr> <tr> <td>Kieserite</td> <td>110,375</td> <td>1.6775</td> </tr> <tr> <td>NPK-13 GRANUL</td> <td>1,055,077</td> <td>16.0351</td> </tr> <tr> <td>NPK-12</td> <td>157,795</td> <td>2.3982</td> </tr> </tbody> </table> <p>Periode January – September 2024</p> <table border="1" data-bbox="1498 1774 2457 1990"> <thead> <tr> <th rowspan="2">Fertilizer Name</th> <th colspan="2">Sungai Bahaur Estate</th> </tr> <tr> <th>Fertilizer usage (Kg)</th> <th>Fertilizer (Kg)/ tFFB</th> </tr> </thead> <tbody> <tr> <td>CRF</td> <td>21,874</td> <td>0.3324</td> </tr> <tr> <td>RP</td> <td>185,251</td> <td>2.8154</td> </tr> <tr> <td>MOP</td> <td>5,643</td> <td>0.0858</td> </tr> <tr> <td>Dolomite</td> <td>43,321</td> <td>0.6584</td> </tr> </tbody> </table>	Fertilizer Name	Sungai Bahaur Estate		Fertilizer usage (Kg)	Fertilizer (Kg)/ tFFB	RP	295,386	4.4893	HGFB	24,985	0.3797	Dolomite	254,050	3.8611	Kieserite	110,375	1.6775	NPK-13 GRANUL	1,055,077	16.0351	NPK-12	157,795	2.3982	Fertilizer Name	Sungai Bahaur Estate		Fertilizer usage (Kg)	Fertilizer (Kg)/ tFFB	CRF	21,874	0.3324	RP	185,251	2.8154	MOP	5,643	0.0858	Dolomite	43,321	0.6584	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
Fertilizer Name	Sungai Bahaur Estate																																										
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CR	CHECKLIST	RESULTS OF VERIFICATION			COMPLIANCE STATUS
		Borate	18,089	0.2749	
		NPK Granul 13:6:27 + 0.65B	631,808	9.6022	
		NPK Granul 12:12:17:2	240,229	3.6510	
		Micro Compund B+Cu+Fe	535	0.0081	
		ESTA Kieserite	135,980	2.0666	
		<u>PT WNA - Sungai Bangun Koling Estate:</u>			
		Periode 2023			
		Bangun Koling Estate			
		Fertilizer Name	Fertilizer usage (Kg)	Fertilizer (Kg)/ tFFB	
		RP	510,409	8.898	
		HGFB	17,629	0.307	
		Kieserite	386,001	6.729	
		NPK-13 GRANUL	881,158	15.361	
		Micro Compound	12,485	0.218	
		Periode January – September 2024			
		Bangun Koling Estate			
		Fertilizer Name	Fertilizer usage (Kg)	Fertilizer (Kg)/ tFFB	
		RP	423,579	7.384	
		Dolomite	10,247	0.179	
		Borate	17,290	0.301	
		Kieserite	357,638	6.234	
		NPK Granul 13:6:27 + 0.65B	1,389,862	24.228	
		Micro Compund B+Cu+Fe	12,225	0.213	
		N.K 10:30+Humat	27,917	0.487	
		<u>PT NKU - Sungai Banama Haring Estate:</u>			
		Periode 2023			
		Banama Haring Estate			
		Fertilizer Name	Fertilizer usage (Kg)	Fertilizer (Kg)/ tFFB	
		RP	715,650	10.2652	
		HGFB	31,647	0.4539	
		MOP	20,709	0.2970	
		Kieserite	496,634	7.1236	
		NPK-13 GRANUL	1,477,602	21.1945	
		Micro Compound	12,722	0.1825	
		Periode January – September 2024			
		Banama Haring Estate			
		Fertilizer Name	Fertilizer usage (Kg)	Fertilizer (Kg)/ tFFB	
		Urea	33,873	0.4859	
		RP	667,162	9.5697	
		MOP	33,873	0.4859	
		Borate	31,426	0.4508	
		Kieserite	548,289	7.8646	
		NPK Granul 13:6:27 + 0.65B	2,199,893	31.5549	

CR	CHECKLIST	RESULTS OF VERIFICATION			COMPLIANCE STATUS
		Micro Compound B+Cu+Fe			
		12,694	0.1821		
		PT NKU - Sungai Mirah Minting Estate:			
		Periode 2023			
		Sungai Mirah Minting Estate			
		Fertilizer Name	Fertilizer usage (Kg)	Fertilizer (Kg)/tFFB	
		RP	468,451	8.370	
		HGFB	24,090	0.430	
		MOP	47,595	0.850	
		Dolomite	145,319	2.596	
		Kieserite	311,453	5.565	
		NPK-13 GRANUL	1,166,886	20.849	
		NPK-12	9,781	0.175	
		Micro Compound	20,549	0.367	
		Periode January – September 2024			
		Sungai Mirah Minting Estate			
		Fertilizer Name	Fertilizer usage (Kg)	Fertilizer (Kg)/tFFB	
		Urea	3,240	0.058	
		RP	492,318	8.796	
		MOP	3,240	0.058	
		Dolomite	3,240	0.058	
		Borate	25,286	0.452	
		Kieserite	422,374	7.547	
		NPK Granul 13:6:27 + 0.65B	1,561,977	27.908	
		Micro Compound B+Cu+Fe	10,701	0.191	
		N.K 10:30+Humat	40,059	0.716	

7.5 Practices minimise and control erosion and degradation of soils

R 7.5.1 Practices minimise and control erosion and degradation of soils

	<p>a. Are there maps identifying marginal and fragile soils, including steep terrain and peat soils?</p>	<p>Findings:</p> <p>The unit of certification has shown the marginal area map as stated on MAP PT WNA and PT NKU with scale of 1:70.000 and scale 1:75.000. The map explains the types of marginal land found in the area, detail on:</p> <p>PT Windu Nabatindo Abadi (WNA)</p> <table border="1"> <thead> <tr> <th rowspan="2">Slope Class</th> <th colspan="2">Area</th> </tr> <tr> <th>Hectares</th> <th>(%)</th> </tr> </thead> <tbody> <tr> <td><2%</td> <td align="center">26.39</td> <td align="center">3.4</td> </tr> <tr> <td>2 – 8 %</td> <td align="center">454.60</td> <td align="center">5.9</td> </tr> <tr> <td>9 – 15 %</td> <td align="center">7,279.68</td> <td align="center">90.7</td> </tr> <tr> <td>Total</td> <td align="center">7,760.67</td> <td align="center">100</td> </tr> </tbody> </table> <p>PT Nabatindo Karya Utama (NKU)</p> <table border="1"> <thead> <tr> <th rowspan="2">Slope Class</th> <th colspan="2">Area</th> </tr> <tr> <th>Hectares</th> <th>(%)</th> </tr> </thead> <tbody> <tr> <td>2-8%</td> <td align="center">1,486.48</td> <td align="center">45.1</td> </tr> <tr> <td>9-15%</td> <td align="center">1,810.15</td> <td align="center">54.9</td> </tr> </tbody> </table>	Slope Class	Area		Hectares	(%)	<2%	26.39	3.4	2 – 8 %	454.60	5.9	9 – 15 %	7,279.68	90.7	Total	7,760.67	100	Slope Class	Area		Hectares	(%)	2-8%	1,486.48	45.1	9-15%	1,810.15	54.9	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
Slope Class	Area																														
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		16-25%	-	-	
		Total	3,296.63	100	
		<p>According to the Table above, it could be concluded that there were soil type consist of Dystrudepts (54,421 Ha), Local Alluvium (676 Ha), paleudeults (21 Ha), and Quartzpsammets (614 Ha) in PT WNA, and were soil type consist of Dystrudepts (2,229 Ha), Local Alluvium (166 Ha), haplohumods (23 Ha), udifuvents (11 Ha) and Quartzpsammets (55 Ha) in PT NKU.</p> <p>Furthermore, the land is dominated by a slope class of 0 – 15% (flat). Based on filed observation in all estate (sample), it is known that the operational land is that flat category.</p>			
O	7.5.2 [There is no extensive replanting of oil palm on steep terrain / The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.]				
	<p>a. Is there evidence of replanting on steep terrain (i.e. more than 25 degrees) greater than 25 ha within the re-planting area?</p> <p>b. If yes, when was the replanting done and what is the total replanting area at above 25 degrees?</p>	<p>The results of the study of the area statement document informed the distribution of planting years between 1998 - 2015. In addition, the results of interviews with management and the review of the 5-Years Financial Projection 2024 – 2028 document informed that there is any projection replanting plan for the next 5 years in PT WNA and PT KNU, for scheme smallholder is not yet applicable. For detail projection replanting plan please see indicator 3.1.2 and 7.5.1.</p>			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	7.5.3 [There is no new planting of oil palm on steep terrain / New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.]				
	<p>a. Is there new plantings on steep terrain?</p>	<p>The results of the study of the area statement document informed the distribution of planting years between 1998 - 2015. In addition, the results of interviews with management and field observations did not reveal any new land clearing in the company's areas.</p>			<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
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				
R	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 / Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.]				
	<p>a. Has the unit fo certification submitted NPP to RSPO? If no, how does the unit conducted its soil maps or soil surveys identifying the marginal and fragile soil, including the steep terrain?</p> <p>b. Are the soil maps or soil surveys taken into account in plans and operations of the estates to ensure long term suitability of land for palm oil cultivation?</p> <p>c. Are the maps used to identify areas that are inappropriate for planting?</p> <p>d. Are there any new planting on unsuitable area as identify in the soil map?</p>	<p>N/A, no new planting in all the supply-based plantation of Cempaga POM.</p>			<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
O	7.6.2 Extensive planting on marginal and fragile soils, is avoided, or, if necessary, [done in accordance with the soil management plan for best practices / carried out according to the best-practice soil management plan.]				
	<p>a. Is there evidence of planting on marginal and fragile soils?</p> <p>b. If yes in (a) above, how extensive is the area planted and was it done in accordance with the soil management plan for best practices?</p> <p>c. Is the plan implemented?</p>	<p>N/A, no new planting in all the supply-based plantation of Cempaga POM.</p>			<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
O	7.6.3 Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure				
	<p>a. Are the areas where planting was carried out require drainage or irrigation?</p> <p>b. If yes, is there topographic information and soil surveys to guide the planning of drainage and irrigation system?</p> <p>c. Is the topographic information and best practices taken into consideration during the development of roads and infrastructure?</p>	<p>N/A, no new planting in all the supply-based plantation of Cempaga POM.</p>			<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
7.7	No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly				

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R & O	7.7.1 (C) There is No new planting on peat regardless of depth after 15 November 2018 in existing and new development areas, as well as in new development areas		
	a. Is there peat in the unit of certification? If yes, please refer to RSPO Peat Audit Guidance for P&C 2018	Based on a review of documents and interviews with PT WNA and PT NKU management, the company is no longer planting new plants in existing plantation areas or clearing new land. The company also does not have peat areas. The types of soil found in the company area are Dystrudepts, Quartzpsamments, Local alluvium, paleudults, plinthudults. Based on the PIPPIB map, it is known that company areas that are included in the scope of certification are not included in peat areas.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
R & O	7.7.2 [Areas of peat / Peat areas] 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)		
	Refer to RSPO Peat Audit Guidance for P&C 2018	As mentioned in Indicator 7.7.1, it was known that there are no presence of peat soil within estate operational areas. Thus, this indicator is not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
R & O	7.7.3 (C) [Subsidence of peat / Peat subsidence] is monitored, documented and minimized		
	Refer to RSPO Peat Audit Guidance for P&C 2018	As mentioned in Indicator 7.7.1, it was known that there are no presence of peat soil within estate operational areas. Thus, this indicator is not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
R	7.7.4 (C) [A documented water and ground cover management programme is in place / Availability of implementation evidence of the water and land cover management program]		
	Refer to RSPO Peat Audit Guidance for P&C 2018	As mentioned in Indicator 7.7.1, it was known that there are no presence of peat soil within estate operational areas. Thus, this indicator is not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
R & O	7.7.5 (C) [For plantations planted on peat, drainability assessments are conducted / Drainability assessment are conducted for plantations planted on peat] following the RSPO Drainability Assessment Procedure, or other [RSPO recognised methods / method recognized by RSPO], (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) [prior to / before] replanting. [The assessment result is / The result of the assessment are] used to [set the time frame for future replanting / determine the period of replanting to be carried out], as well as [for phasing out of / to gradually replace] oil palm cultivation at least 40 years, or two cycles, (whichever is [greater / longer]), before reaching the natural [gravity drainability / gravitational drainage] limit for peat. [When oil palm is phased out / If oil palm is gradually replaced], it is replaced [with crops suitable for a higher water table (paludiculture) / by other commodity crops that are better suited for higher groundwater levels (paludiculture)] or rehabilitated with natural vegetation.		
	Refer to RSPO Peat Audit Guidance for P&C 2018	As mentioned in Indicator 7.7.1, it was known that there are no presence of peat soil within estate operational areas. Thus, this indicator is not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
O	7.7.6 (C) [All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance / All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).]		
	Refer to RSPO Peat Audit Guidance for P&C 2018	As mentioned in Indicator 7.7.1, it was known that there are no presence of peat soil within estate operational areas. Thus, this indicator is not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
O	7.7.7 (C) [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', version 2 (2018) and associated audit guidance / All peat areas not planted and reserved in the managed area (regardless of depth) are protected as "peatland conservation areas"; unit of certification are prohibited from constructing drainage channels, building, roads and new electricity lines on peatlands; unless if it is		

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	for a non-corporate land clearance. Peatlands are managed in accordance with “RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands” (the latest version) along with relevant audit guidelines.].		
	Refer to RSPO Peat Audit Guidance for P&C 2018	As mentioned in Indicator 7.7.1, it was known that there are no presence of peat soil within estate operational areas. Thus, this indicator is not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A NCR No :
7.8	Practices maintain the quality and availability of surface and groundwater		
R & O	<p>7.8.1 A water management plan is [in place / available] and is implemented to [promote more / support] efficient use of watersources and [continued / continuous] availability [of watersources...the word has deleted on INA-NI] and to avoid negative impacts on other users in the catchment. The plan [addresses the following / referred to contains the following matters] :</p> <p>a. The unit of certification does not [restrict / limit] access to clean water or [contribute to pollution of water used by communities / does not pollute the water used by the community.]</p> <p>b. Workers have adequate access to clean water</p> <p>c. depending on the agroecological zones, set up a guide for interpreting the results of wter analyses (Ph) by an accredited body</p>		
	<p>a. Is there a water management plan for mill and the estates?</p> <p>b. Is the plan includes the following? - Identification of water sources - Efficient use of water - Renewability of water source - Impacts on catchment area and local stakeholders - Access of clean drinking water all year round for workers - Avoidance of surface and ground water contamination</p> <p>c. Are the identified actions in the plan implemented?</p> <p>d. Is the company contribute to local communities programmes to protect, maintain and improve water sources?</p>	<p>The unit of certification has identification on water course with its operational area in HCV document and there is also water management plan covered in HCV management plan. Waster Management plan 2024 for PT Windu Nabatindo Abadi with scale 1:45.000 and PT Nabatindo Karya Utama with scale 1:45.000, mention that any three points of water sources in the operational area of PT WNA – Sungai Cempaga POM, there are Mirah Hulu and Hilir River SCMM, Cempaga Hulu BKLE, Cempaga Hilir SCME and PT NKU there are Mirah Hulu and Hilir River BHGE, Mirah Minting Hulu and Hilir River. The plan consist of water sources identification and water management, efficient use of water, impacts on catchment area and local stakeholder access of clean drinking water and avoidance of surface and ground water contamination. The document describes the water source identification, Mill and estates housing water usage monitoring & efficiency and catchment area protections.</p> <p>Unit of certification has plan for water sources is to test the quality of surface water and monitoring welles every semester, socialization of surface water protection, installing of sign board about effucency of water usage, maintain a hygienic environment around water sources and manage of surface water erosion and runoff, etc. For all test are carried out by KAN accredited laboratory no. LP-024-IDN, and for the result is preview in RKL RPL and UKL UPL report every semester, last report in semester I periode 2024.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
O	<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) / the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the “RSPO Manual on BMPs for the management and rehabilitation of riparian reserves” (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).]</p>		
	<p>a. Is there a map identifying water courses and wetlands?</p> <p>b. Are the water courses and wetlands protected in accordance with the RSPO Manual on BMPs for the management and rehabilitation of riparian reserves?</p> <p>c. Are the riparian and buffer zones maintained and restored in existing plantation and replanting areas ?</p> <p>d. Is there SOP for riparian and buffer zone protection? If yes, has it been implemented?</p>	<p>Unit of certification has procedure for riparian and bufferzone protection in document SOP no. 001/KG-BGA/CSV/04/04/2021/R0 dated on June 04, 2021. about identifikasi of water management and water sources maintenance. That procedure mention for protection riparian areas is:</p> <ul style="list-style-type: none"> Installing boundary signs Involve the people who participate water sources usage to manage water sources and prevent the functions change Monitoring periodically to find out the water table, water quality and take corrective actions Management of buffer zones Control of chemical application Water management programs <p>As like mention in indicator 7.8.1 that Unit of certification has plan for water sources is to test the quality of surface water and monitoring welles every semester by KAN accredited laboratory no. LP-024-IDN. Some quality test has conducted in 2024, e.g:</p> <p>PT Windu Nabatindo Abadi (WNA)</p> <ul style="list-style-type: none"> SCMM - Mirah Hulu River has Certificate of test result for raw water no. 29705/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 7.08 mg/L; SCMM - Mirah Hilir River has Certificate of test result for raw water no. 29706/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 11,6 mg/L; BKLE - Sungai Cempaga Hulu River has Certificate of test result for raw water no. 29707/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 10,1 mg/L; SCME - Sungai Cempaga Hilir River has Certificate of test result for raw water no. 29708/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 2.35 mg/L; 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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		<p>PT Nabatindo Karya Utama (NKU)</p> <ul style="list-style-type: none"> - BHGE – Mirah Hilir River has Certificate of test result for raw water no. 29693/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 9.66 mg/L; - BHGE – Mirah Hulu River has Certificate of test result for raw water no. 29694/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 3.04 mg/L; - Mirah Minting Hulu River has Certificate of test result for raw water no. 29695/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 2.35 mg/L; - Mirah Minting Hilir River has Certificate of test result for raw water no. 29696/ANBPAP, dated on June 12, 2024, with result under threshold, BOD 11.8 mg/L; 	
R	<p>7.8.3 Mill effluent is [treated to be in compliance with national regulations / managed according to applicable regulations]. [Discharge / The] quality of mill effluent discharged, especially Biochemical Oxygen Demand (BOD), is [regularly monitored / monitored in accordance with applicable regulations.]</p>	<p>The unit of certification has POM effluent treatment before discharge. The waste water quality processed monitored by daily and monthly. Wastewater analysis conducted by KAN accredited laboratory no. LP-024-IDN. Based on the analysis shown that BOD parameter is comply with regulation (Environmental Ministry Regulation Number: 5-year 2021). All of POME management and monitoring has been reported to related institution regularly every 3 month.</p> <p>Unit of certification has permit to utilize palm oil on the ground (Land Application) with Land application license of Sungai Cempaga POM with number 52/DPMPPTSP-PT/LA/IX/2019 about Permit for utilization of palm oil industry waste water on land at the PT WNA Palm Oil Plantation in Tumbang Koling village, Cempaga Hulu District, Kab. East Kotawaringin, Kalimantan Province. However, based on the technical directive by the Environmental Agency 52/DPMPPTSP-PT/LA/IX/2019, dated on September 16, 2019, it is mentioned that the land application permit is still valid if there is no change in the operational activities.</p> <p>The company has conducted quality test of waste water based on wasted water analysis in periode January to July 2024, with sample result below Certificate of test for Land Application no. 43533/ANBPAP dated on August 05, 2024, with result all parameters that tested under the threshold especially BOD 25608 mg/L.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	<p>7.8.4 Mill water use per tonne of FFB is monitored and recorded.</p>	<p>The unit of certification has a mechanism for measuring mill water usage, described in IOM No. 048/IOM/EN-BGA/IX/2016 on September 13, 2016. It is explained that the measurement uses a flowmeter (recording in the morning and evening). The observation to the Water Treatment Plan (WTP) also showed that the flowmeter used is still functioning well, and the officer responsible for the WTP understands on the WTP process and records flowmeter data. Officers can also show the input data for inlet and outlet, which is recorded every day. The company has a plan to monitor and measure water usage, and water usage per ton FFB periode 2023, for instance the total water usage was: 132.043 m3 and FFB process was 265.539 Ton, with ratio usage 0,49 m3/ton FFB. And usage per ton FFB periode January – September 2024, for instance the total water usage was: 92.069 M3 and FFB process was 170.191 Ton, with ratio usage 0,54 m3/ton.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
7.9	<p>Efficiency of fossil fuel use and the use of renewal energy is optimised</p>		
R & O	<p>7.9.1 [A plan for improving / Plans to increase the] efficiency of [the use of fossil fuels / fossil fuel use] and to optimise renewable energy [is in place / are available], monitored and [reported / documented].</p>	<p>Organization has a program to reduce the GHG Emission for 2024. The program such as:</p> <ul style="list-style-type: none"> - Efficiency and reduce the fertikizer - Efficiency and reduce the chemical for spraying - Efficiency and reduce the fuel for transport activity - Application of BMP in peatland management - Efficiency and reduce the fuel for mill machine - Waste management according to standards - Greening of conservation areas and vacant land <p>Unit of certification uses shells and fiber as boiler fuel to generate turbine power, which can reduce the use of fossil fuels. There are the documentation of shells and fiber usage on document of “Efisiensi Penggunaan Energi” period January-December 2022. For example, use of shells and fiber period January-December 2022 usage is 12,843 ton and 32,096 ton respectively, while electricity generated from diesel fuel 640 kWh. The efficiency renewable energy use per ton of palm product in the mill is 3.56 KWH/Ton CPO, while result direct fossil fuel used is 4.34 liter/MT CPO.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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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																																																																																																			
R	7.10.1 (C) [GHG emissions are identified and assessed for the unit of certification / GHG emissions for the unit of certification are identified and assessed]. Plans to reduce or minimise [them / GHG emissions] are implemented, monitored through the Palm GHG calculator and [publicly reported / reported publicly].																																																																																																			
	<p>a. Are all sources of GHG emissions identified?</p> <p>b. Is the GHG emissions for the unit of certification calculated using the latest version of RSPO Palm GHG calculator?</p> <p>c. Are there plans to reduce or minimise the GHG emissions? Is this publicly reported?</p> <p>d. Are the plans being implemented? Was there any changes? Is it justified?</p> <p>e. Is there a system in place to monitor emission of greenhouse gases from estate (plantation) and mill operations?</p> <p>f. Is there regular reporting of the monitoring outcomes?</p>	<p>CH has conducted GHG emission calculations period 2023 Using Calculator Palm GHG version 4.1. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.1) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full version".</p> <p>Summary of Net GHG Emissions</p> <table border="1"> <thead> <tr> <th>Emissions per product</th> <th>tCO2e/tProduct</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>1.36</td> </tr> <tr> <td>PK</td> <td>1.36</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Production</th> <th>t/yr</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>22.54</td> </tr> <tr> <td>CPO produced</td> <td>60855</td> </tr> <tr> <td>PK produced</td> <td>11183</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Extraction</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>OER</td> <td>23.13</td> </tr> <tr> <td>KER</td> <td>4.25</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Land use</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>Planted area on mineral</td> <td>11669.89</td> </tr> <tr> <td>Planted on peat</td> <td>0.00</td> </tr> <tr> <td>Total area planted</td> <td>11669.89</td> </tr> <tr> <td>Conservation Area (Forested)</td> <td>5.00</td> </tr> <tr> <td>Conservation Area (Non-Forested)</td> <td>147.05</td> </tr> <tr> <td>FFB Production per hectare</td> <td>22.54</td> </tr> </tbody> </table> <p>Summary of field emission and Sinks</p> <table border="1"> <thead> <tr> <th rowspan="2">Description</th> <th>Own</th> <th>Group</th> <th>3rd Party</th> <th rowspan="2">Total</th> </tr> <tr> <th>tCO2e</th> <th>tCO2e</th> <th>tCO2e</th> </tr> </thead> <tbody> <tr> <td>Emission Source</td> <td>78122.</td> <td>29005.</td> <td>16766.</td> <td>12389</td> </tr> <tr> <td>Land Conversion</td> <td>79</td> <td>21</td> <td>29</td> <td>4.29</td> </tr> <tr> <td>CO2 Emissions from Fertiliser</td> <td>5199.5</td> <td>4451.0</td> <td>773.7</td> <td>10424.</td> </tr> <tr> <td>N2O Emissions from Peat</td> <td>2</td> <td>4</td> <td>7</td> <td>33</td> </tr> <tr> <td>N2O Emissions from Fertiliser</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td></td> <td>2058.9</td> <td>1809.2</td> <td></td> <td>4202.8</td> </tr> <tr> <td></td> <td>8</td> <td>2</td> <td>334.63</td> <td>3</td> </tr> <tr> <td></td> <td>2323.0</td> <td>1452.6</td> <td></td> <td>4477.6</td> </tr> <tr> <td>Fuel Consumption</td> <td>7</td> <td>0</td> <td>701.96</td> <td>3</td> </tr> <tr> <td>Peat Oxidation</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Sinks</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Emissions per product	tCO2e/tProduct	CPO	1.36	PK	1.36	Production	t/yr	FFB processed	22.54	CPO produced	60855	PK produced	11183	Extraction	%	OER	23.13	KER	4.25	Land use	Ha	Planted area on mineral	11669.89	Planted on peat	0.00	Total area planted	11669.89	Conservation Area (Forested)	5.00	Conservation Area (Non-Forested)	147.05	FFB Production per hectare	22.54	Description	Own	Group	3rd Party	Total	tCO2e	tCO2e	tCO2e	Emission Source	78122.	29005.	16766.	12389	Land Conversion	79	21	29	4.29	CO2 Emissions from Fertiliser	5199.5	4451.0	773.7	10424.	N2O Emissions from Peat	2	4	7	33	N2O Emissions from Fertiliser	0.00	0.00	0.00	0.00		2058.9	1809.2		4202.8		8	2	334.63	3		2323.0	1452.6		4477.6	Fuel Consumption	7	0	701.96	3	Peat Oxidation	0.00	0.00	0.00	0.00	Sinks					<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
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R	7.10.2 (C) [Starting / Since] 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 / an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are] prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).																																																																																																	
	<p>a. Has the unit of certification identified and estimated carbon stock of the proposed development area?</p> <p>b. If yes, what are the potential major sources of emissions that may result directly from the development?</p> <p>c. Is there a plan to minimise the emissions? If yes, is the plan following the RSPO GHG Assessment Procedure for New Development</p> <p>d. Is the plan implemented and monitored?</p>	<p>Based on document verification, there is no additional new areas in the scope of certification, it is still the same as the previous audit activities. Company has identified pollution and emissions activities including GHG. Pollution/emissions come from activities such as land clearing, fertilization and use of chemicals (spray activities), use of solar in transportation, lighting and processing of FFB, and management of POME. Based on the results of document review and interviews with management, it is known that there is an area of PT WNA that was planted after January 1, 2020 without going through the NPP procedure, covering an area of ± 403.03 Ha. The area is located on Sungai Cempaga Estate covering an area of 363.66 Ha and Bangun Koling Estate covering an area of 39.37 Ha.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>																																																																																															
R & O	7.10.3 (C) Other significant pollutants [are identified / identification results are available] and plans to reduce or minimise them are implemented and monitored.																																																																																																	
	<p>a. Is there a documented list of all significant pollutants from the estate and mill operations?</p> <p>b. Are there plans to reduce or minimise the identified pollutants ?</p>	<p>Consistent with previous audit, there is no additional new areas in the scope of certification, it is still the same as the previous audit activities. Company has identified pollution and emissions activities including</p>	<p><input checked="" type="checkbox"/> Yes</p>																																																																																															

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	c. Is there a system in place to monitor the pollutants?	GHG. Pollution/emissions come from activities such as land clearing, fertilization and use of chemicals (spray activities), use of solar in transportation, lighting and processing of FFB, and management of POME. Company has also implemented of GHG emission management including establishing a policy of zero burning in land clearing, fertilizer and chemical use in accordance with recommendations, EFB and POME applications on land, routine emission testing, use of fibers and shells as boiler fuel, planting trees in the area riparian.	<input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
7.1 1	Fire is not used for preparing land and is prevented in the managed area		
○	7.11.1 (C) Land for new planting or replanting is not prepared by burning.		
	a. Does the company has a zero burning policy or any statement on zero burning? b. Has the policy been implemented throughout the operations? c. Is there any new planting or replanting takes place? If yes, how was the land prepared?	Consistent with previous audit, the company has a no-burn policy contained in the Policy on Environment and Biodiversity and was approved by the Regional Head on June 1, 2016 which states that PT BGA in running its business is committed to land clearing implementing a zero burning system in all plantation development activities and waste disposal. The company also has SOP No. BGA-AGRKS-PTKS-PLH has been approved by the Director on January 4, 2011 regarding Land Preparation, where the procedure explains that land clearing is carried out by mechanical means and Zero Burning Based on field visit to replanting area at Block D15A-D16A, the organization replanting with a mechanical method which includes uprooting chipping work, removing roots and making holes (hole in hole), making trenches, stacking and compacting, and making fields drains. The organization has shows the Minutes of payment for the results of replanting land clearing work in 2022.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :
○	7.11.2 The unit of certification establishes fire prevention and control measures for [the areas directly managed / lands that are directly managed] by the unit of certification.		
	a. What is the mechanism/system established for fire prevention and contral measures for areas directly managed by the unit of certification? b. Is there adequate fire control equipment? c. What are the equipment available and how are equipment maintained to ensure that they are functioning well at all time? d. Has fire drill been conducted? If yes, when was it last carried out? e. Are the relevant workers aware of the actions to be taken in case of fire occurrence?	Consistent with previous audit, the company has a no-burn policy contained in the Policy on Environment and Biodiversity and was approved by the Regional Head on June 1, 2016 which states that PT BGA in running its business is committed to land clearing implementing a zero-burning system (no burning) in all development activities estate and waste disposal. The company also has SOPs on fire prevention: - SOP for Fire Management and Prevention (BGA-WNA-KRD/PRO-19/03/2012) was approved on 21 March 2012 by the Area Controller 3. Emergency response conditions identified include fire, explosion, pollution, natural disaster, civil commotion violence, demonstrations, work accidents. Broadly speaking, the SOP contains fire prevention procedures (with APAR, Hydrant), fire prevention, coordination, communication, training and socialization processes. - The Work Instruction for Land Fire Management and Prevention (BGA-WNA-KRD/IK-20/03/2012) was ratified on March 21, 2012 by the Area Controller 3. The procedure describes land fire prevention, formation of a firefighting team, land fire prevention, and activities after the blackout. In carrying out fire prevention and control activities, the company has carried out several activities, including: a. Establish an internal emergency response structure for PT WNA and PT NKU. b. Annually the Health Fire Fighting Department together with Estate management analyze fire hazards and risks to assess the level of danger and protected areas by determining the priority scale according to the hazard. c. Fire-prone locations are marked on the map and assigned different grades and colors according to hazard based on the level of fire hazard and limiting factors in Fire control. d. The field team will monitor the daily level of vulnerability based on weather behavior by counting days without rain, fuel conditions in the field, rainfall in the last 15 days and also the level of relative humidity (relative humidity). e. PT WNA and PT NKU plans, carries out fire prevention patrols whose frequency is adjusted to the daily fire hazard level and carries out patrols with a priority scale to areas with higher danger levels. f. Establish clear handling procedures in the context of Land Fire Control. g. Conduct training involving competent parties and create applications to monitor Hotspots in the certification unit's area and its surroundings. h. The certification unit has also formed a Forest and Land Fire Brigade, stratified according to the scale and extent of the fire as well as the severity and equipped with a support team such as logistics, planning, heavy equipment, medical, work safety, security, public relations and others. updated to ensure preparedness. i. Conduct socialization of the dangers of forest and land fires directly and indirectly, namely through	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :

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		warning boards. Based on the field observation also show that socialization regarding the prohibition of burning land has been conveyed through direct socialization to employees during meeting in the morning and symbols posted in places that are easy for everyone to read. Beside that, based on hydrant simulation also show that the available tools are quite complete and in good condition.																					
O	7.11.3 The unit of certification engages [with adjacent stakeholders on / stakeholders in adjacent locations for] fire prevention and control measures.																						
	a. Has the company made engagement with adjacent stakeholders on fire prevention and control measures? b. What type of engagement is agreed?	Consistent with previous audit, the three-partite socialization activities were carried out in 2022 between the company, the community and Manggala Agni. Related routinely conducts socialization and training to employees for fire prevention and control activities, some examples of activities that have been carried out include documentation in the form of socialization reports, simulations, and training for land, plantation, and forest firefighters was conducted on December 2023 in SBHE & SMME.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :																				
7.1 2	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																						
R	7.12.1 (C) 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 / carried out before] any new land clearing, in accordance with the RSPO LUCA guidance document. Note to Auditor : Refer to Interpretation of Indicator 7.12.2 and Annex 5																						
	a. Since November 2005, have any new plantings replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs)? If yes, was an adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification submitted the Disclosure form and LUCA to RSPO? c. Does the disclosure form reported any land liability? d. Since 15 November 2018, have any new plantings been done? If yes, was a HCV-HCSA assessment conducted and passed through the HCVRN ALS quality review process prior to any land clearing. e. Where HCVs & HCS forests have been identified on the land that is intended for new plantings, have new plantings been planned and managed to best ensure the HCVs & HCS forest identified are maintained and/or enhanced.	PT WNA and PT NKU have been clearing new land since November 2005 without prior identification of HCVs. BGA Group has sent disclosure and liability, and has carried out LUC analysis and has been sent to the RSPO on April 1, 2015 and November 7, respectively, 2014. The results of the document review show that there is a Final Conservation Liability of PT WNA of 103.68 Ha and Final Conservation Liability of PT NKU is 578.59 ha.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :																				
R & O	7.12.2 (C) HCVs, HCS forests and other conservation areas are identified as follows : 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. 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. PROCEDURAL NOTE for 7.12.2 : For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCS Assessments.																						
R & O	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. a. Is there any land clearing after 15 November 2018? If yes, go to 7.12.2b) b. Who conducted the HCV assessment? c. Is the HCV assessment covers the following : - Presence of protected areas that could be significantly affected by the grower or miller; - Conservation status (e.g. IUCN status), legal protection, population status and habitat requirements of rare, threatened, or endangered (RTE) species that could be significantly affected by the grower or miller. - Identification of HCV habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower or miller; d. Was the HCV assessment performed in consultation with relevant stakeholders? e. Does the HCV assessment include checking of available biological records? f. Does the HCV assessment include both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors)? g. Was the HCV assessment performed in accordance to the latest methodology available at global and national level?	PT WNA and PT NKU has conducted HCV assessment for the entire area of operations respectively on 2010 and 2013 by RSPO approved assessor based on locations area permit and operational plantation permit (<i>Izin Lokasi</i> and <i>IUP</i>). The process of HCV identification conducted for 11,900 ha of PT WNA and 11,000 ha of PT NKU by using HCV identification guides in Indonesia on June 2008, and indicates there is HCV 1, HCV 2, HCV 4, and HCV 5 presence covered on area of 1007.44 (PT WNA) and 699.06 ha for PT NKU. All of HCV attributes presence on company was mapped on 1:42000 scale, and this HCV identifications covered all estates/mill operational areas including surrounding landscape, species corridors, and RTE species presence. Unit certification was re-delineation and has determine of HCV area within certified area based on IOM (Internal Office Memo) on 05 April 2022 regarding Determination of HCV Area PT. WNA and NKU with HCV area in certifications area are 107.66 Ha consist of 52.55 HA in PT NKU and 55.11 Ha in PT WNA. The detail area and type of HCV within the certified area are: - PT WNA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A NCR No :																				
		<table border="1"> <thead> <tr> <th>HCV Area</th> <th>SBHE</th> <th>SCME</th> <th>BKLE</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Sungai Bahaur</td> <td align="center">2.26</td> <td align="center">-</td> <td align="center">-</td> <td align="center">2.26</td> </tr> <tr> <td>Sungai Bahaur Sim-pang</td> <td align="center">11.97</td> <td align="center">-</td> <td align="center">-</td> <td align="center">11.97</td> </tr> <tr> <td>Sungai Keruh</td> <td align="center">6.49</td> <td align="center">19.77</td> <td align="center">-</td> <td align="center">26.26</td> </tr> </tbody> </table>	HCV Area	SBHE	SCME	BKLE	Total	Sungai Bahaur	2.26	-	-	2.26	Sungai Bahaur Sim-pang	11.97	-	-	11.97	Sungai Keruh	6.49	19.77	-	26.26	
HCV Area	SBHE	SCME	BKLE	Total																			
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CR	CHECKLIST	RESULTS OF VERIFICATION				COMPLIANCE STATUS																																			
	<p>h. For existing plantation going for certification after 15 November 2018, are the applicable requirements in Annex 5 fulfilled?</p>	<table border="1"> <tr><td>Sungai Rege</td><td align="center">-</td><td align="center">-</td><td align="right">14.61</td><td align="right">14.61</td></tr> <tr><td>Water source</td><td align="center">-</td><td align="center">-</td><td align="right">0.01</td><td align="right">0.01</td></tr> <tr><td>Total</td><td align="right">20.72</td><td align="right">19.77</td><td align="right">14.62</td><td align="right">55.11</td></tr> </table>	Sungai Rege	-	-	14.61	14.61	Water source	-	-	0.01	0.01	Total	20.72	19.77	14.62	55.11																								
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R & O	<p>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.</p> <p>a. Is there land clearing after 15 November 2018?</p> <p>b. If Yes to (a), does it fall into any of the scenarios in Annex 5 and the 'RSPO Interpretation of Annex 5 & indicator 7.12.2' document?</p> <p>c. If Yes to (b), are the applicable requirements for the scenario in Annex 5 fulfilled?</p> <p>d. If No to (b), was a HCV-HCSA assessment conducted prior to any land clearing?</p> <p>e. Is the HCV-HCSA assessment passed the ALS quality control? How was this confirmed?</p> <p>f. Was the HCV-HCSA assessment conducted in consultation with stakeholders and take into account wider landscape-level considerations?</p>	<p>There is no new land clearing after 15 November 2018</p>																																							
O	<p>7.12.3 (C) 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 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>This checklist will be provided once the procedure by the "No Deforestation Joint Steering Group" is finalised.</p>																																							
		<p>This is requirement not relevant to Indonesian country until further decisions by RSPO so that this is section not applicable (N.A)</p>				<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N.A</p> <p>NCR No :</p>																																			
R & O	<p>7.12.4 (C) 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 / if] 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 considerations (where these are identified).</p>	<p>The company has a HCV management and monitoring plan which is contained in the HCV Area Man-</p>																																							
	<p>a. Has the unit of certification identified the HCV, HCS, peatland and other conservation areas? This is applicable</p>																																								

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	<p>for both existing and new planting areas.</p> <p>b. Where (a) have been identified on the land that is intended for new plantings, have new plantings been planned and managed to ensure the identified HCVs are maintained and/or enhanced.</p> <p>c. Is there an integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas developed, implemented and adapted where necessary? Is the plan contains monitoring requirements?</p> <p>d. Is the integrated management plan developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified)?</p> <p>e. Is the plan reviewed by the unit of certification? When was the last reviewed conducted?</p>	<p>agement Plan of PT WNA and PT NKU on 2024 with management activity plans in the form of boundary marking, boundary marking maintenance, flora and fauna area protection, patrolling, species rehabilitation and enrichment, counselling, employee training.</p> <p>In addition, the management implementation timeline is contained in the 2024 HCV Area Management Work Program with management activities in the form of monitoring/maintenance of buffer zone stakes every 3 months, patrols and monitoring of flora and fauna once in 3 months, HCV socialization 2 times within 1 year (workers and community), and the manufacture and maintenance of the notice board once every 1 year. For example:</p> <ul style="list-style-type: none"> HCV Socialization for Workers of Bangun Kolin Estate was conducted on 25 June 2024 with total participant is 52 workers. HCV Socialization for Workers of Sungai Mirah Minting Estate was conducted on 30 May 2024 with total participant is 39 workers. HCV Socialization for Tumbang Koling Village was conducted on 15 August 2024 with total participant is 6 attendees. HCV Inspection Checklist with the latest conducted on 27 September 2024 with condition of HCV and buffer zone stakes still in good condition. Identification Flora and Fauna with the latest monitoring was done on 27 September 2024 and found some flora and fauna <p>Based on field visit to Riparian Area of Mirah Hujan River at Division 3 Block O33 & Riparian area of Mirah River at Division 2 Block M20/21 Banama Haring Estate, Riparian area of Rege River & Boundary Mark No. 70 at Division 1 Block K10 Bangun Koling Estate, it was known that HCV still in good condition and some area was revegetated become a shrubs, there are buffer zone mark, there are signboard of HCV area and there is no indication of chemist application in the buffer zone.</p> <p>The Company has not been able to demonstrate that the HCV management work program has been reviewed at least once every five years and that the integrated management plan was developed through consultation with relevant stakeholders. This become Non-conformity No. RSPO06084 under indicator 7.12.4</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No : RSPO06084</p>
O	<p>7.12.5 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>PT WNA and PT NKU has conducted HCV assessment for the entire area of operations respectively on 2010 and 2013 by RSPO approved assessor. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008, and indicates there is HCV 1, HCV 2, HCV 4, and HCV 5 presence covered on area of 1007.44 (PT WNA) and 699.06 ha for PT NKU. Based on document verification of re-delineation HCV area, unit of certification has established HCV areal which is in its operational area in 2022 which are 55.11 ha for PT WNA and 52.55 ha for NKU that was controlled by company.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R & O	<p>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.</p>	<p>PT WNA and PT NKU has conducted HCV assessment for the entire area of operations respectively on 2010 and 2013. HCV identification results also explain there is RTE species according IUCN-Redlist V3.1 for examples <i>Hylobates agilis</i> (EN), <i>Manis javanica</i> (CR), and <i>Pongo pygmeus</i> (CR) (sign by orangutan nest). To provide protection against RTE species, management unit has provides HCV management plan that consist of HCV areas marking, signboard placement, regular species monitoring and patrols, rehabilitation of riparian, and etc.</p> <p>The company has a HCV management and monitoring plan which is contained in the HCV Area Management Plan of PT WNA and PT NKU on 2024 with management activity plans in the form of boundary marking, boundary marking maintenance, flora and fauna area protection, patrolling, species rehabilitation and enrichment, socialization, employee training.</p> <p>Based on document review, it is shown that result of HCV management and monitoring in 2024 has been implemented in accordance with management plan, e.g., maintain HCV attributes (HCV bounda-</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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		<p>ry, sign board), HCV socialization (community and worker), maintain HCV area, regular patrols for maintain HCV security, and species monitoring.</p> <p>The HCV socialization including RTE species also was conducted to workers and stakeholder, for example:</p> <ul style="list-style-type: none"> • HCV Socialization for Workers of Bangun Kolin Estate was conducted on 25 June 2024 with total participant is 52 workers. • HCV Socialization for Workers of Sungai Mirah Minting Estate was conducted on 30 May 2024 with total participant is 39 workers. • HCV Socialization for Tumbang Koling Village was conducted on 15 August 2024 with total participant is 6 attendees. <p>Based on minutes of socialization, the main topic of socialization are HCV area introduction including the value of HCV, informing regarding buffer zone and regarding RTE Species. Based on interview with workers and village representative, it was known that they known regarding the RTE Species and HCV area from the socialization and signboard in the field.</p>	
O	<p>7.12.7 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>a. Is the management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species?</p> <p>b. Is the status documented and reported?</p> <p>c. Are the result of monitoring available to justify the trend of HCV attribute for improvement of management plan ?</p> <p>d. Are the outcomes of monitoring fed back into the management plan?</p>	<p>The company has conducted monitoring activities for HCV and RTE species in March, June and September 2024. For example, on the BHGE the latest monitoring was done on 27 September 2024 and found some flora and fauna. Furthermore, the monitoring of RTE species result was include in the annual review of Work Program of Management and Monitoring HCV with latest review conducted on 09 December 2023.</p> <p>According to interviews with workers and local communities in surrounding community representatives, it is known that they know protected animals, through socialization and signboards available on plantations. It was confirmed at the HCV area also has sign boards that prohibited to hunting the animal.</p> <p>Certification units are encouraged to improve the knowledge of HCV officers in monitoring flora and fauna, especially protected species, because in the form of monitoring Flora and Fauna did not mention whether the flora and fauna found during monitoring were RTE species or not. OFI</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>
R	<p>7.12.8 (C) 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>a. Is there land cleared since November 2005 without prior HCV assessment?</p> <p>b. Is there land cleared since 15 November 2018 without prior HCV-HCSA assessment?</p> <p>c. If (a) or (b) above applies, has the unit of certification undergone the RaCP process?</p> <p>d. If (c) applies, is there evidence that compensation plan for the affected area has been approved by the RSPO?</p> <p>Note to auditor : Certificate shall not be issued until the Compensation Plan is approved.</p>	<p>PT WNA and PT NKU have been clearing new land since November 2005 without prior identification of HCVs. BGA Group has sent disclosure and liability, and has carried out LUC analysis and has been sent to the RSPO on April 1, 2015 and November 7, respectively, 2014. The results of the document review show that there is a Final Conservation Liability of PT WNA of 103.68 Ha and Final Conservation Liability of PT NKU is 578.59 ha. The certification unit has shown the results of RaCP communication with RSPO on January 9 2023 which stated that, "...Annex 8 Submission for Bumitama has achieved a Satisfactory evaluation result. Henceforth, the RaCP process for Bumitama are now completed and you may proceed with certification."</p> <p>BGA group also has shown the annual progress report of RaCP area in the form of Annex 9. Monitoring Report Template (Annual Progress Update) period January – December 2023 and was send to RSPO secretariat (rspocompensation@rspo.org) on 2 August 2024. The report was include of certified unit that are PT WNA and PT NKU.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N.A</p> <p>NCR No :</p>

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6.2 Compliance to Book & Claim requirement:

<i>Chapter is applicable by client :</i>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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if yes, please complete information require in **appendix 7**.

If not, please delete **appendix 7**

7.0 STATUS OF PREVIOUSLY IDENTIFIED NON-CONFORMITIES

Ref	Status of NCR	NCR No.	Evidence Observed in order correction/corrective action on previous audit	Verification of correction/corrective action taken on current audit	Auditor Conclusion
3.2.2	Non Critical	2023.01	The company has not been able to show sufficient evidence that the preparation of the matrix template is based on accurate data sources	Based on document verification the submitted evidence of correction documents, it is shown that corrective actions based on document deficiencies and improvements based on the root causes of the problems determined show suitability to be able to close / correct the available findings. Evidence: <ul style="list-style-type: none"> - Metrics templateversion 2.1 periode ASA2.audit - Supporting document or basic data The company has been able to show sufficient evidence that the preparation of the matrix template is based on accurate data sources.	Closed
3.8.7	Critical	2023.02	The company has not been able to show sufficient evidence that the registration of certified products has been carried out in accordance with applicable proce-	Based on verification document of FFB delivery letter (SPB) and recapitulation of Certified & Noncertified FFB per each block, it is known	Closed

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			dures	<p>that separating FFB certified and non-certified was clear. SPB for non-certified block area also not stamped with FFB certified. It is also confirmed that the block on the SPB is listed as non-certified block on the list of block certified and non-certified. For example: SPB No. 01796A0124-BHGE Div 1 FFB from Block O12 as non-certified block and not stamped with FFB certified.</p> <p>Based on interview with weighbridge admin and FFB transport clerk, they can explain which block is certified and non-certified block based on the list. Therefore, they also understand that SPB from non-certified block cannot be stamped with FFB certified and cannot enter to mill if any mistaken of stamp application on the SPB.</p> <p>Based on explanation, certification unit still maintenance the corrective action from previous non-conformity</p>	
6.1.6	Non Critical	2023.03	The company doesn't have sufficient evidence yet of payment of equal wages for the same scope of work	The company has an approved plan of new salary scale for Permanent Daily Workers with range start District Minimum Wage+ Rp 250 for 0-1 year work period and up to UMK+Rp 1750 for above 7 years work-period, as seen on Memo of Human Capital Group Dept. Head No. 015/MEMO-BGA/HC/06/2024 dated 6 June 2024. Opportunity for improvement for company to give socialization regarding the salary range to all workers.	Closed
6.7.2	Non Critical	2023.04	Company has not shown evidence of monitoring first aid boxes, first aid kits locations, a list of first aid officers in the company and proof of identification of every acci-	Based on the results of field visits and document verification, it is known that the Organization has shown evidence of improvements in-	Closed

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Ref	Status of NCR	NCR No.	Evidence Observed in order correction/corrective action on previous audit	Verification of correction/corrective action taken on current audit	Auditor Conclusion
			dent, especially those that cause LTA	cluding determine the duties and responsibilities of first aid officers, provide documents of first aid monitoring, provide a list of first aid distribution locations, recording work accidents that regular monitoring by sustainability staff and Internal audit by CST Dept.	
6.7.3	Critical	2023.05	The company has not been able to show the proof that the PPE used by workers is in accordance with results of identifying the required PPE	Based on the results of interviews with workers and document verification, it is known that the organization has provided PPE in accordance with the HIRAC it has, there is a PPE monitoring system for each worker and there is evidence of socialization related to the use of PPE.	Closed
6.7.4	Non Critical	2023.06	There is not enough evidence that the company has registered its workers with BPJS Health	Based on the results of interviews with workers and document verification, it is known that the organization has conducted an inventory of each worker who has not/has problems related to ownership of BPJS Health and Employment. This is monitored by the HR region and supported when the internal audit is carried out.	Closed
7.8.4	Non Critical	2023.07	The company has not been able to show the evidence that it has accurately recorded the amount of water used for processing	Unit of certification has permit to utilize palm oil on the ground (Land Application) with Land application license of Sungai Cempaga POM with number 52/DPMPTSP-PT/LA/IX/2019 about Permit for utilization of palm oil industry waste water on land at the PT WNA Palm Oil Plantation in Tumbang Koling village, Cempaga Hulu District, Kab. East Kotawaringin, Kalimantan Province. However, based on the technical directive by the Environmental Agency 52/DPMPTSP-PT/LA/IX/2019, dated on September 16, 2019, it is mentioned that the land application permit is still valid if there is no change in the operational activities. The company has conducted quality test of	Closed

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Ref	Status of NCR	NCR No.	Evidence Observed in order correction/corrective action on previous audit	Verification of correction/corrective action taken on current audit	Auditor Conclusion
				waste water based on wasted water analysis in periode January to July 2024, with sample result below Certificate of test for Land Application no. 43533/ANBPARG dated on August 05, 2024, with result all parameters that tested under the threshold especially BOD 25608 mg/L.	
RSPO Certification System 2020 TBP 5.5.2	Critical	2023.08	The company has not been able to show the evidence that the TBP for several uncertified units has a planned time frame for certification	<p>Evidences observed:</p> <ul style="list-style-type: none"> The company has shown evidence of improvement, namely List of attendees for the meeting regarding PT BGA's Timebound Plan which will be held on December 5 2023 at the Jakarta Office, attended by 6 people consisting of the Document & License Team and the Sustainability Team Proof of email communication and approval from the RSPO regarding the latest Time Bound Plan update on 27 December 2023 Attachment of the revised excel file of Bumitama Agri Ltd's Time Bound Plan approved by RSPO on 27 December 2023 TBP review meeting minutes via internal memo no. 133/MEMO-BGA/CS-CRC/12/2023 dated 6 December 2023 from the CRC Department to the D & L Department which explains several things, namely a review of BGA licensing updates and their extent on TBP documents, a review of RSPO certification targets for plasma cooperatives under BGA and certification targets for core 2024 and 2025 Report on the results of the partial certifica- 	Closed

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Ref	Status of NCR	NCR No.	Evidence Observed in order correction/corrective action on previous audit	Verification of correction/corrective action taken on current audit	Auditor Conclusion
				tion self-assessment of BGA management units for all units that are not yet RSPO certified	

8.0 IDENTIFIED NON-CONFORMANCES, ROOT CAUSE ANALISYS; CORRECTIVE ACTIONS TAKEN AND AUDITORS CONCLUSIONS

A total of 7 nonconformances were identified during the main certification assessment. These consisted of 4 major non-conformities and 3 minor non-conformities. For the major non-conformances, the company has taken the necessary corrective action to close these non-conformances within 90 days from completion of the assessment time (closing meeting), and this was verified by the audit team through checks of documents submitted by the company. For the minor non-conformances, the company has taken corrective action against these as well, and for those which could not be verified as closed through document checks, the closure of these minor non-conformities will be assessed during the next surveillance audit. A summary of all identified non-conformances, corrective actions taken and auditor conclusions is as explained below:

8.1 Major Non-Conformities

Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Corre tion/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause	Correction / Corrective Action		
Remote audit						
-	-	-	-	-	-	-
On-site audit						
3.3.1	RSPO 06080	Based on the results of field visits and interviews, it is known that: (1). There were no spray masks in the lockers in the rinse house area	(1) Lack of employ-ee understanding regarding the stor-age of spray PPE (2) Delays in the	Correction: (1) Providing out-reach to spraying employees regard-ing storage provi-	The organization has made improve-ments consisting of analyzing the root of the problem, demonstrating correc-tions and corrective action. Some evidence of improvement shown	22/12/2024 / Closed

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause	Correction / Corrective Action		
		(conditions where there was no spraying activity) (2). Based on the results of field visits to the SCMM, SMME and BHGE Warehouses, it was known that the stock of PPE in each warehouse was running out (such as earplugs, earmuffs, green helmets, rubber gloves and masks). (3). There is a work activity document explaining the working hours (chemical applicator) from 05.00 – 13.00 (exposure allocation 5 hours). However, based on interviews, it is known that spraying activities started at 06.00 – 13.30.	procurement of PPE due to monitoring by warehouse officers being ineffective (3) There is no policy yet that determines spraying work hours.	<p>sions for spraying PPE (2) Accelerating procurement of PPE (3) Memo on determining spraying work hours (4) SOP/Internal Audit Mechanism (5) 2025 Internal Audit Schedule</p> <p>Corrective Action: (1) APD storage checklist by PIC (2) Routine monitoring of APD by warehouse officers (3) monitoring through internal audits</p>	<p>includes:</p> <ul style="list-style-type: none"> - RSPO Certification Plan 2025, that inform related of Internal Audit, training refreshment and management review - Procedure of internal audit (No Document SUST-WNA-SOP-39 Rev 00). - minutes of socialization of the regulation of storage of personal protective equipment on 23 November 2024 (BHGE). - minutes of socialization of the regulation of storage of personal protective equipment on 25 November 2024 (BKLE). - minutes of socialization of the regulation of storage of personal protective equipment on 13 November 2024 (SBHE). - minutes of socialization of the regulation of storage of personal protective equipment on 21 November 2024 (SCME). - minutes of socialization of the regulation of storage of personal protective equipment on 22 November 2024 (SMME). - Memo No.027/MEMO-BGA/RH-PUNDU/XI/2024 on 20 November 2024 related work hour for spraying operator. - PPE monitoring of each estate. <p>Based on proof of improvement</p>	

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause	Correction / Corrective Action		
					shown, the nonconformity is declared fulfilled, and the effectiveness of its implementation will be confirmed during the next audit activity.	
3.8.12	RSPO 06081	<p>The company has shown a Book Keeping Document that informs FFB received, processed FFB, CPO & PK production, sales and product stock. However, there are errors in the data, including:</p> <p>(1). There has been no balance for a maximum of 3 months. This can be seen from the stock at the beginning of the month, where there is still a minus amount in uncertified stocks.</p> <p>(2). Total month-end stocks at CPO (non-certified and certified) in September 2024 minus (-198.40 mt)</p> <p>(3). Supporting data on CPO delivery to buyers has not been shown</p> <p>(4). Proof of CPO stock in LBBS for the period of October 2023 – September 2024 cannot be shown.</p>	<p>1. Lack of control from the PIC to the balancing of 3 months due to the vacancy and replacement of the PIC so that the balancing has not been carried out.</p> <p>2. There is missing information to the PIC so that the stock in LBBS has not been included in the mass balance calculation so that the final stock is minus</p>	<p>Correction:</p> <p>1. Revise the mass balance calculation</p> <p>2. Provide CPO sales documents from mills and LBBS</p> <p>3. LBBS data stock</p> <p>4. CPO Delivery Data to Buyers from LBBS</p> <p>5. Proof of Remove stock</p> <p>Corrective action :</p> <p>1. Monthly monitoring by PIC</p> <p>2. Monitoring through internal audit mechanisms</p>	<p>UoC has shown some corrective action evidence, that are:</p> <ul style="list-style-type: none"> - Revision of Mass Balance Calculation period October 2023 – September 2024 that has been balanced every 3 months. - The recap of stock report from bulking (LBBS) and mill and was accordance with figure of end of physical stock in mass balance. - The recap of CPO delivery report from bulking (LBBS) and mill and was accordance with figure of CPO delivery in mass balance. - The detail of CPO delivery to buyer from LBBS period October 2023 – September 2024 and and was accordance with figure of CPO delivery in mass balance and on recap of CPO delivery. - The sample of CPO delivery documentation on September 2024 that was accordance with figure of CPO delivery in mass balance - Proof of Removing Stock of CSPK on 11 October 2024 with total volume is 1,612.97 mt and it has been more than the CSPO volume that used for selling volume of CSPK under conventional sell <p>Based on Mass Balance revision, there</p>	<p>Closed / 10-01-2025</p>

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause	Correction / Corrective Action		
					are minus stock of CSPK in the end of balancing period in the previous license on January 2024 with total - 95.97 mt and UoC was remove their credit stock on 02 January 2025 for covered the minus stock.	
6.2.3	RSPO 06082	Checking the overtime recapitulation documents for the July-August 2024 period for several samples of the process section, WTP, and kernel plant as well as the results of interviews with Sungai Cempaga POM workers (process section) found that the realization of overtime was more than 4 hours a day and 18 hours a week. This is not in accordance with the overtime provisions in PP 35/2021 article 26.	Lack of understanding from the PIC (section head) regarding overtime provisions according to applicable regulations	<p>Correction:</p> <ol style="list-style-type: none"> Memorandum of affirmation related to the regulation of employee overtime working hours and monitoring by PIC (section head) Socialization of overtime provisions Overtime realization monitoring form by payroll admin and cashier Coordinate and notify the Manpower Agency <p>Corrective action :</p> <ol style="list-style-type: none"> Monitoring by payroll and cashier admins Monitoring through Internal Audit 	<p>Auditee has submitted correction and corrective evidences as follow:</p> <ol style="list-style-type: none"> Overtime monitoring sheet for mill workers in processing area period Nov 2024, not exceed 18 hours per week. Internal Memo by Regional Head Pundu No. 046/Memo-BGA/RH-PUNDU/XII/2024 dated 23 Dec 2024 regarding Adjustment of Overtime to be strictly 4 hours per day or 18 hours per week, and will be monitored regularly by payroll admin and head section in mill, so that will be in accordance with PP35/2021 Act 26. Joint agreement No. 001/SCMM-WNA/EXT/12/2024 between management of PT WNA and workers' representative regarding overtime to be in accordance with PP 35/2021, this agreement is acknowledged by Manpower Agency of Sampit. Awareness regarding overtime regulation to be in accordance with PP 35/2021, given by HRD to Head Section, Assistants, Payroll admin, and mill workers, dated 30 Dec 2024, attended by 85 participants. 	Closed / 31-12-2024

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause	Correction / Corrective Action		
					5. Internal audit plan in June 2025 referring to procedure No. SUST-WNA-SOP-39 and reference RSPO P&C with specific checklist about overtime under Indicator 6.2.3	
7.1 2.4	RSPO 06084	The Company has not been able to demonstrate that the HCV management work program has been reviewed at least once in five years and that the Integrated Management Plan was developed in consultation with relevant stakeholders.	The HCV update review is still in the finalization stage by the Sustainability Governance & Reporting Dept.	<p>Correction:</p> <ol style="list-style-type: none"> Follow up to the Sustainability Governance & Reporting Dept. Document of the review report of the update of HCV PT WNA & NKU Memorandum of determination of HCV PT WNA & NKU HCV Program in 2024 BA consultation with stakeholders (the results of stakeholder consultation are contained in the HCV update review report on page 59) <p>Corrective action : Annual review through Management Review Meeting</p>	<p>The company has shown evidence of improvement, including:</p> <ol style="list-style-type: none"> Report on the Review and Renewal of the HCV Area of PT WNA, partners of PT WNA and PT NKU in July 2024. The review activity was carried out in 2 stages, namely a pre-study on January 5-16, 2023 and a field review on July 4-26, 2023. The objectives of the review and renewal of HCV include re-measuring the HCV area from the previous assessment because it uses the area of the location permit, assessing the elements of the HCV, identifying additional areas if any, assessing the implementation of HCV management and providing recommendations for the management and monitoring of HCV. Memo No. 074/MEMO-BGA/CS-SGR/09/2024 dated September 27, 2024 regarding the determination of the HCV area of PT NKU and its partners informing of changes in the HCV area due to the initial assessment of HCV carried out within the scope of the Location permit and the addition of a new HCV area with a total new HCV area of 1,655.32 Ha Memo No. 075/MEMO-BGA/CS- 	Closed / 10-12-2024

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause	Correction / Corrective Action		
					<p>SGR/09/2024 dated September 27, 2024 regarding the determination of the HCV area of PT WNA and its partners informing of changes in the HCV area because the initial assessment of HCV was carried out within the scope of the Location permit and the addition of a new HCV area with a total new HCV area of 488.20 Ha</p> <p>4. Minutes of stakeholder consultation during the review of HCV conducted on July 6-8, 2024 to the chairman of the Sehati Pundu cooperative, leaders of the upstream Cempaga Community, the head of Selucing Village, the supervisory agency of the Koling Hapakan cooperative, and community leaders of Tumbang Koling Village</p> <p>5. HCV Management Work Program in 2024 which is made per HCV type area with the type of socialization activities, maintenance and monitoring of HCV boundaries, HCV patrols to HCV training.</p> <p>Based on RCA, Correction and corrective action, as well as evidence of improvement shown. Thus, the discrepancy in indicator 7.12.4 can be declared fulfilled.</p>	

It is recommended by the lead auditor to award the system of the company with a certificate pursuant to the above-mentioned RSPO standards after eliminating the non-conformities rated as "major".

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8.2. Minor Non-Conformities

Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause Analysis	Correction/ Corrective Action		
Remote audit						
-	-	-	-	-		-
On-site audit						
2.2.2	RSPO 06078	<p>(1). Based on the results of a field visit in Block I12, Division 2, Sungai Mirah Minting Estate, it was found that Wholesale workers were sowing empty bunches under the condition of not using PPE, bringing children under five and not having a clear work agreement to work in Division 1 of SMME. Based on the results of interviews with the workers who sowed empty janjang, the wages paid were Rp 4,000/basic, but it could not be proven if the wages were in accordance with the provisions of the East Kotawaringin minimum wage.</p> <p>In addition, based on the contractor's employment contract, it is known that outsourcing is carried out by individuals (an. AP) and is</p>	Lack of understanding of PIC requirements of contractors	<p>Correction:</p> <ol style="list-style-type: none"> 1. Socialization back to the estate related to the Contractor's SOP 2. Re-evaluate the contractor 3. BAST reporting PKWT PT Surya Mentaya Jaya 4. Proof of BPJS PT Cahaya Bumi Rezeki membership document <p>Corrective action :</p> <ol style="list-style-type: none"> 1. Verification by Sustainability when submitting a contractor 2. Monitoring and evaluation of contractors 	Based on the rootcause, correction and corrective action submitted, it is acceptable and the implementation of the correction action will be reviewed during the next audit.	Open until next audit

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause Analysis	Correction/ Corrective Action		
		<p>not in the form of a legal entity in accordance with Law No. 6 of 2023</p> <p>(2). The Company has not been able to show evidence that all regulatory compliance evaluations for contractors have been carried out such as:</p> <p>(a) Reporting of PT Surya Mentaya Jaya PKWT workers to the Manpower Office in accordance with Government Regulation No. 35 of 2021.</p> <p>(b) PT Cahaya Bumi Rezeki has not shown evidence that its workers have BPJS Employment and Health as insurance for workers.</p>				
2.2.3	RSPO 06079	The company has shown SPK with contractors, including PT Cahaya Bumi Rezeki No. 128-RPLANT/WNAL-SBHE/JKT/01/2024 dated January 2, 2024. The contract has stipulated that it is not allowed to employ minors, but it has not stipulated that there should be no forced labor and workers	Lack of understanding of PIC requirements of contractors	<p>Correction:</p> <ol style="list-style-type: none"> 1. Revision of Contractor SPK (agreement) 2. Socialization to PICs <p>Corrective action : Review by the sustainability department on the contractor's SPK submission</p>	Based on the rootcause, correction and corrective action submitted, it is acceptable and the implementation of the correction action will be reviewed during the next audit.	Open until next audit

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Ref	NCR No.	Evidence Observed / NCR raised	Auditee Response		Verification of Correction/Corrective action	Date of closure Auditor/ Conclusion
			Root Cause Analysis	Correction/ Corrective Action		
		from human trafficking.				
6.3.2	RSPO 06083	There is no evidence that PT WNA and PT NKU have reported the Bipartite Committee activity meeting for the first quarter of 2024 to the local Manpower Agency in accordance with Permenaker 32/2008 Article 17 (2).	Delay of PIC in providing documentary evidence of Bipartite meeting reporting	Correction: Submit documents proving Bipartite LKS reporting to the auditor Corrective action : Monitoring and collective BAST documents reported to the agency by sustainability staff on a quarterly basis	Root cause, correction, corrective action and attached evidence are acceptable. The company submitted evidence of the Bipartite LKS meeting of the ladder; May 21, 2024 for PT WNA and PT NKU and has been attached to the East Kotawaringin Regency Manpower Office on May 28, 2024. Based on this, this NCR can be closed.	Closed / 11-01-2025

It is recommended by the lead auditor to award the system of the company a certificate pursuant to the above-mentioned RSPO standards. The non-conformities identified shall be audited again in line with the timeframe during the next surveillance audit

9.0 NOTEWORTHY POSITIVE COMPONENTS AND POTENTIAL FOR IMPROVEMENT

9.1 Positive Observation

No.	Ref.	Positive Comments
1	-	The company demonstrated efforts in meeting the requirements of the principles, criteria, indicators and verifiers listed in the RSPO P&C (INA NI 2020)

9.2 Potential for Improvement:

No.	Ref.	Potential for improvement
1	6.1.6	The implementation of the wage structure and scale for PHT workers is in accordance with the Memo of the Human Capital Group Dept. Head No. 015/MEMO-BGA/HC/06/2024 dated June 6, 2024 so that it is disseminated to workers.
2	6.2.4	The company has the opportunity to improve the facilities needed for daycare/ creche such as educational games and other supporting facilities needed.
3	7.12.7	Certification unit is encouraged to increase the knowledge of HCV officers in monitoring flora and fauna, especially for protected species

10.0 ISSUES RAISED BY STAKEHOLDERS AND FINDINGS PERTAINING TO ISSUES

10.1 Issues Raised during Stakeholder Consultation Meeting

No.	Issues Raised	Management Response	Auditor Verification
1	Labor Unions Issue: No negative issue	No negative issue	No negative issue
2	Public Figure of Tumbang Koling Village (<i>Tokoh Masyarakat Desa Tumbang Koling</i>) Issue: There is no negative issue related of company. Good Communication between Public Figure and Company. Improving the community's economy by providing plasma. there is no issue of environmental pollution.	Management is committed to improving the community's economy through plasma.	Improving the economy of the surrounding community by providing plasma has been carried out with a payment method every 3 months. There is no outstanding communication between community leaders and company.

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3	<p>Badan Pertanahan Nasional (Land Agency of Kotawaringin Timur) Issue:</p> <p>There is no negative issue related of company. Reporting related Land Used was on scheduled but need to improve the timeliness of reporting.</p>	<p>Management had a commitment related to improve the timeliness of Land Used Reporting.</p>	<p>The last reporting related of land used was deliver to agency on 12 February 2024.</p>
4	<p>Manpower Agency Issue:</p> <ul style="list-style-type: none"> - Reporting of OHS Committee Updates usually late, suggest to give on time - To make sure the company already has paramedics with <i>Hiperkes</i> - Salary of workers during replanting period to be always in accordance with regulation, hopefully there will be no gap or reducement. - Suggest company to also send copy of lab test result regarding work environment condition. 	<p>Company is committed to implement regulations set by government.</p>	<p>Organization has paramedics who have taken part in <i>Hiperkes</i> training with the initials AH (No. 25.827/DBK3-PM/II/XI/2018) established in November 2018 and initial DW (No. 46.072/X/DBK3-PM/07/IV/2023 on 28 July 2023).</p>
5	<p>Koling Hapakat Plasma Issue: Plasma is given 20 percent of the company's managed area to the community. Plasma payments are made periodically every 3 months. Plasma supplies FFB to Cempaga Mill. Plasma increases the economic value of the community around the company.</p>	<p>The company is committed to providing plasma for the surrounding community and improving the economy.</p>	<p>The company has implemented plasma distribution for the surrounding community. Based on communication with community leaders, it is known that communication between them is running smoothly.</p>
6	<p>Smallholders/Petani sekitar area estate (Supplier FFB) Koperasi Sehati Pundu Issue positive :</p> <ul style="list-style-type: none"> • Payment is made in cash every 3 months • The FFB selling price is based on Disbun's price determination, the Cooperative gets updates on the FFB price from the com- 	<p>Management is committed to improving the community's economy through plasma.</p>	<p>There are no issues that need further verification by the auditor</p>

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	<p>pany every time there is a change via short message or telephone</p> <ul style="list-style-type: none"> • Regarding sales results, updates are carried out every day, then recapitulation is carried out every month • The cooperative supervises activities on the plantation, all management is carried out by the company • Cooperatives already know the mechanism for submitting complaints, namely through the person in charge of the partnership 		
7	<p>NGO of <i>Forum Bersama Kotawaringin Timur</i></p> <p>Issue: No negative issue</p>	No negative issue	No negative issue
8	<p>PT Surya Mentaya Jaya (CPO Transporter)</p> <p>Issue: Not yet submitted the contract agreement of PKWT to Labour Agency</p>	Contract of PKWT was submitted to Labour Agency according to the regulation.	Based on verification document, company cannot shown the proof of reporting the contract of PKWT to Labour Agency for non-permanent worker of PT Surya Mentaya Jaya and has become an Non-Conformity No. RSPO06078 under indicator 2.2.2.
9	<p>Land Previous Owner (Mr. D & Mr. L)</p> <p>Issue: No negative issue. Land compensation was done through FPIC process</p>	No negative issue	No negative issue
10	<p>Environmental Agency, Kotawaringin Timur Regency</p> <p>Issue: No issue, all proses for intergrated environment licensing still on progress and for all licensing now still valid</p>	No negative issue	No negative issue

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11	<p>Head of Law Enforcement Supervision, Environment Agency of Kotawaringin Timur Regency</p> <p>Issue:</p> <ul style="list-style-type: none"> - Report of <i>Laporan Perkembangan Usaha Perkebunan</i> only in province, not reported to Regency. - For report about plantation/ SIPERIBUN quarterly please to be fast - Suggested for tools of mitigation burning compliance with PERMENTAN 5 year 2018 - And cooperative with local community for mitigation and manage for burning. 	<p>Company is committed to implement regulations set by government.</p>	<p>No negative issue</p>
12	<p>Gender Committee</p> <p>Issue:</p> <p>No negative issue</p>	<p>No negative issue</p>	<p>No negative issue</p>

10.2 Issues Raised during Stakeholder Interviews On-site

No.	Issues Raised	Audit Verification
1	-	-

11.0 CERTIFICATION DECISION

11.1 Recommendation for Certification

PT Windu Nabatindo Agro – Sungai Cempaga POM has established and maintains an effective system to ensure compliance with the RSPO principles and criteria. The audit team has confirmed through the audit process that the company’s practices complies with, adequately maintains and implements the requirements of RSPO Principles and Criteria INA-NI 2020.

PT TUV Rheinland Indonesia recommends that PT Windu Nabatindo Agro – Sungai Cempaga POM be approved as a producer of RSPO Certified Sustainable Palm Oil.

11.2 Date of Certificate Issued and Scope of Certificate

The scope of the certificate covers production of palm oil from PT Windu Nabatindo Agro – Sungai Cempaga POM and its supply base, which includes Sungai Cempaga Estate, Sungai Bahaur Estate, Sungai Mirah Minting Estate, Bangun Koling Estate and Banama Haring Estate. The first date of certificate issued was 21 December 2022. Further details of the certificate are as per Appendix 1.

11.3 Date of Next Surveillance Visit

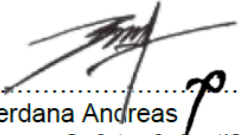
The next surveillance visit is planned for July-August 2025.

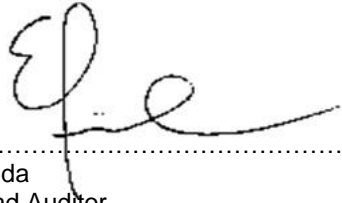
12.0 ACKNOWLEDGEMENTS OF INTERNAL RESPONSIBILITY AND FORMAL SIGN-OFF BY CLIENT

It is acknowledged that the assessment visit was carried out as described in this report and we accept the assessment findings and report content.

Signed on behalf of PT Windu Nabatindo Agro

Signed on behalf of PT TUV Rheinland Indonesia


.....
Erick Perdana Andreas
Compliance, Safety, & Certification Dept. Head
Date: 13 January 2025


.....
Efrida
Lead Auditor
Date: 11 January 2025

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APPENDICES

Appendix 1 Details of Certificate

Certificate

Standard : Indonesian National Interpretation of RSPO Principles & Criteria for the Production of Sustainable Palm Oil Year 2018 (April 2020)

Certificate Registr. No. : 824 502 24190

Certificate Holder : PT TUV Rheinland Indonesia certifies :
PT Windu Nabatindo Abadi
Sungai Cempaga Palm Oil Mill
Tumbang Koling Village, Cempaga Hulu Sub-District,
Kotawaringin Timur District, Central Kalimantan

and its company owned estates according to the annex


RSPO number : -
Scope : Palm Oil Production and Plantation Management System

An audit was performed, Report No. ASA02_24190. Proof has been furnished that the requirements according to Indonesian National Interpretation of RSPO Principles & Criteria for the Production of Sustainable Palm Oil Year 2018 (April 2020) are fulfilled.

Validity: The certificate is valid from 21-12-2022 until 20-12-2027.
The certificate shall remain valid in period stipulated above provided that the certificate holder mentioned here continues to comply with the RSPO P&C requirements. Status of compliance of the certificate holder shall be based on the annual inspections conducted by PT TUV Rheinland Indonesia.

RSPO registered parents company* : Bumitama Agri Ltd
(RSPO Member No. : 1-0043-07-000-00)
* Name of the RSPO registered member company of which the certificate holder is a subsidiary (if applicable)

Date of first certificate : December 21st, 2022

Indonesia, 15-01-2025 
PT TUV Rheinland Indonesia
Director

The certificate remains property of PT TUV Rheinland Indonesia and can be withdrawn in case of terminations as mentioned in the contract or in case of changes or deviations of the above-mentioned data. The licensee is obliged to inform PT TUV Rheinland Indonesia immediately of any changes in the above-mentioned data. Only an original and signed certificate is valid.

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Annex to certificate

Standard : Indonesian National Interpretation of RSPO Principles & Criteria for the Production of Sustainable Palm Oil Year 2018 (April 2020)

Certificate Registr. No. : 824 502 24190

Location: **PT Windu Nabatindo Abadi**
 Address : **Sungai Cempaga Palm Oil Mill**
 Tumbang Koling Village, Cempaga Hulu Sub-District,
 Kotawaringin Timur District, Central Kalimantan

The palm oil mill and supply base covered in certification scope are :

Name of Mill / Estate	Location	Certified Area (Ha)	GPS Locations	
			Latitude (N/S)	Longitude (E/W)
Sungai Cempaga POM		-	01° 47' 52" S	112° 59' 05" E
Sungai Cempaga Estate		3,306.01	01° 49' 6" S	113° 0' 47" E
Sungai Bahaur Estate	Tumbang Koling Village, Cempaga Hulu Sub District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	1,899.50	01° 49' 10" S	113° 1' 46" E
Bangun Koling Estate		2,555.16	01° 48' 14" S	112° 58' 14" E
Banama Harang Estate		1,174.51	01° 44' 27" S	112° 59' 24" E
Sungai Mirah Minting Estate		2,124.12	01° 44' 16" S	112° 58' 5" E

CPO Tonnage Total Production: 53,192.10 MT
 PK Tonnage Total Production: 9,250.80 MT
 Company Estates FFB Tonnages: 187,388.00 MT
 FFB Tonnages from other sources: 43,882.00 MT
 CPO Tonnage claimed for certification: 43,099.24 MT
 PK Tonnage claimed for certification: 7,495.52 MT

Scope of SCCS & supply chain model assessed : FFB receipt, produce and delivery of CPO & PK with implementation of the following SCCS :
 Identity Preserved
 Mass Balance

Indonesia, 15-01-2025

PT TUV Rheinland Indonesia
Director

Issued by PT TUV Rheinland Indonesia

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Appendix 2 Surveillance Audit Plan

Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
Monday, 7 October 2024				
05.00 – 07.20	Flight KNO (Medan) – CGK	EF		Citilink QG-911
12.35 – 14.15	Flight from CGK to PKY	All Auditors		Citilink QG-452
14.30 – 18.00	Travelling from Airport to Site	All Auditors	Management Representatives	Please provide transportation and accommodation during the audit
Tuesday, 8 October 2024				
08.00 – 08.30	Opening Meeting Auditor introduce Audit plan explanation Company presentation	All Auditors	Management Representatives	
08.30 – 10.00 Mill and Plantation	Stakeholder consultation to: 1. Dinas Lingkungan Hidup Kabupaten Kotawaringin Timur 2. Dinas Perkebunan Kabupaten Kotawaringin Timur 3. Dinas Tenaga Kerja Kabupaten Kotawaringin Timur 4. Kantor Pertanahan Kabupaten Kotawaringin Timur 5. Serikat Pekerja POM & Estates 6. Komite Gender POM & Estates 7. Kontraktor Penyedia Tenaga Kerja 8. Pemasok TBS 9. Perwakilan Wanita dari Masyarakat (desa sekitar) 10. Tokoh Masyarakat Desa Tumbang Koling 11. Kepala Desa Tumbang Koling 12. LSM Lokal	1. DP 2. DP 3. EF 4. SAP 5. MRI 6. EF 7. EF 8. DA 9. DA 10. SAP 11. SAP 12. MRI	Auditee	Stakeholder for Official Government will be conducted by phone call. Local stakeholders via face-to-face meeting or phone, flexible depend on confirmation given by stakeholders, if face to face then please invite to office and provide separated meeting room The stakeholder consultation may be carried out simultaneously with the audit process (from opening until the last day before the closing meeting).
10.00 – 12.00 Cempaga POM	Document verification: a. Previous NCR Verification b. Principle and Criteria: - Managing human resources	EF	Auditee	Principle and Criteria 3.5 (3.5.1 to 3.5.2) 6.1 (6.1.1 to 6.1.6) 6.2 (6.2.1 to 6.2.7) 6.3 (6.3.1 to 6.3.3)

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Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
	<ul style="list-style-type: none"> - Commitment to avoid any discrimination - Pay and condition for permanent and non-permanent workers - Respect to freedom association - Children not employed or exploited - No harassment and reproductive rights protection - No forced and trafficked labour used 			6.4 (6.4.1 to 6.4.4) 6.5 (6.5.1 to 6.5.4) 6.6 (6.6.1 to 6.6.2)
10.00 – 12.00 Cempaga POM	Document verification: a. Previous NCR Verification b. Principle and Criteria: <ul style="list-style-type: none"> - Consultation and communication handling - Commitment of code of ethical conduct on business operations - Management plan for long-term economic and financial availability - Continuous improvement monitoring and reporting - Comprehensive SIA - Respect to human rights - Mutually agreed for complaint and grievances - Contribute to local sustainable development - Transparent and fairly with all smallholders (ISH or scheme) - Improved livelihood smallholders 	DA	Auditee	Principle and Criteria 1.1 (1.1.1-1.1.5) 1.2 (1.2.1-1.2.2) 3.1 (3.1.1 to 3.1.3) 3.2 (3.2.1 to 3.2.2) 3.4 (3.4.1 to 3.4.3) SIA only 4.1 (4.1.1 to 4.1.2) 4.2 (4.2.1 to 4.2.4) 4.3 (4.3.1) 5.1 (5.1.1 to 5.1.9) 5.2 (5.2.1 to 5.2.5)
10.00 – 12.00 Cempaga POM	Document verification: a. Previous NCR Verification b. Principle and Criteria:	DP	Auditee	Principle and Criteria 3.4 (3.4.1 to 3.4.3) EIA only

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Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
	<ul style="list-style-type: none"> - Comprehensive EIA - Integrated pest management - Pesticide used in responsible manner to avoid the health and environmental damage - Waste management (3R) - Soil management and fertility - Soil erosion control management - Soil surveys and topographic information - No new planting on peat - Surface and ground water protection 			7.1 (7.1.1 to 7.1.3) 7.2 (7.2.1 to 7.2.11) 7.3 (7.3.1 to 7.3.3) 7.4 (7.4.1 to 7.4.4) 7.5 (7.5.1 to 7.5.3) 7.6 (7.6.1 to 7.6.3) 7.7 (7.7.1 to 7.7.7) 7.8 (7.8.1 to 7.8.4)
10.00 – 12.00 Cempaga POM	a. Previous NCR Verification b. Principle and Criteria: <ul style="list-style-type: none"> - Evidence on compliance to applicable law and regulations - Operational procedure availability, documented, implemented and evaluated - H&S plan and effectiveness implementation - Training - Safety environment in work place, mitigate and reduce the potential risk to health - Efficiency energy and renewable energy optimizing - Emission and GHG management - Fire not used for business process activity 	SAP	Auditee	Principle and Criteria 2.1 (2.1.1 to 2.1.3) 3.3 (3.3.1 to 3.3.3) 3.6 (3.6.1 to 3.6.2) 3.7 (3.7.1 to 3.7.3) 6.7 (6.7.1 to 6.7.5) 7.9 (7.9.1) 7.10 (7.10.1 to 7.10.3) 7.11 (7.11.1 to 7.11.3)
10.00 –	a. Previous NCR Verifica-	MRI	Auditee	Principle and Criteria

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Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
12.00 Cempaga POM	tion b. Principle and Criteria: - Proof of contractors comply with the relevant legal requirements - Third party FFB legal sources - SCCS - Use of the land not diminish the legal customary rights through the FPIC process - Previous land ownership verification (if applicable) - No new planting carry out on local customary rights without FPIC process - Negotiation and compensation process and agreement - Land disputes handling and resolutions agreement - HCV and HCS protection and management			2.2 (2.2.1 to 2.2.3) 2.3 (2.3.1 to 2.3.2) 3.8 (3.8.1 to 3.8.17) 4.4 (4.4.1 to 4.4.6) 4.5 (4.5.1 to 4.5.8) 4.6 (4.6.1 to 4.6.4) 4.7 (4.7.1 to 4.7.3) 4.8 (4.8.1 to 4.8.4) 7.12 (7.12.1 to 7.12.8) *4.4.1 (including previous land ownerships verification if applicable).
12.00 – 14.00	Break			
14.00 – 16.00 Cempaga POM	Field Observation at POM: <ul style="list-style-type: none"> • Comply to regulations • OHS Implementation • Environmental Management • Waste Management • Chemical handling • GHG implementation • Observation regarding infrastructure 	All Auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).
16.00 – 16.30 Cempaga POM	Continue document check			RSPO P&C 1 – 7 (Please refer P&C above).
16.30 – 17.00 Cempaga POM	Daily progress (Day-1)	All Auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).

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Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
08.00 – 12.00 Sungai Bahaur	Field Observation: <ul style="list-style-type: none"> • Comply to regulations • Boundary Poles Maintenance • Good Agriculture Practises • OHS Implementation • Environmental Management • Waste Management • Soil Fertility Effort • Erosion Management • Maintain the quality and availability of surface and groundwater. • Chemical handling • HCV Management • GHG implementation • Interview with local stakeholder (Previous Land Owners, Land Claimers) Observation regarding infrastructure	EF, SAP	Auditee	
08.00 – 12.00 Bangun Koling Estate	Field Observation: <ul style="list-style-type: none"> • Comply to regulations • Boundary Poles Maintenance • Good Agriculture Practises • OHS Implementation • Environmental Management • Waste Management • Soil Fertility Effort • Erosion Management • Maintain the quality and availability of surface and groundwater. • Chemical handling • HCV Management • GHG implementation • Interview with local stakeholder (Previous Land Owners, Land Claimers) Observation regarding infrastructure	MRI, DP, DA	Auditee	
12.00 – 14.00	Break	All auditors		
14.00 – 16.30 Sungai Bahaur Estate & Bangun Koling Estate	Continue document check	All auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).
16.30 – 17.00 Sungai Ba-	Daily progress presentation (Day-2)	All Auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).

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Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
hourEstate & Bangun Koling Estate				
Thursday, 10 October 2024				
08.00 – 12.00 Banama Haring Estate	Field Observation: <ul style="list-style-type: none"> • Comply to regulations • Boundary Poles Maintenance • Good Agriculture Practises • OHS Implementation • Environmental Management • Waste Management • Soil Fertility Effort • Erotion Management • Maintain the quality and availability of surface and groundwater. • Chemical handling • HCV Managemenet • GHG implementation • Interview with local stakeholder (Previous Land Owners, Land Claimers) - Observation regarding infrastructure 	MRI, DA	Auditee	
08.00 – 12.00 Sungai Mirah Minting Estate	Field Observation: <ul style="list-style-type: none"> • Comply to regulations • Boundary Poles Maintenance • Good Agriculture Practises • OHS Implementation • Environmental Management • Waste Management • Soil Fertility Effort • Erotion Management • Maintain the quality and availability of surface and groundwater. • Chemical handling • HCV Managemenet • GHG implementation • Interview with local stakeholder (Previous Land Owners, Land Claimers) Observation regarding infrastructure 	EF, SAP, DP	Auditee	
12.00 – 14.00	Break	All auditors		
14.00 – 16.30 Bangun Koling Estate & Sungai Mirah	Continue document check	All auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).

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Date / Time ⁽¹⁾	Organizational Unit and Processes	Auditor / Abbrev.	Interviewee	Procedure - Element - Standard Chapter
Minting Estate				
16.30 – 17.00	Daily progress presentation (Day-3)	All Auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).
Friday, 11 October 2024				
08.00 – 12.00	Continue document check	All auditors	Auditee	RSPO P&C 1 – 7 (Please refer P&C above).
12.00 – 14.00	Break	All auditors		
14.00 – 15.30	Continue Document Verification	All Auditors	Management Representatives	
15.30 – 16.00	Preparation for Closing Meeting	All auditors	Auditee	
16.00 – 17.00	Closing Meeting	All auditors		
17.00 -	Travelling to Palangkaraya	All auditors		Overnight in Palangkaraya, please provide hotel for auditors
Saturday, 12 October 2024				
07.10 – 08.55	Flight from PKY to CGK	All Auditors	Management Representatives	Garuda GA-555
13.10 – 15.30	Flight CGK to KNO (Medan)	EF	-	Citilink QG-918

Appendix 3 List of Abbreviations

AMDAL	Analisis Dampak Lingkungan & Sosial (Social & Environmental Impacts Assessment)
CPO	Crude Palm Oil
EIA	Environmental Impact Assessment
ERTs	Endangered, Rare & Threatened species
ESH	Environmental Safety & Health
FFB	Fresh Fruit Bunches
EFB	Empty Fruit Bunches
HCV	High Conservation Value
IPM	Integrated Pest Management
LTA	Lost Time Accident
MSDS	Material Safety Data Sheets
NGO	Non-Government Organization
NPP	New Planting Procedure
OSH	Occupational Safety & Health
PKO	Palm Kernel Oil
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
PT	Perseroan Terbatas
WNA	Windu Nabatindo Abadi
NKU	Nabatindo Karya Utama
RKL	Rencana Pengelolaan Lingkungan (Environmental Management Plan)
RPL	Rencana Pemantauan Lingkungan (Environmental Monitoring Plan)
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
UKL	Upaya Pengelolaan Lingkungan (Environmental Management Efforts)
UPL	Upaya Pengelolaan Lingkungan (Environmental Management Efforts)
	Please add other abbreviation if necessary

Appendix 4 Other Achievements and Certification Helds

Name of mill / es- tate	Certification Standard / Award achieved	Certification Body / Awarder	Date Achieved
-	-	-	-

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Appendix 5 List of Stakeholders Interviewed and Contacted

No.	Name of Stakeholder	Institution / Position
Stakeholders Interviewed during Public Consultation Meeting		
1.	YD	Public Figure of Tumbang Koling Village
2.	YD	Koling Hapakat Cooperative
3.	Y	Head Koperasi Sehati Pundu
4.	D	National Land Agency of Kotawaringin Timur.
5.	Audi Valen	NGO of <i>Forum Bersama Kotawaringin Timur</i>
6.	Kahli Fahlevi	PT Surya Mentaya Jaya (CPO Transporter)
7.	During	Land Previous Owner
8.	Landuk	Land Previous Owner
9.	AT	Head of Law Enforcement Supervision, Environment Agency of Kotawaringin Timur Regency
10.	WA	Head Of Plantation, Agriculture Agency of Kotawaringin Timur Regency
11.	E	Gender Committee
12.	I	Gender Committee
13.	R	Labor Union WNA
14.	R	Labor Union NKU
15.	MP	Manpower Agency of Sampit
Stakeholders Interviewed On-Site		
16.	M	HR Dept
17.	A	Manager of Sungai Bahaur Estate
18.	A	Afd 4 Assistant of SBHE
19.	Y	Harvest Foreman Afd 4 Block G10 SBHE
20.	RPTA	Harvester Afd 4 Block G10 SBHE
21.	AS	Harvester Afd 4 Block G10 SBHE
22.	F	Harvester Afd 4 Block G10 SBHE
23.	W	Harvester Afd 4 Block G10 SBHE
24.	T	Harvester Afd 4 Block G10 SBHE
25.	S	Transport Clerk Afd 4 SBHE
26.	M	Afd 6 Assistant of SBHE - Upkeep
27.	S	Upkeep foreman Afd 6 Block C16 SBHE
28.	R	Upkeep worker – manual weeding Block C16 SBHE
29.	D	Upkeep worker – manual weeding Block C16 SBHE
30.	LR	Upkeep worker – manual weeding Block C16 SBHE
31.	MA	Upkeep worker – manual weeding Block C16 SBHE
32.	FLM	Upkeep worker – manual weeding Block C16 SBHE
33.	I	Upkeep worker – manual weeding Block C16 SBHE
34.	L	Chemist Forewoman – Afd4 SBHE
35.	NMI	Chemist sprayer Afd 4 SBHE
36.	MPB	Chemist sprayer Afd 4 SBHE
37.	N	Chemist sprayer Afd 4 SBHE
38.	W	SMME Manager
39.	A	PIC RSPO SMME

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40.	V	GIS SMME
41.	E	Chemical Warehouse Operator Sungai Cempaga POM
42.	K	Water Treatment Process Operator, Sungai Cempaga POM
43.	LN	<i>IPAL</i> Operator, Sungai Cempaga POM
44.	VAG	Land Application Operator, Sungai Cempaga POM
45.	AS	Foreman Land Application, Sungai Cempaga POM
46.	S	Sprayer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
47.	Y	Sprayer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
48.	MS	Sprayer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
49.	F	Fertilizer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
50.	A	Fertilizer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
51.	TS	Fertilizer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
52.	Ys	Foreman Sprayer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
53.	MF	Foreman Fertilizer/ Manual Workers, Division 2, Block L21a, Bangun Koling Estate
54.	PJ	Harvester, Division 2, Block M20, Bangun Koling Estate
55.	STH	Harvester, Division 2, Block M20, Bangun Koling Estate
56.	KS	Foreman Harvester Workers, Division 2, Block M20, Bangun Koling Estate
57.	AH	Midwife division 2 at Sungai Mirah Minting Estate
58.	RS	Chemical and PPE warehouse operator division 2 at Sungai Mirah Minting Estate
59.	V	Babysitter division 2 at Sungai Mirah Minting Estate
60.	H	Babysitter division 2 at Sungai Mirah Minting Estate
61.	RH	Babysitter division 2 at Sungai Mirah Minting Estate
62.	EF	Loading Ramp Operator at Sungai Cempaga Mill
63.	C	Sterilizer Operator at Sungai Cempaga Mill
64.	S	Engine Room Operator at Sungai Cempaga Mill
65.	M	Kernel Operator at Sungai Cempaga Mill
66.	IN & TY	Boiler Operator at Sungai Cempaga Mill
67.	HD, MP, MS, RS, MH, T	Harvesting Operator at Sungai Mirah Minting Estate
68.	JS, A, S, SM, MA, K, Y	Spraying and Fertilizer at Sungai Mirah Minting Estate

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69.	FS	Security
70.	RW	Security
71.	RH	Seciurity
72.	WN	Grading Worker
73.	RA	Grading Worker
74.	EWD	Weighbirdge Admin
75.	YKS	Weighbirdge Admin
76.	GPS	Commercial Staff
77.	RS	HCV Officer of Bangun Koling Estate
78.	N	Transport Clerk
79.	BS	HCV Officer of Banama Haring Estate
80.	HYR	Supervisor of Manuring
81.	ME	Manuring worker
82.	NL	Manuring worker
83.	JP	Warehouse clerk Bangun Koling Estate
84.	ADN	Daycare center workers (TPA) Bangun Koling Estate
85.	IM	Daycare center workers (TPA) Bangun Koling Estate
86.	SS	Foreman Harvester BHG Estate Div II Block M21-22
87.	KRN	Brondolan workers
88.	SN	Harvester BHG Estate Div II Block M21-22
89.	HB	Harvester BHG Estate Div II Block M21-22
90.	MOS	Harvester BHG Estate Div II Block M21-22
91.	YVN	Harvester BHG Estate Div II Block M21-22
92.	EKO	General Warehouse , Chemical warehouse, Fertilizer warehouse clerek , BHG Estate
93.	BS	TPS LB3 clerk
94.	STN	Damkar officer
95.	KRT	Daycare center workers (TPA) BHG Estate
96.	LSN	Daycare center workers (TPA) BHG Estate

Appendix 6 Organization's Land History and Information About All Previous Users of The Land

Total of land compensation : **PT WNA total of 489 plots covering 6,273.76 Hectares and PT NKU total of 152 plots covering 2,904.97 Hectares**

Total of entity : unit so minimum of the quantity of sample each audit is $0.8 \times \sqrt{\text{..... unit}} = \text{.... unit}$

No	Year of Verification		Location (estate name and or village/sub-village name)	Previous land owner (person name / group name / traditional group name / etc)	Total areas (ha)	Year of land released and their evidences	Remarks or the result of interview
	Plan	Actual					
1				During	92.6		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
2				Laurento A Asan	100		
3				Lisem	90		
4				Tariono	90		
5				Esah	90		
6				Leset	90		
7				Yuster	90		
8				Leginah	30		
9				Sento	30		
10				Rusmiati	87		
11				Jaman Jinu	20		
12				DENI	45		
13				Tenong	56		
14				Amut	20		
15				Sutoyo	10		
16				CANDRA	30		
17				DURING	30		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
18				Pusu	50		
19				Gatin	121		
20				Songong	10		
21				Taryono	30.2		

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22			Amut	9.4	
23			Esah	10.6	
24			YESAYA	21	
25			Kerud	52.2	
26			Doyo	26.7	
27			Lisem	23.9	
28			Yuster	35.3	
29			Atek	57.6	
30			Yahudi	65.9	
31			Laga	29	
32			Onggot	19.4	
33			Alang	23.5	
34			Upas	2.4	
35			Lisem	35.6	
36			Mihing	26.1	
37			Ingdarson	15	
38			Yuster	12.7	
39			Roket	52.7	
40			Subuh/Roket	80.6	
41			Subuh/Dias	50.7	
42			Dias/Onyeng/ljo/heri	59.45	
43			Dias	17.1	
44			Kerud	16.8	
45			Agan	4.3	
46			Agan	5.3	
47			Agan	4	
48			Agan	2.6	
49			Rusmani	5.4	

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50				Duwik	4.2		
51				Duwik	4.5		
52				Duwik	3.5		
53				Bambang	2		
54				Petrus	4		
55				Petrus	3.8		
56				Rusmani	3.9		
57				Rusmani	3.2		
58				Rusanti	3.1		
59				Rusanti	3.8		
60				Ralie	4.6		
61				Rian	3.6		
62				Rian	4.7		
63				Rusmani	4.1		
64				Teguh A	3.8		
65				Aca	4		
66				Sudi	5.8		
67				Hendy	4.1		
68				Dadang	2.2		
69				Idin	4.7		
70				otong	5.7		
71				Amut	5.2		
72				During	4		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
73				Leset	4.9		
74				Mihing	3.5		

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75				Candra	5		
76				Teno	5		
77				Rahajo	5		
78				Isem	4.3		
79				Laurento	4.7		
80				Hendrygus	2.3		
81				Buan	5		
82				Yono	5		
83				Udung	5.4		
84				Isem	3.8		
85				Leset	5		
86				Iyus	5.9		
87				Laurento	5.5		
88				During	4.3		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
89				Arianto	3.3		
90				Mimie	3.5		
91				Adit	4.5		
92				Gomie	3.5		
93				Rosmani	4		
94				Yuster	5		
95				Manto	3.5		
96				Ogel	4.2		
97				Suparlie	5.1		
98				Onoe	5.3		
99				Uwas	3.2		

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100			Mihing	3		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
101			During	3		
102			Hendranto	3.7		
103			Laurento	5.4		
104			Hendrygus	4.6		
105			Amut	4.4		
106			Radianto	5.1		
107			Agan	4.7		
108			Rinto	5.2		
109			Rian	4.2		
110			Yudes	5.3		
111			Mihing	4.5		
112			Midae W	3.7		
113			Bambang R	4		
114			Roket	5.3		
115			Amut	3.7		
116			Teguh A	4.5		
117			Teno	2.7		
118			Diwanto	5.4		
119			Elmi M	3.3		
120			Netty	4.5		
121			Berdy	4		
122			Rinae	4		
123			Ulak S	4.1		
124			Nilae	5.5		

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125			Jentoso	4	
126			Sento	3.6	
127			Tunggal	3.7	
128			Talan	4.4	
129			Runyi	3.5	
130			Heno	3.1	
131			Norsiae	5.3	
132			Junjung	4.9	
133			Margaretae	6.2	
134			Kunyatie	4.1	
135			Misnae	4.7	
136			Darno	5.4	
137			Mukrin	4.3	
138			Jentoso	4.5	
139			Kunyatie	4.18	
140			Nillae	2.77	
141			Selnie	4.3	
142			Durham	5.2	
143			Norsia	3.7	
144			Bahrianor	4.2	
145			Margaretae	4	
146			Selie	4.2	
147			Junjung	3.5	
148			Yudesmin	4	
149			Ronie Y	2.6	
150			Darno	1.65	
151			Ulak	4.2	
152			Duwik L	3.8	

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153			Sento	4.4	
154			Elmi M	3.8	
155			Diboe	5.65	
156			Madiyanto	3.78	
157			Ramenae	3.65	
158			Bambang	4.9	
159			Ida Royani	0.31	
160			Berdy	0.5	
161			Darmintin	3.97	
162			Yudesmin	3.06	
163			Rinae	4.4	
164			Ramenae	5.3	
165			Netty	3.5	
166			Madiyanto	4.1	
167			Misnae	4.2	
168			Selnie	4.1	
169			Duwik	4.4	
170			Talan	4.9	
171			Nilae	4.5	
172			Tunggal	4.4	
173			Midae	4	
174			Heno	4	
175			Helmi	5.1	
176			Darno	5.2	
177			Durham	5.3	
178			Diboe	5.1	
179			Mukrin	4.2	
180			Bahrianor	4.8	

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181				Runyi	2.2		
182				Ida Royanie	0.96		
183				Diwanto	2.49		
184				Noriae	1.26		
185				Roni Y	0.87		
186				Darmintin	0.14		
187				Junjung	2.19		
188				Berdy	3.5		
189				Dasmin	4.17		
190				Sulmie	0		
191				Remie	4.23		
192				Remie	4.26		
193				Sulmie	1.17		
194				Gojo	4.1		
195				Dasmin	2.9		
196				Taryono	4		
197				Dedi	3.4		
198				Surisno	16.5		
199				Ibuk	11.6		
200				Ibuk	14.3		
201				Surisno	10.4		
202				Oda	44.1		
203				Opelderis	45.5		
204				Sute	16.4		
205				Sute	8.3		
206				Unai	14.4		
207				Unai	31.5		
208				Wanto	20.4		

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209				Yones	23.4		
210				Satoyo	8.2		
211				Dunang	23.9		
212				Sariono	2.5		
213				Kahak	21.5		
214				Mujel	5.7		
215				Joni	4.2		
216				Atik	4.4		
217				Agau	11.2		
218				salundik	47.3		
219				Kakau	29.2		
220				Kakau	6.4		
221				Sinto	13.3		
222				Dono	17.1		
223				Satoyo	4.6		
224				Satoyo	6.5		
225				Satoyo	9		
226				Rina	9.7		
227				Rina	18		
228				Oda	15.3		
229				Satoyo	5.2		
230				Joni	1.56		
231				Atik	0.54		
232				Mujel	5.06		
233				Jaini	27.8		
234				Deprin	8.2		
235				Tobing	0.5		
236				Kapuas	0.4		

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237				Roket	24.7		
238				Mihing	100		
239				Amut	100		
240				Juwatie	88.4		
241				Onyeng	8.8		
242				Ijo	15.5		
243				Anai	3		
244				Efraim	11.3		
245				Ijo	10.4		
246				Dante	3		
247				Manto	3.2		
248				Candra	4.3		
249				Esah	1.6		
250				CANDRA	8.7		
251				LISEM	10.3		
252				ACA	3.7		
253				ESAH	5.7		
254				Laurento	6.3		
255				Taryono	1.3		
256				Rabuk	2.1		
257				Taryono	2		
258				Leset	3.1		
259				Sina	0.7		
260				Rabuk	0.4		
261				Rabuk	0.5		
262				Rabuk	2		
263				Rabuk	0.9		
264				Lisem	17		

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265				Helbert	14		
266				Kandrik L.K	23.4		
267				During	0.8		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
268				During	2.6		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
269				During	0.4		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
270				Leset	3.8		
271				Sina Ijal	8.4		
272				Roket	17.8		
273				Mihing	2.7		
274				Yono	0.7		
275				Lisem	2		
276				Mihing	6.9		
277				Nyai	4.2		
278				Laga	1.1		
279				Lanei	0.8		
280				Lia	5.2		
281				Anai.2	3.3		
282				Peri	1.6		
283				Udang	40		

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284			Anai	0.3	
285			Anai.1	3.5	
286			Helbert	5.3	
287			Amut	4.8	
288			Rabuk	6.3	
289			Roket	4.7	
290			Subuh	10.6	
291			Leset	1	
292			Lia	1.3	
293			Leset	1.1	
294			Leset	2.9	
295			Idin	6.4	
296			Idin	3.9	
297			Roket	1.1	
298			Subuh	1	
299			Tobing	5.5	
300			Rusina ljal	10	
301			Donas	17	
302			Rabuk	0.5	
303			Tobing	1.5	
304			Deni	1.5	
305			Candra	1	
306			Kristina	2	
307			Kristina	3	
308			Lisem	1.5	
309			Kandrik	7.61	
310			Kandrik	1	
311			Kandrik	1	

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312			Amut	8.5	
313			Laurento	0.04	
314			Tobing	2	
315			Yono	2	
316			M.Fadli Sabran	5.2	
317			Lia	1.4	
318			Mihing	2.5	
319			Amut	5	
320			Darwin 1	1.5	
321			Darwin 2	0.5	
322			Rusmiati 2	5.3	
323			Seno	2.5	
324			Mira	1.6	
325			Esah	2.4	
326			Mihing 1	0.3	
327			Mihing 2	1.2	
328			Amut 1	2.3	
329			Juati	5.8	
330			Amut 2	8.5	
331			Leset	5.5	
332			Idin	3.2	
333			Lisem	15	
334			Feri	1.2	
335			Rusmiati	2	
336			Mihing 2	2.77	
337			Candra	0.6	
338			Lisem	2.5	
339			Lisem	2.5	

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340				Leset	0.4		
341				Leset	0.7		
342				Mihing	4.2		
343				Supi	2.3		
344				Kapuas	3.4		
345				Lisem	6.8		
346				Lane	2.8		
347				Lane	2.4		
348				Mihing	1		
349				Lamson	1.5		
350				Kawit	1		
351				Subuh	2.1		
352				Saryono	1.7		
353				Anai	2.2		
354				Tobing	1.9		
355				Stepanus Candra	2.3		
356				Budin	2.2		
357				Ati	1		
358				Jinu	7.74		
359				Jinu	13.75		
360				Dase	2.2		
361				Sale	2.63		
362				Dante	1.34		
363				Dante	0.48		
364				Sutei	7.79		
365				Raca	0.86		
366				Demis	0.3		
367				Johanes	14.09		

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368				Demis	2.71		
369				Dase	2		
370				Ijon	2.75		
371				Onyeng	0.69		
372				Demis	2.54		
373				Oda	2.08		
374				During	1.05		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
375				Upas	3		
376				Onyeng	6.25		
377				Juli	4.35		
378				Budin	4.43		
379				Salwin	7.92		
380				Kakau	8		
381				Demis	0.72		
382				Demis	0.24		
383				Demis	0.47		
384				Demis	3		
385				During	4.75		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
386				Sinto	1.1		
387				Lamson Mandala	3.2		
388				Laurento	8.5		
389				Agan	0.14		

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390				Lia	0.23		
391				Atek dkk	109.8		
392				Rudi	25.8		
393				acil pisu	23.1		
394				Greksi	11.4		
395				agau	11.7		
396				gunter	13.1		
397				amut	30.3		
398				ardian	8.4		
399				naptali	154.1		
400				usy g	15.8		
401				longos	25.8		
402				atek	63		
403				gunter	19.2		
404				gunter	51.8		
405				feri	107		
406				idis	125.4		
407				gunter	10		
408				Alang	16.7		
409				Singkiu	16.2		
410				Idin	20.2		
411				Yahudi	10.9		
412				Idis	96		
413				Siberon	209.43		
414				lyul	230.47		
415				Cining	192.8		
416				Ingdarson	75.7		
417				Udang	6.06		

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418				Leson	29.2		
419				Esah	24.32		
420				Yahudi	19.4		
421				Yahudi	4.5		
422				Candra	5.9		
423				Nika	10.9		
424				Naptali	1.9		
425				Leset	6.3		
426				Nika	6.6		
427				Anie	7.6		
428				Candra	4.5		
429				Lisem	9.7		
430				Leset	4.2		
431				During	4		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
432				Aca	0.8		
433				Mihing	5.6		
434				Candra	2		
435				Saria	3.5		
436				Sinae	9		
437				Amut	2.7		
438				During	3		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
439				Amut	5.4		

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440				Kerut	2		
441				Usung	7.8		
442				Yahudi	6.3		
443				Yahudi	8.4		
444				Sudi	2.5		
445				Lisem	25.6		
446				Mihing	1.3		
447				Amut	45		
448				Leset	8.1		
449				Mihing	13.8		
450				Demet Rius	3.3		
451				Demet Rius	10		
452				Lisem	9.2		
453				Leset	1.5		
454				Ateng	4.7		
455				Cirak	2.3		
456				Naptali	5.3		
457				Mihing	2		
458				Amut	1.3		
459				LAURENTO	0.6		
460				Agan	1.86		
461				Esah	3.42		
462				Stepanus Candra	1.86		
463				Leset	0		
464				Uhat 1	5.5		
465				Roket	52.7		
466				Amut	3.2		
467				Suberson	4.88		

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468				Onyeng	3.05		
469				Mihing	0		
470				Ajo	4.3		
471				Uhat 2	3.1		
472				Kerud	16.8		
473				Taryono	0.9		
474				Roket 3	2.6		
475				Subuh	4.36		
476				Lane 3	1		
477				Lia	1		
478				Mihing 1	1.3		
479				Riyanto	4		
480				Roket 2	15.6		
481				Laurento	4.8		
482				Kapuas	5.06		
483				Onyeng	19.1		
484				Uhat 3	5		
485				Roket 1	5.9		
486				Laurento	4.6		
487				Lane	1.9		
488				Lia	1		
489				Kendet	9.4		
490				Nyahun	2		
491				Ibar	0.04		
492				Iyen	2.19		
493				Dinar	1.83		
494				Dinar	2.21		
495				Sihiansyah	1.66		

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496				Darius	1.83		
497				Rendi	1.67		
498				Cining	100		
499				Ikie	100		
500				Paul	119.5		
501				Diyer	1.31		
502				Antoy	0.28		
503				Antoy	0.96		
504				Dier	0.67		
505				Ubis	18.77		
506				Yuster	2.75		
507				Cirak	7.94		
508				Cirak	5.62		
509				Margo	4.32		
510				Illo	4.69		
511				Untung	8.75		
512				Laga	1.01		
513				Bujang Inin	3.17		
514				Margo	18.3		
515				Paul T	95.45		
516				Nyahun RL	206.79		
517				Deta	39.23		
518	2024	2024		Landuk	38.42		Interviewed and document verification, no negative issue. Land compensation was done through FPIC process.
519				Cirak	1.43		
520				Naptali	1.93		
521				Mintang	4.05		

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522			Bujang	1.79	
523			Beteng	5.45	
524			Sabrin	22.24	
525			Segah	2.94	
526			Budiyono	0.99	
527			Agai	1.7	
528			Naptali	2.88	
529			Cirak	0.97	
530			Tasman	2.71	
531			Kasmadi / hero	1.67	
532			Laga	2.62	
533			Itar	1.25	
534			Ibar	7.05	
535			Diyer	2.85	
536			Julie	24.02	
537			Rudi	100	
538			Iyul	4.23	
539			Atek	100	
540			Napiah	30.82	
541			Sukarli	11.86	
542			Tarla UT	0.49	
543			Gedi Onggot	0.22	
544			Juli T Isa	33.93	
545			Mintang	3.69	
546			atek	0.71	
547			Sumadi	8.16	
548			Usman	1.92	
549			Ipei	0.72	

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550			Siber T. Isa	374.72	
551			Resmianus	2.88	
552			Mintang	2.62	
553			Ayok	2.06	
554			Siberson	3.07	
555			Iwan	6.76	
556			Badi	1.77	
557			Ugak	1.65	
558			Bangun	2.16	
559			Sukarman / Siberson	1.08	
560			Cirak	1	
561			Angai	1.4	
562			Uji T Isa	24.74	
563			Illo	0.78	
564			Andrea Suni	2.4	
565			Heru / Hero	1.87	
566			Bujang	2.71	
567			Cirak	1.6	
568			Tarla	4.59	
569			Tarla UT	1.6	
570			Rendi	0.73	
571			Itar	5.58	
572			Panji	1.16	
573			Unai	3.47	
574			Antoy	8.6	
575			Iter	99.89	
576			Iking	100	
577			Segah	27.79	

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578				Diwel	83.02		
579				Uji T Isa	115.12		
580				Udin T	0.65		
581				Yunadi	74.55		
582				Yuster	2.26		
583				Iwan	7.42		
584				Bangun	1.62		
585				Dinar	1.68		
586				Nyahun RL	10		
587				iLLO	4.19		
588				Resmianus	4.11		
589				Demetrius	1.54		
590				Demetrius	0.98		
591				Sukarli	40.95		
592				Sendy	1		
593				Edek/ hatno	2		
594				Rinto	1.8		
595				Milo	1.7		
596				Poltak/ Damanik	8.1		
597				Kasmadi	3.29		
598				Antoi	0.4		
599				Busli / Sekak	2.27		
600				Asie	0.5		
601				Iyen	3.24		
602				Bujang	2.89		
603				Diyer	1.15		
604				Nai	100		
605				Hadryansah	88.5		

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606			Jurai	6.9	
607			Lian	14.57	
608			Illo	28.53	
609			Untung	17.99	
610			Suadi	1.69	
611			Cristopel Sahabu	240.14	
612			Rakap	3.66	
613			Bujang	2.99	
614			Siberson	5.73	
615			Beteng	1.89	
616			Sukarli	11.54	
617			Naptali	2.18	
618			Hero	1.32	
619			Ipei	2.08	
620			Bujang	2.26	
621			Diwil Igan	11.18	
622			Naptali	8.94	
623			Atek	3.23	
624			Bujang Inin	30.43	
625			Mandra	5.47	
626			Badi	3.28	
627			Karli S	8.34	
628			Sumadi	2.96	
629			Siberson	8.4	
630			Ibar	4.5	
631			Dinar	2.63	
632			Alang/ Sumar	1	
633			Sukarman	5.65	

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634			Mawar	2.64		
635			Udin T	5.57		
636			Diyer	0.52		
637			Illo	2.64		
638			Bangun	1.4		
639			Segah	16.56		
640			Ayok	1.62		
641			Yahudi	4.28		

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Appendix 7 Requirement on Book & Claim

If applicable please fill the table below:

Type of Book & Claim audit	<input type="checkbox"/> Remote Audit <input type="checkbox"/> Combined with RSPO SC <input checked="" type="checkbox"/> Combined with other on-site audit RSPO P&C						
Type of organization relate of SC actor	<input checked="" type="checkbox"/> POM <input type="checkbox"/> Crusher (KCP) <input type="checkbox"/> ISH Group <input type="checkbox"/> Manufacture/retailer						
Within twelve (12) months Company the qualifying level of 500 RSPO credits have been claimed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Auditor findings: Based on Bookkeeping, Company also selling credit of product through Book & Claim with details information: <table border="1" data-bbox="1173 667 1957 788"> <thead> <tr> <th>Product</th> <th>Current License (27 Jan 24 – 30 Sept 24)</th> </tr> </thead> <tbody> <tr> <td>CSPO</td> <td>20,659</td> </tr> <tr> <td>CSPK</td> <td>0</td> </tr> </tbody> </table> <p>Company also has shown the proof of selling under Book & Claim for example transaction No. 14934 on 29 July 2024 with type "Off Market Accepted" with buyer ACT Commodities B.V. with quantity 5,000 tonnes</p> <p>Compliance status : <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NCR No.(if any) :</p>	Product	Current License (27 Jan 24 – 30 Sept 24)	CSPO	20,659	CSPK	0
Product	Current License (27 Jan 24 – 30 Sept 24)						
CSPO	20,659						
CSPK	0						
RSPO Credits make market claims for one (1) year from the date of purchase of credits (include of it has complied with RSPO Role on Market Communications and Claims)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Auditor findings: Based on Bookkeeping, Company also selling credit of product through Book & Claim with details information: <table border="1" data-bbox="1173 1107 1957 1228"> <thead> <tr> <th>Product</th> <th>Current License (27 Jan 24 – 30 Sept 24)</th> </tr> </thead> <tbody> <tr> <td>CSPO</td> <td>20,659</td> </tr> <tr> <td>CSPK</td> <td>0</td> </tr> </tbody> </table> <p>Company also has shown the proof of selling under Book & Claim for example transaction No. 14934 on 29 July 2024 with type "Off Market Accepted" with buyer ACT Commodities B.V. with quantity 5,000 tonnes</p> <p>Compliance status : <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NCR No.(if any) :</p>	Product	Current License (27 Jan 24 – 30 Sept 24)	CSPO	20,659	CSPK	0
Product	Current License (27 Jan 24 – 30 Sept 24)						
CSPO	20,659						
CSPK	0						

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<p>RSPO credit transactions document is consistent with the amount of credit volume and information stated on RSPO IT platform.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Auditor findings: Company also has shown the proof of selling under Book & Claim for example transaction No. 14934 on 29 July 2024 with type "Off Market Accepted" with buyer ACT Commodities B.V. with quantity 5,000 tonnes.</p> <p>Compliance status : <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NCR No.(if any) :</p>
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A.2.3 SC Requirement	
<p>The organization has sold RSPO Credit of CSPO amount of 20,659 mt. The organization have valid RSPO certificate/licence in the RSPO IT Platform so they are allowed to sell RSPO Credit.</p> <p>The mill has not oversold due to underproduction and it has not made a request to RSPO Secretariat to buy back RSPO Credit.</p> <p>The buyer status is RSPO member. The RSPO Credit has traded on the online marketplace of the RSPO IT system and/or off market deal (OMD). OMD has reported in RSPO IT system by either party at the time the deal is made.</p>	<p>Compliance status: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NCR No.(if any) :</p>