

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- Extension of Scope

| |
|---|
| Client Company name (Parent Company) PT. Saudara Sejati Luhur (PT. Inti Indosawit Subur) |
| Client company Address: Head Office: JI MH Thamrin No 31 Jakarta 10330 |
| Certification Unit: PT Saudara Sejati Luhur - Gunung Melayu I Palm Oil Mill Location of Certification Unit: Batu Anam Village, Sub-District of Rahuning, Asahan Regency, North Sumatra Province, Indonesia |
| Date of Final Report: 21/3/2022 |

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Section 1: Scope of the Assessment

| 1. Company Details | | | |
|--|--|---------------------------------|--|
| Parent Company | PT. Inti Indosawit Subur | | |
| RSPO Membership Number | 1-0022-06-000-00 | Membership Approval Date | 6 February 2006 |
| Address | Jl MH Thamrin No 31 Jakarta 10230 | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | PT. Saudara Sejati Luhur - Gunung Melayu I Palm Oil Mill | | |
| Location / Address | Batu Anam Village, Sub-District of Rahuning, Asahan Regency, North Sumatra Province, Indonesia | | |
| Website | www.asianagri.com | | |
| Management Representative | Mr Ivan Novrizaldie | E-mail | Ivan_novrizaldie@asianagri.com |
| Telephone | 021 2301119 | Facsimile | 021 2301120 |

| 2. Certification Information | | | |
|---|--|--------------------------------|------------|
| Certificate Number | RSPO 620755 | Certificate Start Date | 21/03/2022 |
| Date of First Certification | 07/09/2015 | Certificate Expiry Date | 20/03/2027 |
| Scope of Certification | Production of Palm Oil and Palm Kernel | | |
| Visit Objectives | Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. | | |
| Assessment Cycle | <input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil | | |
| Supply Chain Module | <input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance | Mill Capacity | 60 MT/Hour |
| ISH certification Phase | <input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable | | |

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| 3. Other Certifications | | | |
|-------------------------|-----------------------------|-----------------------|--------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| ID05/65250 | ISO 14001:2004 | SGS | 10 June 2023 |
| ISCC | EU-ISCC-Cert-DE100-03726121 | SGS | 01 Dec 2022 |
| ISPO | BSI-ISPO 619194 | BSI | 18 July 2022 |

| 4. Location(s) of Mill & Supply Bases | | | |
|---|---|------------------|------------------|
| Name (Mill / Supply Base / Group Manager / Smallholders) | Location | GPS Coordinates | |
| | | Latitude | Longitude |
| Gunung Melayu I POM | Batu Anam Village, Rahuning Sub-District, Asahan Regency, North Sumatra Province, Indonesia | 02° 47' 29.29" N | 99° 35' 54.25" E |
| Pulau Maria Estate | Batu Anam Village, Rahuning Sub-District, Asahan Regency, North Sumatra Province, Indonesia | 02° 45' 51.07" N | 99° 34' 32.06" E |

| 5. Description of Supply Base | | | | | |
|-------------------------------|--|--------------|--|--------------------|-----------------|
| New Planting Development | <input checked="" type="checkbox"/> No (no change in total planted area) | | <input type="checkbox"/> Yes (please refer to Principle 7 for details) | | |
| Estate / Smallholders | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Pulau Maria Estate | 2,063 | 17.17 | 226.83 | 2,307 | 89.42 |
| Total | 2,063 | 17.17 | 226.83 | 2,307 | 89.42 |

| 6. Plantings & Cycle | | | | | | | |
|-----------------------|-------------|----------|--------------|----------|----------|--------------|----------|
| Estate / Smallholders | Age (Years) | | | | | Mature | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Pulau Maria Estate | - | - | 2,063 | - | - | 2,063 | - |
| Total (ha) | - | - | 2,063 | - | - | 2,063 | - |

Note: N/A

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| 7. Summary of Certified Tonnage of FFB (Own Certified Scope) | | | | |
|--|---|---|---|--------------------------------|
| Estate / Smallholders | Tonnage / year | | | |
| | Estimated last year (Sep 2019 – Aug 2020) | Actual (May 2019 – Jul 2021) | | Forecast (Sep 2021 – Aug 2022) |
| | | Previous license period (May 2019 – Aug 2019) | *Current license period (Sep 2019 – Jul 2021) | |
| Pulau Maria Estate | 50,699 | 14,795.92 | 60,950.51 | 44,478 |
| | 36,163* | | | |
| Total | 86,862 | 75,746.43 | | 44,478 |

Note:
Volume extended
FFB extended – 36,163 MT (total FFB after extension = 86,862 MT)

| 8. Summary of Certified Tonnage of FFB (from other certified unit(s)) | | | | |
|---|---|---|--|--------------------------------|
| Estate / Smallholders | Tonnage / year | | | |
| | Estimated last year (Sep 2019 – Aug 2020) | Actual (May 2019 – Jul 2021) | | Forecast (Sep 2021 – Aug 2022) |
| | | Previous license period (May 2019 – Aug 2019) | Current license period (Sep 2019 – Jul 2021) | |
| - | | - | - | |
| - | | - | - | |
| Total | | - | | |

Note:

| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) | | | | |
|---|---|---|--|--------------------------------|
| Out growers / smallholders | Tonnage / year | | | |
| | Estimated last year (Sep 2019 – Aug 2020) | Actual (May 2019 – Jul 2021) | | Forecast (Sep 2021 – Aug 2022) |
| | | Previous license period (May 2019 – Aug 2019) | Current license period (Sep 2019 – Jul 2021) | |
| 3 rd Party | | 87,881.78 | 347,225.56 | |
| Total | | 435,107.34 | | |

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| 9A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|---|---------------------|--|--|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply base (MT) | Volume of FFB from uncertified supply base (MT) | Total FFB/Month (MT) |
| 1 | May 2019 | 2,968.76 | 19,689.26 | 22,658.01 |
| 2 | June 2019 | 3,251.98 | 16,853.20 | 20,105.17 |
| 3 | July 2019 | 4,182.69 | 26,646.16 | 30,828.85 |
| 4 | August 2019 | 4,392.50 | 24,693.16 | 29,085.66 |
| 5 | September 2019 | 4,386.08 | 23,185.65 | 27,571.73 |
| 6 | October 2019 | 4,958.69 | 17,990.78 | 22,949.47 |
| 7 | November 2019 | 3,844.27 | 12,730.97 | 16,575.24 |
| 8 | December 2019 | 3,931.11 | 14,459.45 | 18,390.56 |
| 9 | January 2020 | 3,206.91 | 14,017.64 | 17,224.55 |
| 10 | February 2020 | 3,500.50 | 11,403.39 | 14,903.89 |
| 11 | March 2020 | 3,294.91 | 10,074.55 | 13,369.46 |
| 12 | April 2020 | 3,283.13 | 11,594.54 | 14,877.67 |
| 13 | May 2020 | 2,851.76 | 8,524.09 | 11,375.85 |
| 14 | June 2020 | 3,934.53 | 13,971.38 | 17,905.91 |
| 15 | July 2020 | 4,431.55 | 18,793.10 | 23,224.65 |
| 16 | August 2020 | 4,418.20 | 21,997.84 | 26,416.04 |
| 17 | September 2020 | 4,171.49 | 21,215.07 | 25,386.55 |
| 18 | October 2020 | 3,512.68 | 15,321.36 | 18,834.04 |
| 19 | November 2020 | 3,081.84 | 10,531.21 | 13,613.05 |
| 20 | December 2020 | 2,919.26 | 11,451.59 | 12,675.20 |
| 21 | January 2021 | 1,223.61 | 15,545.43 | 15,545.43 |
| 22 | February 2021 | 0.00 | 13,589.78 | 13,589.78 |
| 23 | March 2021 | 0.00 | 16,743.44 | 16,743.44 |
| 24 | April 2021 | 0.00 | 9,536.02 | 9,536.02 |
| 25 | May 2021 | 0.00 | 18,358.92 | 18,358.92 |
| 26 | June 2021 | 0.00 | 15,958.99 | 15,958.99 |
| 27 | July 2021 | 0.00 | 20,230.38 | 20,230.38 |
| TOTAL | | 75,746.43 | 435,107.34 | 507,934.51 |
| Note: | | | | |

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Since February 2021, according to top management policy, Gunung Melayu I POM only received/processed non certified FFB from outgrower/independent supplier. FFB from Pulau Maria Estate sent to Gunung Melayu II POM.

10. Summary of Certified Tonnage (not applicable for ISS)

| Estimated last year (Sep 2019 – Aug 2020) | Actual (May 2019 – Jul 2021) | | Forecast (Sep 2021 – Aug 2022) |
|--|--|---|-----------------------------------|
| | Previous license period (May 2019 – Aug 2019) | Current license period (Sep 2019 – Jul 2021) | |
| FFB | FFB | | FFB |
| 86,862* | 14,795.92 | 58,031.25 | 44,478 |
| | 72,827.17 | | |
| CPO (OER: 24.9%) | CPO (OER: 24.44 %) | | CPO (OER: 25.00%) |
| 21,669* | 3,567 | 14,231.60 | 11,120 |
| | 17,799.00 | | |
| PK (KER: 5.36%) | PK (KER: 5.45 %) | | PK (KER: 5.36%) |
| 4,666* | 768.61 | 3,197.07 | 2,384 |
| | 3,965.68 | | |

Note:

Volume extended

FFB extended – 36,163 MT (total FFB after extension = 86,862 MT)

CPO extended – 9,045 MT (total CPO after extension = 21,669 MT)

PK extended – 1,949 MT (total PK after extension = 4,666 MT)

The actual FFB, CPO and PK production is under estimated plus extended volume.

10A. Monthly Records of Certified CPO & PK since the last audit

| No. | Month - Year | Certified CPO (MT) | Certified PK (MT) |
|-----|----------------|--------------------|-------------------|
| 1 | May 2019 | 699.45 | 154.24 |
| 2 | June 2019 | 769.53 | 169.23 |
| 3 | July 2019 | 1,017.21 | 216.94 |
| 4 | August 2019 | 1,080.81 | 228.21 |
| 5 | September 2019 | 1,095.37 | 227.71 |
| 6 | October 2019 | 1,178.48 | 258.03 |
| 7 | November 2019 | 898.44 | 200.36 |
| 8 | December 2019 | 918.44 | 204.55 |
| 9 | January 2020 | 750.41 | 166.63 |

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| | | | |
|--------------|----------------|------------------|-----------------|
| 10 | February 2020 | 807.60 | 182.06 |
| 11 | March 2020 | 748.54 | 171.42 |
| 12 | April 2020 | 774.60 | 171.10 |
| 13 | May 2020 | 654.86 | 149.84 |
| 14 | June 2020 | 908.61 | 211.68 |
| 15 | July 2020 | 1,019.02 | 235.33 |
| 16 | August 2020 | 1,025.70 | 233.45 |
| 17 | September 2020 | 988.68 | 221.10 |
| 18 | October 2020 | 831.28 | 184.97 |
| 19 | November 2020 | 700.78 | 162.57 |
| 20 | December 2020 | 658.94 | 152.76 |
| 21 | January 2021 | 271.85 | 63.53 |
| 22 | February 2021 | - | - |
| 23 | March 2021 | - | - |
| 24 | April 2021 | - | - |
| 25 | May 2021 | - | - |
| 26 | June 2021 | - | - |
| 27 | July 2021 | - | - |
| TOTAL | | 17,798.60 | 3,965.68 |

Note:

Since February 2021, according to top management policy, Gunung Melayu I POM only received/processed non certified FFB from outgrower/independent supplier. FFB from Pulau Maria Estate sent to Gunung Melayu II POM.

| 11. Summary of Actual Volume sold | | | | | |
|---|----------------|-------------------------|--------|--------------|-----------|
| Current License period (Sep 2019 – Jul 2021) | | | | | |
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | Others | | |
| CPO (MT) | - | 3,410.70 | - | - | 3,410.70 |
| PK (MT) | 815.12 | - | - | - | 815.12 |
| Credits | - | - | - | - | - |
| Previous License period (May – Aug 2019) | | | | | |
| CPO (MT) | - | 14,301.00 | - | - | 14,301.00 |
| PK (MT) | 3,130.69 | - | - | - | 3,130.69 |

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| | | | | | |
|---|---|---|---|---|---|
| Credits | - | - | - | - | - |
| Note: Conventional is RSPO certified material but sold as non-RSPO. | | | | | |

| 11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) | | | | |
|--|--|----------------------------------|-------------------------|------------------------|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (MT) | Certified PK Sold (MT) |
| 1 | PT Saudara Sejati Luhur - Gunung Melayu KCP | - | - | 3,945.81 |
| TOTAL | | | - | 3,945.81 |
| Note: | | | | |

| 11B. Records of CPO & PK Sold under other schemes since the last audit (if any) | | | | |
|--|-------------|-------------|------------------|--------------|
| No. | Buyers Name | Scheme Name | CPO Sold (MT) | PK Sold (MT) |
| 1 | PT SDS | ISCC | 17,711.70 | - |
| TOTAL | | | 17,711.70 | - |
| Note: | | | | |

| 11C. Records of CPO & PK Sold as conventional since the last audit (if any) | | | | |
|--|-------------|---------------|--------------|--|
| No. | Buyers Name | CPO Sold (MT) | PK Sold (MT) | |
| - | - | - | - | |
| TOTAL | | - | - | |
| Note: | | | | |

| 11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any) | | | |
|--|-------------|----------------------------------|---|
| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (MT) |
| - | - | - | - |
| TOTAL | | | - |
| Note: | | | |

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| 12. Independent Smallholders Certified Tonnage / Volume | | | | | | | | | |
|--|---|-------------|-------------|------------------------------------|-------------|-------------|--------------------------------------|-------------|-------------|
| | Estimated last year (Not Applicable) | | | Actual (Not Applicable) | | | Forecast (Not Applicable) | | |
| Phase | Eligibility | MS A | MS B | Eligibility | MS A | MS B | Eligibility | MS A | MS B |
| | 40% | 70% | 100% | 40% | 70% | 100% | 40% | 70% | 100% |
| FFB | | | N/A | | | N/A | | | N/A |
| IS-CSPO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKO | N/A | N/A | | N/A | N/A | | N/A | N/A | |
| IS-CSPKE | N/A | N/A | | N/A | N/A | | N/A | N/A | |

| 13. Independent Smallholders Actual Sold Tonnage / Volume | | | | | | |
|--|------------|-----------------------------|------------------------------|----------------|----------------|-----------------|
| | FFB | FFB Conventional | FFB Other schemes | IS-CSPO | IS-CSPK | IS-CSPKE |
| Current License period (Not Applicable) | | | | | | |
| Credits | | | | N/A | N/A | N/A |
| Physical | N/A | N/A | N/A | | | |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **18, 19, 20, 21 and 26 August 2021**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **9 June 2021** (<https://rspo.org/certification/public-announcement/page/8?>). Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **14 – 15 July 2020**.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on **15 November 2021**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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 Section 3.4.

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The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

| Assessment Program | | | | | |
|--------------------------------------|-------------------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| Name (Mill / Supply Base) | Year 1 (Recertification) | Year 2 (ASA 1_1) | Year 3 (ASA 1_2) | Year 4 (ASA 1_3) | Year 5 (ASA 1_4) |
| Gunung Melayu I POM | X | X | X | X | X |
| Pulau Maria Estate | X | X | X | X | X |

Tentative Date of Next Visit: May 2, 2022 - September 5, 2014

Total Number of Mandays: 8 Mandays

2.2 BSI Assessment Team

| Name | Role | Competency |
|-----------------------------------|-------------|--|
| Andi Pratama Pasaribu (AP) | Team Leader | <p>Education: Holds a Bachelor Degree, majoring Social Economy</p> <p>Work Experience: He has more than 5 years experince in the oil palm plantation as agronomy and sustainability officer from 2008 – 2013 and has more than 8 years of RSPO and sustainable palm oil auditing experience.</p> <p>Training attended: Attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training and High Conservation Value and GIS Awareness training.</p> <p>Aspect covered in this audit: During this assessment, he assessed legal, social and best management practices aspect</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> |
| Imam Fakhrurozi (IF) | Team Member | <p>Education: Holds a Degree in Agriculture Technology from Gadjah Mada University.</p> <p>Work Experience: He has 2 years working experience in oil palm plantation as a sustainability and HSE officer and agronomy staff and has more than 7 years of RSPO and sustainable palm oil auditing experience.</p> |

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| | | |
|---|--------------------|--|
| | | <p>Training attended: Attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation Training, and Occupational Safety and Health Expert Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on environment, occupational, safety and health aspects.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> |
| <p>Pratama Agung Sedayu (PS)</p> | <p>Team Member</p> | <p>Education: Holds a Degree in Social Economic of Agriculture from University of Jenderal Soedirman.</p> <p>Work Experience: He has more than 10 years auditing experience in sustainability and traceability on RSPO, FSC, CAFÉ, Organic programs and Timber origins.</p> <p>Training attended: Attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, and Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of estate supply chain, environmental and HCV management aspect. He also conducted public consultation with external stakeholders.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> |
| <p>Nanang Rusmana (NR)</p> | <p>Team Member</p> | <p>Education: Holds a Bachelor Degree of Forestry from IPB University..</p> <p>Work Experience: He has 8 years working experiences in oil palm plantation and mining sector as Safety, Health and Environment officer and has more than 5 years auditing experience on RSPO and ISPO.</p> <p>Training attended: Attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, and Technical Training of Assessment of High Conservation Value Forest (HCVF).</p> <p>Aspect covered in this audit: During this assessment, he assessed on social and worker welfare. He also conducted public consultation with related stakeholders.</p> |

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| | | |
|----------------------------------|----------------------|---|
| | | <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> |
| <p>Dr. Suhaili Sahari</p> | <p>Peer Reviewer</p> | <p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI Peer reviewer training 3. Safety and Health 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards: MS 2530:2013 part 1, 2 , 3 and 4 7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard: Global GAP, Euru GAP |

Accompanying Persons: NIL

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1.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

| Date | Time | Subjects | AP | NR | IF | PS |
|--------------------------|---------------|--|----|----|----|----|
| Wednesday, 18/08/2021 | 08.00 – 08.30 | Opening Meeting <ul style="list-style-type: none"> • Presentation by PT SSL – GM I POM and its supply bases • Presentation by PT GM – GM II POM and its supply bases • Presentation by BSI Indonesia | √ | √ | √ | √ |
| | 08.30 – 12.00 | Document Review for Gunung Melayu I POM and Pulau Maria Estate | | √ | | √ |
| | 12.00 – 14.00 | Break | | √ | | √ |
| | 13.00 – 14.30 | Flight Jakarta – Medan | √ | | √ | |
| | 14.30 – 19.00 | Travel from Medan to Kisaran | √ | | √ | |
| | 14.00 – 17.00 | Document Review continuation for Gunung Melayu I POM and Pulau Maria Estate | | √ | | √ |
| Thursday, 19/08/2021 | 08.00 – 12.00 | Field Visit to Pulau Maria Estate: <ul style="list-style-type: none"> - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. | √ | √ | √ | √ |
| | 12.00 – 14.00 | Break | √ | √ | √ | √ |
| | 14.00 – 17.00 | Document Review continuation for Gunung Melayu I POM and Pulau Maria Estate | | √ | | √ |
| Friday, 20/08/2021 | 08.00 – 12.00 | Field Visit to Gunung Melayu I POM: <ul style="list-style-type: none"> • Inspection of processing, warehouse, workshop, mill waste management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. • Audit Supply Chain for CPO Mills (RSPO SCCS) • Interview workers. | √ | √ | √ | √ |
| | 12.00 – 14.00 | Break | √ | √ | √ | √ |
| | 14.00 – 17.00 | Document Review continuation for Gunung Melayu I POM and Pulau Maria Estate | √ | √ | √ | √ |
| Saturday, 21/08/2021 | 08.00 – 12.00 | Document Review continuation for Gunung Melayu I POM and Pulau Maria Estate | √ | √ | √ | √ |

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| | | This is a half day audit | | | | |
|-------------------------|---------------|------------------------------------|---|---|---|---|
| Thursday, 26/08/2021 | 14.00 – 15.00 | Closing Meeting Preparation | √ | √ | √ | √ |
| | 15.00 – 16.00 | Closing Meeting | √ | √ | √ | √ |
| Friday, 27/08/2021 | 11.00 – 12.00 | Flight to Jakarta | √ | √ | √ | √ |

NCR Close Out Plan

| Date | Time | Subjects | NR |
|------------------------|---------------|---|-----------|
| Sunday, 14/11/2021 | 07.35 – 10.00 | Flight Jakarta – Kualanamu (Medan) (GA-182) | √ |
| | 10.30 – 17.00 | Travel from Medan to PT. SSL & PT. GM - Gunung Melayu I & II POM | √ |
| Monday, 15/11/2021 | 08.00 – 08.30 | Opening Meeting - Presentation by PT. SSL – Gunung Melayu I -II POM & Supply bases - Presentation by BSI Indonesia | √ |
| | 08.30 – 12.00 | Pulau Maria Estate and Gunung Melayu I POM: Verifying of correction, root-cause and corrective action (document review and field observation) | √ |
| | 12.00 – 14.00 | Break | √ |
| | 14.00 – 15.00 | Batu Anam Estate: Verifying of correction, root-cause and corrective action (document review and field observation) | √ |
| | 15.00 – 16.00 | Report Preparation | √ |
| | 16.00 – 17.00 | Closing Meeting | √ |
| | 17.00 – 21.00 | Travel from site to Medan | √ |
| | pm | Stay in Medan and conducts Rapid Antigen/PCR Test for Flight Requirement | √ |
| Tuesday, 16/11/2021 | 11.00 – 13.35 | Flight Kualanamu (Medan) - Jakarta (GA-185) | √ |

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

| Requirement | Assessment | Compliance |
|--|--|------------|
| Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company? | PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base. | Complied |
| Have all the estates and mills certified within five (5) years after obtaining RSPO membership? | <p>According to the latest TBP, there is remaining mill and estate that has not certified yet which is PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. However, according to the public notification seen in RSPO website, both PT Mitra Unggul Pusaka - Segati and Penarikan Mill has been audited by TUC Rheinland Indonesia on 29 November – 4 December 2021.</p> <p>The other uncertified unit (PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate) subject to RaCP liability.</p> <p>The company’s sustainability team has conducted latest RSPO internal audit on October 2021.</p> <ul style="list-style-type: none"> • PT Mitra Unggul Pusaka - Segati Palm Oil Mill and Penarikan Mill located in Pelalawan, Riau will planned Re-Audit in year 2022. Status of disclosure PT MUP has been submitted to RSPO by email on 29 November 2017. The latest respond from RSPO received on 23 April 2019 by Biodiversity Manager, stating that RSPO is on review of Annex 3a and all supporting documents. According to the RSPO Public Notification (https://rspo.org/uploads/default/pnc/Public Announcement RSPO - ENGLISH Mitra Unggul (Rev 2).pdf), both PT Mitra Unggul Pusaka - Segati and Penarikan Mill has been audited by TUC Rheinland Indonesia on 29 November – 4 December 2021. • PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review for PT Gunung Melayu - Sentral Estate and will be proceed. <i>No additional information until this audit.</i> • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has | Complied |

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| | <p>been "Pass" and moving forward to preparing and submitted the remediation plan. According to the email, summary of key finding stated:</p> <ul style="list-style-type: none"> ➤ FCL – 0 Ha ➤ Environmental remediation – 18.98 Ha (riparian) <ul style="list-style-type: none"> • Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO | |
| <p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p> | <p>No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.</p> | <p>Complied</p> |
| <p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p> | <p>Yes, there is time bound plan revision dated 1 January 2019, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2022.</p> | <p>Complied</p> |
| <p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p> | <p>Yes, there is time bound plan revision dated 1 January 2019, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2022.</p> | <p>Complied</p> |
| <p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p> | <p>No, Based on internal audit there is no isolated lapse in implementation of the plan.</p> | <p>Complied</p> |
| <p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p> | <p>There is no fundamental failure. Unit management can show the evidence of certification progress such as correspondency of RaCP with RSPO Secretariat. The status as follows:</p> <ul style="list-style-type: none"> • PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill has been re-audited by TUV Rheinland Indonesia on 29 November – 4 December 2021. • PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review. • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has | <p>Complied</p> |

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| | <p>been "Pass" and moving forward to preparing and submitted the remediation plan.</p> <ul style="list-style-type: none"> Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO. | |
| Un-Certified Units or Holdings | | |
| <p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p> | <p>Based on Time Bound Plan revised 1 January 2019, PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill located in Pelalawan, Riau Province has been re-audit on December 2021 by TUV Rheinland Indonesia. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. Company revised the Timeboundplan on June 2021 and the plan for certification is change due to RaCP still under process. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest.</p> <p>Latest progress of RaCP based on email correspondence between company and RSPO dated 17 February 2022, confirmed that RSPO has received feedback from the Compensation Panel on the Concept Note of PT Inti Indosawit Subur – Mitra Unggul Pusaka. The concept note is close to an endorsement, however, there have been a few issues raised with regard to the content of the concept note. Therefore, the company is to address the concerns in the revised concept note.</p> | Complied |
| <p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p> | <p>PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest.</p> <p>Another progress related to uncertified unit (PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate) related to progress of RaCP actively communicated with RSPO secretariat. The detail of process as follows:</p> <ul style="list-style-type: none"> PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review. PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO | Complied |

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| | <p>Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has been "Pass" and moving forward to preparing and submitted the remediation plan.</p> <ul style="list-style-type: none"> Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO. <p>Unit management actively demonstrates its commitment to the RaCP process.</p> | |
| <p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p> | <p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker), PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> MU's with potential liabilities: 4 unit LUCA Submitted: 4 units LUCA review Completed: 3 unit Concept Note Required: 3 units Concept Note Submitted: 2 units Concept Note Approved: - Compensation Plan Submitted: - Compensation Plan Endorsed: - Remediation Plan Required: 4 units Remediation Plan Submitted: - Remediation Plan Approved: - <p>Based on the latest correspondence between the unit management and RSPO Secretariat on 17 February 2022 related to Concept Note submission, The RSPO Secretariat stated <i>"The concept note is close to an endorsement. However, the company should address the recommendations on the long-lasting and timeline section in the revised concept note"</i>.</p> | <p>Complied</p> |
| <p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p> | <p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition the</p> | <p>Complied</p> |

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| | company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016. | |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016. | Complied |
| Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified. | According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. Report of internal audit are available. Positive assurance: PT Inti Indosawit Subur committed to fulfill all the requirement related to RSPO certification process. PT Inti Indosawit Subur has detailed the correction and corrective action plan and any unresolved issues has been on the right path towards the certification process. | Complied |
| Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO? | According to internal audit result on October 2021, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | During internal audit October 2021, the stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation. | Complied |

3.2 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|--|------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | No smallholders within scope of Gunung Melayu I POM. | Complied |

Approved Time Bound Plan

| Name of Mill | Mill Address | Name of Supply Bases | Estate Address | Time Bound for Certification | Status |
|--|--|-----------------------|---|------------------------------|---|
| Buatan I Mill – PT Inti Indosawit Subur | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | Buatan Estate | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | 2010 | Certified on 16 September 2010 Re-Certified on 16 September 2015 |
| | | Buatan (Plasma) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | |
| Buatan II Mill - PT Inti Indosawit Subur | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | Simpang Perak Estate* | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | 2010 | Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019 |
| | | Buatan (Plasma) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | |
| Ukui I Mill - PT Inti Indosawit Subur | Ukui Village, Ukui District, Pelalawan Regency, Riau | Ukui Estate | Ukui Village, Ukui District, Pelalawan Regency, Riau | 2011 | Certified on 1 March 2011 Re-Certified on 1 March 2016 |
| | | Sei Lala Estate* | Ukui Village, Ukui District, Pelalawan Regency, Riau | 2011 | *Split From Ukui & Soga Estate Since 1 January 2019 |
| | | Ukui (Plasma) | Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau | 2011 | Certified on 1 March 2011 Re-Certified on 1 March 2016 |
| Ukui II Mill - PT Inti Indosawit Subur | Ukui Village, Ukui District, Pelalawan Regency, Riau | Soga Estate | Ukui Village, Ukui District, Pelalawan Regency, Riau | 2011 | Certified on 1 March 2011 Re-Certified on 1 March 2016 |
| | | Ukui (Plasma) | Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau | 2011 | Certified on 1 March 2011 Re-Certified on 1 March 2016 |
| Tungkal Ulu Mill - PT Inti Indosawit Subur | Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu | Tungkal Ulu Estate | Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | 2012 | Certified on 15 August 2012 Re-Certification on August 2017 |

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| | District, Tanjung Jabung Regency, Jambi | Tungkal Ulu (Plasma) | Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, | 2012 | Certified on 15 August 2012 Re-Certification on August 2017 |
| Muara Bulian Mill - PT Inti Indosawit Subur | Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency, Jambi | Muara Bulian Estate | Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency, | 2013 | Certified on 12 July 2013 Re-Certification on August 2017 |
| | | Muara Bulian (Plasma) | Maro Sebo Ilir District, Batanghari Regency, Jambi | 2013 | Certified on 12 July 2013 Re-Certification on August 2017 |
| Topaz Mill – PT Tunggal Yunus Estate | Petapahan Village, Tapung District, Kampar Regency, Riau | Topaz Estate | Petapahan Village, Tapung District, Kampar Regency, Riau | 2015 | Certified on 30 March 2015 |
| Taman Raja Mill – PT Dasa Anugrah Sejati | Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | Taman Raja, Badang & Bernai Estate* | Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | 2015 | Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019 |
| Segati Mill – PT Mitra Unggul Pusaka | Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau | Segati Estate | Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau | Main Audit in 2014 | NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note) |
| | | Gondai Estate | Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau | Re-audit by TUV Rheinland Indonesia on 29 November – 4 December 2021 | NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note) |

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| Penarikan Mill – PT Mitra Unggul Pusaka | Penarikan Village, Langgam District, Pelalawan Regency, Riau | Penarikan Estate* | Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau | Re-audit by TUV Rheinland Indonesia on 29 November – 4 December 2021 | Re-audit Certification in December 2021 by TUV Rheinland Indonesia |
| Tanah Datar Mill – PT Supra Matra Abadi | Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera | Tanah Datar Estate | Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera | 2015 | Certified on 18 May 2015 |
| | | Bahilang Estate* (PT Nusa Pusaka Kencana) | Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera | 2022 | *Bahilang Estate On Process RaCP (Excluded from the certification scope but scheduled to re-audit during Recertification 2022 Tanah Datar Mill – once the RaCP process approved by RSPO) |
| Aek Nabara Mill – PT Supra Matra Abadi | S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera | Aek Nabara Estate | S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera | 2015 | Certified on 6 March 2015 |
| Teluk Panjie Mill – PT Supra Matra Abadi | Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera | Teluk Panjie Estate (3,885 Ha) | Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera | 2015 | Certified on 21 April 2015 |
| | | Teluk Panjie Estate (801 Ha) | | 2022 | HGU is still in Process |
| Peranap Mill – PT Rigunas Agri Utama | Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, | Peranap Estate | Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau | 2015 | Certified on 7 January 2015 |
| | | Peranap (Plasma) | | 2016 | Certified on 18 August 2016 |

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|---|---|------------------------------|---|------|---|
| | Indragiri Hulu Regency, Riau | | | | |
| Bungo Tebo Mill – PT Rigunas Agri Utama | Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi | Bungo Tebo Estate | Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi | 2015 | Certified on 3 December 2015 |
| | | Bungo Tebo (Plasma) | | 2017 | Certified on 7 February 2017 |
| Tanjung Selamat Mill – PT Indo Sepadan Jaya | Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | Tanjung Selamat | Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | 2015 | Certified on 26 May 2015 |
| | | Pangkalan | Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | 2015 | Certified on 26 May 2015 |
| Gunung Melayu I – PT Saudara Sejati Luhur | Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra | Pulau Maria Estate | Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra | 2015 | Certified on 7 September 2015 |
| Gunung Melayu II – PT Gunung Melayu | Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra | Aek Tarum & Batu Anam Estate | Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra | 2015 | Certified on 8 July 2015 |
| | | Sentral Estate | | 2022 | *Sentral Estate On Process RaCP (Excluded from the certification scope but scheduled to re-audit during Recertification 2022 Gunung Melayu 2 Mill – once the RaCP process approved by RSPO) |
| Negri Lama II Mill – PT Hari Sawit Jaya | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | Negri Lama | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | 2016 | <ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base |
| | | Aek Kuo (2,088 Ha) | Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra | 2018 | HGU Complete Audit at ASA 3 (2018) |

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|---|---|---|--|------|--|
| | | Aek Kuo (501 Ha) | | 2018 | |
| Negri Lama I Mill – PT Hari Sawit Jaya | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | *3rd party which is excluded from scope of certification | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | 2015 | <ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill |

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were **1 (one) Critical (remote), 1 (one) critical (onsite) and 5 (five) minor (onsite)** raised. The **PT Saudara Sejati Luhur – Gunung Melayu I POM** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

| Non-conformity | | | |
|---|---|--------------------------------------|-------------------|
| NCR Ref # | 1933967-202007-M1 | Date Issued | 15 July 2020 |
| Due Date | 13 October 2020 | Date of nonconformity Closure | 21 September 2020 |
| Clause & Category (Critical / Minor) | 6.2.2 Critical | | |
| Statement of Nonconformity: | Certificate holder has not been able to demonstrate in detail related to employment procedures specifically for Specified Time Work Agreement/PKWT employees. | | |
| Requirement Reference: | (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. | | |
| Objective Evidence: | Certificate holder has had employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009. However, the procedure has not yet been specified in detail related to employment procedures, especially for PKWT employees. Based on document verification on latest employee data documents in May 2020 and estate/mill staff explanation obtained information each unit had some PKWT’s workers. | | |
| Corrections: | Revised procedures related to HR regarding the implementation of the 2019 RSPO INA NI P&C, especially the mechanism for the recruitment and recruitment of PHL and PKWT workers. | | |
| Root Cause Analysis: | Lack of coordination between the Sustainability Department and the HR Department has resulted in procedures related to HR regarding the implementation of the 2019 RSPO INA NI P&C, especially the mechanism for the Acceptance and Appointment of PHL and PKWT workers not yet updated. | | |
| Corrective Actions: | Update HR procedures if there are changes to the management system, both RSPO and other management systems. | | |
| Assessment Conclusion: | Based on NCR Close Out verification, certificate holder has shown the CAP's evidence as follows: | | |

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| | <p>1. Memorandum No. 30/GM/INT/07/2020 dated 23 July 2020. Those memorandum described the recruitment process of Specified Time Work Agreement Worker/Temporary Worker. Effective since the memorandum released. Those memorandum attached with recruitment flow chart.</p> <p>2. Certificate holder has shown the minutes of meeting with workers representatives on 3 August 2020, attended by 97 workers.</p> <p>3. Certificate holder has shown the workers evaluation schedule year 2020. Sighted the amount of 43 people on 2020 and 23 people on 2023.</p> <p>Based on that evidence, this Major NC's has been closed.</p> |
|--|---|

| Non-conformity | | | |
|---|---|--------------------------------------|------------------|
| NCR Ref # | 2097225-202108-M1 | Date Issued | 21 August 2021 |
| Due Date | 19 November 2021 | Date of nonconformity Closure | 15 November 2021 |
| Clause & Category (Critical / Minor) | 6.7.3 Critical | | |
| Statement of Nonconformity: | Based on field visit sampled, the organization has not been able to demonstrate the consistency of PPE to cover all potentially hazardous operations. | | |
| Requirement Reference: | (C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. | | |
| Objective Evidence: | <p>During field visit, the auditor team found:</p> <ul style="list-style-type: none"> • Gunung Melayu I POM - Rotary motors were not provided with safety cover, e.g: water pump in IPAL area and rotary motor in near Polishing Drum Mill Station • Pulau Maria Estate - TUS does not change PPE, wash, and put personal clothes in sanitation facilities for those who use pesticides. • Warehouse PPE (Apron) for welding workers is not available • Found two pesticide applicators were not using appropriate PPE (apron and mask) | | |
| Corrections: | <p>a. Re-install the safety cover of the rotating machine at each station.</p> <p>b. Conducting socialization to the TUS workers about the requirements for replacing and storing PPE in the TUS Room so that in the future no PPE is brought home.</p> <p>c. Provide 1 unit apron at workshop for operator and 1 unit in the warehouse as stock if the apron is lost and damaged.</p> <p>d. Conducting socialization to the TUS workers about the requirements for replacing and storing PPE in the TUS Room so that in the future no PPE is brought home.</p> | | |

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| Root Cause Analysis: | <ul style="list-style-type: none"> a. There is a miscommunication between the assistant and operator. Assistant gives the instruction to the operator to check the engine fan belt before the mill operates, however the operator checks while the operation is in progress so the operator opens the safety cover. b. Decreased understanding, awareness and discipline from supervisor and workers regarding the dangers and safety of their work and there is no sanctions for violating these rules. c. Decreased understanding, awareness and discipline from supervisor and workers regarding the dangers and safety of their work. d. Decreased understanding, awareness and discipline from supervisor and workers regarding the dangers and safety of their work and there is no sanctions for violating these rules. |
| Corrective Actions: | <ul style="list-style-type: none"> a. Provide socialization regarding the important of the use of PPE and OHS to all workers. Conduct periodic monitoring and maintenance by workshop supervisor. Effectively check the readiness and conformity with the physical installations required before changing the shifts during the briefing. b. The Management Unit (Pulau Maria Estate) made an agreement with the TUS supervisor and TUS workers in the form of a Statement Letter that the workers were willing to be subject to the agreed sanctions if there were still matters related to the suitability of PPE users. c. Provide apron at workshop and 1 unit in the warehouse as stock if the apron is lot and damaged. d. The Management Unit (Pulau Maria Estate) made an agreement with the TUS supervisor and TUS workers in the form of a Statement Letter that the workers were willing to be subject to the agreed sanctions if there were still matters related to the suitability of PPE users. |
| Assessment Conclusion: | <p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <ul style="list-style-type: none"> a. Certificate holder has shown the minute of meeting with workers on 23 September 2021, attended by 26 workers at Gunung Melayu I POM. The socialization has also conducted through media OHS bulletin regarding topic "Advice to self-cleaning after working with chemical", OHS bulletin has distributed via WhatsApp. Periodic monitoring and maintenance by workshop supervisor has shown during verifications. The document evidence is for September and October 2021. Field verification has conducted at Gunung Melayu I POM, based on field verification has shown that all rotating machine has equipped by safety cover. b. Certificate holder has shown the minute of meeting with TUS workers (Pulau Maria Estate) in September 2021, attended by 15 workers. Certificate holders has shown the agreement letter regarding willing to be subject to the agreed sanction if there are still matters related to the suitability of PPE users. |

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| | <p>Field verification has conducted at TUS room, it was shown that the CH has provide the employee locker to store clean PPE, further a clothesline is also provided.</p> <p>Based on interview with the TUS workers during NCR Close Out visit at Pulau Maria Estate Block I02a Afd I revealed that all TUS workers have understood regarding the importance of using PPE.</p> <p>c. Certificate holders has shown the evidence regarding the Purchase Order for Welding Apron as mentioned on the Good Receive Notes (GRN) No. 113200597 dated 7 September 2021, qty 2 pcs.</p> <p>Field verification has conducted at workshop and warehouse, apron has already available.</p> <p>d. Certificate holder has shown the minute of meeting with TUS workers (Pulau Maria Estate) in September 2021, attended by 15 workers.</p> <p>Certificate holders has shown the agreement letter regarding willing to be subject to the agreed sanction if there are still matters related to the suitability of PPE users.</p> <p>Field verification has conducted at TUS room, it was shown that the CH has provide the employee locker to store clean PPE, further a clothesline is also provided.</p> <p>Based on interview with the TUS workers during NCR Close Out visit at Pulau Maria Estate Block I02a Afd I revealed that all TUS workers have understood regarding the importance of using PPE</p> <p>Based on that evidence, this Major NC's has been closed.</p> |
|--|---|

| Non-conformity | | | |
|---|---|--------------------------------------|------------------|
| NCR Ref # | 2097225-202108-N1 | Date Issued | 21 August 2021 |
| Due Date | Next ASA | Date of nonconformity Closure | 15 November 2021 |
| Clause & Category (Critical / Minor) | 3.2.2 Minor | | |
| Statement of Nonconformity: | PT. Saudara Sejati Luhur – Gunung Melayu I POM and its supply base cannot provide filled up/completed RSPO metrics template. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | PT. Saudara Sejati Luhur – Gunung Melayu I POM and its supply base cannot provide filled up/completed RSPO metrics template. | | |
| Corrections: | Re-Inventory and re-identify the required data in the templates in the units (estate and mill), so that the data can be completed. | | |
| Root Cause Analysis: | There is no coordination between the Sustainability Dept and units (estate and Mill), so there has not been an update as per new indicator regarding the implementation of the RSPO PC INANI 2020 especially the mechanism of RSPO Metric Template. | | |

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| Corrective Actions: | Create a standard mechanism and format for the timeline progress for the implementation of data collection related to the RSPO Metric Template, so that the required data is available and complete before the next audit. |
| Assessment Conclusion: | Unit of certification has sent the RSPO Metric Template and verified by auditor during the NCR Close Out Visit. based on that, this nonpliance is closed . |

| Non-conformity | | | |
|---|---|--------------------------------------|----------------|
| NCR Ref # | 2097225-202108-N2 | Date Issued | 21 August 2021 |
| Due Date | Next ASA | Date of nonconformity Closure | - |
| Clause & Category (Critical / Minor) | 6.7.2 Minor | | |
| Statement of Nonconformity: | Based on field visit sampled, first aid equipment was not complete available at worksites as required in PERMENAKER No:15/MEN/VIII/2008 | | |
| Requirement Reference: | Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. | | |
| Objective Evidence: | Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed. | | |
| Corrections: | Complete first aid kit for the mandor, at warehouse and workshop. | | |
| Root Cause Analysis: | There is no mechanism and PIC that has special task for the completeness of first aid kit or medicine according to the applicable requirements | | |
| Corrective Actions: | The manager issues a Memorandum of Affirmation for special officers on the completeness of the first aid kit, to ensure that the reference for the types of drugs used in the garden are materials that comply with the Permenaker 15/2008 and make a list format for the type of drugs and equipment as a reference routine monitoring that must be documented by PIC t the RSPO Clerk | | |
| Assessment Conclusion: | N/A | | |

| Non-conformity | | | |
|---|---|--------------------------------------|----------------|
| NCR Ref # | 2097225-202108-N3 | Date Issued | 21 August 2021 |
| Due Date | Next ASA | Date of nonconformity Closure | - |
| Clause & Category (Critical / Minor) | 7.3.2 Minor | | |
| Statement of Nonconformity: | Lack of evidence that disposal of waste material is demonstrated properly | | |

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| Requirement Reference: | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. |
| Objective Evidence: | Based on field visit at Housing Division I - Pulau Maria Estate, it was found that domestic waste has not been managed properly, domestic waste is seen pilling up behind the housing areas, furthermore it also was found 2 (two) cans of used oil behind the housing areas, this is not in accordance with SOP AA-KL-05-EFP rev.2 dated 1 February 2008 "Penanganan Sampah Industri Non-B3" and SOP AA-KL-06-EFP rev.8 dated 1 June 2021 "Penanganan Limbah B3". |
| Corrections: | Conduct special inspection and cleaning of the houses that do not throw domestic waste in the available bin every 2 months. |
| Root Cause Analysis: | There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management. |
| Corrective Actions: | <ul style="list-style-type: none"> • Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used, • Make a plan for a routine schedule of employee housing inspections signed by all staff and managers. |
| Assessment Conclusion: | N/A |

| Non-conformity | | | |
|---|---|--------------------------------------|----------------|
| NCR Ref # | 2097225-202108-N4 | Date Issued | 21 August 2021 |
| Due Date | Next ASA | Date of nonconformity Closure | - |
| Clause & Category (Critical / Minor) | 7.3.3 Minor | | |
| Statement of Nonconformity: | Based on field visit at Housing Division 1 - Pulau Maria Estate, it was found that domestic waste has not been managed properly, during the visit it was observed that there were traces of burning waste behind the housing areas. | | |
| Requirement Reference: | The unit of certification does not use open fire for waste disposal. | | |
| Objective Evidence: | Based on field visit at Housing Division 1 - Pulau Maria Estate, it was found that domestic waste has not been managed properly, during the visit it was observed that there were traces of burning waste behind the housing areas. | | |
| Corrections: | Conduct special inspection and cleaning of the houses that do not throw domestic waste in the available bin every 2 months. | | |
| Root Cause Analysis: | There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management. | | |
| Corrective Actions: | <ul style="list-style-type: none"> • Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used, • Make a plan for a routine schedule of employee housing inspections signed by all staff and managers. | | |

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| Assessment Conclusion: | N/A |
|-------------------------------|-----|

| Non-conformity | | | |
|---|--|--------------------------------------|----------------|
| NCR Ref # | 2097225-202108-N5 | Date Issued | 21 August 2021 |
| Due Date | Next ASA | Date of nonconformity Closure | - |
| Clause & Category (Critical / Minor) | 7.12.7 Minor | | |
| Statement of Nonconformity: | PT. Saudara Sejati Luhur has not put management and monitoring plan from HCV assessment document and monitoring report as feedback to HCV management and monitoring plan/conservation management plan. And the conservation management plan has no plan for monitoring of disturbance to HCV identified. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | PT. Saudara Sejati Luhur has not put management and monitoring plan from HCV assessment document and monitoring report as feedback to HCV management and monitoring plan/conservation management plan. And the conservation management plan has no plan for monitoring of disturbance to HCV identified. | | |
| Corrections: | Coordinate with the HCV Officer HO by providing guidance and direction in the revision and evaluation of the document CMP related to the management and monitoring of further HCVs, especially the plan for monitoring the level of disturbance to the HCVs that have been identified. | | |
| Root Cause Analysis: | Lack of understanding in the unit to complete the results of the analysis of monitoring and identifications of biodiversity concludes regarding the description of species conditions in detail, and the reciprocal impacts given in the CMP document. | | |
| Corrective Actions: | Provide socialization and training in the preparation of special CMP reports to the PIC by the HCV Officer HO, so that they understand in completing the conclusions from the results of the analysis of monitoring and identification of biodiversity related to the description of species conditions in detail, and the reciprocal impacts given in the CMP document. | | |
| Assessment Conclusion: | N/A | | |

| Opportunity for Improvements | |
|------------------------------|-------------|
| OFI # | Description |
| OFI 1 | - |

| Positive Findings | |
|-------------------|-------------|
| PF # | Description |

| | |
|------|---|
| PF 1 | - |
|------|---|

3.3.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | |
|---|--|--------------------------------------|-------------------|
| NCR Ref # | 1778313-201905-N1 | Date Issued | 16 May 2019 |
| Due Date | Next ASA | Date of nonconformity Closure | 21 September 2020 |
| Clause & Category (Critical / Minor) | 5.1.2 Minor | | |
| Statement of Nonconformity: | There was lack of evidence the organization has submitted the report of implementation of RKL-RPL for second semester year 2018 (July-December 2018) as required at the SK Izin Lingkungan Nomor: 660.1/0779/LH/2015 tentang Izin Lingkungan PT Saudara Sejati Luhur. | | |
| Requirement Reference: | Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document. | | |
| Objective Evidence: | <p>PT. Saudara Sejati Luhur has shown the environmental document of "UKL-UPL" that been approved under environmental decree "Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara Nomor: 660.1/0779/LH/2015, tertanggal 17th June 2015 tentang Izin Lingkungan PT Saudara Sejati Luhur" pada poin Memutuskan bagian kesembilan "Menyampaikan laporan pelaksanaan implementasi pengelolaan lingkungan hidup dan implementasi pemantauan lingkungan hidup kepada:</p> <ol style="list-style-type: none"> 1. Menteri Negara Lingkungan Hidup dan Kehutanan RI di Jakarta, 2. Kepala Badan Lingkungan Hidup Provisni Sumatera Utara dan 3. Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara. <p>However, there was lack of evidence the organization has submitted the report of implementation of RKL-RPL for second semester year 2018 (July-December 2018) as required at the "SK Izin Lingkungan Nomor: 660.1/0779/LH/2015 tentang Izin Lingkungan PT Saudara Sejati Luhur".</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Daftar Distribusi Eksternal tentang Laporan Pelaksanaan RKL-RPL periode Juli-Desember 2018 kepada Dinas Perkebunan Kabupaten Asahan. • Memorandum Nomor: 117/MI-PGS/MEMO/03/2019, Hal Pengiriman Laporan RKL/RPL Juli – Desember 2018, tertanggal 27 Maret 2019 ditujukan kepada RH Plt I Medan; Attn: Ibu Rika Damanik (RO Plt I –Medan) | | |
| Corrections: | Ask the Medan office to provide of receipt the RKL RPL report and follow up back to the field for receipt of RKL-RPL Semester 2 2018 as soon as possible. Evidence: | | |

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| | <ul style="list-style-type: none"> Receipt of RKL-RPL Semester 2 Year 2018 submission report, dated 26 April 2019. E-Receipt of "Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL)", dated 18 June 2019 |
| Root Cause Analysis: | The RKL RPL report has been sent to Medan but no feedback report or receipt has been received by the HO office, so the receipt of the RKL RPL report for semester 2018 cannot be shown. |
| Corrective Actions: | Appoint the PIC in charge of all report receipts to follow up with the Medan office. In order to avoid re-misunderstanding to show receipts throughout the report. |
| Assessment Conclusion: | Management unit has controlled the submission of environmental report regularly. All scheduled report has been submitted to the respective stakeholders. Based on that fact, this nonconformity has been closed. |

| Opportunity for Improvement | |
|-----------------------------|-------------|
| OFI# | Description |
| OFI 1 | - |

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|--|-----------------------------|---------------|----------------|-------------------------|
| Previous Assessment (ASA-1.4) | | | | |
| 1778313-201905-N1 | Minor | 5.1.2 | 16 May 2019 | 21 September 2020 |
| Recertification Assessment (Remote Audit) | | | | |
| 1933967-202007-M1 | Critical | 6.2.2 | 15 July 2020 | 21 September 2020 |
| Current Assessment (Onsite Audit) | | | | |
| 2097225-202108-M1 | Critical | 6.7.3 | 21 August 2021 | 15 November 2021 |
| 2097225-202108-N1 | Minor | 3.2.2 | 21 August 2021 | Next ASA |
| 2097225-202108-N2 | Minor | 6.7.2 | 21 August 2021 | Next ASA |
| 2097225-202108-N3 | Minor | 7.3.2 | 21 August 2021 | Next ASA |
| 2097225-202108-N4 | Minor | 7.3.3 | 21 August 2021 | Next ASA |
| 2097225-202108-N5 | Minor | 7.12.7 | 21 August 2021 | Next ASA |

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss **PT Saudara Sejati Luhur – Gunung Melayu I POM** Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted 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

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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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

| Stakeholders contacted | | |
|--|--|---|
| Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities) | Stakeholder name / organization | Means of communication (e.g. face to face interview, email, phone interview, comment from public notice) |
| Workers of PT Inti Indosawit Subur – Ukui I Estate/POM and Supply Bases | Workers during field visit | Face to face interview |
| Head of Gender Committee of Pulau Maria Estate | Sutiyani | Face to face interview |
| Board of Worker Union | Djunarto A & Jalaludin Siregar | Face to face interview |
| Staff of Gunung Melayu Cooperation "Koperasi Gunung Melayu" | Sri Wahyuni | Face to face interview |
| FFB and EFB Transporter | Julius Franklin | Face to face interview |
| Environmental Service Asahan Regency | Ilham | By phone |
| Agriculture Service Asahan Regency – Plantation Department | Hasudungan | By phone |
| Unit for Manpower Monitoring Region IV Sumatera Utara Province | Iskandar | By phone |
| Manpower Office Asahan Regency – Industrial Relation Department | Hermansyah | By phone |
| National Lands Body Asahan Regency | Lizandri | By phone |
| LSM ICON RI (Local NGO) | Amri Simanjuntak | By phone |
| LSM Tipan RI | Syahri Al Amin | Face to face interview |
| Sawit Watch (National NGO) | Sawit Watch – Bogor | Mail to: info@sawitwatch.or.id |
| Lingkar Komunitas Sawit/Links (National NGO) | Lingkar Komunitas Sawit | Mail to: info@links.co.id |
| Aid Environment (International NGO) | Aid Environment | Mail to: info@aidenvironment.org |
| Wahana Lingkungan Hidup Indonesia (National NGO) | WALHI | Mail to: info@walhi.or.id |

| | | |
|---|---|---|
| Badan Kerja Sama Perusahaan Perkebunan Sumatera (plantation labor alliance of Sumatera) | Badan Kerja Sama Perusahaan Perkebunan Sumatera | Mail to: bspsps2@gmail.com |
| Forest Watch Indonesia (National NGO) | Forest Watch Indonesia | Mail to: fwibogor@fwi.or.id |
| Village Head of Batu Anam and Gonting Malaha | Hariato & Sopian | By phone |

Stakeholders comment

| | |
|----------|---|
| 1 | <p>Feedbacks:</p> <p>Head of Gender Committee of Pulau Maria Estate</p> <ul style="list-style-type: none"> • There is no issue regarding the gender, discrimination and/or sexual harassment in period 2019, 2020 and 2021 at Mills and Estates. • Gender Committee has understood regarding the grievance mechanism as well as the protection of the identity of the complainants/whistle-blower. • The company has implemented the sexual harassment policy. • Unit of Certification has provided pregnancy test to spraying workers and fertilization workers every month. • Due to pandemic Covid-19, some gender committee activities in 2020 and 2021 has been postponed until the situation returns to normal. • Vaccination program to toddlers has started in 2021. <p>Audit Team verification and response:</p> <p>The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</p> |
| 2 | <p>Feedbacks:</p> <p>Djunarto A & Jalaludin Siregar – Worker Union</p> <ul style="list-style-type: none"> • The company has realized employee normative rights such as remuneration in accordance with applicable regulations, allowances/THR and BPJS Program • Communication has gone well with the company • Legally union member is a labor consist of Permanent Workers (SKU-H & SKU-B), however operationally union also consider the problems that occur at the level of daily workers. • Daily workers have had a Work Agreement (SPK) with the company. • There is no indication that organisation conducted discrimination against to the workers. • Organisation has provided PPE for all workers • The company has provided the workers amenities, such as; housing, clean water, electricity, toilets, sanitation, clinics, day care, place of worship, etc. • The company has registered all workers in BPJS program (Accident and Health Insurance) including daily workers. • There’s never been demonstration to the company management in 2020 and 2021 • The company has provided wages in accordance with the regulations. • There is no indication of the company has violated of Human Rights. • There is no indication of forced labor or coercive labor practice of work. |

| | |
|-----------------|---|
| | <ul style="list-style-type: none"> There is a difference in the calculation of the retirement period with the issuance of UU 11/2020 junto PP 35/2021 compared to the BKSPPS Agreement. The calculation based on UU 11/2020 junto PP 35/2021 is smaller. However, company and worker union (PUK-SPSI) has made an agreement on 03 August 2021 about the calculation of retirement period due to judicial review process in the Constitutional Court (<i>Mahkamah Konstitusi</i>), agreed that per February 2021 the calculation of retirement period is based on PP 35/2021 until the judicial review is completed. The company will follow the results of judicial review process. |
| | <p>Audit Team verification and response: The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</p> |
| <p>3</p> | <p>Feedbacks: Sri Wahyuni – Staff of Gunung Melayu Cooperation "Koperasi Gunung Melayu"</p> <ul style="list-style-type: none"> The total members of "Koperasi Gunung Melayu" is 980 members. The <i>Koperasi</i> business includes savings and loan, credit for electronic goods and provision of basic goods. The Annual Member Meeting (RAT) for period 2020 has conducted in May 2021. The members of <i>Koperasi</i> is Permanent Workers (SKU). Daily workers can receive <i>Koperasi</i> services based on Letter Agreement from Mandor/Supervisor. Company has provided assistance to the <i>Koperasi</i> such as provide building, clean water and electricity. <i>Koperasi</i> has assisted employees in accessing basic goods, because access to the marketplace is quite far 25 Km or 1 hour by motorcycle. |
| | <p>Audit Team verification and response: The company shows support for all forms of positive activities carried out by employees and employee organizations. For example, lending a building to an employee cooperative.</p> |
| <p>4</p> | <p>Feedbacks: Julius Franklin – FFB and EFB Transporter</p> <ul style="list-style-type: none"> The contractors have an agreement in providing the dump truck units to transport FFB and EFB. The communication has gone well with the company. Payment process has gone well. Contractors has understood against of Company Policy and Grievance Mechanism. The contractors have registered the driver to the Accident Insurance (<i>BPJS Ketenagakerjaan</i>) and has provided PPE (helmet, mask and boot). The wage of driver is more than IDR 3,000,000 per month. |
| | <p>Audit Team verification and response: The company has maintained good partnership with local contractor related to payment and OHS.</p> |
| <p>5</p> | <p>Feedbacks: Environmental Service Asahan Regency Ilham</p> <ul style="list-style-type: none"> PT. Saudara Sejati Luhur dan PT. Gunung Melayu has meet obligation for environmental permits and licenses, including temporary hazardous waste storage, land application, domestic wastewater. Companies reporting routinely the environmental parameters: air emission, ambient air, POME quality, soil quality, water quality, as per timeline requirement. In general, the analysis and test result upon environmental parameters meet boundary requirements. |

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| | <ul style="list-style-type: none"> • There was no report/complaint from community related to environmental pollution. • Company has proactive approach with participation from community for environmental conservation. • The environmental service appreciates biogas and methane capture, but need continuous monitoring. • Input from environmental service is for river buffer zones already planted with oil palm, should be conserved, and planted with hard wood to reduce erosion risk during high rainfall season. <p>Audit Team verification and response: PT Saudara Sejati Luhur has maintain good performance on environmental issue.</p> |
| <p>6</p> | <p>Feedbacks: Agriculture Service Asahan Regency Hasudungan – Plantation Department</p> <ul style="list-style-type: none"> • PT. Saudara Sejati Luhur dan PT. Gunung Melayu has plantation business permit and valid. • The plantation business assessment carried out and the result “Kelas II – Baik”. • PT. Saudara Sejati Luhur dan PT. Gunung Melayu encourage to prepare partnership 20% early on. Current progress, companies have accompanied independent smallholders and communities with lands of 3,000 Ha. • One of the smallholder group will go for government replanting programme “Peremajaan Sawit Rakyat” and company assisting the administration process. • The palm oil mills of PT. Saudara Sejati Luhur and PT. Gunung Melayu buys the FFB from communities and farmers in accordance to FFB purchase price determination. • Plantation Business Report and Fire Report submitted to Agriculture Service in timely manner. No fire reported from area of PT. Saudara Sejati Luhur and PT. Gunung Melayu. • There is no complaint related to land addressed to PT. Saudara Sejati Luhur and PT. Gunung Melayu. • Company and their CSR is good to assist communities. • Input from Agriculture Service is for river buffer zones already planted with oil palm, should be restored/planted with forest plant, but communicated to reduce encroachment risk. <p>Audit Team verification and response: Audit team will continue to monitor PT Saudara Sejati Luhur – Gunung Melayu Group related to Plantation management and monitoring performance.</p> |
| <p>7</p> | <p>Feedbacks: Unit for Manpower Monitoring Region IV Sumatera Utara Province Iskandar</p> <ul style="list-style-type: none"> • PT. Saudara Sejati Luhur and PT. Gunung Melayu has provide normative rights to their workers, salary, overtime, housing facilities and social amenities. • PT. Saudara Sejati Luhur and PT. Gunung Melayu supports and committed to health and safety in company operation. Safety committee and safety officer has been appointed. Safety committee’s report submitted regularly. Health and safety training implemented for operator’s license, routine machinery inspection performed – however due to COVID-19 pandemic, sometimes delayed. • Accident report submitted regularly. Year 2020 recorded some accidents. Company should pay more attention for area with high voltage cable transmission. • PT. Saudara Sejati Luhur and PT. Gunung Melayu demonstrate commitment to minimize COVID-19 spread during pandemic condition: provides masker, disinfection sprays, temperature check, health screening, vaccination program for workers. • Annual health check carried out by companies. • Company paid the workers in accordance to sectoral minimum wage as per UMSK. |

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| | <ul style="list-style-type: none"> • There was no dispute between company and the worker union. • Related to contract workers, has been reported and following latest government regulation "Peraturan Pemerintah No.35 tahun 2021 tentang Perjanjian Kerja Waktu Tertentu", stating the timeframe for contract agreement including extension not more than 5 years. • For pension fund shall comply to regulation as normative rights for workers, however company discretion/consideration is advised. <p>Audit Team verification and response: The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil / issue. With respect to wages, the use of PPE and Indonesia Official License of Operator/SIO, the company has implemented in accordance with relevant law and regulations. Regarding the high voltage area will be checked further in the next surveillance.</p> |
| <p>8</p> | <p>Feedbacks: Manpower Office Asahan Regency Hermansyah – Industrial Relationship</p> <ul style="list-style-type: none"> • PT. Saudara Sejati Luhur and PT. Gunung Melayu has provide manpower report regularly. • There is no industrial relation dispute in these companies. There was 2 cases in year 2020 however the cases resolved. • Based on monitoring to companies, no practice of use child labor. • Based on monitoring to companies, no practice of forced labor or human traficcking. Companies paid the workers in accordance to UMSK and registering to BPJS Ketenagakerjaan and BPJS Kesehatan. • Based on monitoring to companies and communication with bipartite member, communication between company and worker union is good. • PT. Saudara Sejati Luhur and PT. Gunung Melayu has update and obeying latest regulation related to manpower in "Undang-undang No. 11 tahun 2020 tentang Cipta Kerja" and "Peraturan Pemerintah No.35 tahun 2021 tentang Perjanjian Kerja Waktu Tertentu". • Related to contract workers, has been reported and following latest government regulation "Peraturan Pemerintah No.35 tahun 2021 tentang Perjanjian Kerja Waktu Tertentu", stating the timeframe for contract agreement including extension not more than 5 years. • For pension fund shall comply to regulation. <p>Audit Team verification and response: The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil / issue.</p> |
| <p>9</p> | <p>Feedbacks: National Lands Body Asahan Regency Lizandri</p> <ul style="list-style-type: none"> • The legal ownership of the land; Hak Guna Usaha No.1/Gunung Melayu dated 23 April 2001 valid to 31 Desember 2026 for land of 10,414.331 Ha. • HGU certificate issued as per "Surat Keputusan No.20/HGU/BPN/2001 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha atas Tanah terletak di Kabupaten Asahan, Propinsi Sumatera Utara" dated 7 August 2001; and "Surat Keputusan No.20/HGU/BPN/2001/A/28 tentang Ralat Keputusan Kepala Badan Pertanahan Nasional No.20/HGU/BPN/2001 tanggal 7 Agustus 2001 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha atas Tanah terletak di Kabupaten Asahan, Provinsi Sumatera Utara" dated 19 December 2001. • Currently under mortgage guarantee ABN AMRO Bank NV, Singapore Branch with register No.2054/2019. |

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| | <ul style="list-style-type: none"> For all the HGU boundary poles installed on lands with HGU, it is the responsibility of rights holder to guard and maintains as per regulation. There is no official report submitted to Kantor Pertanahan Kabupaten Asahan related to land dispute with any party for this HGU. The legal ownership of the land; "Hak Guna Usaha No.1/Rahuning" dated 29 April 2004 valid to 31 Desember 2030 for land of 2,301.883 Ha. HGU certificate issued as per "Surat Keputusan No.154/HGU/BPN/2004 tentang Pemberian Perpanjangan Jangka Waktu Hak Guna Usaha atas Tanah terletak di Kabupaten Asahan, Propinsi Sumatera Utara" dated 11 November 2004. Currently under mortgage guarantee ABN AMRO Bank NV, Singapore Branch with register No.1250/2020. For all the HGU boundary poles installed on lands with HGU, it is the responsibility of rights holder to guard and maintains as per regulation. There is no official report submitted to Kantor Pertanahan Kabupaten Asahan related to land dispute with any party for this HGU. |
| | <p>Audit Team verification and response: There is no issue related to the land title so far.</p> |
| <p>10</p> | <p>Feedbacks: LSM ICON RI Amri Simanjuntak</p> <ul style="list-style-type: none"> Icon RI is NGO focusing on environmental management and monitoring in Bandar Pulau and Rahuning Sub-district. Icon RI is NGO managing waste bank through "Pemuda Asahan Peduli Asahan". PT. Gunung Melayu and PT. Saudara Sejati Luhur provides support for NGO by giving waste with economic value, the conversion of waste used for operational of waste collector. Icon RI is monitoring the companies communication to surrounding communities: road maintenance for surrounding village, supporting independent smallholder, production road maintenance, assisting in fertilizer provision, scholarship for students, providing staple food for surrounding communities, the company's POM is buying FFB from surrounding communities. So far no report or complaint related to operation of PT. Gunung Melayu and PT. Saudara Sejati Luhur Input from NGO Icon RI for company to put consideration and avoid planting oil palm on river buffer zone; for river buffer zone already planted with oil palm, company have to rehabilitate the condition. <p>Audit Team verification and response: The company has maintained good performance especially in environmental and OHS. There is no issue so far. They also managed good relationship with the external parties and openness in all aspect.</p> |
| <p>11</p> | <p>Feedbacks: LSM Tipan RI Syahri Al Amin – Koordinator Kabupaten Asahan</p> <ul style="list-style-type: none"> Tipan RI is NGO focusing on environmental management and industrial relation in Asahan Regency. NGO Tipan RI sent out letter requesting clarification and confirmation to Batu Anam Estate, PT> Gunung Melayu. In the letter, Tipan RI inquiring their finding that Aek Tarum river buffer zone planted with oil palm and against the regulation. NGO Tipan RI stating their expectation is the Aek Tarum river buffer zone that has been planted be restored and rehabilitated with local vegetation species. |

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| | <ul style="list-style-type: none"> The NGO Tipan RI responded by GM PT. Gunung Melayu and PT. Saudara Sejati Luhur, the representative confirm receipt and stated response is sufficient. NGO Tipan RI will monitor implementation of rehabilitation and conservation plan for river buffer zone. <p>Audit Team verification and response: The company has maintained good performance especially in environmental and OHS. There is no issue so far. They also managed good relationship with the external parties and openness in all aspect.</p> |
| <p>12</p> | <p>Feedbacks: Hariato – Village Head of Batu Anam Sopian – Village Head of Gonting Malaha</p> <ul style="list-style-type: none"> Until this audit activity was carried out, there were no negative issues in the relationship between the company and the village government as well as the community. For example land disputes, environmental pollution, labour and social disputes. So far, communication between village government and company management has been very good. The communication process both verbally and in letters from the village was responded well by the company management. The existence of the company has a positive impact in the form of job opportunities for villagers who need work. Currently, quite a lot of local villagers work in the company, both in the plantations and factories. The company also supports development activities in surrounding villages. For example in terms of village road maintenance. <p>Aspirations: Please be able to allocate sufficient duration for borrowing heavy equipment for village road maintenance.</p> <p>Audit Team verification and response: The company has managed good relationship with local communities. There is no issues on land dispute, environmental or social conflict.</p> |

| List of land owner / user contacted | | | | | |
|--|---------------------------|----------------|----------------------|---------------------------------|--|
| Name | Years of ownership / used | Land area (ha) | Agreement (Yes / No) | Agreement base on FPIC (Yes/No) | Compliance on the agreement terms and conditions |
| NIL | | | | | |
| PT Saudara Sejati Luhur – Gunung Melayu I POM has established since 1975. Currently the palm oil has been replanting since 2002. | | | | | |

| Previous land owner / user comment | |
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| | Feedbacks: NIL |
| | Audit Team verification and response: NIL |

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

Formal Signing-off of Assessment Conclusion and Recommendation

| <p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Saudara Sejati Luhur – Gunung Melayu I POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Saudara Sejati Luhur – Gunung Melayu I POM is remain certified.</p> | |
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| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Andi Pratama Pasaribu | Name: Putu Grhyate Yonata Aksa |
| Company Name: On behalf of BSI Services Malaysia Sdn. Bhd. | Company Name: PT Saudara Sejati Luhur – Gunung Melayu I POM |
| Title: Lead Auditor | Title: Sustainability Manager |
| <p>Signature:</p>  | <p>Signature:</p>  |
| Date: 25 November 2021 | Date: 25 November 2021 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance | |
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| <p>Principle 1: Behave ethically and transparently</p> | | | |
| <p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p> | | | |
| <p>Criteria 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.</p> | | | |
| <p>1.1.1</p> | <p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> | <p>The Certificate Holder has shown the list of information that can be accessed by relevant stakeholders under document "<i>Daftar Dokumen Yang dapat diakses oleh Stakeholders</i>, Memorandum No. 12/GM-GME/Int/V/2021", updated on 17 May 2021, that covered:</p> <ol style="list-style-type: none"> 1. Legal Documents - a copy of SK HGU (Land Title) - a copy of AMDAL (Social and Environmental Impact Assessment) - a copy of Operational Permit (IUP/SPUP). 2. Environment Documents - Hazardous waste storage permit - Waste management plans - Report of waste water - Report of water management - Report of river water quality - Report of air quality. - Report of RKL (Environmental Management Plan) – RPL (Environmental Monitoring Plan). - Report of Hazardous Waste - HCV Assessment 3. Social Activity Documents (<i>Rencana dan Realisasi Program CSR</i>). 4. Employment Documents. - <i>Jamsostek</i> and also <i>BPJS Kesehatan</i> - HSE management programs. | <p>Complied</p> |
| <p>1.1.2</p> | <p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> | <p>Company has a set of publicly available document in form of "<i>Daftar Dokumen Yang dapat diakses oleh Stakeholders</i>" as per Memorandum No. 12/GM-GME/Int/V/2021", updated on 17 May 2021. The provision of publicly available document segregates based on stakeholder category.</p> | <p>Complied</p> |

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| | | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM was provided an information in appropriate languages (Bahasa Indonesia) it can be understood and accessible by relevant stakeholders.</p> <p>Based on interview with surroundings stakeholder (e.g. Head of Village, community group and contractor of transport FFB) understood of that list.</p> | |
| 1.1.3 | (C) Records of requests for information and responses are maintained. | <p>The Certificate Holder has developed a communication procedure under "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>"(No. SOP; AA-GL-5008.1-R1) dated 22nd August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will be responded according to respective authorities, starts from Humas (Public Relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respond information request on 14 working days.</p> <p>Request Information and response from Stakeholder has been documented into a log book "<i>Surat Masuk</i>" and the response is documented in "Log Book Stakeholders – Out". There were noted 15 information request and others from Stakeholder up to April 2021.</p> <p>Below are seen and verified sample:</p> <ul style="list-style-type: none"> • Report on Environment Management and monitoring (RKL-RPL) Report period July – December 2020, sent to Environment Agency of Asahan Regency on 24 June 2021. • Report on Environment Management and monitoring (RKL-RPL) Report period July – December 2020, sent to <i>Pusat Pengendalian Pembangunan Ekoregion Sumatera</i> (PPPES) of Asahan Regency on 22 June 2021. • P2K3 Activities Report (Safety Committee report) Period January - March 2021, sent to Manpower Agency of North Sumatera Province on 10 April 2021. • P2K3 Activities Report (Safety Committee report) Period April - June | Complied |

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| | | <p>2021, sent to Manpower Agency of North Sumatera Province on 3 July 2021.</p> <ul style="list-style-type: none"> • CSR and CSV Report 2020 sent to Agricultural Agency of Asahan Regency on 1 April 2021. • CSR and CSV Report 2020 sent to Regent of Asahan Regency on 1 April 2021. <p>All request information and others has been responded timely manner Personnel in Charge to monitor the records of information request and response is Public Relation Department (Humas) and KTU (Head of Administration) PT. Saudara Sejati Luhur both mill and estate.</p> | |
| <p>1.1.4</p> | <p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> | <p>The Certificate Holder has developed a communication procedure under "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>" (No. SOP; AA-GL-5008.1-R1) dated 22nd August 2011, <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (internal) SOP AA-HR-308.5-R1, dated 1 December 2019. Ensuring the anonymity profile, and <i>SOP Penanganan Keluhan Masyarakat</i> (SOP AA-GL-510.1-R0, dated 1 Jan 2013. SOP also explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted.</p> <p>The company has nominated person Mr. Agus Salim Batubara (Public Affair Staff) as per "Memorandum Regional Head Plantation-1 No.071/HR-RO1/MEMO/02/17 <i>tentang Penugasan Sebagai Humas</i>" dated 25 February 2017 as Personnel in Charge related to consultation and communication with local communities and other stakeholders.</p> <p>Based on public stakeholder consultation with local contractor, NGO and public official, it was revealed that company has communicating in good manner. Company also provide response to information request in accordance to authority and the communication SOP.</p> | <p>Complied</p> |

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| 1.1.5 | An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. | <p>List stakeholders are available, and records of stakeholders' communication and consultation were being documented into "Buku Masuk", the last updated in June 2020. The stakeholders list completed with name of chairman, address and contact number. List of information that can be access by relevant stakeholders available in Indicator 1.2.1.</p> <p>The list of stakeholder list updated annually by Public Relation. Last update performed in June 2021, consist of 25 stakeholders which related to company operations, as follows:</p> <ul style="list-style-type: none"> - Government institutions consist of surrounding Villages, District Head, and related Agency of Asahan Regency (Dinas Lingkungan Hidup, Dinas Pertanian and Perkebunan, Dinas Tenaga Kerja, BPN, BPPPM and BAKORTIBA). - Informal Institution around the company, e.g. DPC F-SP.PP SPSI Asahan, Public Figure, Worker Union and Gender Committee. - NGO around the company i.e.: Icon RI, Tipan RI, etc. | Complied |
| Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions. | | | |
| 1.2.1 | A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. | <p>The company has had a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kelvin Tio). The company's policy confirms the Code of Conduct behavior in business at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviors that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in article 16 related of the behavior of the business ethics in the company.</p> | Complied |

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| | | The company's policy is also published to use posters at any strategic places in the plantations (Pulau Maria Estate and Gunung Melayu I Mill). | |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | <p>Mechanism used to monitor the implementation of the company's policy, carried out by several methods, including: On workers conducted every morning before doing the work at 06.00 delivered by the field foreman (Mandor) concerned, this activity is referred to as "morning circle or Muster morning". At the time of revision of the contract with the contractor (because the validity period has expired), the company always resubmit to all contractors about the conduct of business ethics which is subsequently carried out contracts by the contractor.</p> <p>In the event of changes or additions to the company's policy, the company will promptly deliver it, including updates to employment contracts and PKB and local employment contract documents.</p> <p>Based on the interview with some employees and stakeholders, that they have understood linked to the company's policy.</p> | Complied |
| <p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p> | | | |
| <p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p> | | | |
| 2.1.1 | (C) The unit of certification complies to relevant regulations. | The Company has implemented mechanism for ensuring compliance with applicable legal requirement. It was stated on " <i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i> " (SOP AA-GL-5001.1-R0), dated 5 December 2009. Evidence of implementation of legal requirements compliance evaluation is documented in "Status Evaluasi Per January 2020". The evaluation was performed on annual basis conducted by public relation officer. Latest evaluation was conducted on January 2021. | Complied |

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| | | <p>Document of "Evaluasi Kepatuhan Hukum" is the system used for tracking any changes in laws and regulations. Evaluation of compliance with the regulation has updated on January 2021. Updating, for example:</p> <p><u>Land title</u></p> <p>Land title/HGU certificate No. 1 dated 29 April 2004 that issued by National Land Agency of Asahan Regency refer to measurement report No. 01/Rahuning/2004 dated 27 April 2004 with total area 2,301.883 Ha. Valid until 31 December 2030.</p> <p><u>Environment regulation:</u></p> <ol style="list-style-type: none"> 1. Environmental ministry decree No. 5 year 2018 related to PerMenLh no. 5 Tahun 2018, related Standard on competency of wastewater officer. 2. Environmental ministry decree No. 1 year 2018 related to Transportation Ministry no. 5 Tahun 2018. <p><u>Manpower regulation:</u></p> <p>Ministry of Labour Decree no. 15 year 2018 related to minimum wage.</p> <p><u>Agricultural regulation:</u></p> <ol style="list-style-type: none"> 1. Permentan No. 1 Tahun 2018, related Pedoman penetapan harga pembelian Tandan Buah Segar (TBS) kelapa sawit produksi kebun. 2. Peraturan Menteri Pertanian No 05 Tahun 2018, related Pembukuan dan/atau pengolahan lahan perkebunan tanpa membakar. 3. KepMenATR No. 14 Tahun 2018, related Izin Lokasi. <p>Until this audit, there is no new updating of the license. PT Saudara Sejati Luhur has fulfill the requirement such as land title, environmental permit and plantation permit.</p> <p>Based on the document verification, the legal register (updated per December 2021) are in place. For example: <i>Undang – Undang Cipta Kerja No. 11/2020</i> and its clauses, <i>Permentan 38/2020</i> related to Indonesian Sustainable Palm Oil (ISPO).</p> | |
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| 2.1.2 | A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor. | The certificate holder through the legal department has scheduled an annual legal compliance evaluation process. Based on the document verification, the legal register (updated per December 2021) are in place. For example: <i>Undang – Undang Cipta Kerja No. 11/2020</i> and its clauses, <i>Permentan 38/2020</i> related to Indonesian Sustainable Palm Oil (ISPO). The legal department also conducted the evaluation of legal compliance of third parties engaged. Especially the fulfilment of working agreement. | Complied |
| 2.1.3 | Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries. | According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit concluded that the boundary poles area well maintained. For example: <ul style="list-style-type: none"> • Boundary poles No. SSL046 Block J06H (Boundary pole side by side with boundary pole No. GM-LSI GM II PT London Sumatra Indonesia). • Boundary poles No. SSL047 Block I02G (Boundary pole side by side with boundary of PT London Sumatra Indonesia). • Boundary poles No. SSL069 Block I08F • Boundary poles No. SSL070 Block I08F • Boundary poles No. SSL038 Block I02G (Boundary pole side by side with boundary pole No. GM-LSI GM II PT London Sumatra Indonesia). • Boundary poles No. SSL037 Block I02H The boundary poles recorded in document "Laporan Pemeriksaan dan Perawatan Patok Batas PT. Saudara Sejati Luhur – Kebun Pulau Maria dated May 2021". 76 boundary pegs already identified and checked, completed with GPS coordinates (degree, minutes, second). All poles reported in good condition. | Complied |
| Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | |
| 2.2.1 | A list of contracted parties is available. | PT Saudara Sejati Luhur has a listed the total of existing contractor. As per June 2020. For example, PT. Saudara Sejati Luhur - Gunung Melayu I POM has an agreement in transporting the hazardous waste with licensed | Complied |

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contractor: "Perjanjian Kerjasama antara PT. Saudara Sejati Luhur dengan Konsorsium PT. Sumatera Deli Lestari Indah – PT Indostar Cargo dan PT Prasadha Pamunah Limbah Industri No.003/AA-SDLI-ISC-PPLI/III/2018 dated 2nd March 2018; valid for one year. The type of hazardous waste to be transported: used oil, old battery, waste oil, old lamp bulb, used chemical container, used filter, used jerry can, contaminated waste and used filter.

Onsite Audit:

Certificate holder has listed the contracted parties. The list of third parties as per August 2021 as follows:

| Unit | Contractors name | Address | Contact person | Contract status |
|--------|--|-----------------------|-------------------------|-----------------|
| Estate | Arjuna Manurung (Transporter FFB and EFB) | Pulau Rakyat | Arjuna Manurung | Active |
| | Julius Franklin Tarigan (Transporter FFB and EFB) | Huta Bandar Selamat | Julius Franklin Tarigan | Active |
| | Muhammad Hanif | Dusun III Pulau Maria | Muhammad Hanif | Active |
| Mill | CV Pengangkutan Jaya (Transporter CPO and CPKO) | Tanjung Balai | Jaya | Active |
| | UD Yuspianti (Transporter CPO) | Tanjung Balai | Yuspianti | Active |

Based on interview with general manager and head clerk obtained information that the list of third parties updated in a monthly basis.

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| <p>2.2.2</p> | <p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> | <p>Based on document verification, certificate holder has supplied by several FFB supplier. For example, FFB supplier on behalf of Abdul Gani and CV Abadi Tetap Jaya. The legal information of both entity has been verified by Create Share Value (CSV) staff. After it fulfil the company's requirement, the CSV staff visited the area and tagged the location to verify the legality status. After that, FFP Procurement Department issued the award letter of Delivery Order (DO) for those suppliers.</p> <p>Onsite audit:</p> <p>During this onsite audit found the list of potential FFB supplier of Gunung Melayu I POM. Based on the list of supplier data obtained information that all supplier has had the FFB supplier agreement (including legal verification, location, smallholder coordinate and name of smallholder). The potential supplier as follows:</p> <ul style="list-style-type: none"> • Abdul Gani (private ownership) • Sinar Bakti (private ownership) • PT Sawit Trading Sejahtera (FFB collector and trader), divided into 4 delivery order: <ol style="list-style-type: none"> 1. PT Sawit Trading Sejahtera 2. PT Sawit Trading Sejahtera (A) 3. PT Sawit Trading Sejahtera (AK) 4. PT Sawit Trading Sejahtera (L) • Soelianto (private ownership) • CV Ronauli Tani (FFB collector and trader) <p>Management unit has shown the sample of FFB purchasing contract between PT Inti Indosawit Subur (holding of Asian Agri company) with PT Sawit Trading Sejahtera that signed together on 1 May 2020. By signed this agreement letter, PT Sawit Trading Sejahtera has officially record as FFB Supplier of Gunung Melayu I POM.</p> | <p>Complied</p> |
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| | | <p>Based on public consultation with village leader surrounding the plantation area (Batu Anam and Gonting Malaha) and local agencies from Asahan Regency obtained information that the mill received the local smallholders FFB. There are no issues related to FFB purchasing in mill.</p> | |
| <p>2.2.3</p> | <p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> | <p>Based on the agreement document (Cooperation Agreement contract), that in Article 7. About responsibilities and obligations, described in relation to legal requirements and documentation, employees (including not to employ minors or child labour), human rights and business-ethics.</p> <p>Based on the agreement document (Contract cooperation agreement) that have been verified above, there are explanations on legal requirements, employment (including wage) and compliance with legislation and the obligation to respect human rights, disallowing child, force labor and business ethics in article 1 No. 6-9; and no. 13 related to business ethics.</p> <p>This remote audit only verifies data/documents (offsite), so the implementation of this policy will be verified when an onsite audit is performed.</p> <p>Onsite audit:</p> <p>Third party contract with some FFB suppliers have completed with some important clause such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs etc. • Workers payment referred to local minimum payment's regulation. • All worker will be register in health insurance and workers insurance according to national regulation. <p>All of contract data kept by Head Clerk in estate and mill.</p> | <p>Complied</p> |
| <p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p> | | | |

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| <p>2.3.1</p> | <p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. | <p>FFB Purchasing from outside supplier are conducted based on Procedure Traceability – FFB Purchase (AA-SOP-MM-506.4-R1 dated 1 September 2017. The procedure stated that all FFB supplier shall make guarantee statement that FFB delivered are legal, not coming from protected forest, conservation forest or production forest; No deforestation; zero burning; and not employed underage worker. The company cooperates with the surrounding community in terms of purchasing FFB and recorded in "Pernyataan dan Jaminan" - Statement and Guarantee as a supplier of FFB. The document stated that:</p> <ol style="list-style-type: none"> 1. FFB that supplied to Gunung Melayu I POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation. 2. FFB supplied does not originate from unauthorized areas, such as: <ol style="list-style-type: none"> a. Protected Forest Area b. Industrial Forest Area c. Production Forest Area d. Conservation area <p>Information of Geolocation of each FFB supplier can be demonstrated by the unit of certification.</p> <p>The Mill has recorded list of third party FFB supplier as recorded in "Laporan Harian Pabrik" (Mill Daily Report) and resume in document Mill Summary Operation. The FFB from third party coming from collectors, cooperative farmers association and outgrower. List of third-party supplier that supplied FFB to Gunung Melayu I Mill is available containing 25 outside FFB supplier, e.g.:</p> <ul style="list-style-type: none"> • Abdul Gani, • BD Siregar, • Gunawan Tanu, | <p>Complied</p> |
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| | | <ul style="list-style-type: none"> • Hasan BP, • UD Saudara, PT Sawit Trading Sejahtera, • LU, and • CV Mitra Langgeng Sukses. <p>Onsite audit: <i>There is no change in information since the remote audit assessment.</i></p> <p>During this onsite audit found the list of potential FFB supplier of Gunung Melayu I POM. Based on the list of supplier data obtained information that all supplier has had the FFB supplier agreement (including legal verification, location, smallholder coordinate and name of smallholder). The potential supplier as follows:</p> <ul style="list-style-type: none"> • Sinar Bakti (private ownership) • PT Sawit Trading Sejahtera (FFB collector and trader) • PT Sawit Trading Sejahtera (L) 2 • PT Sawit Trading Sejahtera (A) 2 • Soelianto (private ownership) • CV Ronauli Tani (FFB collector and trader) <p>During the audit, auditor has checked the land ownership document "Surat Keterangan Tanah" on behalf of Soelianto. Based on document 'Surat Kepemilikan Lahan' obtain information that he has around 14 Ha area which is divided into 3 persil.</p> | |
| 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. | During this onsite audit found the list of potential FFB supplier of Gunung Melayu I POM. Based on the list of supplier data obtained information that all supplier has had the FFB supplier agreement (including legal | Complied |

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| | | <p>verification, location, smallholder coordinate and name of smallholder). The potential supplier as follows:</p> <ul style="list-style-type: none"> • Sinar Bakti (private ownership) • PT Sawit Trading Sejahtera (FFB collector and trader) • PT Sawit Trading Sejahtera (L) 2 • PT Sawit Trading Sejahtera (A) 2 • Soelianto (private ownership) • CV Ronauli Tani (FFB collector and trader) <p>Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Copy of bank account <p>Management unit has shown the sample of FFB purchasing contract between PT Inti Indosawit Subur (holding of Asian Agri company) with PT Sawit Trading Sejahtera that signed together on 1 May 2020. By signed this agreement letter, PT Sawit Trading Sejahtera has officially record as FFB Supplier of Gunung Melayu I POM.</p> | |
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| Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement. | | | |
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| Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability. | | | |
| 3.1.1 | <p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> | <p>Certificate holder has provided longterm management plan in document <i>Rencana Jangka Panjang periode 2020 – 2025</i>. This document described the five year business projection of PT Saudara Sejati Luhur.</p> <p>Longterm management plant of PT Saudara Sejati Luhur has documented in <i>Rencana Jangka Panjang periode 2020 – 2025</i>. The longterm management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) <p>Through the document, the production of Gunung Melayu I was projected to increased. During the audit, Gunung Melayu I POM has had average extraction for CPO (24.73%) and KER (5.19%) in 2019. Refer to annual report 2020, achieved average extraction CPO (25.00%) and PK (5.36%). This achievement was not met the target set.</p> <p>Based on interview with head clerk and sustainability staff, PT Saudara Sejati Luhur has started to engage with independent smallholder named Create Share Value (CSV) near the Saudara Sejati Luhur’s concession since a couple year ago and renewed annually.</p> | Complied |
| 3.1.2 | <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> | <p>Based on document <i>Rencana Jangka Panjang periode 2020 – 2025</i> obtain information that there is no replanting plan for the next five years.</p> | Complied |

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| | | <p>Onsite Audit: Based on field visit and interview with estate manager obtained information that some block in Pulau Maria Estate was Basal Stem Root (BSR) infection caused by <i>Ganoderma boninense</i>. This disease impact is decrease in plant population and production automatically. Based on the results of the census and calculations from the Research and Development Department, it was found that the attack rate was below the economic threshold, so replanting and some special treatments were planned to reduce the speed of the spread of the disease. However, until the audit is completed, there has been no official decision from management regarding the area of the block to be replanted. The total of replanting area will be observed on the next assessment.</p> | |
| 3.1.3 | <p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> | <p>Management review conducted regularly in each semester. The last review of semester I/2021 Gunung Melayu I Mill has been conducted on 10 January 2021. Some issues reviewed such as processing quality and FFB supplies. Management review meeting attended by unit head, head clerk, field assistant and sustainability staff. The record of management review is in place.</p> <p>Onsite Audit: During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <ul style="list-style-type: none"> • Visit Agronomy Pulau Maria Estate: Report No. VA-KPM-MAR-FULL-01-2021 date of visit 15 – 19 March 2021 by Liew Ah Chai. Some agronomy issue was quality of circle spraying, correction round of woodies, weak discipline of frond stacking, the quality if road repairs and other issues. • Visit Engineering PBS: Report No. VE-PGS-AUG-FULL-01-2020-Full Report, date of visit 5 – 8 August 2020. There were no main issues in | Complied |

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| | | <p>this mill. However, there were a key issue related to poor maintenance of bunch conveyor, loose fruit losses in loading ramp, sterilizer vessel thickness and some other issues.</p> <p>Based on interview with estate and mill manager obtained information that they have been conducted monthly management review to follow up the internal audit/visit and reported the correction to the agronomy/mill advisor.</p> | |
| <p>Criteria 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.</p> | | | |
| <p>3.2.1</p> | <p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> | <p>Gunung Melayu I POM:</p> <p>In 2020, Continuous Improvement Program/Kaizen “Menurunkan HM Backhoe Loader menjadi 0 HM serta Menurunkan Waktu Muat Cangkang dari 90 Menit menjadi 40 Menit” – reducing backhoe loader hour meter and reducing kernel shell loading from 40 to 20 minutes, dated 13-17 April 2020. The issue related to resources utilization. Abnormalities: ineffective motion to change screw press mounting. The improvement in form of new working method, new tools and work instruction; resulted in shorter maintenance time and cost saving.</p> <p>Pulau Maria Estate:</p> <p>In 2020, Continuous Improvement Program/Kaizen “Peningkatan Output Dump Truck dari 21 ton/unit ke 23 ton/unit dan Percepatan Pengiriman” dated 13-17 April 2021. The issue related to dump truck productivity. The improvement in form of reducing ineffective dump truck transport; resulted in productivity increase 25 ton/truck and reduced overtime last transport to POM.</p> <p>In 2021, Continuous Improvement Program/Kaizen “Peningkatan Output Pembuatan Tapak Kuda Bertingkat No.AA.2021.KR.ASH.04.26” dated 26-30 April 2021. The issue related to soil conservation in form of platform for palms. The project taking into consideration time series data from</p> | <p>Complied</p> |

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| | | 2019-2020. Abnormalities: repetitive work filling in gunny bag, over processing for gunny bag/platform, platform placement not accurate. The improvement in form of revise work instruction for platform placement; resulted in productivity increase 2.5/manday and better loose fruit collection. | |
| 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. | PT. Saudara Sejati Luhur – Gunung Melayu I POM and its supply base cannot provide filled up RSPO metrics template. | Non-compliance |
| Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored. | | | |
| 3.3.1 | (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. | <p>Certificate holder has had standard operational procedure for operational activity in estate and mill as follows:</p> <p>Standard Operational Procedures (SOP) for estate that covering entire operational activity as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). 2. SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). 3. SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); 4. SOP AA-APM-OP-1100.04-R3 dated 7 December 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). 5. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). 6. SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). 7. SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam</i> | Complied |

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| | | <p><i>Kelapa Sawit</i> (Planting Oil Palms).</p> <ol style="list-style-type: none"> 8. SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). 9. SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). 10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). 11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). 12. SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. 13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> for (Pruning). 14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification). 15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). 16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). 17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management). 18. SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). 19. SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport). 20. SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> | |
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| | | <p>(Replanting).</p> <p>Mill SOP's:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan</i> dan Pengempaan for Pressing Station; 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation; 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>; 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>; 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>; 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>; 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; 13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation; 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for | |
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| | | <p>Preventive Maintenance;</p> <p>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca</i> (GHG)</p> <p>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</p> <p>17. AA-MPM-OP-1400.17-R6 Traceability</p> <p>Onsite Audit:</p> <p>During onsite audit, auditor has conducted field visit to the Pulau Maria Estate as follows:</p> <ul style="list-style-type: none"> • EFB application J03C Afdeling 2 Unit management using EFB in mature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 250 kg/palm. • Land application Block J02C Afdeling 2 Unit management using POME in mature area to enrich the soil fertility and production with dosage 183 m3/Ha/year. There is 190 Ha area of land application. • Harvesting in Block J03D Afdeling 2 The harvesters able to demonstrate the harvesting procedure in a safe way (PPE usage), good understanding related to determining fruit ripeness criteria and many others. | |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. | <p>During the onsite audit, auditor team verified the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <ul style="list-style-type: none"> • Visit Agronomy Pulau Maria Estate: Report No. VA-KPM-MAR-FULL-01-2021 date of visit 15 – 19 March 2021 by Liew Ah Chai. Some agronomy issue was quality of circle spraying, correction round of woodies, weak discipline of frond stacking, the quality if road repairs and other issues. | Complied |

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| | | <ul style="list-style-type: none"> • Visit Engineering PBS: Report No. VE-PGS-AUG-FULL-01-2020-Full Report, date of visit 5 – 8 August 2020. There were no main issues in this mill. However, there were a key issue related to poor maintenance of bunch conveyor, loose fruit losses in loading ramp, sterilizer vessel thickness and some other issues. <p>Based on interview with estate and mill manager obtained information that they have been conducted monthly management review to follow up the internal audit/visit and reported the correction to the agronomy/mill advisor.</p> | |
| 3.3.3 | Records of monitoring and any actions taken are maintained and available. | <p>Certificate holder has had annual monitoring activity to ensure all operational activity align with the procedure existed. There is visit agronomy and visit engineering report. Sighted the sample of VA report No VA-KPM-SEP-FULL-02-19) Kebun Pulau Maria period 17 – 21 September 2019. Some issues found such as weeding, pest and disease, pruning etc. The issues have been corrected by the management.</p> <p>Moreover, there is a record of Visit Engineering on 7 – 11 October 2019 in Gunung Malayu I POM (Report No. PGS-VE-OCT-FULL-02-19) . There are some issues found during the visits such as Loading ramp: over usage of grease, some minors finding in sterilizer etc. All correction related to the issues has been corrected and reported to the mill advisor on 2 December 2019 has accepted.</p> <p>Onsite Audit:</p> <p>Certificate holder conducted monitoring of operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily.</p> <p>Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> | Complied |

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| | | To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff. | |
| Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations. | | | |
| 3.4.1 | (C) SEIA in new planting or operation including mills, 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. | <p><u>Environmental Assessment:</u> PT Saudara Sejati Luhur has shown the document of environment permit under "<i>Dokumen Studi Evaluasi Lingkungan (SEL) Perkebunan dan Pabrik Kelapa Sawit PT Gunung Melayu, PT Saudara Sejati Luhur dan PT Sumber Sawit Makmur di Kabupaten Asahan – Sumatera Utara</i>", prepared by CV Andalen Persada Konsultan.</p> <p>The author team consist of:</p> <ul style="list-style-type: none"> • Team leader: Dr. Hemat R. Bramana, MSc • Coordinator: Ir. Juliarto Barus, MS (AMDAL A/B) • Agronomy/Soil science: Ir. Bahtera Purba and Ir. Jansen Sinulingga • Water and air quality: Drs. Ahmad Darwin, MSc (AMDAL A) dan Drs. Satrianda • Social, economic, and cultural: Abdul Rahman SH, MH, and Drs. Johannes Karo-Karo • Production technology: Dr. R. Kamrol D, MSc and Renalson • Aquatic and Terra biology: Dra. Retno Widhiastuti and Drs. Mimpin Ginting, MS • Mechanical engineering: Ir. Rejeki Maha and Juna B • Programmer: Drs. Sehat Sembiring and Roshermida <p>The environment document has approved by "Komisi Pusat AMDAL, Department Pertanian" through "Surat No.220/687/B/IV/1994 dated 18/04/1994. The document has explained the positive and negative</p> | Complied |

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| | | <p>impact from construction and development of oil palm plantation and palm oil mill Gunung Melayu since pre-operation up to construction of palm oil mill.</p> <p>PT Saudara Sejati Luhur has shown the document of <i>"Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL) Pekebunana Kelapa Sawit, Peningkatan Kapasitas Produksi Pabrik CPO 60 Ton TBS/Jam dan Pembangunan Pabrik KCP 200 Ton/Hari dan Biogas Plant"</i>, the environmental permit under <i>"Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara Nomor: 660.1/0779/LH/2015, tertanggal 17 Juni 2015 tentang Izin Lingkungan PT Saudara Sejati Luhur"</i></p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM also has identified Environmental impact assessment in whole operation as documented in <i>"Evaluasi Aspek dan Dampak Lingkungan"</i>, last review on 7th January 2020 in each unit operation, in estate and mill, this document covering all operation in Estates and mill.</p> <p><u>Social Impact Assessment</u></p> <p>The document has prepared as presented in <i>"Laporan Identifikasi dan Upaya Kelola Sosial"</i> which covering social impact assessment dated in 2017, the company has published a report on the effectiveness of social management efforts of PT Saudara Sejati Luhur – Gunung Melayu I POM, Asahan Regency, Sumatera Utara Province, by Team Corporate Social Responsibility 2017.</p> <p>The social impact assessment document reported the condition of: social interaction, organizational, institutionalization in communities, local community livelihood, economic impact, health condition, education, presence of worker union and gender committee. During the preparation for Social Impact assessment, the team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting</p> | |
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| | | <p>with affected parties and stakeholder are available and can be demonstrated. The SIA was carried out during 25-29 April 2017.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM continued the meeting with stakeholders, surrounding communities and filling in questionnaire on May 2018. Record sighted: 4 "Kuesioner Pendapat Masyarakat Sekitar Kegiatan Usaha" dated 14 May 2018 to villagers from Dusun VIII Batu Anam, Dusun VI Sidomulyo, Dusun III Gonting Malaha, Kecamatan Bandar Pulau. The questionnaire discussing social relationship between company and communities, basic need, information transparency, job vacancy and/or opportunity for economy development, input/comment/grievance handling satisfaction, environmental impact, perception.</p> <p>Dated 4 March 2019, PT Saudara Sejati Luhur – Gunung Melayu I POM made a consultation meeting to review the social impact assessment program effectiveness with Desa Batu Anam, Desa Gonting Malaha, Desa Sidomulyo. Document sighted "Berita Acara Review Efektivitas Social Impact Assessment PT Saudara Sejati Luhur – Gunung Melayu I POM", dated 4 February 2019. The meeting attended by 19 villagers. Photographic evidence attested.</p> | |
| 3.4.2 | <p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared report on Environmental Management and Monitoring implementation (<i>Laporan RKL-RPL</i>) and submit to the government regularly (per semester), e.g. RKL-RPL report for year 2019 and 2020 as per "<i>Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL)</i>" was sent to Environmental Agency in North Sumatera, for Period July – December 2019 on 11 February 2020, January-June 2020 on 22 July 2020, July-December 2020 on 22 June 2021. For RKL RPL Report Semester I 2021 the company is still waiting for the results of the laboratory analysis that conducted by Laboratorium BTKLP Kelas I Medan, based on document review, the Laboratory BTKLP</p> | Complied |

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| | | <p>Kelas I Medan has taken samples of environmental parameters to the site in April 2021.</p> <p>The Management Plan incorporated in the "<i>Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan</i>" as mentioned in Bab IV at document of DELH, consist of:</p> <ul style="list-style-type: none"> • <i>Penerimaan Tenaga Kerja</i> (job opportunity) • <i>Peningkatan Pendapatan</i> (increase of income) • Hazardous waste source • <i>Terganggunya keberadaan satwa liar</i> • <i>Penurunan kualitas udara</i> (air quality) • <i>Peningkatan kebisingan</i> (noise) • Solid waste source • Liquid waste source • <i>Munculnya sikap dan persepsi masyarakat</i> <p>As guidance for management and monitoring, company has environmental management and monitoring plan "<i>Rencana Pengelolaan Lingkungan (RKL) – Rencana Pemantauan Lingkungan (RPL)</i>". The document has been approved by "<i>Badan Agribisnis Departement Pertanian</i>" through letter No.072/RLK-RPL/BA/III/1996 dated 19/03/1996. The environment management document explains activity components, type of impacts, impact management (program, project, technical), location and target for management.</p> <p>PT Saudara Sejati Luhur has assigned Estate and Mill Manager to be responsible person on implementation the management plan.</p> <p>During field observation and document verification at Gunung Melayu I POM, Pulau Maria Estate, it can be demonstrated that all the environmental management plan has been implemented as per document RKL-RPL. The evaluation of social environmental management plan</p> | |
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| | | <p>effectivity has been carried out and presented in RKL-RPL report semester I 2020 (January – June), Semester II 2020 (July-December), and for Semester I 2021 (January-June) is still waiting for the results of the lab analysis that conducted by Laboratorium BTKLP Kelas I Medan in April 2021.</p> | |
| <p>3.4.3</p> | <p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> | <p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance raised from the monitoring result) available under Report on Environmental Management and Monitoring implementation (<i>Laporan RKL-RPL</i>) and submit to the government regularly (per semester).</p> <p>Affected stakeholders has able to express their views through their own representative institutions, or freely chosen spokespersons, during the identification of impacts, reviewing findings and plans for mitigation, and monitoring the success of implemented plans. Social impact aspect assessment is done by:</p> <ul style="list-style-type: none"> • Focus group discussions (DKF) • Deep interview • Structured Interviews • Field observation <p>During the preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials.</p> <p>Record of meeting with affected parties and stakeholder are available and can be demonstrated. Latest meeting with stakeholder and affected parties conducted in June 2017. Feedback from the stakeholder was serving as inputs in creating a social impact mitigation and management program 2020-2021.</p> | <p>Complied</p> |

Criteria 3.5: A system for managing human resources is in place.

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| 3.5.1 | <p>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> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established the procedure related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding “<i>Penerimaan Karyawan Baru</i>” (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker.</p> <p>The procedure is available in Bahasa Indonesia Language and has been communicated to all workers. The procedure and its content already comply with applicable laws and regulation in Indonesia related workforce/employment. This procedure were communicated to all employees in the workplace and stakeholders. Last socialization conducted in February 2021.</p> <p>During the process recruitment the company directly calls prospective employees to be conducted interviews and explanations related to employee status, rights and obligations to be done. It is also explained related to the procedures or processes and stages of employee recruitment to prospective workers. If the employee is accepted as an employee of PT Saudara Sejati Luhur, the company will be created a working agreement document (PHL or PKWT working agreement) Signed by both parties and the document made by 2 copies, where each party (company and worker) gets 1 copy of the Working Agreement document. The company will explain that, the company has a policy on discrimination.</p> | Complied |
| 3.5.2 | <p>Employment procedures are implemented and records are maintained.</p> | <p>Based on interview with workers and worker, there is no indication that company being discriminative towards the employees: rice benefit provided as per standard (number of dependent), working tools provided for worker – based on activity, PPE provided for worker – based on risk assessment.</p> | Complied |

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| | | <p>PT Surya Sejati Luhur – Gunung Melayu I POM has conducted regular evaluation against all of employees, as one aspect considered for promotion and conducted talent test prior to promotion.</p> <p>In 2021, there was no recruitment process for new employee.</p> <p>According SOP: AA-HR-305.2-R0 dated 1 February 2009 related to Recruitment and Selection of Employee, the company will accept new employee based on their capabilities and qualifications.</p> | |
| <p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p> | | | |
| <p>3.6.1</p> | <p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established OHS policy that was issued and signed by the Managing Director dated 01/12/2014. Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation</p> <p>OHS risk assessment procedure SOP “Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian” AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control has considered on planning of risk control.</p> <p>Risk Assessment presented in document of HIRADC - last review in February 2021 covering for all activities both in Gunung Melayu I POM and Pulau Maria Estate, such as: boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared and documented the OHS Plan as in “Program Management K3 Tahun 2020”, such as:</p> <ul style="list-style-type: none"> • Training on emergency response and preparedness | <p>Complied</p> |

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| | | <ul style="list-style-type: none"> • Training on implementation OHS management system (SMK3) • Implementation of risk assessment • Zero Accident and consistent on using of PPE • Review of accident report • Medical checkup for workers and provision of first aid kit, • Safety committee meeting, • OHS inspection | |
| 3.6.2 | <p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has demonstrated the document of effectiveness of OHS program year 2021, such as:</p> <ul style="list-style-type: none"> • Refreshment training related to OHS, dated 16th March 2021, consisted of: understanding MSDS; handling empty pesticide containers; emergency response plan (for accident and spillage/contamination); prohibit use of agrochemical for pregnant and breastfeeding female worker; prohibit spraying in HCV and water body. • OHS safety meeting dated 5th July 2021 -> record of OHS meeting provided • Report of OHS inspection (monthly) -> last inspection was carried out on 21st July 2021 location in Gunung Melayu I POM were reported OK. • PPE Provision for all workers at mill are demonstrated as per “Bukti Serah Terima Alat Pelindung Diri Pulau Maria Estate”. Sample seen; PPE AP Shoes provision for harvester as much as 21 unit, dated 11 February 2021. <p>Based on field visit during onsite audit for spraying workers in block and harvester the risk impact probability was irritated and eyes dieses, control by using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) and regular training for sprayer workers.</p> <p>Discipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during</p> | Complied |

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| | | <p>working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January – July 2021.</p> <p>Based on interview with worker in pesticides application, method to minimizing risk and negative impact i.e: - Mixing of chemical conducted by trained person (Supervisor). There were aims to ensuring proper dosage, type of pesticide use. - Using of PPE while chemical mixing. Mixing of chemical located in mixing area, side by side with the chemical storage.</p> | |
| <p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p> | | | |
| <p>3.7.1</p> | <p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has a department which is responsible for the training program, which is the Asian Agri Learning Institute.</p> <p>Training program has been developed by company both mill and estate as per "Kalender Pelatihan Tahun 2020-2021 Learning & Development". Training program developed to enhance the hard skill and soft skill for employee and staff, such as:</p> <ul style="list-style-type: none"> • Refresh of SOP Handling of pests and diseases (Pengendalian hama dan Penyakit), planned in February to March 2021 • Spraying Training; will be held on Mach to May 2021, • Herbicide Application Training, March, June, and August 2021 with target of participants as much as 10 participants • Heavy equipment (Operational and Maintenance) planned in August 2021 • Sustainability awareness include traceability, mass balance and HCV, will be held on February, March, May, July, and September 2021. • Basic fire training and fire equipment and service will be held on February and May 2021 • Job safety analysis training, will be held on February 2021 | <p>Complied</p> |

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| | | <ul style="list-style-type: none"> • Accidents Inspection and observation training will be held on January – March 202 • First aider certification training will be held on September 2021 <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also been conducting socialization on all health protocol related workers for pandemic Covid-19 on 26-27 March 2020.</p> | |
| 3.7.2 | Records of training are maintained, where appropriate on an individual basis. | <p>Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training realization based on the Training calendar period 2020-2021, including:</p> <ul style="list-style-type: none"> • Training of refresh SOP for pest and disease control, implemented on 15 March 2021 was attended by 42 participants. • Basic Fire training conducted on 16 September 2020 and attended by 32 participants. • Traceability training and book-keeping for supply chains, conducted on 16 February 2021 and attended by 6 participants from Gunung Melayu I POM. • Socialization of Pandemic Covid-19 for all communities/employees of PTS from the housing held on March 26, 2020. • Basic fire training, conducted on 3 November 2020 and attended by 16 participants • First aiders training conducted on 23 March 2021 was attended by 19 participants. <p>Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2020-2021, the list of participants</p> | Complied |

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| | | attending the trainees, and some photographs of the activities at the time of training. | |
| 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>PT. Saudara Sejati Luhur – Gunung Melayu I POM has prepared a training program to staff, who are involved in RSPO Supply Chain Certification Standard implementation. As per training program, “Program Pelatihan tahun 2021” the RSPO supply chain training and awareness is planed on 24 August 2021. Actual training RSPO SCCS has been conducted on 15 March 2021.</p> <p>Latest training on “Supply Chain, Mass Balance and Traceability” performed on 15 March 2021 attended by Mill and KCP Assistant, production supervisor, production clerk, weighbridge operator and security officer. In total 11 personnel attending the training led by Mr. Dani (Sustainability Dept.). Training module sighted. Sample training record seen: Mr. Windy R. Turnip (Mill Manager), Mr. Barnes (KTU), Indah & Lusiana (weighbridge clerk), Mr. Mutholib (production clerk), Rolandy A. Bancin (KCP assistant), Nilva Khairani (Personalia clerk), Chandra Kesuma (Operational Assisstant), Dedek Suryanto L. Gaol (KCP Assistant), Fahrur Roza (Assistant Process), Bellie Tan (Head Assisstant).</p> <p>Competency and training records of all staff involved in RSPO Supply Chain were able to be demonstrated.</p> | Complied |
| <p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p> | | | |
| 3.8.1 | <p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM holds current RSPO P&C Certificate No. RSPO 620755, first certification started 7 September 2015 and expired on 6 September 2020. In the current certificate, PT. Saudara Sejati Luhur - Gunung Melayu I POM use Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate: Pulau Maria Estate.</p> <p>No change in the supply chain module since last assessment.</p> | Not Applicable |

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| | 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 Mass Balance Module is applicable. | Not applicable. | |
| 3.8.2 | <p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those 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>PT. Saudara Sejati Luhur - Gunung Melayu I POM holds current RSPO P&C Certificate No. RSPO 620755, first certification started 7 September 2015 and expired on 6 September 2020. In the current certificate, PT. Saudara Sejati Luhur - Gunung Melayu I POM use Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate: Pulau Maria Estate.</p> <p>No change in the supply chain module since last assessment.</p> <p>Not applicable.</p> | Not Applicable |
| 3.8.3 | 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>The projection for certified FFB and production of certified CPO and PK in Gunung Melayu I POM has been recorded in BSI's public summary report and registered in RSPO IT Platform.</p> <p>CB has been submitted to the RSPO Palm Trace Gunung Melayu I POM the projection of FFB, CPO and PK production.</p> <p>The actual CPO and PK produced verified during each subsequent visit to ensure that certified mill only deliver the allowed tonnage for the year.</p> | Complied |
| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. | <p>PT. Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill is a subsidiary of PT. Inti Indosawit Subur, which is a member of RSPO with membership number 1-0022-06-000-00, since 6 February 2006.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill has been registered in RSPO IT Platform with ID number RSPO_PO1000002609, sub license ID CB90877.</p> | Complied |
| 3.8.5 | <p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the</p> | PT. Saudara Sejati Luhur – Gunung Melayu I POM can demonstrate procedures as follow: | Complied |

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| | <p>applicable supply chain model specified. This shall include at minimum the following:</p> <ol 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. | <ul style="list-style-type: none"> Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, from the proportion of certified FFB receiving from company-owned estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; SOP AA-SOP-OP-101.5-R0 Grading; SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; | |
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| | | <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has a procedure for receiving and processing certified and non-certified FFB including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has appointed the mill manager as the person having overall responsibility for and authority over the implementation of RSPO SCCS requirements and compliance with all applicable requirements. This is through memorandum Tehcnical</p> | |
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| | | <p>Controller No.205/MI-PGS/MEMO/08/2021 dated 26 August 2021 for Windy Turnip, Gunung Melayu I POM Manager.</p> | |
| <p>3.8.6</p> | <p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p style="padding-left: 20px;">a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="padding-left: 20px;">b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued 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> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>Internal audit conducted on 15-16 February 2020 by Mr. Hendrik Simanjuntak, Wahyu, Ridho Ilahi, Ian Septian Arifin.</p> <p>Internal audit for PT. Saudara Sejati Luhur-Gunung Melayu I POM has been conducted on 24 January – 2 February 2021 by Mr. Hendryk Kristian Simanjuntak (Internal Audit Department), against RSPO P&C 2018 INA NI 2020. Audit results shown 1 (one) non-conformities, audit findings and report were sighted, the corrective action has been implemented to address the issue found during audit.</p> <p>Hendrik Simanjuntak as an internal auditor has follow the training of RSPO SCCS and RSPO SCCS Webinar training on 21 May 2020.</p> <p>Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action and Closed.</p> <p>Management review conducted twice a year as per procedure AA-MPM-OP-1400.17-R7.</p> <p>- Management review 2020 conducted on 27 February 2020 Input of management review consist of:</p> <ul style="list-style-type: none"> • Internal audit result • Customer feedback • Proses performance and product conformity | <p>Complied</p> |

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| | | <ul style="list-style-type: none"> • Status of Corrective and Preventive Action • Follow up previous management review • Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> • Recommendation for improvement • Resources needed. <p>- Management review 2021 conducted on 4 February 2021, attended by Mikale Depari, Gomgom Sidabutar, Azwar, Himra Sinaga, Ipan GP, Ronal Sitindaon from Gunung Melayu I POM.</p> <p>Input of management review consist of:</p> <ul style="list-style-type: none"> • Internal audit result: no finding; • Customer feedback: no complaint; • Proses performance and product conformity: from VE visit; • Status of Corrective and Preventive Action: related to reporting; • Follow up previous management review: laboratory result; • Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> • Recommendation for improvement: report monitoring; • Resources needed: appoint PIC | |
| 3.8.7 | <p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> | Complied |

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| | | <p>The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate Batu Anam Estate and Aek Tarum Estate. The proportion of non-certified FFB comes from third-party supplier: Bd. Siregar, Hasan BP, Herman Wijaya, Keb. Aman, Sihotang Co., Sipanjang, Gunawan Tanu, Win win, Abdul Gani, Andre, PT. Sawit Trading Sejahtera, PT. Tinggi Raja, Sinar Bakti I, CV. Ronauli Tani, etc.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Kebun Pulau Maria No. 1/12/I/KPM/20" from Division I block I02H dated 1 December 2020 – total 242 bunches. Vehicle BK8560VO; destination Gunung Melayu I POM. - Weighbridge Ticket No.PGSA120207056 dated 1 December 2020, commodity: certified FFB; source: Pulau Maria Estate Division I to Gunung Melayu I POM; net weight: 5,390 kg; amount: 242 bunches; Block: I02h; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK8560VO; - FFB delivery "Surat Pengantar TBS Kebun Pulau Maria No. 207/KPM/I/17/21" from Division I block I02b, I02g and I02h dated 29 July 20221 – total 449 bunches. Vehicle BK9268VN; destination Gunung Melayu I POM. - Weighbridge Ticket No.PGSA421103216 dated 30 July 2021, commodity: certified FFB; source: Pulau Maria Estate Division I to Gunung Melayu I POM; net weight: 7,530 kg; amount: 449 bunches; Block: I02h, I02b, I02g; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK9268VN; | |
| 3.8.8 | Sales and Goods Out | Sample seen of delivery form CSPK from Gunung Melayu I POM to Gunung Melayu I KCP, because under same entity, no contract or delivery order. | Complied |

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| | <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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. | <p>The unit of certification using Mass Balance Sheet and daily production report to record CSPK Delivery:</p> <ul style="list-style-type: none"> • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated 30 June 2020. Total Sustainable PK Production 211.67 MT; Total Sustainable PK Delivery 237.13 MT; Total Announce PK RSPO 343.21 MT; • Shipping Announcement No. TR-4ecfc4fe-fac2 for 343.21 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 7 September 2020; date of confirmation 25 September 2020. • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated 31 July 2020. Total Sustainable PK Production 235.32 MT; Total Sustainable PK Delivery 223.21 MT; Total Announce PK RSPO 243.02 MT; • Shipping Announcement No. TR-fc62aa39-581f for 243.02 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 7 September 2020; date of confirmation 25 September 2020. • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated 30 August 2020. Total Sustainable PK Production 233.45 MT; Total Sustainable PK Delivery 256.41 MT; Total Announce PK RSPO 207.65 MT; • Shipping Announcement No.TR-848071a8-e984 for 207.65 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 7 September 2020; date of confirmation 25 September 2020. • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated 31 January 2021. Total Sustainable PK Production 65.53 MT; Total Sustainable PK Delivery 103.43 MT; Total Announce PK RSPO 99.17 MT; | |
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| | | <ul style="list-style-type: none"> • Shipping Announcement No. TR-24a7a936-3dbd for 99.17 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 31 January 2021; date of confirmation 23 March 2021. • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated 28 February 2021. Total Sustainable PK Production 0 MT; Total Sustainable PK Delivery 0 MT; Balance PK from previous month 55.66 MT; Total Announce PK RSPO 3.4 MT; • Shipping Announcement No. TR-4e702985-f0e1 for 3.4 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 28 February 2021; date of confirmation 28 March 2021. <p>The information contain in the document are complete and can be presented either on a single document or across a range of documents.</p> | |
| 3.8.9 | <p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</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</p> | <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM did not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV. Pengangkutan Jaya.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM having legal ownership of material being transported by appointed outsourced companies: CV. Pengangkutan Jaya.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM have a contract agreement with transporter as below:</p> <p>- "Perjanjian Pengangkutan Nomor: 09/X/JSA-GM/2019" dated 1 October 2019 between PT. Saudara Sejati Luhur and CV Pengangkutan Jaya. Contract transport for CPO & PK.</p> <p>PT. Saudara Sejati Luhur control the CPO transporter by "Surat Perintah Kerja (SPK)" and "Daftar Periksa Kesiapan Kerja Pengiriman".</p> | Complied |

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| | <p>that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p> | <p>SPK covered information as explain in indicator 5.5.2 b. while "Daftar Periksa Kerja" is the tool to control the transporter:</p> <ul style="list-style-type: none"> • Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out); • After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition); <p>The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>During field audit and document verification can be demonstrated that the transporter is under control of Marketing Asian Agri Medan and PT. Saudara Sejati Luhur.</p> | |
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | The site kept the contract of CPO and PK transporter which include name and contact detail of the contractors/transporter. | Complied |
| 3.8.11 | 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. | The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019". | Complied |
| 3.8.12 | <p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> | <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weigbridge ticket for FFB receiving, CPO delivery - Daily Production Report for PK transfer to Gunung Melayu I KCP - Delivery Order - Sales contract - Shipping Announcement - Mass balance report | Complied |

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| | <p>iv) For Mass Balance Module, the mill:</p> <ul style="list-style-type: none"> 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. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 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). | <ul style="list-style-type: none"> - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Gunung Melayu I POM" period 2020: January – March, April – June, July – September, October – December and period 2021: January – March, April – June.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Gunung Melayu I POM only deliver Mass Balance sales from a positive stock.</p> <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM cannot demonstrate sales contract with customer.</p> | |
| <p>3.8.13</p> | <p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p> | <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM is able to provide estimate volume of CPO and PK in a year period as in Budget FY2020/2021 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in "Rekapitulasi Produksi TBS, CPO dan PK PT. Saudara Sejati Luhur – Gunung Melayu I POM". OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>For 2021, the budget for conversion from FFB to CPO at 23.40%; budget for conversion from FFB into PK at 5.00% - as recorded in "Anggaran Tahun 2021".</p> <p>Monthly Records of Certified CPO & PK since the last audit - Extraction rates</p> | <p>Complied</p> |

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| Month - Year | OER (%) | KER (%) |
|--------------|---------|---------|
| Apr 2019 | 18.10 | 5.36 |
| May 2019 | 18.10 | 5.36 |
| June 2019 | 18.10 | 5.36 |
| July 2019 | 18.10 | 5.36 |
| Aug 2019 | 18.10 | 5.36 |
| Sept 2019 | 18.10 | 5.36 |
| Oct 2019 | 18.10 | 5.36 |
| Nov 2019 | 18.10 | 5.36 |
| Dec 2019 | 18.10 | 5.36 |
| Jan 2020 | 18.15 | 5.36 |
| Feb 2020 | 18.15 | 5.36 |
| Mar 2020 | 18.15 | 5.36 |
| Apr 2020 | 18.15 | 5.36 |
| May 2020 | 18.15 | 5.36 |
| June 2020 | 18.15 | 5.36 |
| July 2020 | 18.15 | 5.36 |
| Aug 2020 | 18.15 | 5.36 |
| Sept 2020 | 18.15 | 5.36 |
| Oct 2020 | 18.15 | 5.36 |
| Nov 2020 | 18.15 | 5.36 |
| Dec 2020 | 18.15 | 5.36 |

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|-----------|--|---|----------|-------|------|----------|-------|------|----------|-------|------|----------|-------|------|----------|-------|------|-----------|-------|------|-----------|-------|------|--|
| | | <table border="1"> <tr> <td>Jan 2021</td> <td>18.10</td> <td>5.36</td> </tr> <tr> <td>Feb 2021</td> <td>18.10</td> <td>5.36</td> </tr> <tr> <td>Mar 2021</td> <td>18.10</td> <td>5.36</td> </tr> <tr> <td>Apr 2021</td> <td>18.10</td> <td>5.36</td> </tr> <tr> <td>May 2021</td> <td>18.10</td> <td>5.36</td> </tr> <tr> <td>June 2021</td> <td>18.10</td> <td>5.36</td> </tr> <tr> <td>July 2021</td> <td>18.10</td> <td>5.36</td> </tr> </table> | Jan 2021 | 18.10 | 5.36 | Feb 2021 | 18.10 | 5.36 | Mar 2021 | 18.10 | 5.36 | Apr 2021 | 18.10 | 5.36 | May 2021 | 18.10 | 5.36 | June 2021 | 18.10 | 5.36 | July 2021 | 18.10 | 5.36 | |
| Jan 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| Feb 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| Mar 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| Apr 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| May 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| June 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| July 2021 | 18.10 | 5.36 | | | | | | | | | | | | | | | | | | | | | | |
| 3.8.14 | Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate. | <p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Gunung Melayu - Gunung Melayu I POM is able to demonstrate the work instruction for analysis of oil content. Sampled Daily Production Report to check the OER and KER:</p> <ul style="list-style-type: none"> - "Laporan Harian Pabrik" dated 2 December 2019; FFB from previous day 496.25 MT; FFB Sustainable Received 122.20 MT; FFB Non-sustainable Received 651.79 MT; FFB Received Total 773.99 MT; FFB Sustainable Processed 136.71 MT; FFB Non-sustainable Processed 1,033.59 MT; FFB Processed Total 1,169.76 MT; CPO Sustainable Production 32.95 MT; CPO Non-sustainable Production 181.81 MT; CPO Production Total 214.77 MT; OER CPO Sustainable 24.20 %; OER CPO Non-sustainable 17.59 %; PK Sustainable Production 7.12 MT; PK Non-sustainable Production 54.09 MT; PK Production Total 61.17 MT; KER PK Sustainable 5.23%; KER PK Non-sustainable 5.23%; - "Laporan Harian Pabrik" dated 2 December 2020; FFB from previous day 106.05 MT; FFB Sustainable Received 102.79 MT; FFB Non-sustainable Received 340.97 MT; FFB Received Total 443.76 MT; FFB Sustainable Processed 99.17 MT; FFB Non-sustainable Processed 316.51 MT; FFB Processed Total 415.67 MT; CPO Sustainable Production 22.70 MT; CPO Non-sustainable Production 52.61 MT; CPO Production Total 75.32 MT; OER CPO Sustainable 22.90 %; OER CPO | Complied | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Non-sustainable 16.62 %; PK Sustainable Production 5.22 MT; PK Non-sustainable Production 16.68 MT; PK Production Total 21.91 MT; KER PK Sustainable 5.27%; KER PK Non-sustainable 5.27%;</p> <p>- "Laporan Harian Pabrik" dated 31 July 2021; FFB from previous day 78.30 MT; FFB Sustainable Received 0 MT; FFB Non-sustainable Received 779.85 MT; FFB Received Total 779.85 MT; FFB Sustainable Processed 0 MT; FFB Non-sustainable Processed 676.15 MT; FFB Processed Total 676.15 MT; CPO Sustainable Production 0 MT; CPO Non-sustainable Production 112.17 MT; CPO Production Total 112.17 MT; OER CPO Sustainable 0%; OER CPO Non-sustainable 17.51 %; PK Sustainable Production 0 MT; PK Non-sustainable Production 35.43 MT; PK Production Total 35.43 MT; KER PK Sustainable 5.24%; KER PK Non-sustainable 5.24%;</p> | | | | | | | | | | | | | | | | | | | | | | | | | |
|------------------|---|--|--------------------|----------------|---------|--------------------|---------|--------|------------------|-----------|----------|------|----------------|-------|------------------|-----------|----------|------|----------------|--------|------------------|-----------|----------|------|----------------|-------|----------|
| 3.8.15 | <p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p> | <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM implement Mass Balance Module. This indicator is not applicable.</p> | Not Applicable | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.8.16 | <p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has made shipping announcement inside PalmTrace transaction, sample seen for period July 2019 – July 2021:</p> <table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume*</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-aea72c97-6672</td> <td>GM POM II</td> <td>GM I KCP</td> <td>CSPK</td> <td>MB - confirmed</td> <td>821.4</td> </tr> <tr> <td>TR-bd711eb5-823d</td> <td>GM POM II</td> <td>GM I KCP</td> <td>CSPK</td> <td>MB - confirmed</td> <td>564.73</td> </tr> <tr> <td>TR-9938443c-80d6</td> <td>GM POM II</td> <td>GM I KCP</td> <td>CSPO</td> <td>MB - confirmed</td> <td>66.31</td> </tr> </tbody> </table> | Transaction ID | Buyer | Product | Supply Chain Model | Volume* | Status | TR-aea72c97-6672 | GM POM II | GM I KCP | CSPK | MB - confirmed | 821.4 | TR-bd711eb5-823d | GM POM II | GM I KCP | CSPK | MB - confirmed | 564.73 | TR-9938443c-80d6 | GM POM II | GM I KCP | CSPO | MB - confirmed | 66.31 | Complied |
| Transaction ID | Buyer | Product | Supply Chain Model | Volume* | Status | | | | | | | | | | | | | | | | | | | | | | |
| TR-aea72c97-6672 | GM POM II | GM I KCP | CSPK | MB - confirmed | 821.4 | | | | | | | | | | | | | | | | | | | | | | |
| TR-bd711eb5-823d | GM POM II | GM I KCP | CSPK | MB - confirmed | 564.73 | | | | | | | | | | | | | | | | | | | | | | |
| TR-9938443c-80d6 | GM POM II | GM I KCP | CSPO | MB - confirmed | 66.31 | | | | | | | | | | | | | | | | | | | | | | |

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| | | TR-4ada53dd-3b0f | GM POM | II | GM I KCP | CSPK | MB - confirmed | 625.83 |
| | | TR-42fc41f6-bd10 | GM POM | II | GM I KCP | CSPK | MB - confirmed | 565.83 |
| | | TR-0e90d006-1b06 | GM POM | II | GM I KCP | CSPK | MB - confirmed | 841.45 |
| | | TR-de25ec72-f237 | GM POM | II | GM I KCP | CSPK | MB - confirmed | 1025.18 |
| | | TR-c89851bc-6c0a | GM POM | II | GM I KCP | CSPK | MB - confirmed | 1045.84 |
| | | TR-9a2bb1ea-8fbd | GM POM | II | GM I KCP | CSPK | MB - confirmed | 731.49 |
| | | TR-17944c5f-18b2 | GM POM | II | GM I KCP | CSPK | MB - confirmed | 3365.01 |
| | | TR-0fa137b9-eacc | GM POM | II | Kuala Lumpur Kepong Berhad / KLK Oleo | CSPO | MB - confirmed | 384 |
| | | TR-12e1cde9-a593 | GM POM | II | FRIGORI FICO ALLANA PRIVATE LIMITED | CSPO | MB - confirmed | 499.92 |
| | | <p>Shipping announcement period May 2019 – August 2021</p> <ul style="list-style-type: none"> - TR-848071a8-e984 -> 207.65 MT CSPK, Sept 2020 - TR-fc62aa39-581f -> 243.02 MT CSPK, Sept 2020 - TR-4ecfc4fe-fac2 -> 343.21 MT CSPK, Sept 2020 - TR-4e702985-f0e1 -> 3.4 MT CSPK, Mar 2021 - TR-24a7a936-3dbd -> 99.17 MT CSPK, Mar 2021 <p>Remove:</p> | | | | | | |

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| | | PT. Saudara Sejati Luhur – Gunung Melayu I POM has removed the CSPO volume of 5,675.20 MT from PalmTrace with transaction ID ST-TR-f62c6758-84e1 dated 17 August 2021. Reason for removal sold as ISCC. | |
| 3.8.17 | <p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.</p> <p>RSPO Rules on Market Communications and Claims audited during internal audit.</p> | Complied |
| General corporate communications | | | |
| 4.1 | <p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com.</p> | Complied |
| 4.2 | <p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member’s history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member’s profile page.</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, in its website:</p> <p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p> <p>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable</p> | Complied |

| | | | |
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| | | <p>Palm Oil. We received our first RSPO certification for our estate in 2010.”</p> <p>d. State the member’s history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme.”</p> <p>Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, did not use RSPO trademark in its corporate communication such in website.</p> | |
| 4.3 | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | <p>No, PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, did not display its RSPO membership status.</p> <p>It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p> | Complied |
| 4.4 | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products. | <p>No, PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, did not display its RSPO membership status.</p> <p>Communication is clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their own’s products.</p> | Complied |
| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | <p>No, PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri did not display RSPO Corporate Logo in any document.</p> | Complied |
| Business to business communications | | | |

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| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | PT. Saudara Sejati Luhur - Gunung Melayu I POM does not use RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Gunung Melayu - Gunung Melayu II POM and their buyers. | Complied |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | PT. Saudara Sejati Luhur - Gunung Melayu I POM stating the supply chain model and certificate number under which the claim is being made. | Complied |
| 5.3 | <p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM is not a distributor and/or wholesaler.</p> <p>Not applicable.</p> | Not Applicable |
| 5.4 | <p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and</p> | <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM is not producing or selling end-product to consumer. PT. Saudara Sejati Luhur - Gunung Melayu I POM is not a retailer or food service company. No labelling on product whatsoever.</p> <p>Not applicable.</p> | Not Applicable |

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| | the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim. | | |
| Business to consumer communication | | | |
| 6.1 | Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not using product-specific claims in its product. PT. Gunung Melayu – Gunung Melayu II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable. | Not Applicable |
| 6.2 | Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not using RSPO trademark and/or RSPO label. PT. Gunung Melayu - Gunung Melayu II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable. | Not Applicable |
| 6.3 | When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not using RSPO-certified on-pack claim. PT. Gunung Melayu - Gunung Melayu II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable. | Not Applicable |
| 6.4 | Business to consumer communication shall not include information about the claimant's RSPO membership status. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not making any claim related to their RSPO membership status. PT. Saudara Sejati Luhur - Gunung Melayu I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable. | Not Applicable |
| 6.5 | Members shall not communicate to consumers' information about their suppliers' RSPO membership status. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not making any information about their supplier's RSPO membership status. PT. Saudara Sejati Luhur - Gunung Melayu I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. | Not Applicable |

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| | | Not applicable. | |
| 6.6 | Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not using RSPO trademark and/or RSPO label. Not applicable. | Not Applicable |
| 6.7 | Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim. | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not using other trademark or logo and/or any use of unauthorized product-specific claim. Not applicable. | Not Applicable |
| 6.8 | RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org . | PT. Saudara Sejati Luhur - Gunung Melayu I POM is not a retailer or food service company. No use of RSPO trademark on product whatsoever. Not applicable. | Not Applicable |

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content

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| | 95% or above of the oil palm content must be RSPO MB-certified. | The MB volume that can be sold is the certified CSPO and CSPK volume produced by PT. Saudara Sejati Luhur - Gunung Melayu I POM. Hence the CSPO and CSPK volume sold under MB model is considered 100% content. | Complied |
| | Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits. | The MB volume that can be sold is the certified CSPO and CSPK volume produced by PT. Saudara Sejati Luhur - Gunung Melayu I POM. Hence the CSPO and CSPK volume sold under MB model is considered 100% content. | Complied |
| Labelling and trademark (MB) | | | |
| | <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and | <p>There is no labelling and trademarking used by PT. Saudara Sejati Luhur - Gunung Melayu I POM on their products.</p> <p>Not applicable.</p> | Not Applicable |

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| | in Annex 1 of the Rules on Market Communications & Claims document. | | |
| Messaging (MB) | | | |
| | <p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. | <p>There is no labelling and trademarking used by PT. Saudara Sejati Luhur - Gunung Melayu I POM on their products.</p> <p>Not applicable.</p> | Not Applicable |
| Principle 4: Respect community and human rights and deliver benefit | | | |
| Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed. | | | |
| Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders. | | | |
| 4.1.1 | <p>(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.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has had a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kelvin Tio). The policy relating to human rights, is explained in point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual</i></p> | Complied |

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| | | <p><i>orientation, membership of trade union political affiliation and/or age".</i></p> <p>The policy is also published to use posters at any strategic places Pulau Maria Estate and Gunung Melayu I POM.</p> <p>Corporate policy has been socialized/deseminastion to all levels of PT Saudara Sejati Luhur employees and stakeholders (including local contractors)</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also had a policy related a Human Rights Defender (HRD), which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "<i>Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment</i>".</p> <p>The socialization of this policy has been done to all employees in Pulau Maria Estate dated 12 February 2021.</p> | |
| 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. | Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head), there is no issues of violence or any form of harassment, mercenaries, and paramilitaries usage in the operations. | Complied |
| Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties. | | | |
| 4.2.1 | (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. | <p>Based on document verification and interview with internal stakeholders (labour union, gender committee) informed that the Human rights policy that has been published No.298/ES-KTS/Memo/08/14 dated 26th August 2014 which also covering ethics in business that stated that "ethical behavior, Prohibition of all forms of corruption, bribery in the conduct or transaction business practices and fraudulent use of funds".</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM committed to protect Human Rights Defender in their operational area. Each violation against the policy can be reported to HRD Department, Internal Audit Department, or line manager.</p> | Complied |

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| | | There is no record of Human Rights violation found. | |
| 4.2.2 | Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established a mechanism to handle complaint from external party, as written in “<i>Mekanisme Penanganan Keluhan</i>” – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under “<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>” – Employee’ complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>These mechanisms have communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities in 12 February 2021.</p> <p>Through this communication, PT Saudara Sejati Luhur – Gunung Melayu I POM explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion),</p> <p>The procedure on handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances were recorded in LogBook and in “<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>”.</p> <p>Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head and previous landowners) all policy/procedures are in place and understood by all stakeholders. In addition, there is no illiterate parties found until this audit.</p> <p>Through the public consultation with village head and previous landowners obtained information that all the villagers acknowledge the grievance procedure. They can submit their complaint or grievance by their self or by village head/elders</p> | Complied |

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| 4.2.3 | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. | <p>"Mekanisme Penanganan Keluhan" – complaint handling mechanism (No. SOP-AA-GL-5005-R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (No. SOP-AAHR-3008-R0 05). Refer to the "<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>"; all incoming letter such as requested information or grievance should be responded within 14 working days.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also prepared "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" prepared by Public Relation officer. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested. These mechanisms has been communicated to external parties and disseminated to all employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM is recording each complaint and response provided in the Logbook of "<i>Buku Keluhan Karyawan</i>", where from complaint from external is documented in "<i>Buku Agenda Komplain</i>".</p> <p>Mostly the employee's complaints are complaints about improvements in infrastructure and public facilities.</p> | Complied |
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. | In each conflict resolution process, community representatives/other parties are free to appoint their representatives in any negotiation or advocacy process or third-party mediator. | Complied |
| Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local community are demonstrated. | In 2020 and 2021 period, the company has established CSR program is recorded on CSR Project Tracking 2020 and 2021, consisting 6 types of | Complied |

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| | | <p>activities, such as Social, Economy, Education, Health, Infrastructure and Environment.</p> <p>The creation of the CSR program is done by coordinating with the local village head through the SIA report and monitoring. (see 3.4)</p> <p>CSR program in 2020 and 2021 for example:</p> <ol style="list-style-type: none"> 1. Social aspects: <ul style="list-style-type: none"> - Assistance package for the poor for the surrounding community to Batu Anam, Sonting Malaha and Sidomulyo Village. - Religious day activity in Rahuning, Bandar Pulau and Tinggi Raja Sub District). - Tree planting program of riparian zone in Batu Anam Village 2. Economy aspects: <ul style="list-style-type: none"> - Assistance of computer unit to Rahuning Sub District - Javanese carving craft development in Rahuning, Batu Anam, and Gonting Malaha Village. - Training program for smallholders around the company. - Rice assistances for surrounding community who got covid-19 3. Education aspects: <ul style="list-style-type: none"> - Providing equipment support for elementary schools in Batu Anam and Gonting Malaha Village - Mosque construction in "SMP 1 Atap" – Batu Anam Village - Family welfare development program (PKK) for cake business in Gonting Malaha Village. - Furniture assistances for Play School "PAUD Salwa" in Gonting Malaha Village. 4. Health care aspects: | |
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| | | <ul style="list-style-type: none"> - Medical of PPE assistances "Covid-19 Prevention Program" for Kisaran Regency. - Vaccination "Prosyandu" program for toddlers at surrounding community. - Providing of covid-19 prevention program in Sidomulyo, Batu Anam, and Gonting Malaha Village. - Water close construction assistances for elementary school SDN 017139 in Batu Anam Village <p>5. Infrastructure aspects:</p> <ul style="list-style-type: none"> - Material assistances for the prayer room in Sidomulyo, Pulau Maria and Gonting Malaha Village. - Road maintenance in Gonting Malaha Village. - Rehab of KUD Office in Gonting Malaha Village. <p>Realization of CSR Year 2020 and 2021 program:</p> <ul style="list-style-type: none"> - February 2020, 500 trees planting program of riparian zone in Batu Anam Village, IDR 7,500,000. - April 2020, rice assistances (rice 40 sacks @ 5Kg) for Rahuning Sub District who got covid-19, IDR 2,200,000. - April 2020, Medical PPE Assistances for Kisaran Regency, IDR 117,418,000. - April 2020, masker assistances "covid-19 prevention program" for Batu Anam Village, IDR 4,758,000 - May 2020, Religious day activity "Ied Fitri" in Rahuning, IDR 26,000,000 - September 2020, Medical PPE Assistances for Puskesmas in Rahuning and Bandar Pulau Sub District, IDR 48,450,000. | |
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| | | <ul style="list-style-type: none"> - November 2020, rice assistances (rice 150 sack and PPE) for Batu Anam, Sidomulyo, Gonting Malaha Village, IDR 33,000,000. - December 2020, vaccination program "Posyandu" for Bandar Pulau Sub District, IDR 2,200,000. - June 2021, Assistances of Religious Nasyid Festival for Rahuning, Bandar Pulau and Tinggi Raja Subdistrict, IDR 4,000,000. - February 2021, Assistance of computer unit to Rahuning Sub District, IDR 5,985,000. - March 2021, Javanese carving craft development in Rahuning, Batu Anam, and Gonting Malaha Village, IDR 1,995,000. - March 2021, Material assistances for the prayer room in Sidomulyo, Pulau Maria and Gonting Malaha Village, IDR 9,000,000. - February 2021, Road maintenance in Gonting Malaha Village, IDR 3,433,240. | |
| <p>Criteria 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.</p> | | | |
| <p>4.4.1</p> | <p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> | <p>Certificate holder has shown their legal ownership as follows:</p> <ul style="list-style-type: none"> • Land Use Title (HGU) Certificate of HGU issued by Kantor Pertanahan Asahan Regency no. 1 of 2004 dated April 29, 2004 in accordance with the Measure Letter no. 01/Rahuning/2004 dated April 27, 2004 with an area of 2,301.883 Ha and valid until December 31, 2030. Equipped with HGU Map Appendix with a scale of 1: 10,000. • Plantation Permit (IUP) Surat Pendaftaran Usaha Perkebunan (SPUP) issued from Ministry of Agriculture No.HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Permitted area is 2,319 Ha. <p>Onsite Audit:</p> | <p>Complied</p> |

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| | | Based on public consultation with village leader and related stakeholder in Asahan Regency such as Plantation Agency, National Land Agency and local NGO's obtained information that there is no land dispute case between the company and other parties. | |
| 4.4.2 | Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: 4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making. | Onsite Audit: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| | 4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken; | Onsite Audit: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | |
| | 4.4.2c 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. | Onsite Audit: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | |
| 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). | PT. Saudara Sejati Luhur has legal ownership as Land Use Title or Hak Guna Usaha, completed with map "Peta Bidang Tanah" scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder "Risalah Panitia Tanah-B". | Complied |

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| | | <p>Onsite Audit: <i>There is no new expansion of PT Saudara Sejati Luhur.</i></p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | |
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. | <p>Onsite Audit: <i>There is no new expansion of PT Saudara Sejati Luhur.</i></p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | Complied |
| 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>Onsite Audit: <i>There is no new expansion of PT Saudara Sejati Luhur.</i></p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | Complied |
| 4.4.6 | There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. | <p>Onsite Audit: <i>There is no new expansion of PT Saudara Sejati Luhur.</i></p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | Complied |

| Criteria 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. | | | |
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| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| 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. All the relevant information and documents are made available, 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. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| 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 are non-coercive and entered into voluntarily and carried out prior to new operations. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| 4.5.4 | To ensure local food and water security and as part of the FPIC process, 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 land allocations process. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started | Complied |

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| | environmental and social implications of the proposed operations on their lands. | replanting in the second planting cycle. There were no new expansions during the replanting period. | |
| 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. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| 4.5.7 | After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. | Complied |
| Criteria 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. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| 4.6.2 | (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started | Complied |

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| | established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. | replanting in the second planting cycle. There were no new expansions during the replanting period. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | |
| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement). | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| 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 available to them. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| Criteria 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. | According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started | Complied |

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| | | <p>replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | |
| 4.7.2 | <p>(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.</p> | <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | Complied |
| 4.7.3 | <p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> | <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | Complied |
| <p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p> | | | |
| 4.8.1 | <p>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</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure</p> | Complied |

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| | acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. | (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook. Through the public consultation with village leader and related stakeholder in Asahan Regency such as Plantation Agency, National Land Agency and local NGO's obtained information that there is no land dispute case between the company and other parties. | |
| 4.8.2 | (C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). | Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| 4.8.4 | For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). | Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |

| Principle 5: Support smallholder inclusion | | | |
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| Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships. | | | |
| Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |
| 5.1.1 | Current and previous period prices for FFB are publicly available and accessible by smallholders. | <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM shows SOP to communicate and evaluate the source of third party FFB (non-certified). <i>SOP Pengawasan Sumber Pembelian TBS Luar</i> (AA-MM-506.2-R0), dated 1st January 2014. The procedure for monitoring and evaluation of source of FFB. Purpose to ensure third party FFB sourced from non-forest area, completed with legal use of the land. The procedure: check supporting document from supplier (delivery order, surat pernyataan, plantation block maps); compare the plantation location map/coordinate against the legal documents; team will compare the plantation location map against the RTRWP; conduct field verification to the source of FFB (oil palm plantation belong to farmer), randomly selected; team prepares database, listing the complying suppliers. Supply of FFB from area which legally contested or coming from protected forest, plantation forest, conservation area – will be rejected.</p> <p>SOP Traceability – FFB Purchase AA-SOP-MM-506.3-R0, dated 1st January 2015. The procedure stated all supplier shall fulfill legal requirement, not limited to legal ownership/legal use of the land, hectarage, planting year, production, type of soil, type of seedling, distance from palm oil mill, etc. All supplier shall complete with coordinate points, listed in weighbridge system. While grading and sortation follows SOP for FFB receiving.</p> <p>Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed in front of mill gate. For example, the FFB Prices on 1 – 10 August 2021 is IDR 2,350/kg.</p> | Complied |

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| | | Meanwhile, FFB pricing for independent supplier following the fluctuation of CPO pricing. Through the interview with FFB supplier of Soelianto obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB. There is no dispute related to FFB payments so far. | |
| 5.1.2 | (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. | According to the interview with FFB Purchasing staff and document verification on FFB Purchasing Agreement obtained information that the FFB pricing based the general market of CPO. Buyer (PT Inti Indosawit Subur – Asian Agri holding’s company) has the right to determine the applicable FFB price. FFB price updates are carried out by the FFB Purchasing Department directly to suppliers via telephone or messaging applications. | Complied |
| 5.1.3 | (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. | Based on the results of interviews with FFB suppliers and verification of FFB purchase agreement documents, information was obtained that FFB prices refer to the prevailing market price of CPO. In the agreement it is stated that the buyer (PT Inti Indosawit Subur – Asian Agri holding’s company) has the right to set the applicable FFB price. FFB price updates are carried out by the FFB Purchasing Department directly to suppliers via telephone or messaging applications. | Complied |
| 5.1.4 | (C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable. | Based on the results of interviews with FFB suppliers and verification of FFB purchase agreement documents, information was obtained that FFB prices refer to the prevailing market price of CPO. In the agreement it is stated that the buyer (PT Inti Indosawit Subur – Asian Agri holding’s company) has the right to set the applicable FFB price. | Complied |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. | The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood. The contract contained all relevant information such as payment method, work | Complied |

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| | | <p>requirements, force majeure, contract period, cancellation of contract, etc.</p> <p>Currently the company carried out replanting activity in cooperated with contractor. Based on document review, an agreement between company and local contractors confirmed that contract is made fairly, legal and transparent.</p> <p>Sample of third party FFB suppliers contract:</p> <ol style="list-style-type: none"> 1. PT. SSL & PT. Sawit Trading Sejahtera have signed the Code of Procurement Ethics dated 3 February 2020. 2. PT. SSL & Hasan BP have signed the Code of Procurement Ethics dated 3 February 2020. <p>Onsite audit:</p> <p>There is no change in information since the remote audit assessment.</p> <p>During this onsite audit found the list of active FFB supplier of Gunung Melayu I POM. Based on the list of supplier data obtained information that all supplier has had the FFB supplier agreement (including legal verification, location, smallholder coordinate and name of smallholder). The potential supplier as follows:</p> <ul style="list-style-type: none"> • Abdul Gani (private ownership) • Sinar Bakti (private ownership) • PT Sawit Trading Sejahtera (FFB collector and trader) • PT Sawit Trading Sejahtera (L) 2 • PT Sawit Trading Sejahtera (A) 2 • Soelianto (private ownership) • CV Ronauli Tani (FFB collector and trader) | |
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given. | Evidence of payment is reviewed and interview with local contractor confirmed that payment for contractor timely manner. | Complied |

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| | | <p>Sample seen on third party FFB suppliers: PT. SSL have paid for FFB's sourced from PT. Sawit Trading Sejahtera, dated 8 June 2020 through bank transfer.</p> <p>Onsite audit:</p> <p>Sample seen on third party FFB suppliers Gunung Melayu I POM – PT Saudara Sejati Luhur have paid for FFB's sourced from CV Ronauli Tani, dated 4 August 2021 through bank transfer.</p> | |
| 5.1.7 | Weighing equipment is verified by an independent third party on a regular basis. | <p>According to the Indonesian regulation, verification of weigh bridge conducted annually. Sighted the record of validation from Cooperation and Trading Agency of Asahan Regency as follows:</p> <ul style="list-style-type: none"> • Validation Letter No: 016/SKHP-MT/ASH.59/2020 dated 5 February 2020 for weighbridge Presica PSC 6801-S (capacity 50 MT) brand Presia. Validation renewal before February 2021. • Validation Letter No: 016/SKHP-MT/ASH.59/2020 dated 5 February 2020 for weighbridge Avery Weight Tronix E1205 (capacity 50 MT). Validation renewal before February 2021. <p>Onsite audit:</p> <p>According to the Indonesian regulation, verification of weigh bridge conducted annually. Sighted the record of validation from Cooperation and Trading Agency of Asahan Regency as follows:</p> <ul style="list-style-type: none"> • Validation Letter No: 016/SKHP-MT/ASH.59/2021 dated 5 March 2021 for weighbridge Presica PSC 6801-S (capacity 50 MT) brand Presia. Validation renewal before March 2022. • Validation Letter No: 016/SKHP-MT/ASH.59/2020 dated 5 March 2021 for weighbridge Avery Weight Tronix E1205 (capacity 50 MT). Validation renewal before March 2022. <p><i>Note: due to pandemic, renewal license delayed one month.</i></p> | Complied |

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| <p>5.1.8</p> | <p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> | <p>Certificate holder did not have any engagement with independent smallholders. However, they have an agreement with smallholders named Create Share Value (CSV). Sighted the evidence of engagement with some independent smallholders as follows:</p> <ol style="list-style-type: none"> 1. Maju Bersama 2. Sari Gunung 3. Makmur Abadi 4. Bina Tani Mandiri 5. Sinar Tani Satu 6. Unggulan 7. Sejahtera 8. Sejahtera Sidomulyo Makmur 9. Mekar Jaya 10. Makmur Tani Jaya 11. Suka Maju 12. Berumbung Atas Makmur 13. Berkat Tani Jaya 14. Rezeki Makmur 15. Keluarga Tani 16. Sukses Jaya 17. Jaya Tani 18. Bukit Makmur 19. Subur 20. Tani Sejahtera 21. Buntu Pagar Sukses | <p>Complied</p> |
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| 5.1.9 | <p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> | <p>Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th, 2009: Employees complaints: submission and settlement Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that:</p> <p>"To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance.</p> <p>Onsite Audit:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no grievance such as land dispute, environmental pollution, social conflict or any other dispute between the company and communities surrounding their operational areas.</p> <p>Certificate holder did not have any engagement with independent smallholders. However, they have an agreement with smallholders named Create Share Value (CSV).</p> | Complied |
| Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains. | | | |
| 5.2.1 | <p>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> | <p>There is no scheme smallholder at PT. Saudara Sejati Luhur- PT Gunung Melayu, however based on document review and interview with the Head of Administration, Sustainability Staff and Humas, PT. Saudara Sejati Luhur has started a relationship with an independent smallholders under Farmer Groups "Kelompok Tani" named Create Share of Value (CSV) program for around the company several years ago. The CSV program is aimed at fostering independent smallholders in improving their economy by providing sustainable guidance and receiving FFB to be processes at the company mill. There is 21 Farmer Group "Kelompok Tani", 780</p> | Complied |

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| | | <p>smallholders and 3,201 Ha of area that has been registered at the CSV Program PT Gunung Melayu – PT Saudara Sejati Luhur.</p> <p>The partnership agreement has been verified, verified samples such as:</p> <ul style="list-style-type: none"> - Partnership Agreement No. 03/MA/CSV/VIII/2014 dated 29 August 2014 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Makmur Abadi (Batu Anam Village), consist of 26 head of families with an area of 269 Ha. - Partnership Agreement No. 05/SSM/CSV/VIII/2017 dated 10 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Sejahtera Sidomulyo Makmur (Sidomulyo Village), consist of 40 head of families with an area of 100 Ha. - Partnership Agreement No. 10/MJ/CSV/VIII/2017 dated 24 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Mekar Jaya (Sidomulyo Village), consist of 30 head of families with an area of 43 Ha. - Partnership Agreement No. 08/SM/CSV/VIII/2017 dated 14 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Suka Maju (Sidomulyo Village), consist of 25 head of families with an area of 50 Ha. - Partnership Agreement No. 08/SM/CSV/VIII/2017 dated 14 August 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Berumbun Atas Makmur (Teladan Village), consist of 11 head of families with an area of 75 Ha. - Partnership Agreement No. 63/TS/CSV/VIII/2018 dated 28 August 2018 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Tani Sejahter (Batu Anam Village), consist of 17 head of families with an area of 37.5 Ha. - Partnership Agreement No. 39/JT/CSV/XI/2017 dated 30 November 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and | |
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| | | <p>Kelompok Tani Jaya Tani (Buntu Maraja Village), consist of 10 head of families with an area of 310 Ha.</p> <ul style="list-style-type: none"> - Partnership Agreement No. 16/BTJ/CSV/IX/2017 dated 13 September 2017 between PT Gunung Melayu – PT Saudara Sejati Luhur and Kelompok Tani Berkat Tani Jaya (Gunung Berkat Village), consist of 38 head of families with an area of 552 Ha. <p>The CSV program and realization is available, such as:</p> <ul style="list-style-type: none"> - Owl cage “KBH” assistances in year 2020 (3 unit @ IDR 1,300,000) for independent smallholders at Gonting Malaha Village. - Heavy equipment assistances for road maintenance of independent smallholders at Gonting Malaha Village in year 2020 (motor grader 150 HM @ IDR 350,000, road hardening material 150 m3 @ IDR 420,000 m3, and vibratory roller 80 HM @ IDR 250,000/HM). - Coordination Meeting with the Farmer Group “ Kelompok Tani” in April 2021, IDR 3,000,000 - Owl cage “KBH” assistances in year 2021 for independent smallholders at Gonting Malaha Village in April 2021, IDR 6,500,000 - Heavy equipment assistances for road maintenance of independent smallholders (motor grader 150 HM @ IDR 350,000) in February, May and July 2021, IDR 9,573,968. | |
| 5.2.2 | <p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> | <p>PT Saudara Sejati Luhur – PT Gunung Melayu has develop and implement livelihood improvement programmes of independent smallholders in surrounding communities with Create Share of Value (CSV) program as mentioned in the indicator 5.2.1. The CSV program is aimed at fostering independent smallholders in improving their economy by providing sustainable guidance and receiving FFB to be processes at the company mill. There is 21 Farmer Group “Kelompok Tani”, 780 smallholders and 3,201 Ha of area that has been registered at the CSV Program PT Gunung Melayu – PT Saudara Sejati Luhur.</p> | Complied |

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| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. | <p>Gunung Melayu I POM supplied by own estates (Pulau Maria Estate), and independent smallholder from <i>Kelompok Tani</i> as third parties supplier. Based on document review of independent smallholder's data from <i>Kelompok Tani obtained</i> information that entire land has been granted by government (private land title/SHM/SKT/<i>Surat Keterangan Desa</i>).</p> <p>According to the signboard in mill's gate, Gunung Melayu I POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> • New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer. • FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties. • New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause. <p>The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note.</p> | Complied |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | <p>There is no scheme smallholder at PT. Saudara Sejati Luhur- PT. Gunung Melayu, however based on document review and interview with the Head of Administration, Sustainability Staff and Humas, PT. Saudara Sejati Luhur – PT Gunung Melayu has started a relationship with an independent smallholders under Farmer Groups "<i>Kelompok Tani</i>" named Create Share of Value (CSV) program for around the company several years ago. The CSV program is aimed at fostering independent smallholders in improving their economy by providing sustainable guidance and receiving FFB to be processes at the company mill.</p> | Complied |

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| | | <p>The company has provided a training program for improve independent smallholders for 2019. However, the training program for year 2020 and 2021 cannot be conducted and to be postponed until the condition normal and no outbreak of Covid-19. Verified sample for training program in 2019 such as:</p> <ul style="list-style-type: none"> - Integrated Pest Management (IPM) Training including Pesticides Handling on 9 July 2019, has attended by 25 persons. - Harvesting training on 20 May 2019, has attended by 35 persons. - Basic fire training on 6 August 2019, has attended by 25 persons. - Fertilization training on 12 February 2019, has attended by 17 persons. | |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | <p>There is no scheme smallholder at PT. Saudara Sejati Luhur- PT. Gunung Melayu, however based on document review and interview with the Head of Administration, Sustainability Staff and Humas, PT. Saudara Sejati Luhur – PT Gunung Melayu has started a relationship with an independent smallholders under Farmer Groups "Kelompok Tani" named Create Share of Value (CSV) program for around the company several years ago. The CSV program is aimed at fostering independent smallholders in improving their economy by providing sustainable guidance and receiving FFB to be processes at the company mill.</p> | Complied |
| <p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p> | | | |
| <p>Criteria 6.1: Any form of discrimination is prohibited.</p> | | | |
| 6.1.1 | <p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> | <p>Equal opportunity policy is stated in "Kebijakan Perusahaan", dated 1st December 2014 "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership,</p> | Complied |

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| | | <p>political affiliation and/or age.</p> <p>This policy has been informed to all employees and being placed into noticed board in public area and easily accessed.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM also has SOP about the new employment recruitment. According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Reqrutment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to the rights of local, migrant, or urban worker.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p> | |
| 6.1.2 | <p>(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.</p> | <p>According to the latest employee’s data as per July 2021. Those workers come from different gender, religion, originated area (local or outsiders) and races. Based on interview with labour representative (labour union, gender committee) and random workers that interviewed during field visit obtained information that there is no discrimination between them.</p> <p>Since the audit – August 2021, there was no migrant worker hired in estate or mill.</p> | Complied |
| 6.1.3 | <p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding</p> | Complied |

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| | | <p>"Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications.</p> <p>This procedure was communicated to all employees in the workplace and stakeholders as well on 15 February 2021.</p> <p>The procedure and its content already comply with applicable laws and regulation in Indonesia related workforce/employment.</p> <p>All procedure is available in Bahasa and has been communicated to all workers.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has conducted regular evaluation against all of employees, as one aspect considered for promotion and conducted talent test prior to promotion.</p> <p>There was no new recruitment process during this period. The last recruitment on behalf Hosea Mahendra Penggabean was on 6 August 2018. All the recruitment process documents has been verified by the auditor.</p> | |
| 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. | Based on interview with nurse and female workers, pregnancy testing is applicable for all female workers without discrimination. | Complied |
| 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 gender committee in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Based on interview with Ibu Sutiyanı as a Board of Gender Committee Pulau Maria Estate obtain information that they actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Other information gathered during the interview was:</p> <ul style="list-style-type: none"> • There is no issue regarding the gender, discrimination and/or sexual harassment in period 2019, 2020 and 2021 at Mills and Estates. | Complied |

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| | | <ul style="list-style-type: none"> • Gender Committee has understood regarding the grievance mechanism as well as the protection of the identity of the complainants/whistle-blower. • The company has implemented the sexual harassment policy. • Unit of Certification has provided pregnancy test to spraying workers and fertilization workers every month. • Due to pandemic Covid-19, some gender committee activities in 2020 and 2021 has been postponed until the situation returns to normal. <p>Based on interview with management representatives, the company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test July 2021.</p> | |
| 6.1.6 | There is evidence of equal pay for the same work scope. | <p>Equal Opportunity policy is written in Bahasa Indonesia, so that all employees can understand as stated in "Kebijakan Perusahaan", dated 01st December 2014 "Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>Based on the interview with the women workers (pesticide applicator and IPM census) obtain information there is no difference of the payments between the men or women workers. All are equal. Those information are aligned with the payroll document when the minimum wage are applied to all workers.</p> | Complied |
| <p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p> | | | |

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| 6.2.1 | <p>(C) 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.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Employment on 4 July 2018.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of North Sumatera) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>The Collective Labor Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who cannot read the writing can understood.</p> | Complied |
| 6.2.2 | <p>(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.</p> | <p>The Collective Labor Agreement (PKB) and the daily labour contract of the wage was presented in Bahasa Indonesia.</p> <p>Collective Labour Agreement are contain the detail of working condition among others: responsibility each parties, recognition of company and trade union rights, work relationship, workers admission and requirement, job placement and transfer, working days and working hour, overtime,</p> | Complied |

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| | | <p>weekly rest and official holidays, annual leave, menstruation leave pregnancy and pregnancy loss, prevention of sexual harassment, permission to leave work of worship and permission of illness, wage component and wage system, wage increase, holiday allowance (THR), care and medication, occupational safety and health, work equipment, education, sports & entertainment facilities, school children's facilities, work rules, etc.</p> | |
| <p>6.2.3</p> | <p>(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> | <p>The Collective Labor Agreement (PKB) document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT SSL - Gunung Melayu Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>Sighted the employment contract that has explained the period of agreement, wages and payment (IDR. 120,800 per day in accordance with the Governor's Decree on Wages in 2020), allowances (holidays and others), attachments related to disgraceful acts/actions; which explains</p> | <p>Complied</p> |

| | | related to discrimination, child labor, workers' code of ethics, no sexual harassment and coercion or force labor. | | | | | | | |
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| 6.2.4 | (C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. | During onsite visit to workers compound at Pulau Maria Estate and Gunung Melayu I POM, all workers facilities was provided by the company free. | Complied | | | | | | |
| 6.2.5 | The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. | During interview with sample of workers at Pulau Maria Estate and Gunung Melayu I POM, they stated that company provide vehicle for shopping once a week, to buy affordable food. Because this Estates located far from traditional market or shopping area. | Complied | | | | | | |
| 6.2.6 | A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: “Kenaikan Upah Pekerja Golongan SKUB” and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers).</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also demonstrated the slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has calculations the DLW, based on the wages given to employees as costs.</p> <p>Following is DLW Calculation:</p> <table border="1" data-bbox="1093 1257 1948 1310"> <thead> <tr> <th>No.</th> <th>In Kind Benefits</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | No. | In Kind Benefits | Total | | | | Complied |
| No. | In Kind Benefits | Total | | | | | | | |
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| | | 1. | Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months | 255,430 |
| | | 2. | Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months | 248,717 |
| | | 3. | Education [(Total cost not including teacher and non teacher labour cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months | 68,129 |
| | | 4. | Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers | 13,027 |
| | | 5. | Helathcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of helathcare workers) ÷ Number of workers | 407 |
| | | 6. | Food | 54,801 |
| | | 7. | Sport & Recreation Facilities | 3,432 |
| | | | Total Cost of In Kind Benefits | 643,943 |
| | | | Average Monthly Take Home Salary per Worker | 2,693,286 |
| | | | Total Value of Prevailing Wage | 3,337,229 |

PROCEDURAL NOTE:

The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.

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| <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p> | | | |
| 6.2.7 | Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal | According to interview sample of workers, they informed that employee status is casual workers or "Pekerja Harian Lepas". Sample of Casual Worker Agreement or "Perjanjian Kerja Harian Lepas". | Complied |
| <p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |
| 6.3.1 | (C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented. | Freedom of association policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1 st December 2014 " <i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i> ". This policy has been informed to all employees and being placed into public area easily accessed. | Complied |
| 6.3.2 | Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request. | Based on interview with chairman of labour union obtained information that there is no discrimination, pressure, or any form of negative treatment for the board of labour union. The member of labour union is freely elected. | Complied |
| 6.3.3 | Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. | Based on interview with chairman of labour union obtained information that there is no interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers. | Complied |

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| | | Based on the labour union statutes, the right to become a member of a labour union is a permanent employee. Each member has voting rights (right to be elected and to vote). | |
| Criteria 6.4: Children are not employed or exploited. | | | |
| 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. | PT Saudara Sejati Luhur – Gunung Melayu I POM established the Policy, was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years. Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017). | Complied |
| 6.4.2 | (C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available. | PT Saudara Sejati Luhur – Gunung Melayu I POM established the Policy, was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years. Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017). | Complied |
| 6.4.3 | (C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. | Based on interview with chairman of labour union obtained information that the minimum age of workers has been socialized to the respective workers in all level. According to the list of workers period June 2021, there is no underage employee found. | Complied |

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| | | Based on interview with worker and document verification, there is no indication on forced labour and/or trafficked labour. | |
| 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. | PT Saudara Sejati Luhur – Gunung Melayu I POM established the Policy, was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years. | Complied |
| Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected. | | | |
| 6.5.1 | (C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce. | PT Saudara Sejati Luhur – Gunung Melayu I POM has implemented policy on prevention of sexual harassment and violence, the policy is prominently displayed on notice boards at the Mill and Estates muster areas. Based on interviews of female workers and union representatives confirmed that the company implemented the sexual harassment policy. (which is the latest circular letter to complement previous circulars). The policy has disseminated to all employees. | Complied |
| 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. | A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women PT Saudara Sejati Luhur – Gunung Melayu I POM has established the company policy dated 1 st December 2015 related to A policy to protect the reproductive rights of all, especially of women. The policy stated that "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights". There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. | Complied |

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| | | Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test in July 2021 | |
| 6.5.3 | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia. | <p>The unit of certification has implemented policy to give special time to female workers who are breastfeeding their children. According to the circular letter from the Group Manager on 7 March 2020, all the new mother has given permission to one hour-breastfeeding time in daycare or clinic within their working hour (refer to the meeting agreement between unit management with gender committee and labor union). All the new mother has been acknowledge this policy on 5 May 2020.</p> <p>Based on interview with female worker from fertilizer application and spraying gang, states there is monthly check and monitoring on pregnancy and breastfeeding status. Until this audit, there was 7 new mother existed.</p> | Complied |
| 6.5.4 | A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared “Mekanisme Jaminan Pelapor dan Pengungkapan Kasus” prepared by Public Relation officer PT. Gunung Melayu on 01/12/2015. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested.</p> <p>“Mekanisme Penanganan Keluhan” – complaint handling mechanism (No. SOP-AA-GL-5005- R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (No. SOP-AAHR-3008-R0 05).</p> <p>These mechanisms have been communicated to external parties and disseminated to all employees.</p> | Complied |

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| | | Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company. | |
| Criteria 6.6: No forms of forced or trafficked labour are used. | | | |
| 6.6.1 | <p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • 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 wages | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has had employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009. Based on those procedure, there is no specific request to bonding the employee (especially the new employee).</p> <p>Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages | Complied |
| 6.6.2 | <p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009 and the Memorandum No. 085/EXT-PGM/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Saudara Sejati Luhur – Gunung Melayu I POM; where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators) are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.</p> | Complied |

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| | | Based on document verification on latest employee data documents in June 2021 and estate/mill staff explanation obtained information each unit had 97 PKWT's workers. According to the staff explanation, they will be promoted to be permanent worker according to the company policies. | |
| Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health. | | | |
| 6.7.1 | (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>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the Standard Operating Procedure on personal protective equipment No. AA-SOP-OP-101.3-R0 dated 14/08/2013.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has registered OHS Committee as presented in document of "Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Uatra UP Pengawasan Ketenagakerjaan Wilayah IV Nomor KEP.108/P2K3/DTK/V/2019 tentang Pengesahaan Panitia Pembina Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan dated 13th May 2019.</p> <p>Report of P2K3 in Pulau Maria Estate was sent to Dinas Tenaga Kerja Asahan Regency for period April – June 2021.</p> <p>Record of monthly meeting (P2K3), sample seen: MoM on 15 May 2021, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report.</p> <p>OHS training has been programmed and provided appear balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally by safety officer in charge at mill and estate, the training record and program related to OHS were sighted and verified during this audit, e.g.: licenses for boiler operator, operator of generator set, heavy equipment operator, pesticide training for sprayers</p> | Complied |
| 6.7.2 | Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> – Nomor AA-KL-11-EFP tentang Penangnan Tumpahan di Laboratorium | Non-compliance |

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| | <p>aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> | <ul style="list-style-type: none"> - Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan - Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 - Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya - Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor - Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also prepared the procedure on work accident under "Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018.</p> <p>Those procedures have socialized and available in notice board in site, during interviewed with workers, it was seen that they understood. Emergency call phone also is available in all site operation.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has assigned the first aider namely Retno Satika license No. 17/P3K/2016.</p> <p>List of Attendance on refresh training of first aid dated 14th January 2020, was attended by 36 workers.</p> <p>During field visit in Pulau Maria Estate, Auditor team found the first aid equipment was not complete available at sampled worksites, e.g.: in harvesting activities (Block J03D), in fertilizer warehouse and workshop. This is raised as Minor Noncompliance.</p> | |
| 6.7.3 | <p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has demonstrated the record of realization the OHS program 2021 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting, such as:</p> | <p>Non-compliance</p> |

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| | <p>workers can change out of PPE, wash and put on their personal clothing.</p> | <ul style="list-style-type: none"> - Monitoring of emergency response and preparedness facilities, i.e: fire hydrant and fire extinguisher, updated in March 2021, location in Gunung Melayu I POM. - Refreshment of socialization the company’s policies, conducted in 6th January 2021 – location in Pulau Maria Estate was attended by 34 workers - Report of OHS inspection report, location in Gunung Melayu I POM dated 14^d January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant) - Record of handover of PPE, location in Pulau Maria estate dated 18th April 2021; PPE: helmet, safety glasses. - “Checklist on monitoring of PPE use for harvester in Pulau Maria Estate dated 17th January 2021. Reported Ok for safety helmet, AP boot, safety glasses, chisel cover. <p>During field visit, the auditor team found:</p> <ul style="list-style-type: none"> a. Gunung Melayu I POM - Rotary motors were not provided with safety cover, e.g: water pump in IPAL area and rotary motor in near Polishing Drum Mill Station b. Pulau Maria Estate - TUS does not change PPE, wash, and put personal clothes in sanitation facilities for those who use pesticides. c. Warehouse PPE (Apron) for welding workers is not available d. Found two pesticide applicators were not using appropriate PPE (apron and mask). <p>This is raised as critical noncompliance.</p> | |
| <p>6.7.4</p> | <p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision</p> | <p>Complied</p> |

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| | the unit of certification if applicable regulations do not provide protection. | of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools. PT Saudara Sejati Luhur – Gunung Melayu I POM has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators. | |
| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics. | PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury. The monitoring carried out on monthly basis and results have discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly by safety officer. In 2021 - the occupational injuries reported 0 cases. There is no lost time injuries. Near Miss reported 4 cases. | Complied |
| Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources. | | | |
| Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques. | | | |
| 7.1.1 | (C) IPM plans are implemented and monitored to ensure effective pest control. | According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implement integrated pest management. According to the interview with field staff from Pulau Maria Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows: <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of <i>Ganoderma</i> annually. • Census rat infestation by recap the record of sortation in loading ramp. | Complied |

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| | | <ul style="list-style-type: none"> Census of Barn Owl Box occupation in three monthly bases. <p>The last census in Pulau Maria Estate has been conducted in second week of June 2020. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p> <p>Onsite Audit:</p> <p>During the field visit Pulau Maria Estate Block J02C, J02F, J03D and J03C Afdeling 2 obtained information that there is no eat leaf caterpillar outbreak. However, there is some big issues related to basal stem root disease caused by <i>Ganoderma boninense</i> with a serious infection. Based on estate manager’s explanation, the infection rate in some block are now above the economical threshold (reducing huge population per hectare and reducing potential production under 14 tonnes/hectare/year.</p> <p>Based on that conclusion, top management through the Research and Development Department has planned to conducted replanting in those blocks. However, there is no official decision from the top management related on these cases.</p> | |
| 7.1.2 | 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 company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php . | Complied |
| 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. | Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control. | Complied |
| Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | |
| 7.2.1 | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. | PT Saudara Sejati Luhur – Gunung Melayu Group has had the procedure related to pesticide usage for chemical weeding and pest control (if needed). The recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed | Complied |

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control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).

Onsite Audit:

Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: *Pengendalian Gulma* (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).

During the audit, found some pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and dimetil amina. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.

According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php. The type of pesticide use by management unit during January 2020 – February 2021 and its weeds target are as follow:

| Agrochemical | Active ingredients | Register No. | Target |
|---------------|---------------------------------------|---|--------|
| Kenlon 480 EC | Trikolopir Bitoksi Etil Ester 480 g/l | RI.01030120062 433 Valid until 31 Dec 2021 | Wood |

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| | | Elang 480 SL | Isopropil Amina Glifosat 480 g/l | RI.01030119941 170 Valid until 21 Dec 2021 | Narrow leaf weed, <i>Asystasia Imperata cylindrical</i> |
| | | Kenrane 288 EC | Floroksipir 1-MHE: 288 g/l | RI.01010120103 759 Valid until 20 Dec 2020 | Legume, <i>Asystasia</i> |
| | | Basta 150 SL | Amonium Glufosinat 150 g/l | RI.01030119921 113 Valid until 22 Jan 2024 | Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus</i> , <i>Imperata cylindrical</i> , <i>Ischaemum timorense</i> , <i>Ottochloa nodosa</i> , <i>Setaria palmifolia</i>). |
| | | Karmex 80 WP | Diuron 80% | RI.01030120113 958 | broadleaf weeds (<i>Borreria latifolia</i> , <i>Asystasia intrusa</i> , <i>Clidemia hirta</i> , <i>Mikania micrantha</i>) and narrow leaf weeds (<i>Imperata cylindrical</i> , <i>Cyperus rotundus</i> , <i>Cyclosorus aridus</i>) |
| | | Metaprima | Metil melsulfuron | RI.01030120031 897 Valid until 03 September 2023 | Broadleaf weeds, <i>Ageratum conyzoides</i> , <i>Calopogonium mucunoides</i> , <i>Clidemia hirta</i> , <i>Synedrella nodiflora</i> . |
| | | Rolidor 25EC | Lamda sihalotrin | RI.01010120031 921 Valid until 03 September 2023 | Spodoptera litura |

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| | | <table border="1"> <tr> <td>Nordox 86WG</td> <td>Copper oxide</td> <td>RI. 0102011995118 8 Valid until 11 May 2021</td> <td>Leaf disease</td> </tr> <tr> <td>Gulmaron 80WP</td> <td>Diuron 80%</td> <td>RI. 0103011998141 3 Valid until 2 May 2022</td> <td>Broadleaf weeds, <i>Synedrella nodiflora</i>, <i>Eleusine indica</i></td> </tr> </table> | Nordox 86WG | Copper oxide | RI. 0102011995118 8 Valid until 11 May 2021 | Leaf disease | Gulmaron 80WP | Diuron 80% | RI. 0103011998141 3 Valid until 2 May 2022 | Broadleaf weeds, <i>Synedrella nodiflora</i> , <i>Eleusine indica</i> | |
| Nordox 86WG | Copper oxide | RI. 0102011995118 8 Valid until 11 May 2021 | Leaf disease | | | | | | | | |
| Gulmaron 80WP | Diuron 80% | RI. 0103011998141 3 Valid until 2 May 2022 | Broadleaf weeds, <i>Synedrella nodiflora</i> , <i>Eleusine indica</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 provided. | Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Pulau Maria Estate has calculated the LD50 of each pesticide in a monthly bases. | Complied | | | | | | | | |
| 7.2.3 | (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. | Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage. | Complied | | | | | | | | |
| 7.2.4 | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. | There was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri's Research and Development guidelines. | Complied | | | | | | | | |
| 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 to be 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: | Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019. There is no use of other pesticide class 1A and 1B until this assessment. | Complied | | | | | | | | |

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| | 7.2.5a Judgment of the threat and verify why this is a major threat. | | |
| | 7.2.5b Why there is no other alternative which can be used. | <p>According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p> | |
| | 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. | <p>Certificate holder through Asian Agri’s Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).</p> | |
| | 7.2.5d Process to limit the negative impacts of the application. | <p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. | |

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| | <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> | <p>Certificate holder did not use pesticide to eradicate pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Its rotation can be reduced in line with the palm ages.</p> | |
| <p>7.2.6</p> | <p>(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 conduct.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has assign chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review obtained information that the company has conducted pesticide handling training on 12 February 2021. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask, and hand gloves.</p> <p>PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> | <p>Complied</p> |
| <p>7.2.7</p> | <p>(C) Storage of all pesticides in accordance with recognized best practices.</p> | <p>SOP for pesticide storage has been provided in SOP "<i>Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP</i>" dated 1 February 2008.</p> | <p>Complied</p> |

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| | | <p>Pesticides are stored in the determined area separated from fertilizer and other chemicals. Pesticides storage is provided in Divisions as well as in central storage. Agrochemicals storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides are provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill is managed. Secondary containment is provided around the pesticides storage area. Spill kit is also provided in the area.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "<i>Penanganan Limbah Industri B-3 AA-KL-06-EFP</i>" dated 1 November 2008. The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected. The storage has obtained the license as per "<i>Keputusan Kepala Badan Penanaman Modal dan Pelayanan Perizinan Terpadu Kabupaten pelalawan Nomor: KPTS.503/DPMPTSP/1427/XI/2017 Tentang Izin pengelolaan Limbah Bahan Berbahaya dan Beracun (B3) Untuk Kegiatan Penyimpanan Sementara Limbah B3 kepada PT Saudara Sejati Luhur</i>" dated 22 November 2017 valid until 22 November 2022 (5 years). Storage keeper maintains the balance of incoming and outgoing hazardous waste. Hazardous wastes were sent to licensed contractor PT Indostar Cargo and PT. Hazmat Techno Indonesia for appropriate disposal.</p> | |
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| <p>7.2.8</p> | <p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> | <p>Pesticides are always applied in accordance with the product label and storage instruction.</p> <p>Agro chemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity.</p> <p>PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit to the Pesticides Storage in Pulau Maria Estate found that:</p> <ul style="list-style-type: none"> • Permanent Buildings, • A good ventilation, • Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", • Eye wash shower, first aid box, PPE and Fire extinguisher are provided. • PPE room • Operation control: MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available • A package management/ used pesticide package is available | <p>Complied</p> |
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| | | <ul style="list-style-type: none"> • Water wash of pesticides containers collected in "spillage trap" • The flow of wastewater is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products have been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts).</p> | |
| 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. | Up to onsite audit – 2021, there is no aerial application of pesticide throughout the company plantation and scheme smallholders | Complied |
| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | <p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer.</p> <p>The latest medical check-up performed year 2020 – location in at company medical healthcare attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to related workers.</p> <p>Due to Covid19 pandemic, the medical check up for 2021 has been postponed based on Circular Letter from Manpower Ministry of Republic of Indonesia No M/7/AS.02.02/V/2020. Especially for cholinesterase and spirometry test.</p> | Complied |
| 7.2.11 | (C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> | Complied |

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| | | The last of pregnancy test conducted on June and July 2021 All the female sprayer in well condition and not being pregnant nor breast feeding. | |
| <p>Note For 7.2.11</p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p> | | | |
| <p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p> | | | |
| 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. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a procedure to handle hazardous waste titled "<i>Prosedur Penanganan Limbah B3</i>" nomor: AA-KL-06-EFP dated 1 November 2008 explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (<i>Evaluasi Aspek-Dampak Lingkungan</i>) year 2020. The document covered all operation in mill, estate</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM and Pulau Maria Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>The temporary hazardous waste storage has permit according to "<i>Keputusan Bupati Asahan Nomor 503/LB3/DPMPPTSP/1427/XI/2017 tanggal 22 November 2017 tentang Pemberian Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT Saudara Sejati Luhur</i>", permit valid for 5 years and PT Saudara Sejati Luhur has permit to store the hazardous waste for 180 days because of producing hazardous waste less than 50 kg/day.</p> <p>The hazardous waste with storage time 180 days: used battery, waste from laboratory containing hazardous waste, uncodified solvent, waste contaminated with hazardous waste, sulfic acid, other acid waste, used</p> | Complied |

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| | | <p>refrigerant, clinical waste with infectious characteristic, expired medicine, expired agrochemical, laboratory equipment contaminated with hazardous waste, medical equipment with heavy metal. Hazardous waste type with storage time 365 days: lead scrub, ex-hazardous waste packing, used lubricant, resin waste or ion exchanger, used filter, used rags. Temporary hazardous waste storage has been equipped with fire extinguisher, emergency shower and emergency eyewash, alarm, spill kit. The building also built with floor bund and sufficient ventilation.</p> | |
| 7.3.2 | <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> | <p>Waste material dispose according to company procedure. Below are the procedure to disposal of waste material:</p> <ul style="list-style-type: none"> - "SOP Penanganan Sampah Industri Non B3 AA-KL-05-EFP" dated 1 February 2008. The procedure stipulated the disposal of waste material non hazardous waste, covering: Ex chemical non hazardous waste, ex fertilizer sack, ex equipment, ex praepart, scrap, used polybag, used hose, empty bunch, fibre, shell, solid, ash. - "SOP Penanganan Limbah Bahan Berbahaya dan Beracun (Limbah B3) AA-KL-06-EFP, dated 22 April 2016. The procedure stipulated the hazardous waste handling according to national regulation and best practises. - "SOP Penanganan Limbah Medis AA-KL-07-EFP" dated 5 April 2017. Procedure stipulated the medical waste handling, treat as hazardous waste. - "SOP Penanganan Limbah Laboratorium AA-KL-11-EFP" dated 15 November 2008. Procedure stipulated the handling of waste generated from mill laboratory, mostly treated as hazardous waste. <p>Waste material dispose according to company procedure. Solid waste from Gunung Melayu I POM such as: Fiber and Shell are used as Boiler fuel, while liquid waste water are use as Land Application to the estate (as organic fertilizer).</p> | <p>Non-compliance</p> |

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| | | <p>Hazardous waste handling by deliver to Temporary Hazardous Waste Storage (TPS LB3) of Gunung Melayu I POM.</p> <p>For Year 2020 and 2021, hazardous waste was transported by authorized transporter PT Indostar Cargo and PT. Hazmat Techno Indonesia.</p> <p>Manifest LB3 document for 2020 and 2021 has available during audit, verified samples such as:</p> <ul style="list-style-type: none"> - Manifest LB3, transporter PT. Indostar Cargo, on 18 November 2020, used oil, qty 1.05 Ton, Truck No. BK 9887 EK. - Manifest LB3, transporter PT. Indostar Cargo, on 18 November 2020, used oil filter, qty 0.24 Ton, Truck No. BK 9887 EK. - Manifest LB3, transporter PT. Indostar Cargo, on 18 November 2020, used battery, qty 0.09 Ton, Truck No. BK 9887 EK. - Manifest LB3, transporter PT. Indostar Cargo, on 18 November 2020, used oil, chemical containers, 0.37 Ton, Truck No. BK 9887 EK. - Manifest No. KLHK-1623452874, transporter PT. Hazmat Techno Indonesia, on 20 May 2021, chemical containers, qty 0.3 Ton, Truck No. BK 8107 BN. - Manifest No. KLHK-1623453175, transporter PT. Hazmat Techno Indonesia, on 20 May 2021, used battery, qty 0.27 Ton, Truck No. BK 8107 BN. - Manifest No. KLHK-1623455997, transporter PT. Hazmat Techno Indonesia, on 20 May 2021, used lamp and electronic waste, qty 0.0068 Ton, Truck No. BK 8107 BN. - Manifest No. KLHK-1624011307, transporter PT. Hazmat Techno Indonesia, on 20 May 2021, medical waste, qty 0.0037 Ton, Truck No. BK 8107 BN. - Manifest No. KLHK-1623455997, transporter PT. Hazmat Techno Indonesia, on 20 May 2021, used rags, qty 0.084 Ton, Truck No. BK 8107 BN. | |
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| | | <p>- Manifest No. KLHK-1624806630, transporter PT. Hazmat Techno Indonesia, on 20 May 2021, used oil, qty 0.5508 Ton, Truck No. BK 8107 BN.</p> <p>Domestic waste (an organic waste) generated from emplacement (workers housing) has been disposed to the landfill. However, during field verification at housing Division I revealed that domestic waste has not been managed properly.</p> <p>Based on field visit at Housing Division I - Pulau Maria Estate, it was found that domestic waste has not been managed properly, domestic waste is seen piling up behind the housing areas, furthermore it also was found 2 (two) cans of used oil behind the housing areas, this is not in accordance with SOP AA-KL-05-EFP rev.2 dated 1 February 2008 "Penanganan Sampah Industri Non-B3" and SOP AA-KL-06-EFP rev.8 dated 1 June 2021 "Penanganan Limbah B3". This is raised as Minor Noncompliance.</p> | |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM and supply bases are not use open fire for waste disposal. As described above and as mentioned in the SOP, all waste generated from all activity at plantation and mill categorized as : organic waste (solid & liquid), an organic waste, medical waste, laboratory waste, hazardous waste. However, during field verification at housing Division I revealed that domestic waste has not been managed properly.</p> <p>Based on field visit at Housing Division 1, it was found that domestic waste has not been managed properly, domestic waste is still piled behind the house and observed traces of waste burning. This is raised as Minor Noncompliance.</p> | Non-compliance |
| Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. | | | |
| 7.4.1 | Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented. | Pulau Maria Estate has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and | Complied |

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| | | <p>Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>Based on interview with plasma manager obtain information that the fertilizer recommendation set by Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p> | |
| 7.4.2 | <p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> | <p>According to the Asian Agri's agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> • The last soil sampling conducted on November 2018. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on July 2020. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). <p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department.</p> <p>Onsite Audit:</p> <p>During the document verification, obtained information that the foliar analysis (leaf sampling unit) has been updated. Sighted the document of Foliar Analysis Report by Nusa Kencana Pusaka on April 2020 with the same parameter tested as above.</p> | Complied |
| 7.4.3 | <p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> | <p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha in Pulau Maria Estate.</p> <p>Onsite Audit:</p> | Complied |

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| | | <p>During the field visit, auditor has observed the implementation of nutrient recycling strategy such as POME application in Block J02C Afdeling 2. The POME applied with dosage 183 m3/Ha/year.</p> <p>In addition, management unit also applied empty fruit bunch application with dosage 250 kg/palm/year. For example, auditor has observed the EFB application in block J03C Afdeling 2.</p> | |
| 7.4.4 | Records of fertilizer inputs are maintained. | Record of fertilizer application in estate are in places. For example, there is a record of NPK 12:12:17:2 with dosage 2.5 kg/palm in fertilizer supervisor daily report. | Complied |
| Criteria 7.5: Practices minimise and control erosion and degradation of soils. | | | |
| 7.5.1 | (C) Maps that identify marginal and fragile soils, including steep sloped land are available. | <p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p> <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p> | Complied |
| 7.5.2 | The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. | Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in Block J02C Afdeling 2. | Complied |
| 7.5.3 | New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. | Onsite The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. | Complied |
| Criteria 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. | | | |

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| 7.6.1 | (C) 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. | The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. | Complied |
| 7.6.2 | Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. | Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. | Complied |
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. | Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. | Complied |
| Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. | | | |
| 7.7.1 | (C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. | The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. | Complied |

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| 7.7.2 | Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). | The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. | Complied |
| PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below). | | | |
| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised. | Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . This indicator is not applicable. | Complied |
| 7.7.4 | (C) Availability of implementation evidence of the water and land cover management program. | Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . This indicator is not applicable. | Complied |
| 7.7.5 | (C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation. | Based on soil map and analysis, there is no peat soil in PT Saudara Sejati Luhur – Pulau Maria Estate. The map indicated the predominant soil type consist of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . This indicator is not applicable. | Complied |

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| <p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p> | | | |
| 7.7.6 | <p>(C) 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).</p> | <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. There is no peat existence.</p> | Complied |
| 7.7.7 | <p>(C) All peat areas not planted and reserved in managed areas (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 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.</p> | <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate. There is no peat existence.</p> | Complied |
| <p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p> | | | |
| 7.8.1 | <p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has implemented water management plan based on related regulations. The management including the rainfall monitoring and all water usage, such as: water supply intake, water usage for consumption, mill process and total effluent. Waste and pollution sources have identified and documented in Pulau Maria Estate. The identification of waste and pollution including used</p> | Complied |

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| | | <p>lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was documented in "<i>Evaluasi Aspek Dampak Lingkungan</i>" EMS-431-003-LT issued 7th January 2020.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the document on protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones as in document "<i>Praktek-praktek Mempertahankan Kualitas dan Ketersediaan Air Permukaan dan Air Tanah</i>" – Water Sustainable".</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also developed a procedure to maintain soil fertility and water quality as stated in SOP for maintaining riparian zone is under SOP AA-APM-OP-1100.05. R1 "<i>Konservasi Tanah dan Air</i>"; it is stated that at during land clearing area along the river shall be conserved.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has continuous terrace for hilly land, individual terrace for wave land, and drainage to collect rainwater. based on document review "<i>Penanaman Sempadan</i>" and field visit to riparian zones, company have enriched the vegetation with vetiver grass, Albizia tree, bamboo tree along the riparian area.</p> <p>Monitoring of water quality performed each semester by PT Saudara Sejati Luhur – Pulau Maria Estate including waste water generated from housing area and workshop. Water and waste water analyzed by accredited laboratory "UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau". Sample seen on Clean Water analysis (Ground Water) at housing Pulau Maria Estate dated 11 January 2021, analysis result shown that all parameter analyzed are met with the standard regulation.</p> <p>Surface water quality test (Karmila River) by "UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau" on 22</p> | |
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| | | <p>July 2020 shown the result is comply with Government Regulation of Republic Indonesia PP No. 82/2001.</p> <p>PT Saudara Sejati Luhur are not restrict access to clean water or contribute to pollution of water used by communities.</p> | |
| | <p>7.8.1b Workers have adequate access to clean water.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has implemented water management plan based on related regulations. The management including the rainfall monitoring and all water usage, such as: water supply intake, water usage for consumption, mill process and total effluent.</p> <p>Waste and pollution sources have identified and documented in Pulau Maria Estate. The identification of waste and pollution including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was documented in "<i>Evaluasi Aspek Dampak Lingkungan</i>" EMS-431-003-LT issued 7th January 2020.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the document on protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones as in document "<i>Praktek-praktek Mempertahankan Kualitas dan Ketersediaan Air Permukaan dan Air Tanah</i>" – Water Sustainable".</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also developed a procedure to maintain soil fertility and water quality as stated in SOP for maintaining riparian zone is under SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air", it is stated that at during land clearing area along the river shall be conserved.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has continuous terrace for hilly land, individual terrace for wave land, and drainage to collect rain water. based on document review "Penanaman Sempadan" and field visit</p> | |

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| | | <p>to riparian zones, company have enriched the vegetation with vertiver grass, Albizia tree, bamboo tree along the riparian area.</p> <p>Company provide the clean water for workers at housing area with ground water (drill well) at Pulau Maria Estate and clean water from Mill water treatment for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau". Sample seen on Clean Water analysis (Ground Water) at housing Pulau Maria Estate dated 11 January 2021, Report of analysis result shown that all parameter analyzed are met with the standard regulation PermenKes No. 492/MENKES/PER/IX/2010.</p> <p>During interview with sampled workers (harvester, spraying workers, mill workers and office workers) confirmed that they got clean water freely which provide by Estate and Mill.</p> | |
| 7.8.2 | <p>(C) Water courses and wetlands are protected, including 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>PT Saudara Sejati Luhur – Gunung Melayu I POM and Estate has establish the procedure "<i>Pengelolaan Riparian</i> AA-APM-OP-1100.21-R2 dated 7 December 2015. The procedure defined the criteria of riparian area, lake, spring water and protected area. Each river determined the riparian zone 50 m on the left and right side the river with wide < 12m and 100 m for the river which wide >12 m. All riparian zone was sign by boundary poles and signboard. Riparian restoration performed in the critical/degraded area to enhance and rehabilitate the ecosystem. When the replanting activity performed, it was prohibited to conducted land preparation/clearing in riparian area. During field visit at Karmila and Pamerahan river it can be demonstrated that in the riparian area there is no replanting activity. Protection of riparian areas also performed with no chemical crops care activities both fertilizer and herbicide spraying.</p> | Complied |
| 7.8.3 | <p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has a work instruction for management of POME pond, under "Instruksi Kerja Pengoperasian Kolam Limbah".</p> | Complied |

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Mill effluent has processed in wastes water processing installation and discharge to the land application.

The permit to discharge the wastewater to plantation (land application) according to "Keputusan Bupati Asahan Nomor 503/LA/DPMPPTSP/0041/XI/2020 tentang Izin Pemanfaatan Air Limbah ke Tanah untuk Aplikasi pada Tanah PT Saudara Sejati Luhur" dated 18 November 2020 valid for 5 (five) years.

Monitoring of effluent especially BOD (Biochemical Oxygen Demand) performed each month by accredited laboratory by Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan. Based on the test results of BOD parameters are still below the quality standard in accordance PERMEN-LH No.KEP-51/MENLH/10/1995, (5,000 mg/liters).

Data seen:

2020

| Month | BOD (mg/l) – standard of quality 5,000 | pH – standard of quality 6-9 |
|----------|--|------------------------------|
| January | 3,880 | 7.32 |
| February | 4,100 | 7.34 |
| March | 4,230 | 7.61 |
| April | 4,215 | 7.54 |
| May | 4,160 | 7.23 |
| June | 4,230 | 6.98 |
| July | 4,379 | 6.98 |
| August | 4,735 | 6.89 |

| | | <table border="1"> <tr> <td>September</td> <td>4,897</td> <td>6.62</td> </tr> <tr> <td>October</td> <td>4,792</td> <td>6.72</td> </tr> <tr> <td>November</td> <td>4,921</td> <td>6.59</td> </tr> <tr> <td>December</td> <td>4,361</td> <td>6.83</td> </tr> </table> <p>2021</p> <table border="1"> <thead> <tr> <th>Month</th> <th>BOD (mg/l) – standard of quality 5,000</th> <th>pH – standard of quality 6-9</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>4,800</td> <td>7.47</td> </tr> <tr> <td>February</td> <td>4,539</td> <td>6.74</td> </tr> <tr> <td>March</td> <td>4,281</td> <td>7.95</td> </tr> <tr> <td>April</td> <td>4,253</td> <td>6.95</td> </tr> <tr> <td>May</td> <td>4,352</td> <td>6.45</td> </tr> </tbody> </table> | September | 4,897 | 6.62 | October | 4,792 | 6.72 | November | 4,921 | 6.59 | December | 4,361 | 6.83 | Month | BOD (mg/l) – standard of quality 5,000 | pH – standard of quality 6-9 | January | 4,800 | 7.47 | February | 4,539 | 6.74 | March | 4,281 | 7.95 | April | 4,253 | 6.95 | May | 4,352 | 6.45 | |
|---|--|---|-----------|-------|------|---------|-------|------|----------|-------|------|----------|-------|------|-------|--|------------------------------|---------|-------|------|----------|-------|------|-------|-------|------|-------|-------|------|-----|-------|------|--|
| September | 4,897 | 6.62 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| October | 4,792 | 6.72 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| November | 4,921 | 6.59 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| December | 4,361 | 6.83 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | BOD (mg/l) – standard of quality 5,000 | pH – standard of quality 6-9 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | 4,800 | 7.47 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| March | 4,281 | 7.95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 4,253 | 6.95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 4,352 | 6.45 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. | PT Saudara Sejati Luhur – Gunung Melayu I POM has recorded the mill water use per tonne FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under “Mill Operation Summary” year 2020-2021. Based on document review, water use per ton FFB is still within the budget of 0.98 m3/ton FFB. | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.9.1 | Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented | PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under “Rencana Manajemen Lingkungan” year 2020 - | Complied | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>2021. In point 2 stated to improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels.</p> <p>Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>The source of energy was identified e.g.: water, gasoline, fuels, kerosene and electrical.</p> | |
| <p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p> | | | |
| 7.10.1 | <p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM OM has identified the emission sources and pollution under document of “Enviromental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020”.</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill and Estates consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB</p> <p>The assessment of pollution activities was documented in “Mitigasi Gas Rumah Kaca”. All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> | Complied |
| 7.10.2 | <p>(C) Since 2014, 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</p> | <p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2012, there is no new planting area or developed area after November 2005.</p> | Complied |

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| | plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). | | |
| 7.10.3 | (C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored. | <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a strategy in effort to reduce and mitigate pollution and emission.</p> <p>Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g.: air quality ambient for boiler and Genset, water quality test for river (upstream and downstream), effluent water quality, noise, etc.</p> <p>Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of any pollutant has been done in daily, weekly and monthly basis, report of monitoring was recorded in the "RKL/RPL" report, and this report submitted to the related institution every 6 month – last report provided for period July – December 2020.</p> <p>Emission monitoring system by using "RSPO PalmGHG" system calculation. Emission from estate and mill operation was calculated and monitored, emission reduction achieved.</p> | Complied |
| Criteria 7.11: 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. | <p>It was noted that Pulau Maria Estate has conducted replanting activities since 2008. Procedure of Replanting was documented in SOP AA-APM-OP-1100.20-R8 dated 01 May 2019. The procedure described the company commitment to "Zero Burning" by using chipping and stacking using excavator by bucket modification. Procedure of replanting mentioned that Field Assistant, Head Assistant and Estate Manager must perform checks to ensure that the contractor does not perform burning for land preparation for replanting. In the procedure of replanting mentioned that, the methods used are: Toppling trees using heavy equipment</p> | Complied |

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| | | <p>(excavators); Chipping: cutting palm trunk, so as not infected with Ganoderma; Planting LCC, so that the decay of the old oil palm trunks can be faster; Planting of oil palm. This method has been used in replanting the whole plantation belonging to Asian Agri group including PT Saudara Sejati Luhur – Pulau Maria Estate.</p> <p>All the replanting activities requires to be documented and monitored, such as: Schedule of replanting (chipping, digging and planting), progress planting LCC (Legume Cover Crop) and Minutes Works replanting (Progress in the Works Contractor).</p> <p>The company has also established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2019. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on interview with stakeholders and field observation, it was evident that no fire has been used for replanting in Pulau Maria Estate.</p> | |
| 7.11.2 | <p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> | <p>PT Saudara Sejati Luhur – Pulau Maria Estate has performed and establishes fire prevention and control measures for whole area of company. Fire monitoring was done daily by Fire team and security to monitor the hotspot and fire by patrol to critical area of plantation. Maps of fire critical area has been developed and determined by company and monitor accordingly as per "<i>Peta Area Rawan Kebakaran PT Saudara Sejati Luhur-Kebun Pulau Maria</i>". According to hotspot monitoring and field patrol by security team period 2020 and 2021 shown that there is no hotspot identified at Pulau Maria Estate.</p> <p>In addition, company implementing fire danger rating as early warning system. According to monitoring result since 2019, 2020, and 2021 generally fire danger rating categorized as low risk.</p> <p>Basic fire training also has been performed to increase the competency of workers particularly for emergency response team. Latest basic fire training conducted on 06 December 2019, attended by 25 persons.</p> | Complied |

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| | | <p>However, due to Covid-19 pandemic, the training program for year 2020 and 2021 cannot be conducted and to be postponed until the condition normal and no outbreak of Covid-19.</p> <p>Tools and equipment of fire prevention has been prepared by company as per "<i>Daftar Peralatan Pemadam Kebakaran</i>".</p> <p>The activity of fire prevention and control present in "<i>Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup yang Berkaitan dengan Kebakaran Lahan</i>". Report of fire prevention and control period 2020 and 2021 are submitted to related authority (Dinas Lingkungan Hidup & Dinas Perkebunan) each semester. The sample report verified such as: report period January-June 2020 has submitted on 14 July 2020, period July – December 2020 has submitted on 28 January 2021.</p> | |
| 7.11.3 | The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures. | <p>PT Saudara Sejati Luhur has shown effort for fire prevention and control measures, such as:</p> <ul style="list-style-type: none"> • Program training regarding fire prevention and control measures to stakeholders in adjacent locations. Latest basic fire training conducted on 06 December 2019, attended by 25 persons. However, due to Covid-19 pandemic, the training program for year 2020 and 2021 cannot be conducted and to be postponed until the condition normal and no outbreak of Covid-19. • PT Saudara Sejati Luhur have also the Create Share of Value (CSV) Program in improving the smallholder’s economy. The CSV Program comprises the following segments, such as: company has conducted intensive communication with the local community to increase awareness on the impact of fire and haze on health. And, the company has assistance to enhance local economy. • Monitoring of fire: Daily patrol and inspection by security team, including checked by using Fire Watching Tower. • Firefighting team, completed with firefighting equipment store, equipment such as water tank, portable pump, hose, nozzle, | Complied |

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| | | firefighting uniform, etc. Firefighting team can provide assistance to the stakeholders in adjacent location in case of fire. | |
| <p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p> | | | |
| <p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p> | | | |
| 7.12.1 | <p>(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 HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> | There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. | Complied |
| 7.12.2 | <p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p> | PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di | Complied |

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| | | <p>Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>The HCV identification team consist of: Team leader: Dr. Ir. Nyoto Santoso, MS (RSPO HCV Assessor and HCVRNI member); Environmental service expert: Ir. A. Faizal Siregar, Msi (RSPO HCV Assessor and HCVRNI member); Vegetation expert: Eko Adhiyanto, S.Hut (RSPO HCV Assessor and HCVRNI member); Wildlife expert: Sutopo S.Hut. (RSPO HCV Assessor and HCVRNI member); Social-economic-cultural expert: Rae Birumbo (RSPO HCV Assessor and HCVRNI member); GIS: Arif Prasetyo, S.Hut (RSPO HCV Assessor and HCVRNI member).</p> <p>The HCV identification carried out with field assessment and public stakeholder consultation with surrounding communities on 1-7 April and May 2013. The HCV Identification report has been peer reviewed by Mr.Rachmad Darmawan (RSPO HCV Assessor and HCVRN member) on 01/2014.</p> <p>In the previous assessment, The total HCV identified in Pulau Maria Estate was 12.29 Ha, consist of HCV 4.1 (10.79 Ha) and HCV 6 (1.5 Ha). Based on HCV Identification Report, 2014 shows in area of Pulau Maria Estate, found 54 types of mammal, 42 types of bird, 4 types of reptile.</p> | |
| | <p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p> | <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> | |
| <p>7.12.3</p> | <p>(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>Not applicable.</p> | <p>Not Applicable</p> |

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| PROCEDURAL NOTE for 7.12.3: | | | |
| Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO. | | | |
| 7.12.4 | <p>(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 plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> | <p>According to the indicator 7.12.2, PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> <p>According to the soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p> <p>The same information shown in the HCV Identification Report 2014 obtain information that no peatland and other conservation areas have been identified in Pulau Maria Estate. Based on that fact, there was no specific integrated management plan needed.</p> | Complied |
| 7.12.5 | <p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> | <p>According to the indicator 7.12.2, PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" back in 2014, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai</p> | Complied |

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| | | <p>Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> <p>In addition, based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> | |
| 7.12.6 | <p>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>According to the indicator 7.12.2, PT. Saudara Sejati Luhur has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” back in 2014, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2007.</p> <p>Based on HCV Identification Report, 2014 shows in area of Pulau Maria Estate there is no endangered species. Furthermore, there is no wildlife categorized as Appendix I and II CITES or IUCN Redlist.</p> <p>PT. Saudara Sejati Luhur made socialization to the employees and surrounding community on HCV area and prohibit hunting/poaching of wildlife, dated 25 February 2021. The meeting attended by village head Dusun II Gonting Malaha, 15 communities from Dusun III Gonting Malaha, 2 communities from Dusun I, 1 person from Dusun IV, village head from Dusun VI Bukit Anam, etc.</p> | Complied |

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| 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. | PT. Saudara Sejati Luhur has not review nor put monitoring report as feedback to HCV management and monitoring plan. | Non-compliance |
| 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 Procedures (RaCP) applies. | There is no new planting within certified area of PT Gunung Melayu after November 2005 and /or November 2018. | Not Applicable |

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Gunung Melayu I POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2020** for **Gunung Melayu I POM** and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | -0.34 |
| PKO | -0.34 |

| Extraction | % |
|------------|-------|
| OER | 19.49 |
| KER | 5.25 |

| Production | t/yr |
|--------------|---------|
| FFB Process | 250,440 |
| CPO Produced | 48,804 |
| PKO Produced | 13,140 |

| Land Use | Ha |
|-----------------------------|--------------|
| OP Planted Area | 2,063 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 12.29 |
| Total | 2,307 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 20,375.48 | 0.42 | 594.6 | 0.44 | | | 20,970.08 | 0.86 |
| CO ₂ Emission from fertilizer | 577.59 | 0.01 | 22.06 | 0.02 | | | 599.65 | 0.03 |
| NO ₂ Emmision | 2,234.35 | 0.05 | 19.08 | 0.01 | | | 2,253.43 | 0.06 |
| Fuel Consumption | 270.81 | 0.01 | 13.76 | 0.01 | | | 284.57 | 0.02 |
| Peat Oxidation | 0 | 0 | 0 | 0 | | | 0 | 0 |
| Sink | | | | | | | | |
| Crop Sequestration | -19,313.3 | -0.4 | -563.6 | -0.41 | | | -19,876.90 | 0.01 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | | | 0 | 0 |
| Total | 4,144.97 | 0.09 | 85.89 | 0.06 | 10,054 | | 14,284.86 | 0.15 |

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 2,439.15 | 0.01 |
| Fuel Consumption | 165.3 | 0 |
| Grid Electricity Utilisation | 0 | 0 |
| Credit | | |
| Export of Grid Electricity | -1,984.86 | -0.01 |
| Sales of PKS | -35,844.6 | -0.14 |
| Sales of EFB | 0 | 0 |
| Total | -35,225 | -0.14 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | -4,442.06 |
| PK from other source | 4,313.4 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | -128.66 |

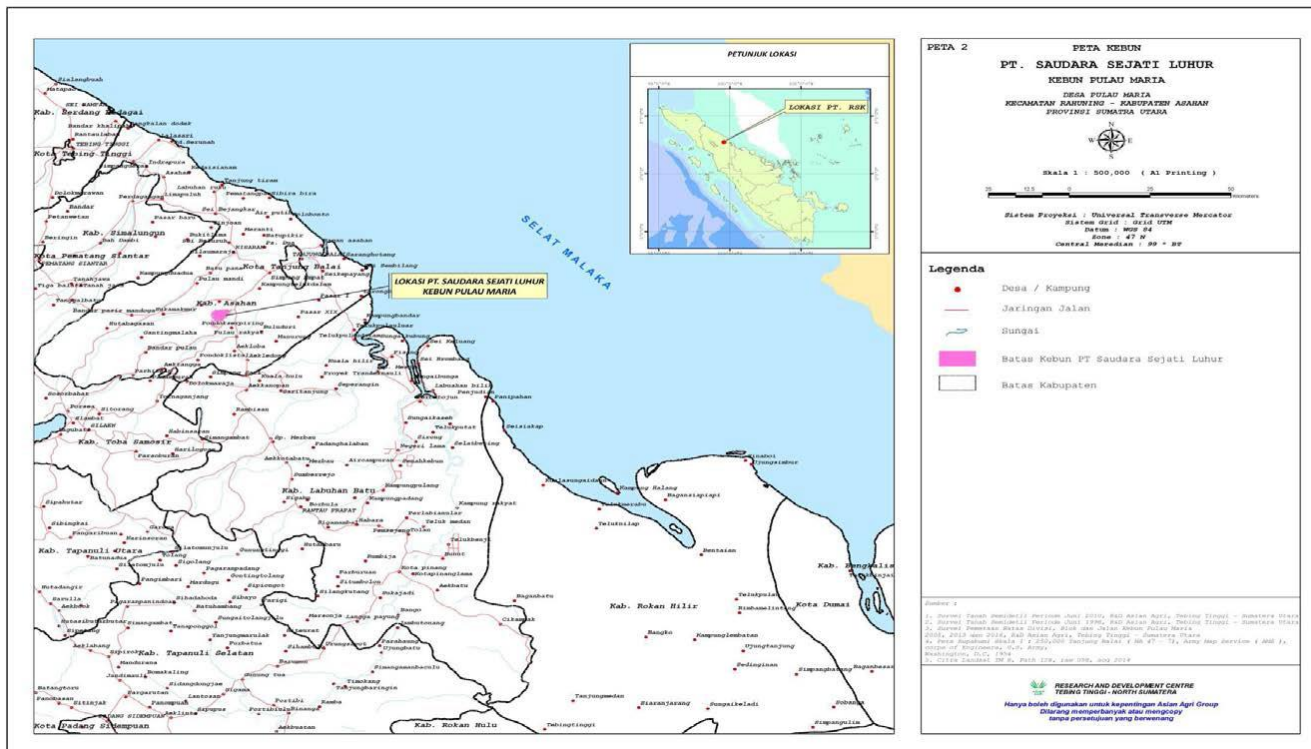
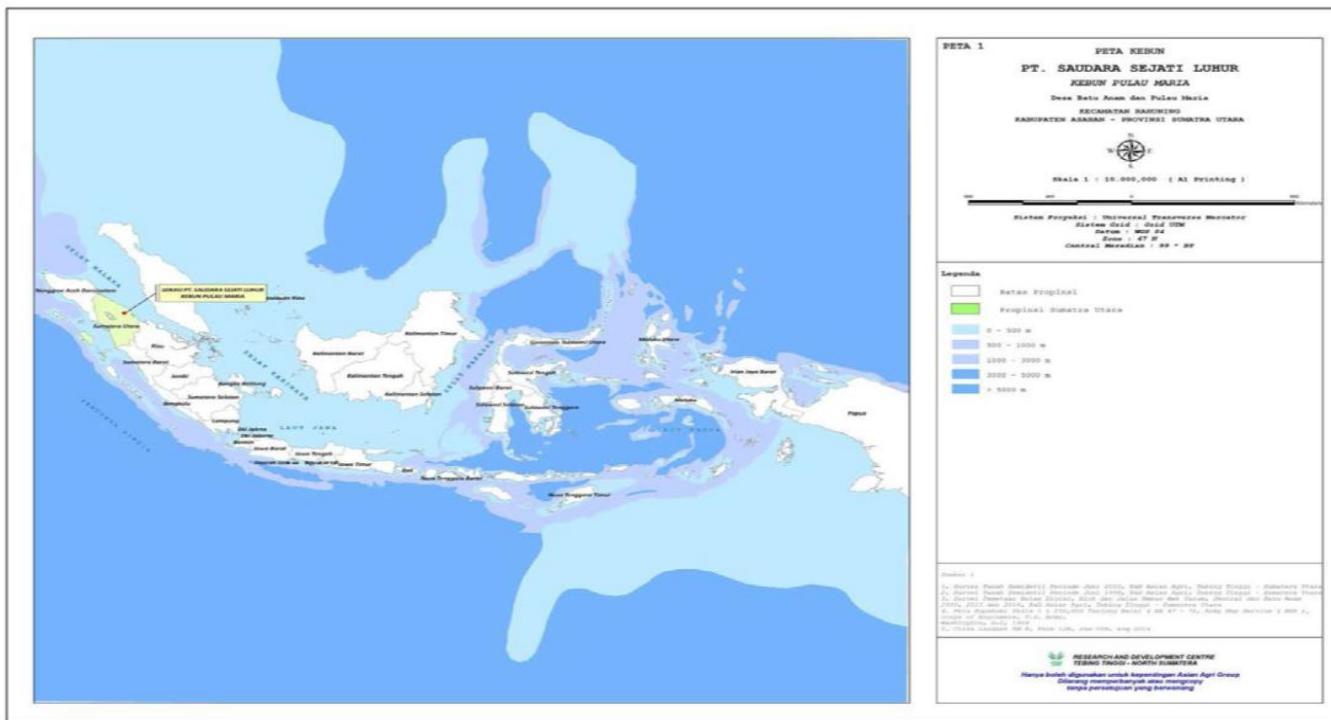
*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

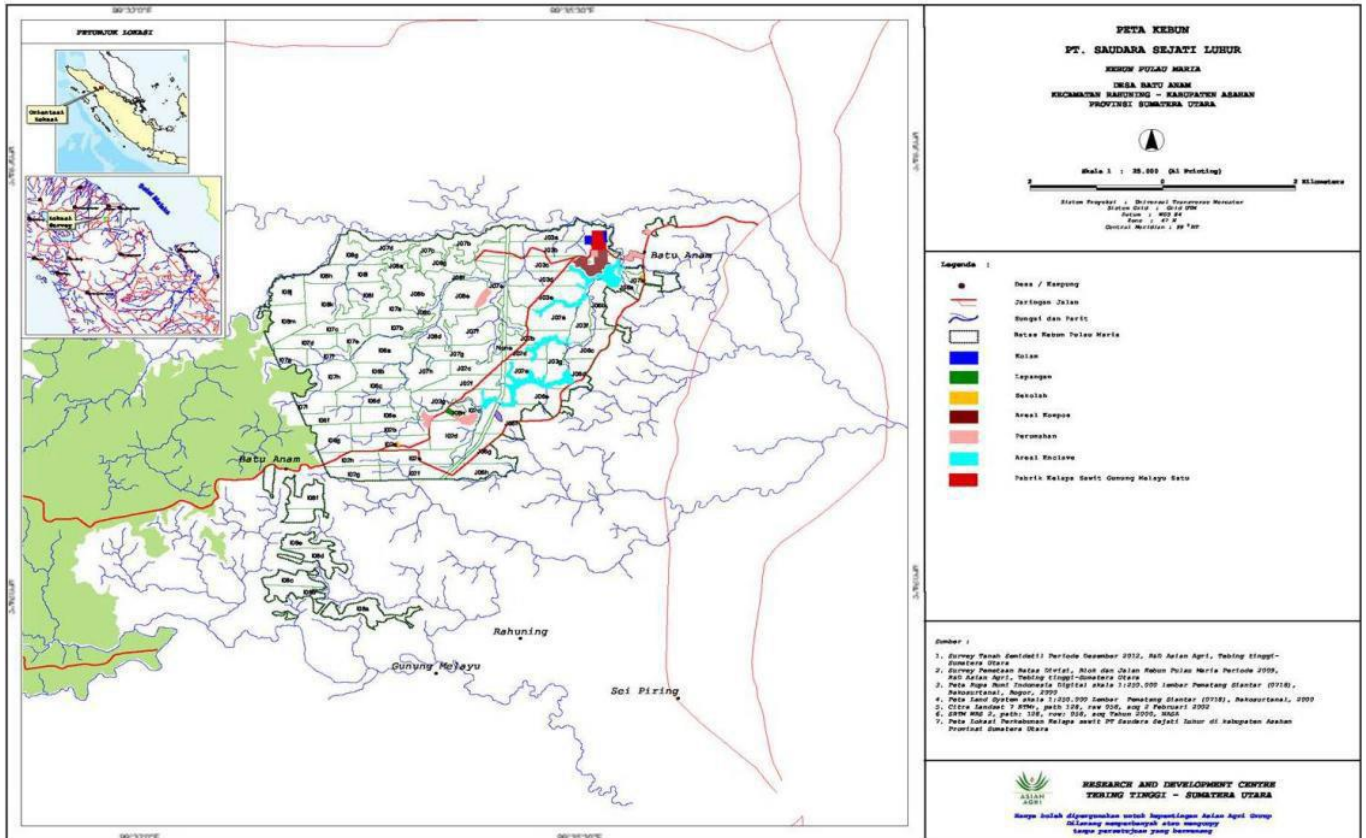
| POME Diverted to Anaerobic Digestion: | |
|--|-----|
| Divert to anaerobic pond (%) | 100 |
| Divert to methane captured (flaring) (%) | 0 |
| Divert to methane captured (energy generation) (%) | 100 |

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Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and sampled

No smallholder scheme within this certification scope. Not applicable

Appendix F: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel Oil |
| EFB | Empty Fruit Bunch |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMS | Environmental Management System |
| FFB | Fresh Fruit Bunch |
| FPIC | Free, Prior, Informed and Consent |
| GAP | Good Agricultural Practice |
| GHG | Greenhouse Gas |
| GMP | Good Manufacturing Practice |
| GPS | Global Positioning System |
| HCV | High Conservation Value |
| IPM | Integrated Pest Management |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| ISS | Independent Smallholder Standard |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |