

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company): SIPEF Group
Client company Address: Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium
Certification Unit: PT. Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill
Location of Certification Unit: Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia
Date of Final Report: 28/04/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SIPEF Group		
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	07/12/2005
Address	Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill		
Location / Address	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia		
Website	www.tolantiga.co.id		
Management Representative	Mr. Sander Van Den Ende	E-mail	svdenende@sipef.com
Telephone	+6261 - 41060020	Facsimile	+6261 - 4520908

2. Certification Information			
Certificate Number	RSPO 632266	Certificate Start Date	17/05/2020
Date of First Certification	17/05/2010	Certificate Expiry Date	16/05/2025
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the requirements of Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 th April 2020.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <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 checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	30 MT FFB/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
BSI-ISPO 614348	ISPO	BSI Indonesia	18/07/2026
EU-ISCC-Cert-ID230-20210006	ISCC	PT SBC Asia Sertifikasi	03/12/2022
00053944	ISO 9001:2015	PT Lloyd's Register Indonesia	02/07/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Maradja POM	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia.	3° 0' 44.26" N	99° 14' 8.06" E
Bukit Maradja Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia.	3° 0' 04.03" N	99° 13' 24.90" E
Kerasaan Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia.	3° 3' 51.00" N	99° 15' 53.53" E
Timbang Deli Estate	Timbang Deli Village, Galang District, Deli Serdang Regency, Sumatera Utara Province – Indonesia	3° 27' 20.97" N	98° 53' 58.47" 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
Bukit Maradja Estate	2,911.14	97.71	*169.09	3,177.94	91.60
Kerasaan Estate	2,175.05	26.42	**160.56	2,362.03	92.08
Timbang Deli Estate	351.25	13.53	***607.41	972.19	36.13
Total	5,437.44	137.66	937.06	6,512.16	83.50

Note:
 *) including land preparation area, BME 115.51 Ha
 **) including land preparation area, KRE 144.50 Ha
 ***) Including area planted with rubber.

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6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Maraja Estate	*279.84	906.33	1,098.17	301.77	325.03	2,736.08	175.06
Kerasaan Estate	*101.68	857.92	619.05	272.01	324.39	2,073.37	101.68
Timbang Deli Estate	*79.63	271.62	-	-	-	271.62	79.63
Total (ha)	461.15	2,035.87	1,717.22	573.78	649.42	5,081.07	356.37

Note: *) Replanting **) Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (May 2021 – Apr 2022)	Actual (Mar2021 – Feb2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Mar-Apr 2021)	Current license period (May 2021 – Feb 2022)	
Bukit Maraja Estate	70,825	11,020.49	51,397.60	64,810.91
Kerasaan Estate	61,524	10,866.56	44,246.20	53,051.36
Timbang Deli Estate	2,982	697.21	4,210.02	5,617.02
Total	135,331	122,438.08		123,479.29

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Mar-Apr 2021)	Current license period (May 2021 – Feb 2022)	
Nil				
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Mar-Apr 2021)	Current license period (May2021 – Feb 2022)	
Nil				

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Total	N/A	N/A	N/A
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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	Mar 2021	10,633.87	-	10,633.87
2	Apr 2021	11,950.39	-	11,950.39
3	May 2021	9,849.89	-	9,849.89
4	Jun 2021	11,730.03	-	11,730.03
5	Jul 2021	11,617.86	-	11,617.86
6	Aug 2021	11,604.15	-	11,604.15
7	Sep 2021	11,921.86	-	11,921.86
8	Oct 2021	10,614.54	-	10,614.54
9	Nov 2021	9,222.15	-	9,222.15
10	Dec 2021	8,122.99	-	8,122.99
11	Jan 2022	7,803.58	-	7,803.58
12	Feb 2022	7,366.77	-	7,366.77
TOTAL		122,438.08	-	122,438.08

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
	Previous license period (Mar-Apr 2021)	Current license period (May 2021 – Feb 2022)	
FFB	FFB		FFB
135,331 mt	32,434.15 mt	90,003.93 mt	123,479.29 mt
	122,438.08 mt		
CPO (OER:23.50 %)	CPO (OER: 23.61%)		CPO (OER: 23.50 %)
32,479.44 mt	7,674.53 mt	21,232.46 mt	29,017.60 mt
	28,906.99 mt		
PK (KER:5.00 %)	PK (KER: 4.91%)		PK (KER: 5.00 %)
7,443.21 mt	1,572.91 mt	4,435.40 mt	6,173.95 mt
	6,008.31 mt		

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2021	2,487.80	517.02
2	Apr 2021	2,786.50	571.45
3	May 2021	2,400.23	484.44
4	Jun 2021	2,782.72	531.17
5	Jul 2021	2,688.04	583.09
6	Aug 2021	2,817.28	608.72
7	Sep 2021	2,830.04	608.35
8	Oct 2021	2,527.22	521.28
9	Nov 2021	2,147.53	447.40
10	Dec 2021	1,908.27	412.83
11	Jan 2022	1,784.64	362.97
12	Feb 2022	1,746.72	359.59
TOTAL		28,906.99	6,008.31

11. Summary of Actual Volume sold					
Current License period (May 2021 – Feb 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	962.86	20,736.88	0	0	21,699.74
PK (MT)	4,546.97	0	0	0	4,546.97
Credits	0	0	0	0	0
Previous License period (Mar-Apr 2021)					
CPO (MT)	0	6,932.95	0	0	6,932.95
PK (MT)	1,443.62	0	0	0	1,443.62
Credits	0	0	0	0	0
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 A	RSPO_PO1000000970	962.86	-
2	PT B	RSPO_PO1000006555	-	5,990.59

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TOTAL	962.86	5,990.59
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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 A	ISCC	27,669.83	
TOTAL			27,669.83	

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil		
TOTAL			

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)
	Nil		
TOTAL			

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

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

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.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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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 15 – 18 March 2022. The audit programme is included as Section 2.3.

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 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 201 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.

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.

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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 (2nd Re- Certification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Bukit Maradja POM	X	X	X	X	X
Bukit Maradja Estate	X	X	X	X	X
Kerasaan Estate	X	X	X	X	X
Timbang Deli Estate	X	X	X	X	X

Tentative Date of Next Visit: March 1, 2023 – March 4, 2023

Total Number of Mandays: 14.5

2.2 BSI Assessment Team

Name	Role	Competency
Eko Purwanto (EP)	Team Leader	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB), 2001.</p> <p>Work Experience: Has more than 9 years working experience at Oil Palm Plantation in East Kalimantan and the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. Has 10 years working experience in auditing and qualified Lead Auditor for ISO 9001 management system and qualified Lead Auditor for RSPO and ISPO.</p> <p>Training attended: Has completed the following training – SMETA, April 2021; ISPO Permentan 38/2020, April 2021; HCV-HCS Assessment Training, February 2021; CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course (PR357), August 2019; ISO 37001:2016 Anti-bribery Management System Implementing Training Course, August 2019; RSPO P&C 2018 Training, May 2019; ISO 17021:2015 Certificate Transfer, 2019; Sustainability Reporting Assurance Training, January 2019; RSPO P&C Lead Auditor Refresher Course, May 2018; RSPO Supply Chain Certification Refresher Course, March 2018; RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, 19 April 2016; Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, September 2014; RABQSA accredited Lead Auditor Training of Environment Management System, July 2013; Roundtable on Sustainable Palm Oil (RSPO) Endorsed RSPO Green House Gas (GHG) Training for Trainer, June 2013; Roundtable on Sustainable Palm Oil (RSPO) Endorsed RSPO P & C Lead Auditor Training, May 2013; Understanding Environmental Management System (EMS), May 2012; Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, May 2012; Roundtable on Sustainable Palm Oil (RSPO) Endorsed RSPO Supply</p>

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		<p>Chain Certification (SCC) Lead Auditor Training, April 2012; RABQSA accredited Lead Auditor Training of Quality Management System, 2012.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of mill and estate best management practices and supply chain for CPO mills.</p> <p>Language proficiency: Bahasa Indonesia and English</p>
Imam Fakhrurozi (IF)	Team Member	<p>Education: Holds a Bachelor Degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta, 2011.</p> <p>Work Experience: Has 2 years working experience in the oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia and has more than 7 years working experience as an qualified RSPO and ISPO auditor.</p> <p>Training attended: Has completed a number of relevant trainings, the training includes OHS expert training by Manpower Ministry of RI, ISO 9001:2015, ISO 14001:2004 ISO 45001:2018, ISPO Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course, LAC for ISO 37001:2016.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Environmental aspect-impacts, Occupational Health and Safety.</p> <p>Language proficiency: Bahasa Indonesia and English</p>
Andi Pratama Pasaribu (APP)	Team Member	<p>Education: Holds a Bachelor degree, majoring Social Economy (Agribusiness), Faculty of Agriculture, University of Jember.</p> <p>Work Experience: Has more than 5 years as Field Agronomy Assistant (2008 – 2013), Sustainability Auditor (8 years).</p> <p>Training attended: Has completed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO), 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, High Conservation Value and GIS Awareness training.</p> <p>Aspect covered in this audit: Legal, Social and Workers Welfare.</p> <p>Language proficiency: Bahasa Indonesia and English</p>
Yudwi Wisnu Rahmanto (YWR)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Faculty of Forestry, University of Gadjah Mada graduated in 2006.</p> <p>Work Experience: He has a combination of 12 years experience as Agronomy Field Assistant and sustainability auditor including RSPO, ISPO, FSC, CAFÉ and Organic programs.</p> <p>Training attended: Has completed Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System-SVLK, Verification Organization Training C.A.F.E Practices-Starbucks, ISPO Auditor/Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RSPO Next Training Course for Lead Auditor, Online Training: FSC Auditor Transition Exam, e-Course UTZ Programme, RSPO P&C Lead Auditors Refresher Course, IRCA Lead Auditor Course ISO 9001:2015, Sustainability Reporting Assurance Training, IRCA ISO 14001:2015 Lead Auditor Course, IRCA ISO 45001:2015 Lead Auditor Course, ISO 37001:2016 Anti-bribery Management System Implementing</p>

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		<p>Training Course, RSPO P&C Lead Auditors Refresher Course, RSPO Supply Chain Certification Refresher Course, Introductory Course for High Conservation Value (HCV) and High Carbon Stock (HCS) in Oil Palm Plantation, Pelatihan Refreshment Auditor ISPO sesuai Peraturan Menteri Pertanian No.38 tahun 2020, SMETA Requirements Training.</p> <p>Aspect covered in this audit: Social aspect, HCV and Stakeholder Consultation.</p> <p>Language proficiency: Bahasa Indonesia and English</p>
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Accompanying Persons:

Name	Role
Nil	

1.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	EP	APP	IF	YWR
Tuesday, 15/03/2022	08.00-09.00	<p>Opening Meeting:</p> <ul style="list-style-type: none"> - Auditee presentation (Introduction of PIC, Profile of Certified Management Unit) - Auditor Team presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	√	√	√	√
	09.00-12.00	<p>Bukit Maradja POM:</p> <ul style="list-style-type: none"> - Document review: <ul style="list-style-type: none"> • Verification of Supply Chain Data • Review of Basic Information Data, Time bound plan, partial certification verification - Data verification of RSPO P&C (Best management practices Mill, OHS, EMS, Social and Labour) 	√	√	√	
		<p>Stakeholder Consultation with interested and affected parties by phone</p> <ul style="list-style-type: none"> - Dinas Lingkungan Hidup Kab. Simalungun - Dinas Tenaga Kerja dan Transmigrasi Kab. Simalungun - Dinas Perkebunan Kab. Simalungun - Dinas Penanaman Modal dan Perijinan Terpadu Satu Pintu Kab. Simalungun - Kantor Pertanahan Kab. Simalungun - Kepala Desa, Ketua Koperasi, Tokoh Masyarakat, Kontraktor Angkut TBS. 				√
	12.00-14.00	Lunch Break	√	√	√	√
	14.00-16.30	<p>Bukit Maradja POM:</p> <p>Field Observation:</p>	√			

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Date	Time	Subjects	EP	APP	IF	YWR
		<ul style="list-style-type: none"> RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous & Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop 		√	√	
		Interview at Bukit Maradja POM : <ul style="list-style-type: none"> Gender Committee Worker Union Sample of workers 				√
	16.30-17.00	Wrap up meeting	√	√	√	√
Wednesday, 16/03/2022	08.00-12.00	Bukit Maradja Estate Field Observation and Worker interview: Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal aspect (boundaries, occupied land, disputes – if any) Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place) 	√	√	√	
		Interview with Previous landowner (if applicable)				√
	12.00-14.00	Lunch Break	√	√	√	√
	14.00-16.30	Bukit Maradja Estate Document Review: Aspect to be verified Principle 1: Behave ethically and transparently Principle 2: Operate legally and respect rights Principle 3: Optimise productivity, efficiency, positive impact and resilience Principle 4: Respect community and human rights and deliver benefit Principle 5: Support smallholder inclusion Principle 6: respect workers' rights and conditions Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources	√	√	√	
		Interview: <ul style="list-style-type: none"> Gender Committee New Mother Worker Union 				√

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Date	Time	Subjects	EP	APP	IF	YWR
		<ul style="list-style-type: none"> Sample of workers 				
	16.30-17.00	Wrap up meeting	√	√	√	√
Thursday, 17/03/2022	08.00-12.00	Kerajaan Estate Field Observation and Worker interview: Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal aspect (boundaries, occupied land, disputes – if any) Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect // Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place) 	√	√	√	√
	12.00-14.00	Lunch Break	√	√	√	√
	14.00-16.30	Kerajaan Estate Document Review: Aspect to be verified: Principle 1: Behave ethically and transparently Principle 2: Operate legally and respect rights Principle 3: Optimise productivity, efficiency, positive impact and resilience Principle 4: Respect community and human rights and deliver benefit Principle 5: Support smallholder inclusion Principle 6: respect workers' rights and conditions Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources	√	√	√	√
	16.30-17.00	Wrap up meeting	√	√	√	√
	17.00-...	Traveling to Timbang Deli Estate	√	√	√	√
Friday, 18/03/2022	08.00-12.00	Timbang Deli Estate Field Observation and Worker interview: Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal aspect (boundaries, occupied land, disputes – if any) Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect // 	√	√	√	√

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Date	Time	Subjects	EP	APP	IF	YWR
		<ul style="list-style-type: none"> Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place) 			√	
	12.00-14.00	Lunch Break	√	√	√	√
	14.00-15.30	Timbang Deli Estate Document Review: Aspect to be verified: Principle 1: Behave ethically and transparently Principle 2: Operate legally and respect rights Principle 3: Optimise productivity, efficiency, positive impact and resilience Principle 4: Respect community and human rights and deliver benefit Principle 5: Support smallholder inclusion Principle 6: respect workers' rights and conditions Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources	√	√	√	√
	15.30-16.00	Report Preparation and Auditor Discussion	√	√	√	√
	16.00-17.00	Closing Meeting <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) Comments, Responses and Questions 	√	√	√	√

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?	The time bound plan has included all the subsidiary and group of companies of SIPEF Group. The TBP was verified against the Group Member information published in the RSPO website under the parent company SIPEF.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	There are estates and mills that are not certified within 5 years of the RSPO membership. But, since this requirement was published in July 2017, the 5 years starts from 2017 in which the SIPEF have up to 2022 to comply with this requirement. Despite the above, SIPEF had demonstrated that those units/estates that are not able to be certified are either due to awaiting for the HGU (Hak Guna Usaha - <i>Right to Cultivate</i>) and/or awaiting for full estate development.	Complied
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.	PT Asri Rimba Wirabhakti (ARWB) in Bengkulu Province was acquired by SIPEF in end of 2018 with Sei Teramang Estate attached to the acquisition. Sei Teramang was supposed to be audited during the recertification audit of PT Agro Muko – Bunga Tanjung Palm Oil Mill. However, due to technical glitch at RSPO where the liabilities cannot yet be confirmed, the certification audit for Sei Teramang Estate has to be postponed and audited as extension of scope to the current PT Agro Muko – Bunga Tanjung Palm Oil Mill supply base. The estimated time to audit will be end 2022 depending of the results of the liability check by RSPO Secretariat. As updated information, Sei Teramang Estate scheduled to be audited in end of March 2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company.	Complied
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?	The commitment timeline has postponed from 2024 to 2025. The changes are acceptable as the control of being certified is not on the hands of the Company due to awaiting for HGU which the approval is beyond the company's choice.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	All lapses of implementing the original plan are justified base on the awaiting for the HGU (Hak Guna Usaha - <i>Right to Cultivate</i>) and/or awaiting for full estate development. While for the newly	Complied

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	acquired estate, it is justified based on awaiting for RSPO Secretariat to confirm liabilities for Sei Teramang Estate.	
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	There is no fundamental failure as all delays are justified as stated above.	Complied
Un-Certified Units or Holdings		
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.	Previously prior to certification, PT Umbul Mas Wisesa and PT Tonton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website</p> <p>PT Agro Muara Rupit</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 <p>PT Bandar Sumatra Indonesia</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate 	Complied

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<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>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>On 20 December 2018, the complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/-5090000028Es1JAAS/detail</p> <p>Based on RaCP tracker in RSPO website there are 4 MU's which have potential liability, 2 of them are PT Umbul Mas Wisesa and PT Tonton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015. Whilst the other 2, PT Dendymarker Indah Lestari have submitted CN to the RSPO Secretariat and waiting for approval and PT Bandar Sumatra Indonesia awaiting for RSPO to revert regarding any potential liabilities.</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>The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT Agro Kati Lama. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5000o000039f8kAAA/detail</p> <p>Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p> <ul style="list-style-type: none"> -The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government; -The daily casual workers are not protected and no remedy available for work accidents; -The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools; 	<p>Complied</p>

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	<p>-The daily casual workers did not receive festive allowance in accordance with the regulation;</p> <p>-The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment.</p> <p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. On 25 August 2021, The Complaints Desk received a brief progress report of the pre-mediation meeting, pending finalisation of the mediation process agreement. The Complaints Panel directs the Secretariat to encourage continuity to ensure that everybody is kept fresh and not forgotten to move a bit faster through the mediator.</p> <p>On 29 Sep 2021, The mediation process agreement is to be signed by both parties.</p> <p>On 06 Dec 2021, Pending outcome of the mediation under Dispute Settlement Facility.</p> <p>On 19 Jan 2022, DSF has been facilitated 3 mediation session; The parties agreed to follow up with the physical meeting and expected it to be conducted in February 2022.</p> <p>On 23 Feb 2022, This matter is under DSF for mediation; The next mediation session has been scheduled in March 2022.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Complied</p>
<p>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.</p>	<p>Currently Sei Teramang Estate – PT Mukomuko Agro Sejahtera is uncertified estate.</p> <p>NPP for Sei Teramang Estate has been conducted onsite visit on 5 – 9 February 2021 by Global Gateway Certification. Area covers for NPP is 372.62 Ha. Submission of NPP notification to RSPO on September 2021 and still ongoing approval process by RSPO.</p> <p>Internal audit for Sei Teramang Estate has been conducted in 19 July 2021. Report of internal audit completed in 14 August 2021 with reference to</p>	<p>Complied</p>

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	<p>RSPO Certification System. Reference criteria of internal audit covers Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <p>Positive assurance statement already justified within the Internal Audit Checklist that Sei Teramang Estate almost fulfilled with RSPO P&C requirement and Sei Teramang Estate is ready to RSPO P&C certification as scheduled in Time Bound Plan.</p> <p>As updated information, Sei Teramang Estate scheduled to be audited in end of March 2022.</p>	
<p>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?</p>	<p>Internal audit of uncertified units have been done, such as:</p> <ul style="list-style-type: none"> - PT Agro Muara Rupit on 19 and 24 May 2021; - PT Agro Kati Lama on 2, 3, 7, 8 December 2021; - PT Agro Rawas Ulu on 30 April 2021 and 6 May 2021; - PT Citra Sawit Mandiri on 28-30 July 2021; - PT Bandar Sumatra Indonesia on 17-20 May 2021; <p>All critical non-conformities have been addressed effectively and verified by internal auditor on 22 January 2022.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Stakeholder consultation related uncertified units conducted during Social Impact Assessment, such as:</p> <ul style="list-style-type: none"> - PT Agro Muara Rupit in September – November 2021; - PT Agro Kati Lama in August 2021; - PT Agro Rawas Ulu in September – November 2021; - PT Citra Sawit Mandiri in November 2021; - PT Bandar Sumatra Indonesia in May 2021; <p>Based on review to Social Impact Assessment report, most stakeholders stated that the company's presence had a positive impact, some of the conflicts that occurred were generally land conflicts. The company strives to always improve positive relationships with the community through:</p> <ol style="list-style-type: none"> 1. Opening more job opportunities to local residents of villages around the company; 2. Improve good relations between the company and the surrounding villages; 3. Increase assistance to the community and surrounding villages, including helping to repair roads in villages around the company; 	<p>Complied</p>

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	<p>4. Periodically conduct dissemination of good agriculture practice of oil palm cultivation to the surrounding villages;</p> <p>5. Any conflicts that arise such as land disputes, etc. can be immediately responded to by the company and resolved in a good and conducive manner.</p>	
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>PT Eastern Sumatera Indonesia – Bukit Maradja POM does not have smallholder or outgrowers as supply base.</p>	<p>Complied</p>

Approved Time Bound Plan

Name of the Unit of Certification	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
PT. Tolan Tiga Indonesia	Indonesia	Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatra Utara Province, Indonesia	2° 3' 40.98" N	100° 4' 57.19" E	-	Certified	-	17 May 2010
	Indonesia	Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatra Utara Province, Indonesia	2° 3' 37.60" N	100° 4' 52.40" E	4,087.02	Certified	-	17 May 2010
	Indonesia	Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatra Utara Province, Indonesia	2° 0' 7.60" N	100° 2' 30.85" E	3,672.04	Certified	-	17 May 2010
PT. Eastern Sumatra Indonesia	Indonesia	Bukit Maradja POM	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 44.26" N	99° 14' 8.06" E	-	Certified	-	17 May 2010
	Indonesia	Bukit Maradja Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 04.03" N	99° 13' 24.9" E	3,177.94	Certified	-	17 May 2010
	Indonesia	Kerasaan Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 3' 51.00" N	99° 15' 53.53" E	2,362.03	Certified	-	17 May 2010
	Indonesia	Timbang Deli Estate	Timbang Deli Village, Galang District, Deli Serdang Regency, Sumatera Utara Province – Indonesia	3° 27' 20.97"N	98° 53' 58.47"E	972.19	Certified	-	March 2018
PT. Umbul Mas Wisesa	Indonesia	Umbul Mas Wisesa POM	Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province, Indonesia	2° 12' 41.00"N	100°16'20.00"E	-	Certified	-	27 March 2015
	Indonesia	Umbul Mas Wisesa South	Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province, Indonesia	2° 13' 5.10"N	100° 17' 12.40" E	4,783.61	Certified	-	27 March 2015
	Indonesia	Umbul Mas Wisesa North	Sei Siarti Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province, Indonesia	2° 15' 7.16" N	100° 16' 43.01" E	2,979.74	Certified	-	27 March 2015

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				Latitude	Longitude				
	Indonesia	Toton Usaha Mandiri	Sei Siarti Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province, Indonesia	2° 15' 7.16" N	100° 16' 43.01" E	1,198.76	Certified	-	27 March 2015
KSU - Suka Makmur	Indonesia	Koperasi Serba Usaha Suka Makmur	Sukoharjo Hamlet, Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province, Indonesia	2° 11' 29.00" N	100° 19' 57.89" E	60.15	Certified	-	05 April 2018
PT. Agro Muko	Indonesia	Bunga Tanjung POM	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	2°43'00.39"S	101°22' 16.94" E	-	Certified	-	22 February 2011
	Indonesia	Bunga Tanjung Estate*	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 43' 30.14" S	101° 22' 21.51" E	2,903.00	Certified	-	22 February 2011
	Indonesia	Air Bikuk Estate*	Air Bikuk Village, Lubuk Bento Village and Air Berau Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 46' 27.67" S	101° 24' 44.68" E	1,410.00	Certified	-	22 February 2011
	Indonesia	Air Buluh Estate*	Air Buluh Village, Semundam Village, Tanjung Jaya Village, Talang Baru Village and Talang Arah Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	3° 01' 27.29" S	101° 33' 15.79" E	2,500.00	Certified	-	22 February 2011
	Indonesia	Malin Deman Estate*	Air Merah Village, Talang Arah Village and Talang Baru Village, Malin Deman District, Mukomuko Regency, Bengkulu Province, Indonesia	3° 01' 27.29" S	101° 33' 15.79" E	1,178.00	Certified	-	22 February 2011
	Indonesia	Kebun Masyarakat Desa/KMD	Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E	224.24	Certified	-	22 February 2011
	Indonesia	Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	3° 03' 15.11" S	101° 29' 53.43" E	139.51	Certified	-	22 February 2011

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				Latitude	Longitude				
	Indonesia	Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 58' 50.37" S	101° 35' 51.83" E	167.75	Certified	-	22 February 2011
	Indonesia	Mukomuko POM	Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 05.76" S	101° 16' 43.50" E	-	Certified	-	22 February 2011
	Indonesia	Mukomuko Estate*	Air Dikit Village, Pondok Lunang Village, Air Kasai Village, Dusun Baru Village, Sari Bulan Village, Sumber Village, Teruntung Village, Talang Kuning Village, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 39' 28.44" S	101° 12' 57.48" E	4,101.20	Certified	-	22 February 2011
	Indonesia	Sei Betung Estate*	Sidomulyo Village, Penarik Village, Lubuk Sahung Village, Talang Medan Village, Surian Bungkal Village, Sei Jerinjing Village, Talang Bungkal Vilage, Penarik Disctrict and Selagan Raya District, Mukomuko Regency, Bengkulu Province Indonesia	2° 36' 1.59" S	101° 22' 12.79" E	1,610.12	Certified	-	22 February 2011
	Indonesia	Tanah Rekah Estate*	Tanah Harapan Village, Tanah Rekah Village, Air Dikit Village, Setia Budi/SP-IV Village, Kota Mukomuko District, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 44.61" S	101° 10' 48.52" E	3,849.00	Certified	-	22 February 2011
	Indonesia	Talang Petai Estate*	Talang Petai Village, Talang Sepakat Village, Talang Sakti Village, Sungai Lintang Village, Sungai Rengas Village, Tunggal Jaya Village, V-Koto District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 28' 24.42" S	101° 16' 33.09" E	2,270.00	Certified	-	22 February 2011
	Indonesia	Sei Kiang Estate*	Lubuk Cabau Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24' 41.18" S	101° 14' 19.71" E	2,171.03	Certified	-	22 February 2011

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Name of the Unit of Certification	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
	Indonesia	Air Manjuntio Estate*	Talang Petai Village and Talang Sepakat Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24' 41.18" S	101° 14' 19.71" E	1,800.00	Certified	-	22 February 2011
	Indonesia	Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU*	Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E	441.80	Certified	-	22 February 2011
	Indonesia	Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	Talang Petai Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E	140.00	Certified	-	22 February 2011
Hargy Oil Palm Limited (HOPL)	PNG	Hargy POM; Hargy Estate	East of Biiala, West New Britain Province, PNG	05° 18' 40.05" S	151° 00' 39.46" E	6,757.65	Certified	-	2009
	PNG	Navo POM; Navo Estate, Pandi Estate	50 Kms East of Biiala, West New Britain Province, PNG	05° 05' 38.86" S	151° 13' 28.03" E	13,701.89	Certified	-	2009
	PNG	Barema POM;	30 km East of Biiala, West New Britain Province, PNG	05° 12' 40.25" S	151° 07' 51.10" E	-	Certified	-	2014
PT. Dendymarker Indah Lestari	Indonesia	Dendymarker POM	Karang Dapo I Village, Karang Dapo Sub-District, Musi Rawas Utara District, Sumatera Selatan Province, Indonesia	2° 47' 44" S	102° 56' 42" E	-	Certified	-	27 July 2015
	Indonesia	Sei Mandang Estate	Bingin Rupit and Beringin Jaya Village, Rupit Sub-District, Musi Rawas Utara District, Sumatera Selatan Province, Indonesia	2° 46' 29" S	102° 52' 30" E	5,070.08	Certified	-	27 July 2015
	Indonesia	Sei Liam Estate	Karang Dapo I Village, Karang Dapo Sub-District, Musi Rawas Utara District, Sumatera Selatan Province, Indonesia	2° 46' 54" S	102° 56' 41" E	6,802.63	Certified	-	27 July 2015

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				Latitude	Longitude				
PT. Bandar Sumatra Indonesia	Indonesia	Bandar Pinang Estate	Desa Kebun Bandar Pinang, Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai	3° 19' 19.24" N	98° 55' 21.67" E	1,412.71	Not Certified	2025	-
PT. Citra Sawit Mandiri	Indonesia	Citra Sawit Mandiri Estate	Desa Pasar Tiga, Kecamatan Panai Tengah, Kabupaten	2° 33' 2.32" N	100° 12' 12.67" E	1,820.04	Not Certified	2024	-
PT. Agro Muko	Indonesia	Sei Jerinjing Estate	Talang Medan Village, Selagan Raya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 10.69" S	101° 20' 21.66" E	2,099.68	Not Certified	2025	-
PT. Muko Muko Agro Sejahtera	Indonesia	Sungai Teramang Estate	Batu Ejung Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 45' 30.16" S	101° 22' 15.38" E	1,770.00	Not Certified	2022	-
	Indonesia	Batu Kuda Estate	Tunggang Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 50' 27.74" S	101° 28' 58.87" E	2,048.22	Not Certified	2024	-
PT. Agro Kati Lama	Indonesia	Agro Kati Lama North Estate	Desa Durian Remuk, Kecamatan Muara Beliti, Kabupaten Musi Rawas – Sumatera Selatan	3° 19' 46.18" S	102° 59' 52.05" E	2,464.00	Not Certified	2023	-
	Indonesia	Agro Kati Lama South Estate	Desa Muara Kati Lama, Kecamatan Tiang Pumpung Kepungut, Kabupaten Musi Rawas – Sumatera Selatan	3° 21' 32.07" S	103° 01' 27.90" E	3,590.00	Not Certified	2023	-
	Indonesia	Agro Kati Lama East Estate (AKL2)	Kelurahan Pasar Muara Beliti, Kecamatan Muara Beliti, Kabupaten Musi Rawas – Sumatera Selatan	3° 17' 32.50" S	103° 00' 50.02" E	1,514.00	Not Certified	2025	-
	Indonesia	Koperasi Beringin Jaya (Smallholder)	Desa Durian Remuk, Kecamatan Muara Beliti, Kabupaten Musi Rawas – Sumatera Selatan	3° 17' 32.50" S	103° 00' 50.02" E	1,514.00	Not Certified	2023	-
PT. Agro Muara Rupit	Indonesia	Agro Muara Rupit East Estate (AMR2&3)	Desa Jadi Mulya, Kecamatan Nibung, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 33' 49.17" S	102° 55' 01.4" E	4,323.20	Not Certified	2023	-

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Name of the Unit of Certification	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
	Indonesia	Agro Muara Rupit West Estate (AMR 1&2)	Desa Remban, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 36' 04.42" S	102° 51' 05.53" E	6,566.90	Not Certified	2023	-
	Indonesia	Agro Muara Rupit South Estate (AMR 4)	Desa Beringin Sakti, Kecamatan Rawas Ilir, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 34' 47.55" S	102° 55' 21.23" E	4,200.82	Not Certified	2025	-
	Indonesia	Koperasi Rempan Jaya (Smallholder)	Desa Jadi Mulya, Kecamatan Nibung, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 32' 52.71" S	102° 57' 12.11" E	1,080.80	Not Certified	2025	-
	Indonesia	Koperasi Tingkip Jaya Raya (Smallholder)	Desa Remban, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 37' 33.40" S	102° 51' 19.92" E	1,641.48	Not Certified	2023	-
PT. Agro Rawas Ulu	Indonesia	Agro Rawas Ulu East Estate	Desa Sungai Jauh, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 36' 08.38" S	102° 44' 29.52" E	2,400.00	Not Certified	2023	-
	Indonesia	Agro Rawas Ulu West Estate	Desa Lubuk Mas, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 40' 19.07" S	102° 37' 46.77" E	2,162.00	Not Certified	2023	-
	Indonesia	Koperasi Rawas Jaya (Smallholder)	Desa Pulau Lebar, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 38' 20.16" S	102° 41' 06.61" E	1,150.00	Not Certified	2023	-

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 no Critical; no Minor nonconformities and one (1) Opportunity For Improvement raised.

Non-conformity			
NCR Ref #	Nil	Date Issued	-
Due Date	-	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	-		
Statement of Nonconformity:	-		
Requirement Reference:	-		
Objective Evidence:	-		
Corrections:	-		
Root Cause Analysis:	-		
Corrective Actions:	-		
Assessment Conclusion:	-		

Opportunity for Improvements	
OFI #	Description
OFI 1	Clause 3.2.1 The management of Bukit Maradja Palm Oil Mill has carried out road repairs in the form of piling up sands, stones, and making outlets for the period from 2021 to February 2022. Road conditions during audit can also be passed by large vehicles (CPO and PK trucks). Furthermore, the Mill can also show the 2023 budget for road repairs at the Mill location, starting from the gate to the dispatch station. However, the current condition of the road next after the weighbridge consider immediate attention.

Positive Findings	
PF #	Description
PF 1	High commitment and supporting from Top Management and all employee due to RSPO and ISPO implementation even though on hard situation such as cause of pandemic COVID-19.
PF 2	All employees have been fully vaccinated with anti-covid vaccines.

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3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	Nil	Date Issued	-
Due Date	-	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	-		
Statement of Nonconformity:	-		
Requirement Reference:	-		
Objective Evidence:	-		
Corrections:	-		
Root Cause Analysis:	-		
Corrective Actions:	-		
Assessment Conclusion:	-		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1033270M1	Major	RSPO P&C 2.1.1	03/03/2014	Closed on 13/05/2014
1033270M2	Major	RSPO P&C 5.3.2	03/03/2014	Closed on 13/05/2014
1033270M3	Major	RSPO P&C 5.6.2	03/03/2014	Closed on 13/05/2014
1033270N1	Minor	RSPO P&C 2.1.4	03/03/2014	Closed on 28/03/2015
1033270N2	Minor	RSPO P&C 4.7.4	03/03/2014	Closed on 28/03/2015
1033270N3	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1033270N4	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1170504M1	Major	RSPO P&C 6.3.1	28/03/2015	Closed on 22/04/2015
1170504M2	Major	RSPO Supply Chain Certification Standard (November 2014) – clause D.3.1	28/03/2015	Closed on 22/04/2015
1170504N1	Minor	RSPO P&C 2.2.5	28/03/2015	Closed on 18/03/2016
1170504N2	Minor	RSPO P&C 5.3.3	28/03/2015	Closed on 18/03/2016
1170504N3	Minor	RSPO P&C 6.1.4	28/03/2015	Closed on 18/03/2016
1170504N4	Minor	RSPO P&C 6.9.3	28/03/2015	Closed on 18/03/2016

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1607838-201803-M1	Major	RSPO Supply Chain Certification Standard (June 2017) – clause D.4.2	24/03/2018	Closed on 16/04/2018
1754045-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement- Clause 5.7.2	23/03/2019	Closed on 03/05/2019

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 Eastern Sumatera Indonesia – Bukit Maradja 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 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)
Union	- Serikat Pekerja Bukit Maradja Mandiri (SPBUM)	Face to face interview
Contractor	- UD Sejahtera - PT Multi Prima Nusa	Phone interview
Local NGO	LSM Suara Inti	Phone interview
Local Government Department	- Manpower Office of Simalungun - Plantation Office of Simalungun - Environmental Office of Simalungun - Land Office of Simalungun	Phone interview
Local Communities	- Village of Meranti - Village of Pematang Gajing - Village of Lingga - Village of Wonorejo - Village of Timbang Deli	Phone interview
Internal	- Gender Committee - New Mother	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Independent Worker Union of Bukit Maradja (SPBUM).</p> <ul style="list-style-type: none"> - Bipartite Union meeting are carried out regularly every month. - The last bipartite meeting was Friday 12 March 2022, regarding wage adjustments. - Retired 2 people in October 2021 at BMPOM, including: Screw Press (Jul2021), WWTP Helper (Oct 2021). - Union membership fee 0.8% of base salary. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Positive feedback and no issues for the last 12 months. - Retirement rights are paid accordingly.
2	<p>Feedbacks: UD Sejahtera (Local Supplier)</p> <ul style="list-style-type: none"> - The company are frequent purchased several materials and no outstanding payment since cooperates for years. - No negative issues raise, all information are disseminated in good communication. <p>Audit Team verification and response: Positive feedbacks</p>
3	<p>Feedbacks: PT Multi Prima Nusa (FFB transport services)</p> <ul style="list-style-type: none"> - PT Eastern Sumatra Indonesia have good initiative to communicate if any changes in their policies, SOP's or essential requirements within the contracts. - RSPO and/or legal requirements are very well implemented. This is also affected to us as a contracted party to be good in business ethics. Such as: PPE use for our workers, social insurance also covered, no child workers, salary paid according to minimum wages, etc. - No outstanding payment. <p>Audit Team verification and response: Positive feedbacks and no negative issues</p>
4	<p>Feedbacks: LSM Suara Inti</p> <ul style="list-style-type: none"> - SIPEF is very good company. Communication with stakeholders are in positive way. We as local NGO always monitored all the activities of this company, from environment, social, legal and community aspects, no infringement is occurring. - This company are prioritizing local workers to be hires, there is no issues in regards of manpowers for the last 5 years. <p>Audit Team verification and response: Positive feedbacks and no negative issues</p>
5	<p>Feedbacks: Manpower Office of Simalungun Regency</p> <ul style="list-style-type: none"> - Report on time. Workers list is updated monthly. - Each unit has independent worker union and registered. - Rights and requirements of manpower are implemented without any discrepancy. <p>Audit Team verification and response: Positive feedbacks and no negative issues</p>

<p>6</p>	<p>Feedbacks: Plantation Office of Simalungun Regency</p> <ul style="list-style-type: none"> - Plantation activities are reported on time twice a year, including replanting program. - Plantation license is still in accordance with company activities, including type of commodities. - No negative issues received according to the company for the last 12 months. <p>Audit Team verification and response: Positive feedbacks and no negative issues</p>
<p>7</p>	<p>Feedbacks: Environmental Office of Simalungun Regency</p> <ul style="list-style-type: none"> - No changes of environment monitoring and management plan. All the environment documents are still valid, including waste permits, aspect impacts, etc. - Environmental report already submitted on time through SIMPEL application nor directly sending hardcopy to environmental office. - In the past 12 months, no pollution report or negative issues from communities against the company. <p>Audit Team verification and response: Positive feedbacks and no negative issues</p>
<p>8</p>	<p>Feedbacks: Land Office of Simalungun Regency</p> <ul style="list-style-type: none"> - Process renewal of land title is in progress from provincial land office. - Currently, re-measurement of land title is waiting for the provincial land office team. <p>Audit Team verification and response: The process of renewal land title is in progress from land office of Simalungun Regency, as per letter below:</p> <ul style="list-style-type: none"> - Letter No: IP.01.02/17-12.08/I/2022, dated 07 January 2022 (PT Eastern Sumatra Indonesia). - Letter No: IP.01.02/18-12.08/I/2022, dated 07 January 2022 (PT Kerasaan Indonesia). - Letter No: G.023/TDI/2022, dated 16 March 2022 (PT Timbang Deli Indonesia).
<p>9</p>	<p>Feedbacks: Village of Meranti, Village of Pematang Gajing, Village of Lingga, Village of Wonorejo, Village of Timbang Deli.</p> <ul style="list-style-type: none"> - So far, the company gave positive impact to the communities. Particularly access for grass collection inside the plantation and collecting palm stick for broom. - Most of villagers are assisted with company program, such as road maintenance, fishery, cattle, etc. - Worker recruitment is communicated with village staff and the company prioritizing local communities. - No negative issues raise. <p>Audit Team verification and response: Positive feedbacks and no negative issues</p>
<p>10</p>	<p>Feedbacks: Gender Committee and New Mother</p> <ul style="list-style-type: none"> - No negative issue on gender since the organization established. - For new mother, the company given access for breastfeeding at 9-10 am every day. Most of new mother are worked at office as administration. <p>Audit Team verification and response: Positive feedbacks and no negative issues</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					
<p>Note: PT. Eastern Sumatera Indonesia – Bukit Maradja POM and its supply bases has been operated since the Netherland Indie era and there was no new land expansion after 2005. Current existing plantation are the third generation/ cycle. There is no previous land owner/user existed.</p>					

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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Eastern Sumatra Indonesia – Bukit Maradja POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 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 Eastern Sumatra Indonesia – Bukit Maradja POM is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Sander Van Den Ende
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: PT Eastern Sumatera Indonesia – Bukit Maradja POM
Title: Lead Assessor	Title: Regional Director Sustainability
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 6 April 2022	Date: 6 April 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<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>Each estate and POM has consistently updated the types of documents that can be accessed by the public once a year, for example;</p> <ul style="list-style-type: none"> a. Bukit Maradja POM has updated the types of documents that can be accessed by the public on 24 February 2022, which states that there are 19 types of documents that can be accessed by the public. b. Bukit Maradja Estate: has updated the types of documents that can be accessed by the public in 24 February 2022 where the document states that there are 20 types of documents that can be accessed by the public. c. Kerasaaan Estate: has updated the types of documents that can be accessed by the public on 24 February 2022, which states that there are 19 types of documents that can be accessed by the public. <p>Based on document verification, it shows that in the estate and POM offices there are documents available to the public including:</p> <ul style="list-style-type: none"> a) A copy of the HGU Permit in the form of <ul style="list-style-type: none"> - Bukit Maradja Estate: license to extend Business Use Rights (HGU) for 25 years as stated in the Decree of the Head of the National Land Agency No. 108 / HGU / BPN / 97, dated 26 August 1997 concerning the Granting of Extension of Business Use Rights over Land located in Simalungun Regency, North Sumatra Province on behalf of PT Eastern Sumatra Indonesia. As a follow-up to the issuance of the HGU Extension Decree, the Simalungun 	<p>Complied</p>

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		<p>Regency Land Office in 1997 issued a HGU Certificate No. 2 of 1997 which is located in Pematang Sahkuda Village dated 16 October 1997 with an area of 3,177.94 Ha in accordance with the Measure Letter No. 02.09.03.34.2.00348 / 1997 dated 16 October 1997. The expiration period for the extension of the HGU certificate is on 31 December 2023.</p> <ul style="list-style-type: none"> - Kerasaaan Estate: Decree of the State Minister for Agrarian Affairs / Head of the Land Agency No.SK 90 / HGU / BPN / 97, dated August 5, 1997, with an area of 2,362.03 Ha, which is located in Kerasaaan II Village, Bandar Rakyat District, Simalungun Regency, North Sumatra Province. Based on the decree, the HGU Certificate was issued by the Land Office of Simalungun Regency No. 01 dated 01 October 1997 with an area of 2,362.03 Ha in accordance with the Measurement Letter No. 131/09 / IV / 97. - Timbang Deli Estate: Decree of the State Minister for Agrarian Affairs / Head of the Land Agency No. SK 69 / HGU / BPN / 97, dated July 10, 1997, with an area of 972.19 hectares, which is located in Timbang Deli Village, Galang District, Deli Serdang Regency, North Sumatra Province. Based on the decree, the HGU Certificate was issued by the Land Office of Deli Serdang Regency No. 04 dated September 10, 1997 with an area of 972.19 Ha in accordance with the Situation Figure No. 8860/1997 dated 9 September 1997. <p>Total certified area of Bukit Maradja POM: 6,512.16 Ha</p> <ul style="list-style-type: none"> a) Occupational Health and Safety, Environment and Social Management Committee Program (P2K3LHS) for each estate and POM. b) Environmental Documents (AMDAL), Report documents on the implementation of RKL-RPL, c) HCV Identification Document, HCV Management and Monitoring Plan, HCV Report. d) Documents of complaints received from stakeholders and company responses to these complaints. 	
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		<p>e) Procedure for providing and responding to requests for information.</p> <p>There are 24 types of set of procedures, for example; Procedures for Legal and Corporate Affairs Department Manual, Environment and Conservation Department Manual, Estate Department Manual, Palm Oil Mill Operational Manual, Internal Audit Department Manual, Occupational Health and Safety Operational Manual, Laboratory independent Operational Manual, Purchasing Department Manual, Engineering Department Manual etc.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Based on document verification, the document listed above in 1.1.1 is available in Bahasa Indonesia and some document made bi-lingual, Bahasa Indonesia and English:</p> <ul style="list-style-type: none"> - Company policies available in English and Bahasa Indonesia; - Company operational procedures is available in English and Bahasa Indonesia; - The document of Land Title/Izin HGU, Environmental Permit/AMDAL, HCV Identification/Identifikasi HCV, Social Impact Assessment available in Bahasa Indonesia; - The document of OHS Committee Management Plan available in Bahasa Indonesia; - The document of GHG identification and GHG Mitigation Plan available in Bahasa Indonesia; - Public summary of the certification assessment report oleh CB available in English; - Internal Audit RSPO P&C Report available in Bahasa Indonesia; - The document of Stakeholder Complaint, Grievance and respond upon complaint and grievance from stakeholder available in Bahasa Indonesia; <p>The document of Continuous Improvement available in Bahasa Indonesia;</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Records of requests for information and responses are maintained by each estate and mill, under logbook title "Rekaman Permintaan Informasi & Tanggapan". For example:</p>	Complied

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		<p>a. In 2021 at Bukit Maradja POM there were 1 incoming letter from stakeholders. For example, the request on 8 November 2021 from staff for housing maintenance. The request has been granted by mill manager on the same day.</p> <p>b. In 2021 at Bukit Maradja Estate there were 3 requests for information from stakeholders. For example, the request for Backhoe Loader’s loan from Village Head of Marihat Bukit for road maintenance on 9 September 2021. The letter has been response and granted by estate manager on 11 September 2021.</p> <p>c. Kerasaan Estate: In 2021 at Kerasaan Estate there 9 incoming letter type of communication / request for information from stakeholders. For example, incoming letter on 21 Februari 2022 from Subdistrict Head of Pematang Bandar for the van loans for Qur’an Reciters contingent. Response and granted by the estate manager on 23 February 2022.</p> <p>d. Timbang Deli Estate: In 2021 at Timbang Deli Estate there 32 incoming letter type of communication / request for information from stakeholders. For example, incoming letter on 21 December 2021 from Agriculture Agency of Deli Serdang Regency related to request report of plantation permit and land title of PT Timbang Deli Indonesia. The request has been replied by the estate manager on 22 December 2021.</p>	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	Records of consultation and communication also documented in the same logbook “Rekaman Permintaan Informasi & Tanggapan”. In year 2021, Bukit Maradja Estate recorded 3 information requests from stakeholders. Most of them in type of donation request. Sample taken: Request on 8 November 2021 from staff for housing maintenance. The request has been granted by mill manager on the same day.	Complied
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	An updated Stakeholder List Document is available, for example: a. Bukit Maradja POM which was updated on 4 February 2022 consists of 44 types of stakeholders including Stakeholders from Local Government (there are 6 stakeholders), MUSPIKA (3 Stakeholders), Community Leaders (8	Complied

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		<p>stakeholders), Pengulu Nagori (8 Stakeholders), Karang Taruna (3 stakeholders), Local NGOs (1 Stakeholder), Trade Unions (3 stakeholders), Contractors / Suppliers (10 stakeholders) and Public Services (2 stakeholders).</p> <p>b. Bukit Maradja Estate, which was updated in 4 January 2022, consists of 23 types of stakeholders including Stakeholders from the Government (there are 4 stakeholders), MUSPIKA (3 Stakeholders), Village Heads (8 Stakeholders), Labour Unions (3 stakeholders) and Contractors / Suppliers (5 stakeholder).</p> <p>c. Kerasaan Estate which was updated on 4 January 2022 consists of 27 types of stakeholders including Stakeholders from the Government (there are 5 stakeholders), MUSPIKA (3 Stakeholders), Village Heads (5 Stakeholders), Community Leaders (2 Stakeholders), NGOs (2 Stakeholders), Trade Unions (3 stakeholders), and Contractors / Suppliers (8 stakeholders).</p> <p>d. Timbang Deli Estate which was updated on 3 January 2022 consists of 24 types of stakeholders including Stakeholders from the Government (there are 10 stakeholders), MUSPIKA (3 Stakeholders), Village Heads (2 Stakeholders), labour unions (4 stakeholders), Contractor (2 stakeholders), supplier (2 stakeholder) and Suppliers (1 stakeholders).</p> <p>The list of stakeholders describes the name of the agency, representative organization, address and contact number.</p>	
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.	PT. Eastern Sumatra Indonesia refers to PT. Tolan Tiga Indonesia has Code of Conduct No.QMM-40-01-P19/21-08-2018/Rev.0 dated 28 September 2018. The code of conduct standards are the company internal guidelines for work ethics, commitment and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, An ethical approach to their work, honesty and discipline at work, openness and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and	Complied

		<p>behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <ul style="list-style-type: none"> - Regulates conduct as superior, employees in superior position must always be a good role model in words and actions, being fair and open with subordinates, establish open and constructive communication with subordinates, follow a policy of always trying to coordinate cooperative relationships, fostering harmonious teamwork, avoid using position or post for personal, group or any other party's interests, etc. - Regulates behaviour as a Subordinate, employees in subordinate positions are expected to always be respectful and polite to supervisor and loyal to the company when executing any given task, communicate with superior honestly, openly and ethically, perform actions that are only within their authority, etc. - Company records, documents and information must be accountable, accurate and timely, therefore, the individuals responsible for the management of records, documents and information must be honest, objective and responsible. - Each individual will secure, protect, maintain and use company property the best possible way, according to the provisions, use company property only in the interests of the company. - The company will not tolerate insider trading practices and will take legal action against insider trading in accordance to applicable regulations. - Each individual has an obligation to put the interests of the company first and avoid conflicts of interest in various forms by the company. It is not permissible to have business ties, personally or involving families, that can cause business conflicts with the company. - Company employees may not become an administrator of a political party or a political candidate, unless there is written permission from the company. - Giving or receiving a sign of gratitude for interests in a business relationship, in the form of gifts of any kind or souvenirs, must not be done in a situation considered as an act that does not meet principle of decency and fairness. Donation can only be made for charitable purpose and other social objectives, 	
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		<p>tailored to financial capacity of the company as well as laws and regulations. The company and each individual do not give, offer or receive, directly or indirectly, anything of value or in the form of promises, that can be categorized as bribe to or from customer or government officials to influence decision.</p> <ul style="list-style-type: none"> - Every individual is obliged to report any breach of the Code of conduct made by other individuals with sufficient evidence, through the communication channels provided by the Company. - The provision of sanction for breaches of the Code of conduct by individuals in the company is determined in accordance with the provisions of the company and/or prevailing laws and regulations. <p>Bukit Maradja POM: Socialization of this policy in Bukit Maradja POM carried out on 5 January 2022; attended by 62 workers.</p> <p>Bukit Maradja Estate: This policy communicated to contractors. For example, sighted the record of code of ethical conduct socialization on 15 February 2022. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p>Kerasaan Estate: This policy communicated to contractors. For example, sighted the record of code of ethical conduct socialization on 5 January 2022. The socialization attended by 7 driver and helper of FFB/EFB transporter from PT. Multi Prima Nusa.</p> <p>Timbang Deli Estate: PT. Timbang Deli Indonesia has Code of Conduct No. SOP/TDI/14 dated 1 July 2017. The code of conduct standards are the company internal guidelines for work</p>	
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		<p>ethics, commitment and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, An ethical approach to their work, honesty and discipline at work, openness and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <p>Socialization of this code of ethical conduct policy in Timbang Deli Estate carried out:</p> <ul style="list-style-type: none"> - 22 workers (harvesting team) of Timbang Deli Estate dated 24 February 2022 attended by harvesting supervisor, harvesting clerk and harvesters. - 15 workers (upkeep team) of Timbang Deli Estate, dated 24 February 2022 joined by pesticide applicator and their supervisor. 	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>Certificate holder conducted annual internal audit program to monitor and to ensure operational activity align with the company's procedures. Furthermore, the internal audit also ensuring all business activity are comply with SIPEF ethics policy.</p> <ul style="list-style-type: none"> - Internal Audit in Bukit Maradja Estate against RSPO, ISPO, ISCC standard dated 1 – 4 September 2021. The internal audit issued 2 Major findings, 4 Minor findings and 4 Observations; but no findings related to code of ethical conduct. Internal Audit in Bukit Maradja Estate against RSPO, ISPO, ISCC standard dated 14-16 February 2021. 2020. The internal audit issued 1 Minor finding and 1 Observation; but no findings related to code of ethical conduct. - Internal Audit in Kerasaan Estate against RSPO, ISPO standard dated 24 – 26 August 2021. The internal audit issued 4 Minor findings and 15 Observations; but no findings related to code of ethical conduct. Management review on 29 September 2021. - Internal Audit in Timbang Deli Estate against RSPO standard dated 7 – 9 	Complied

		<p>February 2022. The internal audit issued 4 Minor findings, but no findings related to code of ethical conduct. Management review on 21 February 2022, attended by 8 participants which is management unit head and staff.</p> <p>All unit has been conducted contractor evaluation to monitor compliance and the implementation of the policy and overall ethical business practice. Sighted the sample of contractor evaluation of Bukit Maradja Estate on behalf on contractor Koperasi Jasa Bukit Maradja on 20 December 2021.</p>	
<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.	<p>Unit of Certification prepared and maintained a list of legal requirements as per describe in "Daftar Peraturan Perundangan Indonesia yang Berkaitan dengan Sistem Sustainability", update February 2022.</p> <p>Unit of Certification has monitored the change in laws and regulation. The changes and update in laws and regulation documented under "Pemantauan Penambahan atau Perubahan Undang-Undang/Peraturan tahun 2021". Based on document verification, there are 19 type laws and regulation changed – relevant and applicable to the company operations:</p> <ul style="list-style-type: none"> a) Governor of Sumatera Utara Province Decree related to the minimum wage as per "Keputusan Gubernur Sumatera Utara No. 188.44/839/Kpts/2021 tentang Upah Minimum Sektoral Kabupaten Simalungun tahun 2021" – new regulation. b) Minister of Labor No. 35 year 2021 related to "Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat dan Pemutusan Hubungan Kerja". c) Minister of Health related to Vaccination to Avoid Pandemic as per "Peraturan Menteri Kesehatan No. 10 tahun 2021 tentang Pelaksanaan Vaksinasi Dalam Rangka Penanggulungan Pandemi" – new regulation. 	Complied

		<p>The documented laws and regulation provide information type of laws/regulation as new or replacing obsolete laws, the impact to company's system, Source of laws/regulation document, Area of concerns, Remarks, and other things.</p> <p>From stakeholder consultation with relevant government services (Dinas Perkebunan, Dinas Lingkungan Hidup dan Dinas Tenaga Kerja Kabupaten Simalungun) and village heads, as well as worker union, the company fulfil all legal, laws, and regulations requirement: legal ownership of the land, legal entity, tax and retribution, regulation related to manpower, regulation related to environmental management.</p> <p>Based on visit and document verification, PT. Eastern Sumatra Indonesia demonstrate effort to comply with laws and regulation, such as: "Izin Usaha Perkebunan", Land Title – "Hak Guna Usaha/HGU", maintenance of HGU boundary poles, evidence of worker payment meets minimum wage regulations, overtime payment as per regulation, annual leave provision for workers, all level of worker registered with social insurance, environmental permit is valid, hazardous waste storage permit is valid, reports related to environmental performance submitted to regulatory bodies.</p>	
2.1.2	<p>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.</p>	<p>PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia:</p> <p>The mechanism for complying with statutory regulations is regulated in the "Legal and Corporate Affairs Department Manual", namely SOP No. LCA-01-08 / 24-01-2020 / Rev.0 concerning Update Information and News and Regulations which was approved by management on March 17, 2020. In this procedure it is explained that the updating of regulations is carried out if there are new regulations issued or changes to regulations legal opinion from the VPL if necessary.</p> <p>The company has documented 259 types of regulations relevant to oil palm plantation operations and POM in 2020, including international conventions, national laws and local regulations.</p> <p>The company monitors changes in laws and regulations that occur and is stated in the document "Monitoring the Addition or Amendment of Laws / Regulations in 2020". Based on the document verification, there are 13 types of changes or</p>	Complied

		<p>additions to laws and regulations that are relevant to POM operations, for example:</p> <ul style="list-style-type: none"> • Governor of North Sumatra Decree No. 188.44 / 597 / Kpts / 2021 concerning the Sectoral Minimum Wage in Simalungun Regency in 2021 (new regulation). • Minister of Agriculture related to ISPO certification as per "Peraturan Menteri Pertanian Republik Indonesia No. 38 tahun 2020 tentang Peyelenggaraan Sertifikasi Kelapa Sawit Berkelanjutan Indonesia". • Minister of Health related to Vaccination to Avoid Pandemic as per "Peraturan Menteri Kesehatan No. 10 tahun 2021 tentang Pelaksanaan Vaksinasi Dalam Rangka Penanggulangan Pandemi" – new regulation. <p>The legal department also conducted the evaluation of legal compliance of third parties engaged. Especially the fulfilment of working agreement.</p> <p>PT Timbang Deli Indonesia:</p> <p>The company has shown the documents of the evaluation results of the changes in the laws and regulations that have occurred and is stated in the document "Evaluation of Compliance with the Laws of 2021". Based on the document verification, there are 20 types of changes or additions to laws and regulations that are relevant to plantation operations, for example:</p> <ul style="list-style-type: none"> • In 2021, 19 types of new regulations will be evaluated as well as changes to previous regulations. • In 2021, 1 new type of regulation will be evaluated. <p>The document describes information on the types of regulations (new / replacement), proof of compliance, compliance evaluation and evaluation date.</p>	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	Unit of Certification had 48 boundary poles in Bukit Maradja Estate, 42 boundary poles in Kerasaan Estate and 13 boundary poles in Timbang Deli Estate. Based on the existing procedures, all boundary poles shall be monitored regularly (every 2 month) by upkeep supervisor in each division. The record of monitoring can be	Complied

		<p>seen in document "Pemeriksaan Nomor Patok HGU" (latest document on February 2022).</p> <p>During the field visit, auditor team has random-checked the boundary poles in each unit as follows:</p> <p>Bukit Maradja Estate – PT Eastern Sumatra Indonesia:</p> <ul style="list-style-type: none"> ➤ Boundary poles No. 25a Block 11A10A Division 2 ➤ Boundary poles No. 26 Block 10A03A Division 2 ➤ Boundary poles No. 27 Block 10A03A Division 2 ➤ Boundary poles No. 28 Block 10A03A Division 2 ➤ Boundary poles No. 29 Block 10A03A Division 2 ➤ Boundary poles No. 30 Block 10A03A Division 2 <p>Kerasaan Estate – PT Kerasaan Indonesia:</p> <ul style="list-style-type: none"> ➤ Boundary poles No. 1 Block 15K01 Division 3 ➤ Boundary poles No. 2 Block 12F01 Division 1 ➤ Boundary poles No. 36 Block 10E03 Division 1 ➤ Boundary poles No. 35 Block 10E03 Division 1 ➤ Boundary poles No. 34 Block 10D04 Division 1 ➤ Boundary poles No. 33 Block 21C04A Division 1 ➤ Boundary poles No. 32 Block 21C04A Division 1 <p>Timbang Deli Estate – PT Timbang Deli Indonesia:</p> <ul style="list-style-type: none"> ➤ Boundary poles No. 8 Block 22I03 Division Rubber ➤ Boundary poles No. 6 Block 17H03 Division Oil Palm Galang ➤ Boundary poles No. 5 Block 20F04A Division Oil Palm Galang ➤ Boundary poles No. 4 Block 04E05 Division Rubber <p>All boundary poles visited clearly visited and well-maintained.</p>	
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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.	<p>Bukit Maradja POM: List of contractor provides service in Bukit Maradja POM recorded under "Bukit Maradja Palm Oil Mill Daftar Stakeholder", updated 1 September 2021". There are 5 contracted parties: KSU Bukit Maraja (consumer minimarket), UD Sumber Teknik (civil material, building material, civil work contractor), UD Harahap (Air Conditioner Services), Romy Taylor (uniform tailor), PT. SSI Solusi Sekuriti Indonesia (security services).</p> <p>Bukit Maradja Estate: List of contractor provides service in Bukit Maradja Estate recorded under "Bukit Maradja Estate Daftar Stakeholder", updated January 2022". There are 5 contractors: Koperasi Jasa Bukit Maradja (manpower supplier), UD Sumber Teknik (civil material, building material, civil work contractor), UD Sejahtera (office utensil supplier), PT. Multi Prima Nusa (FFB transporter), PT. Aneka Sumatrindo (replanting contractor).</p> <p>Kerasaan Estate: List of contractor provides service in Kerasaan Estate recorded under "Daftar Pemangku Berkepentingan", updated 14 January 2022. There are 7 contracted parties: Koperasi Konsumen Kerasaan (manpower supplier), UD Sumber Teknik (civil material, building material, civil work contractor), UD Sejahtera (office utensil supplier and civil material), PT. Multi Prima Nusa (FFB transporter), PT. Aneka Sumatrindo (Ganoderma sanitation), PT. Spectra Utima Perkasa (monitoring tower), CV Sinar Perkasa (fire extinguisher refill).</p> <p>Timbang Deli Estate: List of contractor provides service in Timbang Deli Estate recorded under "Daftar Stakeholder PT. Timbang Deli Indonesia", updated 3 January 2022. There are 3 contracted party listed: Koperasi Jasa Karyawan Timbang Deli (manpower supplier), PT. SSI (security supplier), CV Biring Ndu Cahaya Panglong (FFB transport).</p>	Complied

		<p>Koperasi Jasa Bukit Maradja, Koperasi Konsumen Kerasaan and Koperasi Jasa Karyawan Timbang Deli are the manpower supplier organization to provide Free Labour/Casual Worker. The job under this contract is for General Worker such as gardener, manual upkeep like wooden uproot, slashing, grass mover.</p>	
<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>Bukit Maradja Estate: Contract for FFB transport: "Surat Perjanjian Kerja No.01/RMO-BME/MPN/I/2022 antara PT. Eastern Sumatra Indonesia dengan PT. Multi Prima Nusa tentang Angkut FFB" signed on 4 January 2022. The contract, section 5 stipulates Contractor shall responsible to any accident in the working area PT. Eastern Sumatra Indonesia, referring to "Undang-undang Kecelakaan Kerja No.33 tahun 1974"; Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers; Contractor shall pay the worker using applicable minimum wage; Contractor shall support the implementation of sexual harassment prohibition; Contractor shall abide to all relevant regulation and comply to principle and criteria from certification standard. Timeframe agreed on Section 4: start 3 January 2022 – 31 December 2022.</p> <p>Bukit Maradja POM Contract for Replacement Blowdown Silencer: "Surat Perjanjian No.03/BMM-HO/ENG/2022 antara PT. Eastern Sumatra Indonesia dengan PT. Triroyal Timurraya tentang Replacement Blowdown Silencer at Bukit Maradja POM" signed on 11 January 2022. The contract, section 7 stipulates Contractor shall responsible to any accident in the working area PT. Eastern Sumatra Indonesia, Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labour, do not use trafficked workers; Contractor shall pay the worker using applicable minimum wage; <u>Comply with relevant Laws and Regulation of Indonesia</u>; Timeframe agreed on Section 3: start work period 60 days starting 7 days from agreement signed.</p> <p>Kerasaan Estate:</p>	<p>Complied</p>

		<p>Contract for replanting: "Surat Perjanjian Kerja No.02/RMO-KRE/MPN/I/2022 antara PT. Kerasaan Indonesia dengan PT. Multi Prima Nusantara tentang Angkut FFB" signed on 3 January 2022. The contract, section 5 stipulates Contractor shall responsible to any accident in the working area PT. Eastern Sumatra Indonesia, Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labour, do not use trafficked workers; Contractor shall pay the worker using applicable minimum wage; Comply with relevant Laws and Regulation of Indonesia.</p> <p>Timbang Deli Estate:</p> <p>Contract for FFB transport: "Surat Perjanjian Kerja No. 02/TDI/BNCP/I/2022 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 3 January 2022. The contract, section 8 stipulates contractor shall comply to rules and regulation in Indonesia.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Bukit Maradja POM</p> <p>Contract for Replacement Blowdown Silencer: "Surat Perjanjian No.03/BMM-HO/ENG/2022 antara PT. Eastern Sumatra Indonesia dengan PT. Triroyal Timurraya tentang Replacement Blowdown Silencer at Bukit Maradja POM" signed on 11 January 2022. The contract, section 7 stipulates Contractor shall responsible to any accident in the working area PT. Eastern Sumatra Indonesia, Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, <u>does not employ worker under 18 years old, prohibit forced labour, do not use trafficked workers</u>; Contractor shall pay the worker using applicable minimum wage; Comply with relevant Laws and Regulation of Indonesia; Timeframe agreed on Section 3: start work period 60 days starting 7 days from agreement signed.</p> <p>Bukit Maradja Estate:</p> <p>Contract: "Surat Perjanjian Kerja No.02/GMO-BME/AS/I/2022 antara PT. Eastern Sumatra Indonesia dengan PT. Aneka Sumatrindo tentang Sanitasi Ganoderma</p>	Complied

		<p>Persiapan Replanting 2023” signed on 4 January 2022. The contract, section 1 stipulates contractor’s responsibilities, i.e. does not employ worker under 18 years old. “PT. Aneka Sumatrindo” issued statement letter dated 17 February 2022, stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers; to comply all requirements under certification system principle & criteria; do not employ underage children, willing to be audited by certification body, if needed.</p> <p>Contract: “Surat Perjanjian Kerja No.01/RMO-BME/MPN/I/2022 antara PT. Eastern Sumatra Indonesia dengan PT. Multi Prima Nusa tentang Angkut FFB” signed on 4 January 2022. The contract, section 5 stipulates Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers.</p> <p>Kerasaan Estate:</p> <p>Contract: “Surat Perjanjian Kerja No.02/RMO-KRE/AS/VII/2021 antara PT. Kerasaan Indonesia dengan PT. Aneka Sumatrindo tentang Replanting OP 2021” signed on 1 July 2021. The contract, section 1 stipulates contractor’s responsibilities, i.e. does not employ worker under 18 years old, provides PPE, contractors pays it worker in compliance with minimum wage, worker/operator holds operator license, prevent sexual harassment, shall comply to rules and regulation in Indonesia.</p> <p>Timbang Deli Estate</p> <p>Contract for FFB transport: “Surat Perjanjian Kerja Surat Perjanjian Kerja No. 02/TDI/BNCP/I/2022 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar” signed on 1 January 2021. The contract, section 6 stipulates contractor’s responsibilities, i.e. does not employ worker under 18 years old, pays the insurance, provides PPE, contractors pays it worker in compliance with minimum wage, prevent sexual harassment, shall comply to rules and regulation in Indonesia, forced labor/trafficked labor.</p>	
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Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.

2.3.1	<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. 	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from nucleus estates consisting of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied																				
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.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from nucleus estates consisting of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied																				
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>																							
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>																							
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>PT Eastern Sumatra Indonesia prepared Business Plan 2021-2031, explaining the estimated FFB, CPO, PK, Capital Expenditure summary, infrastructure, installation-machinery-equipment, land-building, revenue, sales processing fee, cost of sales, and unit cost.</p> <p>Bukit Maradja Estate: FFB Production estimates 2021-2031</p> <table border="1" data-bbox="1008 1141 1960 1353"> <thead> <tr> <th>Year</th> <th>FFB production (MT)</th> <th>Field work cost (Rp/kg)</th> <th>Harvesting cost (Rp/kg)</th> <th>General charges (Rp/kg)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>66,360</td> <td>305</td> <td>141</td> <td>246</td> </tr> <tr> <td>2022</td> <td>62,439</td> <td>305</td> <td>141</td> <td>246</td> </tr> <tr> <td>2023</td> <td>59,525</td> <td>305</td> <td>141</td> <td>246</td> </tr> </tbody> </table>	Year	FFB production (MT)	Field work cost (Rp/kg)	Harvesting cost (Rp/kg)	General charges (Rp/kg)	2021	66,360	305	141	246	2022	62,439	305	141	246	2023	59,525	305	141	246	Complied
Year	FFB production (MT)	Field work cost (Rp/kg)	Harvesting cost (Rp/kg)	General charges (Rp/kg)																			
2021	66,360	305	141	246																			
2022	62,439	305	141	246																			
2023	59,525	305	141	246																			

2024	57,424	305	141	246
2025	57,136	305	141	246
2026	56,998	305	141	246
2027	61,280	305	141	246
2028	61,829	305	141	246
2029	64,032	305	141	246
2030	64,896	305	141	246
2031	65,096	305	141	246

Kerajaan Estate:

PT Kerajaan Indonesia prepared Business Plan 2020-2030, explaining the estimated crop, and cost to bear

Year	FFB production (MT)	Total cost (Rp/kg)
2020	56,240	805.54
2021	52,284	876,30
2022	48,667	1,026.31
2023	46,381	1,130.73
2024	44,981	1,224.22
2025	41,472	1,385.18
2026	43,807	1,385.88
2027	44,590	1,429.62
2028	43,139	1,551.59

		<table border="1"> <tr> <td>2029</td> <td>43,188</td> <td>1,627.32</td> </tr> <tr> <td>2030</td> <td>43,439</td> <td>1,698.82</td> </tr> </table>	2029	43,188	1,627.32	2030	43,439	1,698.82																																
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		<p>Timbang Deli Estate: PT Timbang Deli Indonesia prepared Business Plan 2020-2030, explaining the estimated crop, and cost to bear</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB production (MT)</th> <th>Total cost (Rp/kg)</th> </tr> </thead> <tbody> <tr><td>2020</td><td>2,387</td><td>472</td></tr> <tr><td>2021</td><td>4,805</td><td>472</td></tr> <tr><td>2022</td><td>5,804</td><td>472</td></tr> <tr><td>2023</td><td>6,760</td><td>472</td></tr> <tr><td>2024</td><td>7,926</td><td>472</td></tr> <tr><td>2025</td><td>9,162</td><td>472</td></tr> <tr><td>2026</td><td>10,399</td><td>472</td></tr> <tr><td>2027</td><td>11,784</td><td>472</td></tr> <tr><td>2028</td><td>12,896</td><td>472</td></tr> <tr><td>2029</td><td>13,883</td><td>472</td></tr> <tr><td>2030</td><td>14,522</td><td>472</td></tr> </tbody> </table>	Year	FFB production (MT)	Total cost (Rp/kg)	2020	2,387	472	2021	4,805	472	2022	5,804	472	2023	6,760	472	2024	7,926	472	2025	9,162	472	2026	10,399	472	2027	11,784	472	2028	12,896	472	2029	13,883	472	2030	14,522	472		
Year	FFB production (MT)	Total cost (Rp/kg)																																						
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RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Year	FFB own estate (MT)	FFB smallholder* (MT)	CPO (MT)	PK (MT)
2021	67,257	7,628	29,608	2,981
2022	62,728	7,628	27,584	2,755
2023	61,266	7,628	26,555	2,682
2024	60,576	7,628	25,901	2,647
2025	62,630	7,628	26,315	2,750
2026	64,368	7,628	26,694	2,837
2027	70,965	7,628	29,250	3,167
2028	79,836	7,628	31,465	3,610
2029	86,370	7,628	33,518	3,937
2030	90,296	7,628	36,644	4,133
2031	93,921	7,628	35,543	4,315

**) FFB from smallholder received and sold to external mill – until become certified supply base.*

PT Eastern Sumatra Indonesia demonstrated independent financial audit report for from Registered Public Accountants Imelda & Partner (License No.308/KM.1/2020) as evidence in Independent Auditor’s Report No. 00515/2.1265/AU.1/01/1208-2/1/VIII/2021 dated 9 August 2021 by Theodorus Bambang Dwi K. A. (Public Accountant License No. AP.1208). Based on the report, the financial statements presents fairly, in all material respects, the financial position of PT Eastern Sumatra Indonesia as of December 31st, 2020 and its financial performance and cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards. Financial audit for financial year 2021 has been done in January 2022, the report is still in progress by the public accountant.

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		<p>Available evidence of tax receipt dated 05/10/2021; billing code 125716067672073; NPWP 011278165117001 of PT Eastern Sumatra Indonesia; tax object number 120722011711000351; PPB Perkebunan (411313 - land tax) period January – December 2021 for land 31,779,400 m² and building 70,243 m²; amount IDR *,**,301,495. Based on “Surat Pemberitahuan Pajak Terutang” No.00043/670/21/117/21 dated 14 April 2021.</p> <p>PT Kerasaan Indonesia demonstrated independent financial audit report for from Registered Public Accountants Imelda & Partner (License No.308/KM.1/2020) as evidence in Independent Auditor’s Report No.00526/2.1265/AU.1/01/1208-2/1/VIII/2021 dated 24 August 2021 by Theodorus Bambang Dwi K. A. (Public Accountant License No. AP.1208). Based on the report, the financial statements presents fairly, in all material respects, the financial position of PT Kerasaan Indonesia as of December 31st, 2020 and its financial performance and cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards. Financial audit for financial year 2021 has been done in January 2022, the report is still in progress by the public accountant.</p> <p>Available evidence of tax receipt dated 05/10/2021; billing code 125716067921144; NPWP 010022275117001 of PT Kerasaan Indonesia; tax object number 120719011711000341; PPB Perkebunan (411313 - land tax) period January – December 2021 for land 23,624,100 m² and building 78,445 m²; amount IDR *,**,896,990. Based on “Surat Pemberitahuan Pajak Terutang” No.00035/670/21/117/21 dated 14 April 2021.</p> <p>Available evidence of tax receipt dated 03/09/2021; billing code 225128469577028; NPWP 010018000125001 of PT Timbang Deli Indonesia; tax object number 121019012511000191; PPB Perkebunan (411313 - land tax) period January – December 2021 for land 9,911,900 m² and building 26,214 m²; amount IDR **,215,809. Based on “Surat Pemberitahuan Pajak Terutang” No.00036/670/21/125/21 dated 31 March 2021.</p>	
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<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>Bukit Maradja Estate: Replanting Program 2021 – 2031</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr><td>2021</td><td>1996, 1997, 1999</td><td>167.61</td></tr> <tr><td>2022</td><td>2001</td><td>185.09</td></tr> <tr><td>2023</td><td>1993, 1994, 1996</td><td>142.78</td></tr> <tr><td>2024</td><td>1996, 1997, 1999</td><td>193.68</td></tr> <tr><td>2025</td><td>1996, 1997</td><td>203.59</td></tr> <tr><td>2026</td><td>1996, 2002</td><td>148.95</td></tr> <tr><td>2027</td><td>2002</td><td>173.68</td></tr> <tr><td>2028</td><td>-</td><td>-</td></tr> <tr><td>2029</td><td>2003</td><td>158.40</td></tr> <tr><td>2030</td><td>2003</td><td>103.52</td></tr> <tr><td>2031</td><td>2005</td><td>153.14</td></tr> </tbody> </table> <p>Kerasaan Estate: Replanting Program 2021 – 2031</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr><td>2021</td><td>2003</td><td>101.68</td></tr> <tr><td>2022</td><td>1998, 2005</td><td>142.37</td></tr> <tr><td>2023</td><td>1996</td><td>107.48</td></tr> <tr><td>2024</td><td>1996</td><td>74.96</td></tr> <tr><td>2025</td><td>1996</td><td>102.85</td></tr> </tbody> </table>	Replanting year	Planting Year	Total Hectarage (Ha)	2021	1996, 1997, 1999	167.61	2022	2001	185.09	2023	1993, 1994, 1996	142.78	2024	1996, 1997, 1999	193.68	2025	1996, 1997	203.59	2026	1996, 2002	148.95	2027	2002	173.68	2028	-	-	2029	2003	158.40	2030	2003	103.52	2031	2005	153.14	Replanting year	Planting Year	Total Hectarage (Ha)	2021	2003	101.68	2022	1998, 2005	142.37	2023	1996	107.48	2024	1996	74.96	2025	1996	102.85	<p>Complied</p>
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Replanting year	Planting Year	Total Hectarage (Ha)																			
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2044	2019	32.32																			
2045	2020	29.23																			
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>PT Eastern Sumatra Indonesia demonstrated</p> <p>a. "Bukit Maradja POM Management Review Report Implementasi Persyaratan RSPO, ISCC and ISPO" dated 30 September 2021. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 18-20 August 2021; during internal audit there are 6 minor finding and 12 observations. - Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM; - Process performance and product conformity: scope of BM PM is FFB proceesing to be CPO and PK; proces are according to Mill Processing Manual; FFB quality according to Engineering Department, Independent Laboratory Manual; FFB Grading Procedure (Lab-01/11-08-2020/Rev-04). - Correction and Prevention: All internal audit findings have been discussed during management review. 	Complied																		

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		<ul style="list-style-type: none"> - Follow up from previous Management Review: Has been followed up can be seen on internal audit report. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. - Recommendation for Improvement: data & document updateing has to be done routinely and comply to sustainability system. b. "Bukit Maradja POM Management Review Report Implementasi Persyaratan RSPO Supply Chain" dated 22 Februari 2022. The management review consists of: <ul style="list-style-type: none"> - Internal Audit result dated 16-17 Februari 2022. - Customer feedback: no significant complaint related to CPO & PK dellivered from Bukit Maradja POM. - Process performance and product conformity: FFB processed in BM POM only coming from internal company (Bukit Maradja Estate, Kerasaan Estate and Timbang Dlei Estate; proces are according to Mill Processing Manual; FFB quality according to Engineering Department, Independent Laboratory Manual; FFB Grading Procedure (Lab-01/11-08-2020/Rev-04). - Correction and Prevention: All internal audit findings have been discussed during management review and have been closed. - Follow up from previous Management Review: Has been followed up can be seen on internal audit report. - Changes affecting Management System: there is change in FFB Grading Procedure and addition of Specification in FFB process Sortation (LAB-01-10-SPEC-01). - Recommendation for Improvement: corrective action to internal audit finding to be conducted consistently therefore not repeated in the next internal & external audit. 	
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		<p>c. "Bukit Maradja Estate Management Review Report Implementasi Sistem Sustainability RSPO, ISCC, ISPO" dated 28 September 2021. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 1-3 September 2021; during internal audit there were 6 minor finding and 17 observations. - Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM; - Process performance and product conformity: upkeep, harvesting and transport to Bukit Maradja POM following Oil Palm Agriculture SOP; FFB quality follows FFB Grading Procedure Lab-01-10/11-08-2020/Rev.4; - Correction and Prevention: All internal audit findings have been discussed during management review; - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No change in company policy; No changes in procedure and work instruction. - Recommendation for Improvement: corrective action need to be closed faster. <p>d. "Kerajaan Estate Management Review Report Implementasi Persyaratan P&C RSPO, ISPO" dated 29 September 2021. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 24-26 August 2021; during Internal audit, there are 4 minor NC and 15 observation issued. Status of NC have been discussed during management review meeting, un-closed findings have been followed up to related parties. - Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM; 	
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		<ul style="list-style-type: none"> - Process performance and product conformity: upkeep and harvesting followed Oil Palm Agriculture Manual; FFB quality follows FFB Grading Procedure Lab-01-10/11-08-2020/Rev.4; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. - Recommendation for Improvement: corrective action needs to be closed faster. <p>e. "Timbang Deli Estate Management Review Report Implementasi Persyaratan P&C RSPO" dated 21 February 2022. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 7-9 February 2022; during Internal audit, there are 4 minor NC and 24 observation issued. Status of NC have been discussed during management review meeting, un-closed findings have been followed up to related parties. - Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM; - Process performance and product conformity: upkeep and harvesting followed Oil Palm Agriculture Manual; FFB quality follows FFB Grading Procedure Lab-01-10/11-08-2020/Rev.4; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. 	
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		- Recommendation for Improvement: corrective action needs to be closed faster.	
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.			
3.2.1	(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>Bukit Maradja POM: The action plan for continuous improvement based on Vice President Engineering visit, dated 6 October 2021:</p> <ul style="list-style-type: none"> - All chemical should be stored inside bunded areas; completed 20 October 2021; - The wall of the depericarper station needs repair and cleaning; completed 22 November 2021; - The wall of the boiler house needs repair and cleaning; completed 6 November 2021. - More lighting is required in the workshop; completed 26 October 2021; - All welding machines found in the mill are considered to be unsafe for use and the mill manager should send a request to the VPE to replace these, all welding machines should be stored in the workshop and not in the mill; status: open. <p>Bukit Maradja Estate: Estate implements action plan from Senior Estate Manager North Sumatra:</p> <ul style="list-style-type: none"> - Canal construction with civil work – under contracting process; - Weed sanitation for polybag in nursery to ensure no weed in polybag – conducted consistently during spraying and weeding into polybag; - Briefing to manuring team to ensure fertilizer packing not breaking out – briefing done week 1 February 2021; - Construction of Giltrap path for compost application in OP2013 using bulldozer for application of compost using spreader/Giltrap – done February – March 2021; - Application of <i>Cordysep</i> to control cocoon of nettle caterpillar – February on blocks identified. 	OFI

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		<p>Kerasaan Estate: Estate implements action plan from Senior Field Manager (SFM) North Sumatra, dated 27 January 2021:</p> <ul style="list-style-type: none"> - Crop production under budget (-13.16%), budget per harvester 2.3MT/mandays, FFB abnormal OP 2014, OP201 need attention – OP2014/2015 having pollination issues; FFB abnormal to be reported; - Pest & disease: Nettle caterpillar and bagworm reduced compared to 2016-2019, target for trunk injection team 3Ha/team – cordysep application 628.24 Ha, Beneficial Plant introduction; - Loose Fruit Collector capacity – to increase the loose fruit collector productivity on January 2021. <p>Timbang Deli Estate: Program Continuous Improvement based on Agronomist visit dated 7 January 2022, e.g: evaluation of <i>Oryctes</i> sp. control in Immautre; carry out census and application of Marshal (Karbosulfan 5%) 10 gr/palm; Cleaning prond infested by <i>Oryctes</i> sp.; Planting oil palm after LCC (<i>Mucuna bracteata</i>).</p> <p>Opportunity for Improvements: The management of Bukit Maradja Palm Oil Mill has carried out road repairs in the form of piling up sands, stones, and making outlets for the period from 2021 to February 2022. Road conditions during audit can also be passed by large vehicles (CPO and PK trucks). Furthermore, the Mill can also show the 2023 budget for road repairs at the Mill location, starting from the gate to the dispatch station. However, the current condition of the road next after the weighbridge consider immediate attention.</p>	
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.	The company has reported Annual report using RSPO metric template and submitted to CB. Based on the report, Annual Production Palm Oil is 28,909.71 MT, Annual Production Palm Kernel is 6,037.36 MT.	Complied

Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.		
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Estate:</p> <p>The procedures documented in "Oil Palm Agricultural Manual" (latest revision in March 2020), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows:</p> <ol style="list-style-type: none"> 1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm. 2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery. 3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit 4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit. 5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit. 6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan. 7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan. 8. OPM-03-03; dated 02/10/2018; Land Preparation – Persiapan Lahan. 9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracteata</i> – <i>Mucuna bracteata</i> Kacangan Penutup Tanah 10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan. 11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman. 12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman. 13. OPM-05-01; dated 02/10/2018; Ablation and Sanitation – Ablasi dan Sanitasi.

Complied

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		<ol style="list-style-type: none"> 14. OPM-05-02; dated 17/07/2019; Harvesting – Panen. 15. OPM-05-03; dated 17/07/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan. 16. OPM-05-04; dated 18/07/2019; Frond Pruning – Pemangkasan Pelepah 17. OPM-05-05; dated 19/03/2020; Black Bunch Count – Sensus Buah 18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>. 19. OPM-06-01; dated 19/03/2020; Inorganic Fertiliser – Pupuk Inorganik 20. OPM-06-02; dated 19/03/2020; Organic Fertiliser – Pupuk Organik 21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel. 23. OPM-07-01; dated 20/03/2020; Detection and Census – Deteksi dan Sensus. 24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama. 25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit. 26. OPM-07-04; dated 17/07/2019; Integrated Pest Management – Pengendalian Hama Terpadu. 27. OPM-08-01; dated 20/03/2020; Weed Control – Pengendalian Gulma. 28. OPM-09-01; dated 19/02/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir. 29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area. 30. OPM-09-03; dated 15/07/2019; The Use, Store and Discard Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida. 31. OPM-10-01; dated 01/02/2018; Field Quality Control 	
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Interviews with employees indicate satisfactory level of understanding and implementation in relation to their respective job function, e.g. in Bukit Maradja Estate: harvesting at Block 97E25, E26 Division 1; spraying circle at Block 98E30, E29A, E28 Division 2; manuring urea at Block 10A03 Division 2; aplikasi compost at 13C10 Division 3; replanting at Block 21D16, D17. In Kerasaan Estate: harvesting at Block R03 Division 3; spraying circle and path at Block 15A07, B07 Division 1; manuring MOP at Block 14H10A Division 2; pest and disease census at Block 14B08A Division 3; replanting area at Block 21B04, C04 Division 1. In Timbang Deli Estate: harvesting at Block 16B02, 16F02, 18A03, 18C03; manuring CuSO₄ at Block 17C02.

Palm Oil Mill:

Bukit Maradja Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under "Palm Oil Mill Manual" dated 25 March 2019. The procedures explains all activity from receiving FFB into dispatch of products; Such as:

1. POM-01-01; Reception in Bukit Maradja Palm Oil Mill.
2. POM-02-01; Sterilizer in Bukit Maradja Palm Oil Mill.
3. POM-03-01; Threshing in Bukit Maradja Palm Oil Mill.
4. POM-04-01; Pressing in Bukit Maradja Palm Oil Mill.
5. POM-05-01; Clarification in Bukit Maradja Palm Oil Mill.
6. POM-06-01; Kernel Plant in Bukit Maradja Palm Oil Mill.
7. POM-07-01; Steam Plant in Bukit Maradja Palm Oil Mill.
8. POM-08-01; Power Plant in Bukit Maradja Palm Oil Mill.
9. POM-09-01; Water Treatment in Bukit Maradja Palm Oil Mill.
10. POM-10-01; Effluent Plant in Bukit Maradja Palm Oil Mill.
11. POM-11-01; Storage and Dispatch in Bukit Maradja Palm Oil Mill.
12. POM-12-01; Workshop in Bukit Maradja Palm Oil Mill.

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| | | <p>13. POM-13-01; EFB Plant in Bukit Maradja Palm Oil Mill.</p> <p>14. POM-14-01; Biogas Plant in Bukit Maradja Palm Oil Mill.</p> <p>The procedures are supported by specific Work Instructions, e.g. as follows:</p> <ol style="list-style-type: none"> 1. POM-01-01-W01; Penimbangan Truk FFB dan Berondolan – Weighing FFB truck and loose fruit. 2. POM-02-01-W01; Loading ramp, Pengisian FFB ke dalam Rebusan Vertical – Loading ramp, FFB loading into vertical sterilizer; 3. POM-02-01-W02; Pengoperasian Vertical Sterilizer – Operating Vertical Sterilizer; a number of key parameter: sterilizer operating for 100 minutes, ensure manometer showing "0" prior to opening the sterilizer. 4. POM-03-01-W01; Pengoperasian Threshing Machine – Operating Threshing Machine. 5. POM-04-01-W01; Pengoperasian Digester – Operating Digester. 6. POM-04-01-W02; Pengoperasian Screw Press – Operating screw press. 7. POM-04-01-W03; Sand Trap and Vibrating Screen. 8. POM-04-01-W04; Pengoperasian Crude Oil Tank – Operating Crude Oil Tank. 9. POM-05-01-W01; Pengoperasian Continuous Settling Tank – Operating Continuous Settling Tank. 10. POM-05-01-W02; Pengoperasian Clean Oil Tank – Operating Clean Oil Tank. 11. POM-05-01-W03; Pengoperasian Sludge Tank – Operating Sludge Tank. 12. POM-05-01-W04; Pengoperasian Oil Purifier – Operating Oil Purifier. 13. POM-05-01-W05; Pengoperasian Vacuum Drier – Operating Vacuum Drier. 14. POM-05-01-W06; Pengoperasian Sludge Centrifuge – Operating Sludge Centrifuge. 15. POM-06-01-W01; Operating Depericarper. 16. POM-06-01-W02; Pengoperasian Ripple Mill – Operating Ripple Mill. | |
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		<ol style="list-style-type: none"> 17. POM-06-01-W03; Operating Claybath Separator. 18. POM-06-01-W04; Pengoperasian Sawipack Stage 1 & Stage 2 – Operating Sawipack to separate kernel and shell from cracked mixture from ripple mill, through dry separation. 19. POM-06-01-W05; Pengoperasian Kernel Silo Drier – Operating Kernel Silo Drier to reduce moisture < 7%. 20. POM-06-01-W06; Pengoperasian Hydrocyclone – Operating Hydrocyclone to separate kernel and shell from sawipack through wet method; 21. POM-07-01-W01; Operating Cation Exchanger. 22. POM-07-01-W02; Operating Degasifier. 23. POM-07-01-W03; Operating Anion Exchanger. 24. POM-07-01-W06; Operating Thermal Deaerator. 25. POM-07-01-W07; Boiler (Mech 35 MT/hr). 26. POM-07-01-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler. 27. POM-08-01-W01; Operating Genset. 28. POM-09-01-W01; Operating Water Intake. 29. POM-11-01-W01; Pengoperasian CPO Storage Tank – Operating CPO Storage Tank. 30. POM-11-01-W02; Pengoperasian Kernel Bin Storage – Operating Kernel Bin Storage. 31. Analisa FFA CPO No.POM-WI/LAB/001 – Analysing CPO’s FFA; 32. Analisa FFA Kadar air untuk CPO dispatch No.POM-WI/LAB/002A – Analysing CPO’s moisture for CPO dispatch; 33. Analisa kadar kotoran dan kadar air untuk kernel dispatch No.POM-WI/LAB/005A – Analyzing dirt and moisture in kernel for dispatch; 34. Pengiriman CPO No.POM-WI/LAB/043 – Delivery of CPO; 	
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		<p>35. Pengiriman Kernel No.POM-WI/LAB/044 – Delivery of Kernel;</p> <p>A set of work instruction for mill’s workshop, dated 28 June 2014; including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>A set of work instruction for biogas plant, dated 30 August 2014; comprise of: filling in POME into screen chamber and oil grease skimmer, operating of equalization tank, operating of plate heat exchanger and cooling tower, operating of primary clarifier and sludge pit, operating buffer tank, operating anaerobic reactor, operating degassifier, operating Lamella clarifier, operating sludge sump, operating sludge decanter and operating retention pond.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 06/02/2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Record of monitoring in Bukit Maradja POM are available under documents Action Plan Bukit Maradja POM as result Vice President Engineering (VPE) visit, Internal Audit carried out on 18-20 August 2021, and operational monitoring such as Daily Production Figure and Balancing record.</p> <p>Sample of Daily Production Figure verified dated 12 March 2022: FFB received month todate is 4,370.30 MT; year todate is 19,540.65 MT. CPO produced month todate is 1,032.71 MT; year todate is 4,564.08 MT. PK produced month todate is 213.01 MT; year todate is 935.57 MT. OER month todate is 23.57%; year todate is 23.58%. KER month todate is 4.86%; year todate is 4.83%. CPO dispatched</p>	Complied

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		<p>month todate is 608.18 MT; year todate is 3,968.75 MT. PK dispatched month todate is 93.44 MT; year todate is 806.29 MT.</p> <p>Monthly production report is available containing records of FFB received by Bukit Maradja POM from Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. All FFB received by Bukit Maradja POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p> <p>Record of operation monitoring in Bukit Maradja Estate based on SEM (Senior Estate Manager) visit on 29 January 2021:</p> <ol style="list-style-type: none"> 1. Weeding for nursery will be routinely performed by spraying and weeding into polybag. 2. Briefing will be conducted to manuring team, related staff conducted extra monitoring during manuring. 3. Block check will be carry out for preparation of Giltrap line for compost application. <p>Internal Audit result dated 1-3 September 2021; during internal audit there were 6 minor finding and 17 observations.</p> <p>Record of operation monitoring in Kerasaan Estate based on SFM (Senior Field Manager) on 27 January 2021:</p> <ol style="list-style-type: none"> 1. Team and staff structure continue to strengthen plantation operational activities. 2. Actual production vs budget is less by 13.16% and compared to BBC by 10.04%. Immediately conduct a census of pinched fruit in the area to represent what percentage of normal fruit is. The pinched fruit should not be delivered to the mill, but must be loosed at the TPH first. 3. Immediately plan the circle and path spraying standard according to the mature upkeep program according to the budget in February 2021. Report to SFM the effectiveness level after the weedy fern spraying trial for up to 3 weeks. 	
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		<p>Internal Audit result dated 24-26 August 2021; during Internal audit, there are 4 minor NC and 15 observation issued. Status of NC have been discussed during management review meeting, un-closed findings have been followed up to related parties.</p> <p>Record of operation monitoring in Timbang Deli Estate:</p> <ol style="list-style-type: none"> 1. Based on of PD and Directors TDI-VBS visit on 24 February 2021: dissemination to communities regarding prohibition of cattle entering TDE because it harms for oil palm; give permission for grassing at rubber area not in oil palm area; established cattle gride. 2. Based on Agronomist visit on 14 February 2021: at Block 15B04, 16B03 & 17B03. Recommendation: weed control at those blocks can be use herbicide, which previously using manual; increase planting of beneficial plant; release of natural predator (<i>Sycanus</i> sp.). <p>Other record related operation monitoring and action taken in unit of certification is Internal Audit results and Management Review. Internal Audit result carried out on 7-9 February 2022; during Internal audit, there are 4 minor NC and 24 observation issued. Status of NC have been discussed during management review meeting, open findings have been followed up to related parties.</p>	
<p>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.</p>			
3.4.1	<p>(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>	<p>Environmental Document of PT. Timbang Deli Indonesia (Timbang Deli Estate) in form of "Upaya Pengelolaan Lingkungan and Upaya Pemantauan Lingkungan (UKL-UPL)", approved by Environmental Agency of Deli Serdang Regency as per No: APDL.P/325/VIII/2014 dated 6 August 2014. Area covering 972.19 Ha consist of Rubber crops and Oil Palm crops.</p> <p>In 2014, PT. Timbang Deli Indonesia in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" have prepared "Dokumen Laporan Social Impact Assessment (SIA)". The assessment team comprise of: Handian Purwawangsa,</p>	Complied

		<p>S.Hut, M.Si (Team Leader; Social and cultural expert); Udi Kusnidar, S.Hut (Social-economic-cultural expert); Ir. Heri Wiyono (Social and cultural expert).</p> <p>The result: PT. Timbang Deli Indonesia is administratively located in the District of Deli Serdang, Sub-District of Galang. The villages located around the licenced area are Timbang Deli, Keramat Gajah dan Jaharun A. All villages are reasonably distant from the district capital which was 4 km from Timbang Deli village, 7 km for Kramat Gajah village and only 1 km for Jaharun A village.</p> <p>From in-depth interviews and discussions, generally response from community for PT. Timbang Deli Indonesia is good, especially PT. Timbang Deli Indonesia already been there for quite a long time and most of villagers is employee or ever been employed or has relatives working at PT. Timbang Deli Indonesia or used to work at PT. Timbang Deli Indonesia. Community do not reject the existence of company in the area.</p> <p>Some social issues related with management PT. Timbang Deli Indonesia are latex and unplump theft, fires in the dry season, cattle grazing, limited land use for villagers, potential flooding from government's land that beside (outside) PT. Timbang Deli Indonesia which planted/used by villagers.</p> <p>The local communities expect some positive outcomes from the development of oil palm in PT. Timbang Deli Indonesia. Increase of employment opportunities, grazing for their cattles, participation in social villages activities, and fire woods. Besides that, with the development of PT. Timbang Deli Indonesia, villagers could have new opportunities to make their own business as employees of PT. Timbang Deli Indonesia need goods and services that the villagers can supply. PT. Timbang Deli Indonesia also allocated some of its land for the building of Kantor Desa Timbang Deli (office for the village's administration purpose where the head of village and his/her staff work), and schools (SDN Timbang Deli and SMKN Galang). From the interviews with community, it is gathered that PT. Timbang Deli Indonesia give almost no negative impact.</p> <p>In 2017, PT. Timbang Deli Indonesia in cooperation with "Koompasia Enviro Institut" carried out social impact assessment as reported in" Laporan Analisa</p>	
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		<p>Dampak Sosial PT. Timbang Deli Indonesia tahun 2017". The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assistant).</p> <p>PT Eastern Sumatra Indonesia (Bukit Maradja POM & Bukit Maradja Estate):</p> <p>Environmental Document for Composting Premise "Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit, PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit Dengan Limbah Cair Untuk Diproses Menjadi Kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia", June 2015.</p> <p>In PT. Eastern Sumatra Indonesia, environmental document titled "UKL – UPL" was approved "Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Simalungun No.188.4/70/Bpdl" related to finalized environmental and social feasibility at Palm oil mill of PT. Eastern Sumatera Indonesia (PT SIPEF), Bukit Maradja Estate, Simalungun District, North Sumatra Province dated on 26 February 2004 and last revision as in "Rencana Pengelolaan Lingkungan (RKL) dan Revisi Rencana Pemantauan Lingkungan (RPL)" with scope of study palm oil estate area 3,178 Ha and palm oil mill 30 Ton FFB/hour as stated in the "Keputusan Bapedalda Kabupaten Simalungun No.271/Bpdl/2008".</p> <p>The Organization also has prepared the environmtal document as in "Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit dengan Limbah Cair untuk di Proses menjadi kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia". The document has approved per "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/833/Sekrt-2015", dated 8 June 2015, with scope of study palm oil estate area 3,178 Ha location in N 03° 00' 45.0', E 099°14'08.0'.</p> <p>In 2015, PT Eastern Sumatra Indonesia has established new addendum of Environmental License as per "Keputusan Kepala Badan Lingkungan Hidup Kab. Simalungun Nomor: 188.45/869/Sekrt-2015", dated 18 June 2015. The new</p>	
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		<p>amendment environmental license related activities of Oil Palm Plantations, Palm Oil Mill and Utilization of Oil Palm Empty Bunches with Liquid Wastewater to be processed into composting.</p> <p>In 2020, PT Eastern Sumatra Indonesia obtained Document of Environmental Evaluation or "Dokumen Evaluasi Lingkungan Hidup (DELH)" according to Keputusan Kepala Dinas Lingkungan Hidup Kab. Simalungun Nomor: 188.45/928/7.2/2020, dated 23 October 2020. This document is compliment of Environmental License which issued on 2015.</p> <p>Environmental License as per "Persetujuan Pemenuhan Komitmen Nomor: 503/29/17.4/2020 tentang Izin Lingkungan", dated 9 November 2020.</p> <p>In 2010, company has prepared a social impact assessment, as reported under "Dokumen Sosial Impact Assessment – March 2010", in cooperation with Yayasan Sawit Berkelanjutan Indonesia (YASBI). In the preparation process, the social impact study involving multi stakeholder through guided interview, questionnaire, focus group discussion (FGD).</p> <p>Kerajaan Estate (PT Kerajaan Indonesia) have the environmental document under "Dokumen Upaya Pengelolaan dan Pemantauan Lingkungan (UKL- UPL)" is comply with letter of "Kepala Bapedalda Kabupaten Simalungun No.442/Bpdl-2005 dated on 23 Desember 2005 related agreement of "Dokumen UKL/UPL PT. Kerajaan Indonesia" and revision of "Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan (UKL/UPL)" comply with letter agreement "Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.700/109/BLH/2009" dated 8 April 2009 with scope of study 2,362 Ha oil palm estates. Within this UKL-UPL document also covered social aspect as the identification of social impact assessment.</p>	
3.4.2	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.	The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).	Complied

		<p>The Management Plan incorporated in the “Rencana Pengelolaan Lingkungan”, consist of:</p> <ul style="list-style-type: none"> - Physical-chemical compenent/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness). - Social-economy-cultural component/aspects: community welfare; community perception. - Health component: community health, hazardous waste management. 	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>The social and environmental management and monitoring plan of PT. Eastern Sumatra Indonesia is implemented according to Environmental Document Directive. Reviewed and updated regularly per semester (6 month basis) and reported to Environmental Agency.</p> <p>Besides, Environmental Management Plan also required some parameter such as:</p> <ul style="list-style-type: none"> - physical-chemical component/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness). - Social-economy-cultural component/aspects: community welfare; community perception. - Health component: community health, hazardous waste management - All these parameter implemented by unit of certification. 	Complied
<p>Criteria 3.5: A system for managing human resources is in place.</p>			
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 Eastern Sumatera Indonesia – Bukit Maradja POM has defined employment procedures for recruitment, selection, hiring, promotion, retirement, and termination.</p> <p><u>Recruitment/Selection/Hiring</u></p>	Complied

		<ul style="list-style-type: none"> • PT Eastern Sumatera Indonesia – Bukit Maradja POM established SOP Internal Recruitment (from SKU to Acting Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA)) No.HRD-01-01/01-04-2019/Rev.1 effective date 5 April 2019. The objective to give equal career opportunity for every employee and ensure fulfilment of the required manpower needed. Operating Unit (OU) prepares Staff Employment Request (SER). General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. President Director approve or reject recruitment based on the urgency and needs of the company. OU Manager select the best candidates from SKU based on SKU Evaluation. Training Manager conduct assessment program to select candidates. Human Resources Department Manager approve or reject candidate based on the assessment report. Candidate must go through evaluation phase for 6 months as Acting FA/MA/OA. After the evaluation phase, Manager gives evaluation report to GM/RD. GM/RD then decided whether to promote or decline candidate as staff. • PT Eastern Sumatera Indonesia – Bukit Maradja POM established SOP External Recruitment (Staff only) No.HRD-01-02/01-04-2019/Rev.1 effective date 16 April 2020. The objective to ensure the process of recruiting new staff for all position is done and managed systematically, effectively, and efficiently based on the principle of job equality and implemented procedure. Regional Management Office (RMO) or Head of Department prepares Staff Employment Request (SER). President Director approve or reject SER based on the urgency and needs of the company. Office Assistant (OA) Recruitment carried out recruitment database except for special reason use advertising. After publishing recruitment advertisement, candidates resume was collected and select best candidates for selection process: written test, physiological test, interview, medical check-up; choose candidate based on qualification/competence; created interview with user schedule. Office Assistant responsible for offering contract and negotiations. President Director decide to the hiring of staff based on company needs. Newly hired staff is 	
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		<p>required to go through monitoring process for 3 months and manager is responsible for the monitoring period.</p> <ul style="list-style-type: none"> PT Eastern Sumatera Indonesia – Bukit Maradja POM established SOP Recruitment for PKWT/Free Labour (Non-Staff) No.HRD-01-03/09-03-2020/Rev.2 effective date 17 March 2020. The objective to ensure the recruitment process for labor force are according to valid procedure and approve manpower plan. Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA) prepare a proposal for recruitment based on available budget, work experience, achievements. Estate Manager or Mill Manager check and approve the proposal. General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. Upon approval, Office Head Assistant create work agreement signed by the employee and Estate Manager or Mill Manager. <p><u>Promotion</u></p> <ul style="list-style-type: none"> PT Eastern Sumatera Indonesia – Bukit Maradja POM established SOP Promotion to SKU No.HRD-01-04/13-03-2020/Rev.0 effective date 12 May 2020. The objective to give confirmation and clarify in the process of promotion workers in companies. Estate Manager or Mill Manager prepare proposal for promotion and send to Regional Management Office (RMO). The process of submission attach: SKU evaluation form, list of duties and responsibilities, list of training attended, copy of ID card, copy of driver license. Senior Estate Manager (SEM) or Senior Technical Manager (STM) review and approve proposal. General Manager (GM)/Regional Director (RD) approve or reject proposal created by Operating Unit and forward to Head of Department (HOD). Estate HOD or Technical HOD review and approve the proposal. Upon approval, HOD Human Resources then sign memorandum regarding promotion. PT Eastern Sumatera Indonesia – Bukit Maradja POM established SOP Staff Appraisal No.HRD-03-03/17-06-2020/Rev.2 effective date 24 July 2020. The 	
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		<p>objective is part of performance management system to produce staff that enable company to achieve its strategic goals. Every year HOD Human Resources will notify all managers to do staff appraisal. OU Manager set each staff target for one year. Later on, the target which already set up will be KPI as base of staff appraisal evaluation. Manager will evaluate all the staff with 3 set of staff appraisal form (target achievement 60%, competence 40%, summary target + competence). HOD Human Resources doing a review of overall staff appraisal report made by Office Head Assistant Compensation before approve it. Board of Director approve or reject staff appraisal based on moderation meeting result.</p> <ul style="list-style-type: none"> • Retirement and termination refers to Collective Bargaining Agreement between company and the respective worker union. Company and worker union has collective bargaining agreement, in form of "Perjanjian Kerja Bersama". Each company has different agreement: <p>PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode". This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> • Salary regulated under Chapter V; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; <p>Berita Acara – dated 07/09/2021, has been conducted meeting with Labour Union (Serikat Pekerja Bukit Maradja Mandiri – SPBUMM), related to extension time of</p>	
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		Collective Labour Agreement between PT Eastern Sumatra Indonesia and SPBUMM. The letter has been acknowledged by Dinas Ketenagakerjaan Kabupaten Simalungun (Mr. Fhincer Ambarita).	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Recruitment - Bukit Maradja POM carried out recruitment for day worker PKWT through Memorandum Mill Manager "Rekrutmen Karyawan No.10/BM-RMO/I/2020" dated 9 May 2020. Job vacancy distributed to Marihat Bukit village. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, other documentation – sighted for candidate Dedi Ramdani (harvester) and Ramlan (dump truck helper).</p> <p>Promotion - Bukit Maradja POM obtains Letter for promotion based on Memorandum HR Department No.145/JWB-RMONS/VII/2021 dated 16 July 2021. Approved promotion for 15 employees; sample: Anda Elsa Sariska Manik (Payroll clerk & Admin) from P1 to P2, Deny Joko (Workshop supervision) from H to P1. The promotion status indicates all tribe, all sex, all ages are eligible for promotion.</p> <p>Treatment for contract worker - "Perjanjian Kerja Waktu Tertentu Mukisa dan PT. Eastern Sumatra Indonesia Bukit Maradja Estate", Nomor: 001/PKWT/BMM/2022, namely Mr Andi Utama (Helpert in Warehouse) signed on 01/03/2022. The PWKT stipulates: Clause 1: PKWT for Mukisa as general worker; PKWT period 1st March 2022 – 28 February 2023 (a year). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,614,589. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to Jamsostek. (UMK: Rp 1,614,165 - based on Governor of Sumatera Utara nomo: 188.44/839/KPTS/2021, dated 20 December 2021)</p> <p>Pension - Kerasaan Estate paid pension for employee under name Monang Lubis (Division 3 – Harvester Supervision), as per "Surat Persetujuan Pensiun Sekaligus No.01/SPB/KRE/2021" dated 24th April 2021. The agreement stipulates the worker pension effective 24th July 2021, the pension fund will be paid to worker account, company housing will be empty on 3 months after pension. Pension fund paid on 24th April 2021.</p>	Complied

Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Timbang Deli Indonesia has shown the procedure of hazards identification and risk assessment, no document SOP/TDI/03 version 01 issued dated 1 March 2019.</p> <p>PT Eastern Sumatera Indonesia, PT Kerasaan Indonesia has prepared the procedure of risk assessment as per Procedure of Hazard Identification Risk Analysis and Determining Control of OHS, No.OHS-01-01/04-02-2019/Rev.0, dated 12 March 2019.</p> <p>Bukit Maradja POM - The document of risk assessment under "Penilaian Resiko", last review on 20th January 2022, the document was covered all activities in mill, such as: security, weight bridge, loading ramp, transfer carriage, station capstan before sterilizer, sterilizer, capstan after sterilizer, hoisting crane, pressing station, clarification station, kernel plant, dispatch CPO/ PK, water treatment, boiler, engine room, workshop, go-down, office, Temporary hazardous storage, effluent, bunker filling, control room, telescopic handler, wheel loader, emplacement.</p> <p>Timbang Deli Estate -The document of risk assessment under "Penilaian Resiko", last review on 2 March 2021, the document was covered all activities in estate, such as: spraying, manuring, office activity, workshop, harvesting, pruning, - transport TBS.</p> <p>All of the mitigation plan of risk assessment has implemented, e.g: in warehouse of fertilizer has sets the maximum height at 2.5 meters for fertilizer bag stacking, fire extinguisher has instaled in fuel station and temporary hazardous waste, and all of the workers has provided PPE.</p> <p>The document of risk assessment has communicated to all workers, last socialization in June 2021. Attendance list and records of socialization has been demonstrated.</p>	Complied
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia have established an Occupational Health and Safety Policy No.QMM-40-01-P04/27-03/2019/Rev.1 signed by President Director dated 27 March 2019. In point 1 mentioned the company support the implementation of all relevant laws and regulation of	Complied

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		<p>Republic of Indonesia and of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>OHS Procedure under document "Prosedur Keselamatan dan Kesehatan Kerja (K3)" No. SOP/TDI/06, rev.01 dated 1 February 2019. The document of procedure consisted of:</p> <ul style="list-style-type: none"> - Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01 - Procedure of Hot Work – No. OHS-01-02 - Procedure of Potential Hazard Report – No. OHS-01-03 - Procedure of First Aid – No. OHS-01-04 - Procedure of Confined Space – No. OHS-01-06 - Procedure of Working at Heights – No. OHS-01-06 - Procedure of Gas Pressure Management – No. OHS-01-07 - Procedure of Incident Reporting – No. OHS-01-08 - Procedure of Standard for Installation of Safety Sign – No. OHS-01-09 - Procedure of Personal Protective Equipment – No. OHS-01-10 <p>OHS Program was demonstrated under "Program P2K3 year 2022", updated on 2 February 2021, such as:</p> <ul style="list-style-type: none"> - Training of OHS – PPE, HIRADC, planned in February 2022 - Meeting of OHS committee (monthly) - Report of OHS performance (3 monthly base) - Fire Drill (Bakortiba) – conducted on 21st December 2021, was attended by 33 workers. - Fire extinguisher inspection (monthly) 	
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		<ul style="list-style-type: none"> - Training for first aider - Training on handling pesticides - Socialization of company policies - Training of PPE for all workers - Medical Check-up test – last medical Check Up (Special) dated 26th October 2021 was attended by 98 workers (spraying, trunk injection, manuring, go-down) - Monitoring of environmental requirement (water quality, air emission). <p>Implementation of OHS monitoring at Bukit Maradja POM year 2021 through the periodic inspection, such as:</p> <ul style="list-style-type: none"> - Minute of Meeting dated 9th February 2022. Agenda: Review of P2K3 program, review of OHS inspection report and accidents investigation,. - Monitoring fire extinguisher (APAR) on 26th February 2022. Station: Compost Plant. Aspect to be monitored are hose, nozzle, tube pressure, fitting, and seal. - Monitoring Hydrant on 26th February 2022. Totally 5 Hydrant are installed at the Mill: Sterilizer Station, Chainman Station, Kernel Station, Under Fibre Station, Engine Room Station. - Monitoring of Emergency Equipment (alarm) on 26th Feb 2022. Location: Workshop, High Speed Diesel Oil, Clarification. 	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<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 Eastern Sumatra Indonesia – Bukit Maradja POM Program Training 2022, such as:</p> <ul style="list-style-type: none"> - Socialization of Company Policies for all workers. Plan: Jan & Feb 2022 - RSPO/ISPO/Supply Chain (new employee). Plan: March 2022 - MSDS Training (Warehouse, WTP Operator). Plan: April 2022 	Complied

		<ul style="list-style-type: none"> - Training on Work Instruction. Plan: May 2022 - Emergency Response Training (all employee). Plan: May 2022 <p>Record of training:</p> <ul style="list-style-type: none"> • Fire drill (simulation of emergency response preparedness), dated 24th January 2022, attended by 96 workers. Location in Bukit Maradja POM. Photograph, attendance list, scenario, analysis and evaluation and recommendation. • Socialization of company policies dated 5th January 2022. Was attended by 62 workers. • Training on emergency response for handling of hazardous waste dated 28th April 2021, was attended by 3 workers. • Training on implementation of work instruction in composting station dated 13th November 2021 – was attended by 13 workers. <p>PT Timbang Deli (Timbang Deli Estate) has training program min 2021, however some training not implemented due to Covid-19 pandemic are still occurs. An actual training or awareness that provided by Estate, such as:</p> <ul style="list-style-type: none"> - Pesticides management and MSDS awareness on 17 December 2021. - HCV Area Management awareness on 12 October 2021 - First Aid awareness on 4 October 2021 - Spraying tools calibration awareness on 15 January 2022 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Based on interview with sample of worker at Bukit Maradja Mill, Bukit Maradja Estate and Kerasaan Estate. The workers obtain the general and specific training and awareness accordance their job description.</p> <p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p>	Complied

		<p><u>Bukit Maradja Estate:</u> Name: Samsul Bahri (Harvester – register number: 5291)</p> <ul style="list-style-type: none"> - 17th March 2015: Training on fruit quality and harvesting - 12th April 2016: Socialization on fire drill - 11th March 2019: Socialization on minimum wage - 24th March 2020: Training whistle blowing - 20th August 2021: Training on fruit quality and harvesting (refreshment) - 15th February 2022: Training on fruit quality and harvesting (refreshment) <p>Name: Eva Efridayanti Sagian (Manuring – Register number: 135)</p> <ul style="list-style-type: none"> - 12th April 2016: Fire drill - 30th September 2017: Fertilizer application training - 17th May 2017: Training on implementation ISPO requirement - 13th March 2018: Training on implementation of environmental aspect - 16th March 2018: Training quality management system - 18th September 2019: Training on fertilizer application - 22nd February 2020: Fertilizer application training (refreshment) - 24th February 2020: Socialization code of conduct - 3rd February 2021: Calibration training - 4th August 2021: Fertilizer application training (refreshment) <p><u>Kerasaan Estate:</u> Name: Supriyadi (Spraying)</p> <ul style="list-style-type: none"> - 30th April 2015: training on handling of limited pesticides - 15th October 2015: Training on census of ganoderma 	
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		<ul style="list-style-type: none"> - 15th March 2018: Training on implementation of quality management system - 30th January 2019: Calibration on spraying tools - 13th March 2019: Evaluation on competency of spraying team - 14th January 2020: Training on pesticides application - 1st February 2021: calibration on spraying tools 	
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.	Training Program 2022 is available including RSPO Supply Chain. The latest refreshment training of supply chain in Bukit Maradja POM conducted on 20 August 2021. The training subjected to SOP of Supply Chain and Traceability of Palm products (MKT-03-06/04-03-2019/Rev.0) and RSPO Principles & Criteria 2018 that contain supply chain requirement. Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security. Dissemination of supply chain requirement also performed to contracted transporter, e.g Felindo and Sejahtera Abadi on 29 October 2021. Dissemination of supply chain requirements has been conducted to estate employees as well, e.g. in Kerasaan Estate on 23 February 2022, attended by 21 participants.	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 processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified</p>	<p>Company management decided Bukit Maradja Palm Oil Mill, PT Eastern Sumatera Indonesia to implement RSPO Supply Chain Model Identity Preserved (IP). With the implementation of Supply Chain Model IP, the Palm Oil Mill only received and process FFB from certified estate (company-owned and sister company). FFB suppliers of Bukit Maradja POM are Bukit Maradja Estate, Kerasaan Estate (PT Kerasaan Indonesia) and Timbang Deli Estate (PT Timbang Deli Indonesia).</p> <p>Bukit Maradja POM implemented the procedure of supply chain and traceability based on SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving and shipping of CPO. Person</p>	Complied

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	FFB without physically separating them, then only Mass Balance Module is applicable.	responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.	
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>Management decided Bukit Maradja POM, PT Eastern Sumatera Indonesia to implement RSPO Supply Chain Model Identity Preserved (IP). With the implementation of Supply Chain Model IP, the Palm Oil Mill only received and process FFB from certified estate (company-owned and sister company). FFB suppliers of Bukit Maradja POM are Bukit Maradja Estate, Kerasaan Estate (PT Kerasaan Indonesia) and Timbang Deli Estate (PT Timbang Deli Indonesia).</p> <p>This indicator is 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.	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Bukit Maradja POM received certified raw material (Fresh Fruit Bunch) from its own estate, Bukit Maradja Estate and from sister company Kerasaan Estate (PT Kerasaan Indonesia) and Timbang Deli Estate (PT Timbang Deli Indonesia).	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Bukit Maradja Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000000095. The mill also has registered all transaction in RSPO IT Platform.	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 applicable supply chain model specified. This shall include at minimum the following:</p>	PT Eastern Sumatra Indonesia has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving and shipping of CPO. Person responsible for implementation of RSPO Supply Chain standard at the POM is the	Complied

	<ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) 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. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>Mill Manager. The procedure is complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ul style="list-style-type: none"> a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism. b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill. c. Process at Palm Oil Mill covers FFB and loose fruit receiving, identification, production process, delivery of product and recording. d. Evaluation by CB. e. Transportation records. f. Internal control. g. Contractor control. <p>The mill only receives and process certified FFB, therefore the procedure for receiving and processing non-certified FFB is not applicable.</p> <p>The mill has complete and up to date records and reports that demonstrated compliance with the Identity Preserved requirements including training records. Record seen data of FFB received, CPO and PK stock, production, dispatch, OER, KER, refreshment training of RSPO Supply Chain on 20 Agustus 2021. Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security. Dissemination of supply chain requirement also performed to contracted transporter, e.g Felindo and Sejahtera Abadi on 29 October 2021.</p> <p>Available records and report that demonstrated compliance with the RSPO supply chain requirement, e.g. Daily Production Figure for 31 December 2021: FFB received month todate is 8,122.99 MT; year todate is 122,768.88 MT. CPO produced month todate is 1,908.27 MT; year todate is 28,909.70 MT. PK produced month todate is 412.83 MT; year todate is 6,037.37 MT. OER month todate is 23.02%; year todate is 23.57%. KER month todate is 4.99%; year todate is</p>	
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		<p>4.92%. CPO dispatched month todate is 1,875.45 MT; year todate is 29,068.81 MT. PK dispatched month todate is 371.63 MT; year todate is 6,064.83 MT.</p> <p>Daily Production Figure for 12 March 2022: FFB received month todate is 4,370.30 MT; year todate is 19,540.65 MT. CPO produced month todate is 1,032.71 MT; year todate is 4,564.08 MT. PK produced month todate is 213.01 MT; year todate is 935.57 MT. OER month todate is 23.57%; year todate is 23.58%. KER month todate is 4.86%; year todate is 4.83%. CPO dispatched month todate is 608.18 MT; year todate is 3,968.75 MT. PK dispatched month todate is 93.44 MT; year todate is 806.29 MT.</p> <p>Monthly production report is available containing records of FFB received by Bukit Maradja POM from Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. All FFB received by Bukit Maradja POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. 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>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019. Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to. Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</p> <p>The latest internal audit carried out on 16-17 February 2022, against RSPO P&C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings have been determined.</p>	Complied

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		<p>Latest Management Review in Bukit Maradja POM conducted on 22 February 2022. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit in Bukit Maradja POM conducted on 16-17 February 2022, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. • Customer feedback: no significant complaint related to CPO & PK delivered from Bukit Maradja POM to buyer. • Process performance and product conformity: FFB processed in BM POM only coming from internal company (Bukit Maradja Estate, Kerasaan Estate and Timbang Dlei Estate; proses are according to Mill Processing Manual; FFB quality according to Engineering Department, Independent Laboratory Manual; FFB Grading Procedure (Lab-01/11-08-2020/Rev-04). • Correction and Prevention: All internal audit findings have been discussed during management review and have been closed. • Follow up from previous Management Review: Has been followed up can be seen on internal audit report. • Changes affecting Management System: there is change in FFB Grading Procedure and addition of Specification in FFB process Sortation (LAB-01-10-SPEC-01). • Recommendation for Improvement: corrective action to internal audit finding to be conducted consistently therefore not repeated in the next internal & external audit. 	
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>PT Eastern Sumatra Indonesia – Bukit Maradja POM has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT Eastern Sumatra Indonesia – Bukit Maradja POM certificate (RSPO 632266). Based on interview with weighbridge clerk and FFB receiving station, Bukit Maradja POM only received certified FFB from sustainable source, that is Bukit Mardja Estate; Kerasaan Estate and Timbang Deli Estate. There is no FFB received from other source.</p>	Complied

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	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The unit of certification has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print "Receiving Slip" based on FFB Delivery Note, 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> <p>The procedure explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB (projected overproduction). During this annual surveillance assessment, Bukit Maradja POM was not over sold the CPO and PK production.</p> <p>The procedure explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible person is Operating Unit Manager and Senior Manager Marketing. Based on audit, Bukit Maradja POM only receive and processed sustainable FFB. There has been no complaint from buyer.</p> <p>Records of purchasing goods in available:</p> <ul style="list-style-type: none"> - Delivery of FFB from Field "SPB" No.48/F3/SP/2022 dated 11 March 2022 from Bukit Maradja Estate, Division F3, block 13B09A; planting year 2013, total 510 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB22003198W; Truck BK 8002 EQ; Bukit Maradja Estate dated 11 March 2022; D/O No.48/F3/SP/2022; block ID 13B09A; planting year 2013; total bunches 510; nett weight 6,570 kg. Stamp Sustainable Product-IP. - Delivery of FFB from Field "SPB" dated 8 March 2021 from Kerasaan Estate, Division F1, Block 15A06; 625 bunches; planting year 2015; Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB22002970W; Truck BK 9859 EP; Kerasaan Estate dated 8 March 2022; Block ID 15A06; 	
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		<p>Division F1 planting year 2015; total bunches 625; nett weight 6,380 kg. Stamp Sustainable Product-IP.</p> <ul style="list-style-type: none"> - Delivery of FFB from Field "SPB" No.25/III/TDE/22 dated 7 March 2022 from Timbang Deli Estate, Division Oil Palm, Block 17H03 (826 bunches), 17H04 (232 bunches); total 1,058 bunches; planting year 2017; Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB2200290W; Truck BK 8929 ES; Timbang Deli Estate dated 7 March 2022; D/O No.25/III/TDE/2022; Block 17H03 (826 bunches), 17H04 (232 bunches); Division Oil Palm, planting year 2017; total 1,058 bunches; nett weight 6,120 kg. Stamp Sustainable Product-IP. 	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; 	<p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>CSPO:</p> <ul style="list-style-type: none"> - Contract No.2021/LTC-CPO/ESI/20 dated 25 August 2021; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 500 MT Crude Sustainable Palm Kernel – RSPO IP. - Delivery Order No.2021/ESI-CPO/LTC/DO/83 dated 11 September 2021, ordering shipment of 250 MT CPO – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk at Jl. Belmera Baru III, Belawan II, Belawan. - There are 10 Dispatch Slip which refer to DO No.2021/ESI-CPO/LTC/DO/83, consist of: CPO21000773W (14.55 MT), CPO21000806W (25.64 MT), CPO21000771W (24.96 MT), CPO21000793W (25.40 MT), CPO21000789W (27.64 MT), CPO21000820W (24.89 MT), CPO21000799W (27.46 MT), CPO21000800W (26.30 MT), CPO21000801W (26.98 MT), CPO21000812W 	<p>Complied</p>

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	<p>i) A unique identification number.</p>	<p>(26.18 MT).</p> <ul style="list-style-type: none"> - Dispatch Slip No.CPO21000806W, dated 18/09/2021; from PT Eastern Sumatra Indonesia – Bukit Maradja POM; to PT SMART Tbk; product Crude Palm Oil; quantity 25.64 MT; DO No.2021/ESI-CPO/LTC/DO/83; Contract No. 2021/LTC-CPO/ESI/20; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8065 CC; Transporter CV Sejahtera Abadi. - Shipping Announcement, with transaction ID No. TR-89d71b03-991d for 499.210 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO100000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO100000970) as Buyer. Shipping date 30/09/2021; Contract 2021/LTC-CPO/ESI/20; Confirmation date 30/09/2021. <p>Detail Information available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT SMART Tbk, address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat. • The name and address of the seller: PT Eastern Sumatra Indonesia, address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112. • The loading or shipment / delivery date: 18 September 2021 based on Dispatch Slip. • The date on which the documents were issued: Contract on 25 August 2021; D/O on 11 September 2021; Dispatch Slip on 18 September 2021; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPO RSPO IP notation on all mill records; • The quantity of the products delivered: 250 MT based on each DO; from sampled dispatch slip: 25.64 MT of CSPO; • Any related transport documentation: vehicle ID No. BK 8065 CC by CV Sejahtera Abadi. 	
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		<ul style="list-style-type: none"> • Supply chain certificate number of the seller: RSPO 632266. • A unique identification number: Contract No.2021/LTC-CPO/ESI/20 (verified on all record). <p>PK:</p> <ul style="list-style-type: none"> - Contract No.2021/LTC-PK/BM/12 dated 25 November 2021; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 500 MT Crude Sustainable Palm Kernel – RSPO IP. - Delivery Order No.2021/LTC-PK/BM/DO/12 dated 2 December 2021, ordering shipment of 500 MT PK – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk. - Shipping Instruction - “Instruksi Pengambilan Barang” No.154/ SMART-IPB/L/12/21 dated 9 December 2021 issued by PT SMART Tbk to PT Serba Guna Trans, regarding shipping instruction of Palm Kernel based on Contract No. 2021/LTC-PK/BM/12 and DO No.2021/LTC-PK/BM/DO/12. - There are 19 Dispatch Slip which refer to DO No. 2021/LTC-PK/BM/DO/12, consist of PK21000230W (28.02 MT), PK21000229W (25.88 MT), PK21000231W (26.83 MT), PK21000238W (27.21 MT), PK21000239W (27.79 MT), PK21000233W (25.36 MT), PK21000232W (24.66 MT), PK21000236W (27.71 MT), PK22000012W (28.18 MT), PK22000009W (26.09 MT), PK22000007W (25.18 MT), PK21000235W (26.82 MT), PK22000001W (27.17 MT), PK22000002W (26.13 MT), PK22000004W (24.50 MT), PK21000237W (24.57 MT), PK22000011W (22.30 MT), PK22000010W (25.53 MT), PK22000008W (25.68 MT). - Dispatch Slip No. PK22000010W, dated 20/01/2022; from PT Eastern Sumatra Indonesia – Bukit Maradja POM to PT SMART Tbk; product Palm Kernel; quantity 25.53 MT; No.2021/LTC-PK/BM/DO/12; Contract No. No.2021/LTC- 	
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		<p>PK/BM/12; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8471 XR; CV Serba Guna Transport.</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No. TR-474df1a0-239a for 208.29 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO100000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date Nov 2021 – Jan 2022; Contract 2021/LTC-PK/BM/12; Confirmation date 31/01/2022. - Shipping Announcement, with transaction ID No. TR-3e2d7813-b80d for 291.71 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO100000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date Nov 2021; Contract 2021/LTC-PK/BM/12; Confirmation date 31/12/2021. <p>Detail Information available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT SMART Tbk, address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat. • The name and address of the seller: PT Eastern Sumatra Indonesia, address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112 • The loading or shipment / delivery date: November 2021 to January 2022 based on Dispatch Slip. • The date on which the documents were issued: Contract on 25 November 2021; DO on 2 December 2021; Dispatch Slip on 20 January 2022. • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK RSPO IP notation on all mill records. • The quantity of the products delivered: from sampled dispatch slip: 25.53 MT of Palm Kernel. 	
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		<ul style="list-style-type: none"> • Any related transport documentation: vehicle ID No. BK 8471 XR; by CV Serba Guna Tarnsport. • Supply chain certificate number of the seller: RSPO 632266. • A unique identification number: Contract No.2021/LTC-PK/BM/12 (verified on all record). 	
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 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</p>	<p>Bukit Maradja POM is not outsourcing its milling activities to any independent third parties. The mill only outsourcing transport activity of CPO and PK to several contractor. The unit of certification ensures through contractual agreements that the contractors are complies to RSPO Supply Chain requirement.</p> <p>Based on sales contract, deliveries of CPO are using transport contractors that appointed, contracted and instructed by the unit of certification, whilst deliveries of PK, transport contractors are managed by buyer. During transport of CPO, legal ownership is under PT Eastern Sumatra Indonesia, whilst during transport of PK, legal ownership is belong to buyer.</p> <p>Bukit Maradja POM has an agreement covering the transport process with each contractor; therefore, the CB has access to the transport contractor or operation if an audit is deemed necessary.</p> <p>Contract available:</p> <p>a. Addendum No.2021/03 dated 6 April 2021 for Contract of Transport between PT Eastern Sumatra Indonesia and CV Angkutan Sahabat No.2019/Angkutan/CPO/BM-SMRT/02. CV Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 14 October 2020. The statement is "CV Angkutan Sahabat is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>b. Addendum No.2021/04 dated 6 April 2021 for Contract of Transport between PT Eastern Sumatra Indonesia and CV Felindo No.2019/ Angkutan/CPO/BM-SMRT/04. CV Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 8 August 2020. The statement is "CV Felindo Sukses Gemilang</p>	Complied

	<p>accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>c. Addendum No.2021/02 dated 6 April 2021 for Contract of Transport between PT Eastern Sumatra Indonesia and CV Sejahtera Abadi No.2019/Angkutan/CPO/BM-SMRT/02. CV Sejahtera Abadi issued a statement letter signed by Mr. Harsono Sukijung, dated 1 August 2020. The statement is "CV Sejahtera Abadi is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>d. Addendum No.2021/02 dated 6 April 2021 for Contract of Transport between PT Eastern Sumatra Indonesia and CV Jasa Sahabat Abadi No.2019/Angkutan/CPO/BM-SMRT/03. CV Jasa Sahabat Abadi issued a statement letter signed by Mr. Christianto Sanjaya Ong, dated 8 August 2020. The statement is "CV Jasa Sahabat Abadi is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>All contracts are perpetual, as long as the parties need.</p> <p>Bukit Maradja POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>Means of control by Bukit Maradja POM: "Checklist Evaluasi Pemenuhan Standard RSPO Untuk Kontraktor", "External Provider Evaluation List" and "Buku Pemeriksaan Kendaraan CPO dan PK". Sampled: CPO truck No. BK 8065 CC from CV Sejahtera Abadi; inspected to carry certified CPO from Bukit Maradja POM to PT SMART Tbk – Belawan, dated 18 September 2021.</p>	
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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.	<p>Bukit Maradja POM has recorded the names and contact details of all contractors used for transport of certified CPO, as follows:</p> <table border="1" data-bbox="1010 443 1843 788"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>CV Angkutan Sahabat</td> <td>Mr. Gunawan Ruslan</td> <td>Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.</td> </tr> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Mr. Christianto Sanjaya Ong</td> <td>Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring</td> </tr> <tr> <td>CV Sejahtera Abadi</td> <td>Mr. Harsono Sukijung</td> <td>Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239</td> </tr> <tr> <td>CV Felindo Sukses Gemilang</td> <td>Mr. Sutrisno Sukijung</td> <td>Jl. Gunung Krakatau Ujung No. 62, Medan</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.	CV Jasa Sahabat Abadi	Mr. Christianto Sanjaya Ong	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring	CV Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239	CV Felindo Sukses Gemilang	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan	Complied
Contractor	Contact Person	Address																
CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.																
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CV Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239																
CV Felindo Sukses Gemilang	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan																
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 unit of certification inform the audit team in case there is changes in the list of FFB, CPO and PK transporter through the RSPO P&C Pre Audit Information checklist.	Complied															
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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>Bukit Maradja Palm Oil Mill has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT Eastern Sumatra Indonesia: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.</p> <p>Bukit Maradja POM maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. Daily Production Figure for 31 December 2020: FFB received month todate is 7,399.41 MT; year todate is 121,660.31 MT. CPO produced month todate is 1,717.65 MT; year todate is 28,427.27 MT. PK produced</p>	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). 	<p>month todate is 345,81 MT; year todate is 5,977.86 MT. OER month todate is 22.65%; year todate is 23.40%. KER month todate is 4.56%; year todate is 4.91%. CPO dispatched month todate is 1,454.07 MT; year todate is 28,333.45 MT. PK dispatched month todate is 300.04 MT; year todate is 5,976.13 MT.</p> <p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019; Section 5.2 Production Process stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years.</p> <p>Bukit Maradja POM is able to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. For period January to December 2020, FFB processed is 121,660.31 MT; CPO produced is 28,427.27 MT; PK produced is 5,977.86 MT; OER is 23.40%; KER is 4.91%; CPO dispatched is 28,333.45 MT; PK dispatched is 5,976.13 MT; processing hour is 4,465.69 hours; mill throughput is 27.24 ton/hour.</p> <p>Sample of goods out records:</p> <p>CSPO</p> <ul style="list-style-type: none"> - Contract No.2021/LTC-CPO/ESI/20 dated 25 August 2021; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 500 MT Crude Sustainable Palm Kernel – RSPO IP. - Delivery Order No.2021/ESI-CPO/LTC/DO/83 dated 11 September 2021, ordering shipment of 250 MT CPO – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk at Jl. Belmera Baru III, Belawan II, Belawan. - There are 10 Dispatch Slip which refer to DO No.2021/ESI-CPO/LTC/DO/83, consist of: CPO21000773W (14.55 MT), CPO21000806W (25.64 MT), CPO21000771W (24.96 MT), CPO21000793W (25.40 MT), CPO21000789W (27.64 MT), CPO21000820W (24.89 MT), CPO21000799W (27.46 MT), 	
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		<p>CPO21000800W (26.30 MT), CPO21000801W (26.98 MT), CPO21000812W (26.18 MT).</p> <ul style="list-style-type: none"> - Dispatch Slip No.CPO21000806W, dated 18/09/2021; from PT Eastern Sumatra Indonesia – Bukit Maradja POM; to PT SMART Tbk; product Crude Palm Oil; quantity 25.64 MT; DO No.2021/ESI-CPO/LTC/DO/83; Contract No. 2021/LTC-CPO/ESI/20; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8065 CC; Transporter CV Sejahtera Abadi. - Shipping Announcement, with transaction ID No. TR-89d71b03-991d for 499.210 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO100000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 30/09/2021; Contract 2021/LTC-CPO/ESI/20; Confirmation date 30/09/2021. <p>PK.</p> <ul style="list-style-type: none"> - Contract No.2021/LTC-PK/BM/12 dated 25 November 2021; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 500 MT Crude Sustainable Palm Kernel – RSPO IP. - Delivery Order No.2021/LTC-PK/BM/DO/12 dated 2 December 2021, ordering shipment of 500 MT PK – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk. - Shipping Instruction - “Instruksi Pengambilan Barang” No.154/ SMART-IPB/L/12/21 dated 9 December 2021 issued by PT SMART Tbk to PT Serba Guna Trans, regarding shipping instruction of Palm Kernel based on Contract No. 2021/LTC-PK/BM/12 and DO No.2021/LTC-PK/BM/DO/12. - There are 19 Dispatch Slip which refer to DO No. 2021/LTC-PK/BM/DO/12, consist of PK21000230W (28.02 MT), PK21000229W (25.88 MT), PK21000231W (26.83 MT), PK21000238W (27.21 MT), PK21000239W (27.79 	
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		<p>MT), PK21000233W (25.36 MT), PK21000232W (24.66 MT), PK21000236W (27.71 MT), PK22000012W (28.18 MT), PK22000009W (26.09 MT), PK22000007W (25.18 MT), PK21000235W (26.82 MT), PK22000001W (27.17 MT), PK22000002W (26.13 MT), PK22000004W (24.50 MT), PK21000237W (24.57 MT), PK22000011W (22.30 MT), PK22000010W (25.53 MT), PK22000008W (25.68 MT).</p> <ul style="list-style-type: none"> - Dispatch Slip No. PK22000010W, dated 20/01/2022; from PT Eastern Sumatra Indonesia – Bukit Maradja POM to PT SMART Tbk; product Palm Kernel; quantity 25.53 MT; No.2021/LTC-PK/BM/DO/12; Contract No. No.2021/LTC-PK/BM/12; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8471 XR; CV Serba Guna Transport. - Shipping Announcement, with transaction ID No. TR-474df1a0-239a for 208.29 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO100000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date Nov 2021 – Jan 2022; Contract 2021/LTC-PK/BM/12; Confirmation date 31/01/2022. - Shipping Announcement, with transaction ID No. TR-3e2d7813-b80d for 291.71 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO100000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date Nov 2021; Contract 2021/LTC-PK/BM/12; Confirmation date 31/12/2021. 	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2021, the estimated extraction rate from FFB into CPO is 23.50%, whilst from FFB to PK is 5.00%. Based on Daily Production Figure dated 31 December 2020, actual extraction rate ratios from FFB into CPO is 23.40% (average 12 months), whilst from FFB to PK is 4.91% (average 12 months).</p>	Complied

3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure. Based on Daily Production Figure dated 31 December 2020 for period January to December 2020, actual OER is 23.70% and KER is 4.91%. Based on Daily Production Figure dated 15 March 2021 for period January to 15 March 2021, actual OER is 23.17% and KER is 4.90%.	Complied
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>Bukit Maradja POM does not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store certified product.</p> <p>Bukit Maradja POM have 2 storage tanks, consist of BMST01 (capacity 500 MT) and BMST02 (capacity 1,000 MT). Storage tanks are dedicated only for CPO from Bukit Maradja POM. There are no contamination with non-certified product.</p> <p>There are two weighbridges used in Bukit Maradja POM, both have been calibrated based on:</p> <ul style="list-style-type: none"> - "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Pematangsiantar Dinas Koperasi, Usaha Kecil Menengah dan Perdagangan Pemerintah Kota Pematang Siantar No.510.3/1049/X/ML.1-PS" for weighbridge brand: Avery Weigh Tronix; Serial Number 102750224; Capacity 40,000 kg; verified on 22 October 2021. Due for next verification on October 2022. - "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Pematangsiantar Dinas Koperasi, Usaha Kecil Menengah dan Perdagangan Pemerintah Kota Pematang Siantar No.510.3/1050/X/ML.1-PS" for weighbridge brand: Avery Weigh Tronix; Serial Number 102750264; Capacity 40,000 kg; verified on 22 October 2021. Due for next verification on October 2022. <p>Note: PT Eastern Sumatra Indonesia bought some FFB from partner cooperatives (smallholders), however the FFB is processed by another mill. Based on verified</p>	Complied

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		<p>evidence, the basis for payments made to smallholders is the FFB weighing ticket from the recipient mill (PT Prima Sauhur Lestari). Evidence verified:</p> <ul style="list-style-type: none"> - Invoice of FFB sales from Koperasi Konsumen Serba Usaha Mancuk Mandiri Jaya (NPWP 41.374.414.5-117.000) No.009/INV/III/KSU-MMJ/2021; date of FFB delivery 18 February 2022; D/O No. 009; net weight 2,170 kg; FFB price Rp 2,960/kg; cost (fee, transport, weighing) Rp 190/kg; gross earnings Rp *,835,500; cooperative fee Rp 65,100; FFB weighing & loading Rp 86,800; FFB transport Rp 260,400; other deduction Rp 12,000; total deduction Rp 424,300; net earnings transferred to cooperative Rp *.411,200. - Weighbridge slip PT Prima Sauhur Lestari (Mill) dated 18 February 2022; truck BK 9207 TD; net weight 2,170 kg. FFB Delivery note No.011 dated 18 February 2022; truck BK 9207 TD; Block 95B31 (22 bunches) and 08B20 (33 bunches), total 55 bunches + loose fruit. 	
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000000095.</p> <p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, Bukit Maradja POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ol style="list-style-type: none"> a. Shipping Announcement, with transaction ID No. TR-2ff7a535-6ba4 for 15.08 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO1000000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 08-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 09-03-2021. b. Shipping Announcement, with transaction ID No. TR-29b323d0-7b71 for 484.07 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO1000000095) as Seller to PT SMART Tbk – Belawan Refinery 	<p>Complied</p>

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		<p>(RSPO_PO1000000970) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 27-01-2021.</p> <p>c. Shipping Announcement, with transaction ID No. TR-8e31ec18-f63a for 426.84 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 07-12-2020.</p> <p>d. Shipping Announcement, with transaction ID No. TR-4f46cffd-8de7 for 173.16 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 11-01-2021.</p> <p>During this assessment period, Bukit Maradja POM sold several volumes of certified CPO as another certification scheme. Therefore, Bukit Maradja POM performed "Remove" in the RSPO IT Platform as well as for CSPO withdrawn from transport deduction, for examples:</p> <p>e. Transaction ID: ST-TR-8b3da17e-8f0c; dated 09-03-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1,022.61 MT.</p> <p>f. Transaction ID: ST-TR-27f667cb-9cc4; dated 09-03-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 733.47 MT.</p> <p>g. Transaction ID: ST-TR-9bdf3f59-0b95; dated 16-02-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.12 MT.</p> <p>Transaction ID: ST-TR-cefeaf29-2b96; dated 16-02-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 765.26 MT.</p>	
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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>The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Identity Preserved are only stated in sales documents of RSPO certified product.</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 Eastern Sumatra Indonesia is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.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>Corporate communication in SIPEF Group website:</p> <ul style="list-style-type: none"> • Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. • Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. • State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". • State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. <p>Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.</p>	Complied
4.3	<p>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>	<p>No, SIPEF 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	<p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as</p>	<p>No, SIPEF did not display its RSPO membership status.</p>	Complied

	to the certified content of oil palm products in the member’s own products.	It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF’s own products.	
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.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Complied
Business to business communications			
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 Eastern Sumatra Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	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 Eastern Sumatra Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied
5.3	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: 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.	PT Eastern Sumatra Indonesia – Perlabian POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	Not Applicable

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	b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
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 the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Eastern Sumatra Indonesia – Perlabian POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	Not Applicable
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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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 .	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

Certified oil palm content (IP)

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	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Bukit Maradja POM use IP for RSPO supply chain certification model.	Not Applicable
	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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a 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 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	There is no product partial claims	Not Applicable
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>There is no product partial claims</p>	<p>Not Applicable</p>
<p>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.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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. Eastern Sumatra Indonesia established Company Policy on Human Rights No.QMM-40-01-P02/27-03-2019 signed by President Director on 27 March 2019. The policy stated company recognises that human rights are universal and apply to all, without any form of distinction. Company supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation</p>	<p>Complied</p>

		<p>of Republic of Indonesia. Charges of violation of human rights where substantiated will result in disciplinary action up to and including dismissal and may also lead to legal action.</p> <p>Bukit Maradja POM: Socialization of policy to respect human right, in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill’s office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p>Bukit Maradja Estate: This policy communicated to contractors. For example, sighted the record of policy to respect human right socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p>Kerasaan Estate Socialization of respect to human rights policy in Kerasaan Estate carried out: - 71 workers from Division I Kerasaan Estate dated 6 February 2021; - 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</p> <p>Timbang Deli Estate: PT. Timbang Deli Indonesia established Company Policy of Human Rights No.TDI-QM/11 signed by President Director on 1 September 2017. The policy stated company recognises that human rights are universal and apply to all, without any form of distinction. Company supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation of Republic of Indonesia. Charges of violation of human rights where substantiated will result in disciplinary action up to and including dismissal and may also lead to legal action.</p>	
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		The human rights policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.	
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.	<p>During the audit, through the public consultation with village head surrounding the company areas, local government, NGO's and local journalist obtained information that there was a record of land claims between the company and Kelompok Tani Pageraja.</p> <p>However, certificate holder did not use violence approach to handle all case related to their operational activity. There is no evidences of mercenaries and paramilitaries usage in their operations.</p>	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 whistle blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>Based on public consultations with local communities during the audit, such as Pengulu Nagori and community leaders from Nagori Lingga, Nagori Pematang Gajing, Nagori Wonorejo, Nagori Meranti and related agencies such as the Plantation Office and Land Office of Simalungun Regency, information was obtained that the company has carried out operational development of gardens. oil palm since the Dutch colonial rule. There is no process of land acquisition from community land by the company because the entire company concession area has existed since the Dutch era.</p> <p>Based on document verification, statements from related agencies and field visits indicate that PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia have not cleared new land, however, they have several procedures for resolving disputes, namely:</p> <ol style="list-style-type: none"> a. The mechanism used to implement land compensation prior to opening new land is set forth in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020. b. The mechanism used to resolve conflicts due to illegal cultivation within the HGU area is set out in Document No. LCA-01-03 / 01-02-2020 / Rev 0 (Illegal 	Complied

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		<p>Planting and Building Owned by Third Party Inside HGU of The Company) signed by Management on 18 February 2020.</p> <p>c. The company has developed a complaint mechanism as stipulated in SOP No. IAD-01-08 / 22-01-2020 / Rev.0 (Grievance Procedure) signed by the President Director on January 30, 2020.</p> <p>d. The company already has a company policy related to Wistleblower (Document No. QMM-40-01-P16 / 14-01-2019 / Rev. 1) signed by Management on January 14, 2019, states that;</p> <ul style="list-style-type: none"> - PT Tolan Tiga Indonesia guarantees the confidentiality of the report and the information it contains as well as the anonymity of the whistleblower or sender, even if the report is subsequently proven to be incorrect or unfounded. - Any kind of threat, retaliation, penalty or discrimination against the whistleblower or the reported party-or anyone who has participated in the investigation into the validity of the report-will not be tolerated. PT Tolan Tiga Indonesia reserves the right to take the appropriate actions against anyone who retaliates or threats to retaliate against whistleblowers who have submitted a report according to this policy. - It is understood that the company may take appropriate disciplinary and / or legal measures to protect its right, assets and reputation against anyone who. In bad faith, has made false, unfounded or opportunistic report and / or has made reports for the sole purpose of defaming, slandering or causing damage to the reported party or to other parties mentioned in the report. <p>PT Timbang Deli Indonesia: Based on public consultations with local communities during the audit such as Desa Timbang Deli as well as information from related agencies such as the Plantation Service and Land Office of Deli Serdang Regency, information was obtained that the company had been carrying out operations to develop oil palm</p>	
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		<p>plantations since the Dutch colonial era. There is no process of land acquisition from community land by the company because the entire company concession area has existed since the Dutch era.</p> <p>Based on document verification, statements from related agencies and field visits indicate that PT Timbang Deli Indonesia has not cleared new land, however, they already have several procedures for resolving disputes, namely:</p> <ul style="list-style-type: none"> a. The mechanism used for the implementation of land compensation before new land clearing is outlined in the SOP document No SOP / TDI / 02, Rev 1, (Land compensation Procedure) signed by Management on February 1, 2019. b. The company has developed a complaint mechanism from external parties as stipulated in SOP No. SOP / TD07, Rev.1 (Grievance Procedure with External Parties) signed by Management on February 1, 2019. c. The company has a company policy related to Whistleblower (Document No. SOP / TDI / 17, Rev. 0) which was signed by Management on January 1, 2019. <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months behind is none.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>As described in indicator 4.2.1, which states that the company has carried out operations in developing oil palm plantations since the Dutch colonial era. There is no process of land acquisition from community land by the company because the entire company concession area has existed since the Dutch era.</p> <p>However, the company has policies and mechanisms to resolve disputes / claims from external parties. The land compensation mechanism document and the mechanism for submitting complaints from external parties are written in Indonesian, which is the language understood by most of the community around the company. Especially for company policy documents, it is printed in two languages, namely Indonesian and English.</p> <p>To anticipate if there are people who do not understand Indonesian or those who cannot read and write, the company has carried out direct outreach to the</p>	Complied

		<p>surrounding community regarding the complaint mechanism as well as the land compensation mechanism, for example:</p> <ol style="list-style-type: none"> Socialization on February 8, 2021 in Timbang Deli Village which was attended by 25 participants consisting of village officials and the Timbang Deli community. Socialization on January 21, 2021 in Timbang Deli Village which was attended by 13 participants consisting of the Timbang Deli Village community. Based on interviews with Village of Meranti, Village of Pematang Gajing, Village of Lingga, Village of Wonorejo, Village of Timbang Deli stated that their community members had received socialization related to the complaint mechanism and the land compensation process if the company was to carry out development. <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months was none.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>PT Eastern Sumatra Indonesia:</p> <p>Based on the document verification, "the complaint mechanism contained in SOP No. IAD-01-08 / 22-01-2020 / Rev.0" shows that the time frame for providing responses to complaints, for example:</p> <ul style="list-style-type: none"> - Complaints can be submitted via email, WhatsApp and Message to the Complaint Box. - Complaints submitted by stakeholders will be responded to by management a maximum of 3 days after the complaint is received by Unit management. For complaints that cannot be handled locally, this is notified by the Internal Audit Department using the contact details or available email of the Applicant (Acknowledge Receipt). - Responses to complaints will be sent within 30 days and will be notified if more than 30 days. 	Complied

		<p>Based on the results of public consultations with the Head of Nagori Pematang Syahkuda and Nagori Pematang Asilom, it was stated that there had been land disputes between people who named their group "Pegaraja" during 2018 - 2020 and PT Eastern Sumatra Indonesia. The auditor has carried out in-depth verification in this regard to documents and related parties, so that it can be described as follows:</p> <ol style="list-style-type: none"> a. Indeed, there was a land dispute case in 1995 between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998 an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). b. Several residents through Pagaraja made claims against the same object in the 2015 period but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group. c. In 2018, several residents who are members of Pagaraja reported to the Police their chairperson for a case of fraud / embezzlement of funds and they were declared as suspects by the Police and detained for 21 (03-24 February 2019), after being submitted for a suspension of detention and getting guarantees from the family, the chairman of Pagaraja was released from Police custody on 24 February 2019. d. After going through the mediation process and court proceedings starting from the district court level, appeal and cassation during the period 2019 - 2020, on February 19, the decision of the Supreme Court (MA) Number: 341 K / Pid / 2020 was executed on April 20 2020, stated that the defendant Mr. Elperiansyah Nasution (Chairman of Pagaraja) was legally and convincingly proven guilty of a criminal act of fraud. This is as regulated and punishable 	
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		<p>under Article 378 of the Criminal Code (KUHP). Therefore, Bro. Elperiansyah was sentenced to prison for 1.6 years.</p> <p>Thus it can be concluded that there have been land claims by some residents (Hendrik Sihombing Cs Group) to PT Eastern Sumatra Indonesia but the case was declared finished in 2000 through Supreme Court Letter No.413 / H / 2000 / 830.K / PDT / 1998 dated July 31, 2000. The cases that existed in 2019 - 2020 were not a land dispute between the community and PT Eastern Sumatra Indonesia but a case of reporting several Pagaraja members against their chairmen for cases of fraud / embezzlement of funds.</p> <p>PT Kerasaan Indonesia:</p> <p>Based on the results of consultations with related agencies (Environmental Service, Land Office of Simalungun Regency) as well as with local village community leaders and security personnel, it was stated that there were no problems / complaints arising between the surrounding community and the company.</p> <p>Based on the verification of complaint recording documents during the 2020 period, no complaints were received to management, including from the surrounding community.</p> <p>Based on the results of consultations with the Management of the Trade Union and the Gender Committee, it was stated that during the 2020 period there were no complaints from members that were submitted to the Management.</p> <p>Based on a public consultation with the Manpower Office of Simalungun Regency, it was stated that there was 1 industrial relations dispute involving an employee who was dismissed in connection with an immoral case, mediation has been carried out but there is no agreement between the two parties and is currently going to the Industrial Relations Court process. The auditors have conducted in-depth verification of the case, both document verification and interviews with management and trade unions. Management can show evidence of the industrial</p>	
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		<p>relations dispute settlement process properly and is currently still waiting for the industrial relations court process</p> <p>PT Timbang Deli Indonesia:</p> <p>Based on the results of consultations with related agencies (Environmental Service, Land Office of Deli Serdang Regency) as well as with local village community leaders and security personnel stated that during 2020 there were no problems / complaints arising between the surrounding community and the company but in 2021 there were related complaints with the prohibition of grazing livestock in the HGU area of PT Timbang Deli Indonesia which has been an additional source of livelihood for the surrounding community.</p> <p>Based on the verification of the complaint record document during the 2020 period, there were no complaints submitted to management including from the surrounding community, but in 2021 there was 1 complaint submitted by a group of breeders around the company related to the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though The company still allows the community to take grass in the PT Kerasaan HGU area which is very much needed by the goat and cattle breeders in the village area around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p> <p>Based on the results of consultations with the Management of the Trade Union and the Gender Committee, it was stated that during the 2020 period, no complaints from members were submitted to the Management.</p> <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months behind is none.</p>	
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	As described in indicator 4.2.3 which states that there is 1 dispute case in PT Kerasaan Indonesia concerning "Industrial Relations Dispute". The company has shown evidence of the involvement of other parties as a mediator, in this case the Mediator from the Manpower Office of Simalungun Regency but did not get an	Complied

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	<p>them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>agreement between the two parties. The auditors have carried out in-depth verification of the case, both document verification and interviews with management and the Workers' Union as well as with the Manpower Office Mediator. Based on the information from the Mediator, it is stated that there is currently 1 industrial relations dispute between one of the former employees and PT Kerasaan Indonesia where mediation has been carried out by the Manpower Office but has not received an agreement so that both parties agree to proceed the case to the relations court. industrial. Management can show evidence of the industrial relations dispute settlement process properly and is currently still waiting for the industrial relations court process.</p> <p>Whereas at PT Timbang Deli Indonesia there was 1 complaint submitted by the surrounding community regarding the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though the Company still allowed the community to take grass in the PT Kerasaan HGU area which was very much needed by goat and cow breeders in the village area. around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p> <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months behind is none.</p>	
<p>Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p>	<p>PT Eastern Sumatra Indonesia:</p> <p>The Certification Unit has conducted a social impact assessment, as outlined in the "Social Impact Analysis Document - March 2010". The social study was carried out in collaboration with the Indonesian Sustainable Palm Oil Foundation (YASBI). In the process of compiling the social impact study, multi-stakeholders involved through guided interviews, questionnaires and focus group discussions (FGD).</p> <p>Every 1 year period, the Certification Unit has evaluated the implementation of the Social Impact Assessment on the surrounding community as outlined in the</p>	<p>Complied</p>

		<p>document "Social Impact Assessment Implementation Report", where the results of the evaluation are used in the preparation of social programs for the following year.</p> <p>PT Eastern Sumatra Indonesia annually has prepared a Corporate Social Responsibility (CSR) Activity Plan, for example:</p> <ul style="list-style-type: none"> a. The 2021 CSR plan consists of 9 types of activities, namely: Education, Health, Infrastructure, Furniture Equipment, Agriculture & Micro Business, Sports, Arts, Religion and Socio-Economics. b. The 2021 CSR plan also consists of 9 types of activities, namely: Education, Health, Infrastructure, Furniture Equipment, Agriculture & Micro Business, Sports, Arts, Religion and Socio-Economics. <p>Based on document verification, it shows that the actual of PT Eastern Sumatra Indonesia's CSR activities in 2021 are reported, for example as follows:</p> <ul style="list-style-type: none"> a. Grader heavy equipment borrowing assistance for road repairs from the end of the old market to the rice fields. b. Assistance for borrowing heavy equipment for grader to repair the cross-direction road. c. Assistance for borrowing heavy equipment for road repair. d. Building material assistance in the form of cement and zinc nails for the repair of Mosque. e. JCB heavy equipment borrowing assistance for road maintenance (compaction). <p>Based on interviews with the head of the surrounding nagori and the Environmental Service, it was stated that for 2021, where the COVID-19 pandemic is ongoing, several routine events held by the Nagori government and local governments will be eliminated. Much of the CSR budget of PT Eastern Sumatra Indonesia has also been diverted to prevent the spread of COVID-19 by providing assistance for spraying disinfectant liquid and handling the impact of the COVID-</p>	
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		<p>19 pandemic to the surrounding community in the form of providing food packages for families with malnourished children (stunting).</p> <p>Based on interviews with local nagori heads and document verification, it shows that at this time PT Eastern Sumatra Indonesia has started to facilitate the development of community gardens. The steps that have been taken include:</p> <ol style="list-style-type: none"> a. The formation of a special department, namely "Smallholders Support" which is tasked with preparing everything related to the facilitation of community gardens, starting from socialization to the community, identifying land and prospective farmers who want to partner, forming oil palm farmer cooperatives, drafting an MoU, coordinating with the government local nagori etc. b. There have been 4 oil palm farmer cooperatives covering 9 nagori around the PT Eastern Sumatra Indonesia area. c. Identify and measure the land owned by potential partnership garden participants <p>Social Impact Assessment</p> <p>Document of "Laporan Pelaksanaan Penilaian Dampak Sosial PT Eastern Sumatra Indonesia, Tahun 2021". Contribution to community development are based on consultation result conducted through questionnaire. Total respondent consulted during 2021 are 20 persons (4 villages). Result of the questionnaire are positive, particularly access for grass cutting inside the plantation. Activity regarding access for grass cutting is indirectly contribution by Unit of Certification to local communities already reported in the SIA report. In 2021, average grass cutting per day is 853 trip/day or approximate 255,900 trip/year. Grass volume per trip approximately 60kg/trip, therefore estimated volume 15,354 Ton grass/year indirectly contribute to local villagers.</p> <p>PT Kerasaan Indonesia:</p>	
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		<p>The Certification Unit has conducted a social impact assessment, as outlined in the "Social Impact Analysis Document - March 2010". The social study was carried out in collaboration with the Indonesian Sustainable Palm Oil Foundation (YASBI). In the process of compiling the social impact study, multi-stakeholders involved through guided interviews, questionnaires and focus group discussions (FGD).</p> <p>Every 1 year period, the Certification Unit has evaluated the implementation of the Social Impact Assessment on the surrounding community as outlined in the document "Social Impact Assessment Implementation Report", where the results of the evaluation are used in the preparation of social programs for the following year.</p> <p>As a form of social concern for the surrounding community, PT KI has compiled a CSR program every year.</p> <p>Social Impact Assessment</p> <p>Laporan Pelaksanaan Penilaian Dampak Sosial PT Kerasaan Indonesia, Tahun 2021. Contribution to community development are based on consultation result conducted through questionnaire. Total respondent consulted during 2021 are 20 persons (4 villages / 7 immigrant, 13 resident). Result of the questionnaire are positive, particularly access for grass cutting inside the plantation. Activity regarding access for grass cutting is indirectly contribution by Unit of Certification to local communities already reported in the SIA report. In 2021, average grass cutting per day is 435 trip/day or approximate 130,500 trip/year. Grass volume per trip approximately 60kg/trip, therefore estimated volume 7,830 Ton grass/year indirectly contribute to local villagers. However, based on phone interview with representative of Village or "Nagori Wonorejo", there is one activity as basic need from "Huta 1, Nagori Wonorejo" for collecting palm leaf ribs inside the plantations. This activity is to collect and produce broom.</p> <p>PT Timbang Deli Indonesia:</p>	
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		<p>PT Timbang Deli Indonesia has conducted 2 social impact studies, namely:</p> <p>a. In 2014 PT TDI has prepared a Social Impact Assessment (SIA) Report Document in collaboration with the Faculty of Forestry IPB in 2014 with the following summary;</p> <p>The Social Impact Assessment (SIA) Document Drafting Team in 2014 were as follows;</p> <ol style="list-style-type: none"> 1. Handian Purwawangsa, S.Hut, M.Si; Team Leader, Expert on Issues and Culture. 2. Udi Kusnidar, S.Hut; Expert in Socio-Economy and Culture. 3. Ir. Heri Wiyono; Expert in Socio-Culture <p>b. In 2017, PT TDI conducted another social study in collaboration with the Koompasia Enviro Institute, the results of which were outlined in the 2017 PT Timbang Deli Indonesia Social Impact Analysis Report. This study was carried out because of a plan to change commodities from rubber to palm oil.</p> <p>The Social Impact Assessment (SIA) Report Document Preparation Team in 2017 are as follows;</p> <ol style="list-style-type: none"> 1. Henry Marpaung, Team Leader, HCV Assessor for Socio-Culture (ALS License; Provisional ALS160007HM) 2. Harry Kurniawan, Member, GIS and Landscape 3. Ridho Anggara, Member, GIS Assistant <p>Every 1 year period, the Certification Unit has evaluated the implementation of the Social Impact Assessment on the surrounding community as outlined in the document "Social Impact Assessment Implementation Report", where the results of the evaluation are used in the preparation of social programs for the following year.</p>	
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		As a social management effort for the surrounding community, PT Timbang Deli Indonesia has compiled a CSR program every year.	
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.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p><i>There is no change information since previous audit.</i></p> <p>The company has shown evidence of land control in the form of:</p> <p>PT Eastern Sumatra Indonesia:</p> <p>Based on the Verification of Legal Documents, it shows that initially the PT Eastern Sumatra Indonesia HGU land was obtained from the government which was a former West Rights (Hak erfpahct), in the form of an agreement document for transferring rights from the Indonesian government. Based on the company's development, PT Eastern Sumatra Indonesia (PT ESI) was originally named SA SIPEF NV which was founded in 1921, after a change in regulations in Indonesia related to western rights (Erfpahct rights), then in 1962 PT Eastern Sumatra Indonesia was founded but under the name originally PT Eastern Sumatra Rubber Estate (Indonesia) as the holder of land tenure which was previously under the name SA SIPEF NV. Only in 1986, PT Eastern Sumatra Rubber Estate (Indonesia) changed its name to PT Eastern Sumatra Indonesia.</p> <p>The company obtained Land Rights in the form of Business Use Rights (HGU) for the first time in 1975 according to the Decree of the Minister of Agrarian Affairs / Head of BPN No.SK.46 / HGU / DA / 75, dated 21 October 1975 where at that time it was still under the name of PT. Eastern Sumatra Rubber Estate (Indonesia) whose rights expired on December 31, 1998.</p> <p>In 1997, PT Eastern Sumatra Indonesia obtained a license to extend Business Use Rights (HGU) for 25 years as stipulated in Decree No. 108 / HGU / BPN / 97, dated 26 August 1997 concerning the Granting of Extension of Business Use Rights over Land located in Simalungun Regency, North Sumatra Province on behalf of PT Eastern Sumatra Indonesia. PT Eastern Sumatra Indonesia is a name change from PT Eastern Sumatra Rubber Estate (Indonesia) which has been approved by the Minister of Justice No. C2-2217-HT.01.04.TH 97 dated 17 March 1997 in</p>	Complied

		<p>accordance with the Notary Act of Kartini Muljadi, SH No.58 of 1986. The area of the HGU covers a land area of 3,177.94 hectares located in Siantar District, Simalungun Regency, North Sumatra Province.</p> <p>As a follow-up to the extension of the HGU, the Land Office of Simalungun Regency in 1997 issued a HGU Certificate No.2 of 1997 located in Pematang Sakhuda Village on October 16, 1997 with an area of 3,177.94 Ha in accordance with Letter of Measurement No. 02.09.03.34.2.00348 / 1997 dated 16 October 1997. The expiration period for the extension of the HGU certificate is on 31 December 2023.</p> <p>PT Kerasaan Indonesia:</p> <p>Based on the Verification of Legal Documents, it shows that initially the PT Kerasaan Indonesia HGU land was an ex-concession land which in the context of the conversion of the UUPA (Law No. 5/1960) was still retained by the former owner (Sandiland Buttory & Co) by being granted the right to cultivate for 6 (six) years from September 24, 1960 in accordance with the Letter of the Minister of Agriculture and Agrarian Affairs dated December 15, 1962 No. Ka 13/9. Based on Presidential Regulation No. 6 of 1964, this plantation was under government supervision and then based on an agreement between the Indonesian Government and The Laras (Sumatra) Rubber Estates Limited dated 11 May 1968, ownership and control of the plantation was returned to the company and granted a Business Use Rights (HGU) for 30 years commencing on 13 May 1968 on behalf of PT PP Laras Indonesia which ended its HGU license period on December 31, 1998 as stated in the Decree of the Minister of Home Affairs No. 45 / HGU / DA / 75 dated 21 October 1975 and later a Business Use Rights Certificate (HGU) was issued by the Head of the Sub Directorate of Agrarian Affairs Pematang Siantar No. 1 dated January 16, 1978 with an area of 2,468 Ha.</p> <p>In 1997 the company name changed from PT P.P. Laras Indonesia became PT Kerasaan Indonesia as per the Deed of Minutes of General Meeting of Shareholders drawn up before Notary Kartini Mulyadi SH on July 27, 1997 Number</p>	
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		<p>102. The name change was registered at the Land Office of Simalungun Regency on October 1, 1997.</p> <p>In 1997, PT Kerasaan Indonesia received an extension of the HGU for a period of 25 years as stated in the Decree of the State Minister for Agrarian Affairs / Head of the National Land Agency No 90 / HGU / BPN / 97 dated 5 August 1997 which took effect from 1 January 1999 to 31 December 2023 with an area of 2,362.03 Ha.</p> <p>PT Timbang Deli Indonesia:</p> <p>PT Timbang Deli Indonesia as a business legal entity was established in 1962 based on the Decree of the Minister of Justice of the Republic of Indonesia No. J.A.5 / 14/10 dated 01 February 1962 ..</p> <p>Based on the Verification of Legal Documents, it shows that initially the PT Timbang Deli Indonesia HGU land was an ex-concession land in the context of the conversion of the UUPA (Law No. 5 of 1960) until then based on an agreement between the Indonesian Government and The Timbang Deli (Sumatra) Rubber Company Limited dated June 24, 1968, ownership and control of the plantation was returned to the company and granted a Land Title Right (HGU) for 30 years from 1968 on behalf of PT Timbang Deli Indonesia which the HGU license period ended on December 31, 1998.</p> <p>In 1997, PT Timbang Deli Indonesia received an extension of the HGU for a period of 25 years as stated in the Decree of the State Minister for Agrarian Affairs / Head of the National Land Agency No 69 / HGU / BPN / 97 dated 10 July 1997 which took effect from 1 January 1999 to 31 December 2023 with an area of 972.19 Ha.</p> <p>Based on social studies and environmental documents it shows that there is no indication of the existence of customary law communities or land controlled by indigenous peoples in the concession areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p>	
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		<p>Therefore, all the certified units operations (Mill and supply bases) does not diminish the legal, customary or user rights of other users.</p> <p>Referring to document verification and statements from related agencies, it is also shown that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have not done any new land clearing after November 2005, however they already have several procedures to settle land compensation if they plan to open a plantation. new, namely:</p> <ul style="list-style-type: none"> a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020. b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No: SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019. 	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>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.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and information from related agencies, it also shows that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have not done any new land clearing, however, they already have several procedures to settle land compensation if they plan to open new plantations, namely :</p> <ul style="list-style-type: none"> a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting 	Complied

		<p>Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</p> <p>b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No: SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.</p> <p>Based on the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land compensation documents (GRTT approval letter, owner data land, land tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.</p>	
	<p>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;</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p>	
	<p>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.</p>	<p>As described in previous indicator, it shows that:</p> <ul style="list-style-type: none"> - The company has a procedure that is used as a reference for carrying out land acquisition and resolving land complaints / claims. - Based on document verification, public consultations and field visits indicate that there was no new land clearing after November 2005 at PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia. <p>Based on document verification, public consultations and field visits, it was shown that at the time of the audit there were no indications of land disputes between the company and other parties, including the surrounding community. However, in the period of 1995, there was a land dispute case between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998</p>	

		<p>an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through the Pagaraja Group made a Return claim against the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group.</p> <p>During this audit, there is no new land grievance submitted.</p>	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Referring to the legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Based on document verification and statements from related agencies, it is also shown that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have not done any new land clearing after November 2005, however they already have several procedures to settle land compensation if they plan to open a plantation. new, namely:	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.	a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No: SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.	Complied

		Through the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land compensation documents (GRTT approval letter, owner data land, land tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.	
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.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Referring to the legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.	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.	<p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005. 	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations	Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT	Complied

	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.	Timbang Deli Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968. Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.	
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.	As explained under indicator 4.4.1 shows: <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005. 	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, environmental and social implications of the proposed operations on their lands.	Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD). Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency;	Complied
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.		Complied

		<p>interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
<p>4.5.7</p>	<p>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.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2", signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005. <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p> <p>In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has</p>	<p>Complied</p>

		<p>involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2", signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005. <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	Complied

		<p>In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
<p>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.</p>			
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.	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During this ASA-2.2 2022, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 1997).</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.		Complied
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).		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.		Complied

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		In other side, during interview with several community leader surrounding the certificate holder areas such as Village Head Sukosari, Lingga and Timbang Deli obtained information that no customary rights/land within PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.	
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.	Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968. A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. During this ASA2_2 2022, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 1997). However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. In other side, during interview with several community leader surrounding the certificate holder areas such as Village Head Sukosari, Lingga and Timbang Deli obtained information that no customary rights/land within PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.		Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.		Complied
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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed	Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which	Complied

	compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.	
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.	A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. During this ASA2_2 2022, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 1997). However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.	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).	In other side, during interview with several community leader surrounding the certificate holder areas such as Village Head Sukosari, Lingga and Timbang Deli obtained information that no customary rights/land within PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia. Based on document verification, public consultations and field visits, there were no indications of land disputes between the company and other parties, including the surrounding community, although in PT Eastern Sumatra Indonesia there had been land claims by the community who named Hendrik Sihombing et al. year 1995 and has been resolved through the court process up to the cassation process which was decided in 2000 through the Supreme Court Letter No.413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at the cassation level February 24, 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through Pagaraja reclaimed the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of the Hendrik Sihombing et al group in 1995. In 2018, several residents were members	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).		Complied

		<p>of the Pagaraja reports to the Police on the case of fraud / embezzlement of funds and the person concerned is named a suspect by the Police and detained for 21 (03 - 24 February 2019), after being submitted for a suspension of detention and obtaining guarantees from the family, the Pagaraja chairman is released from Police custody on February 24, 2019. After going through the mediation process and court proceedings starting from the district court level, appeal and cassation during the period 2019 - 2020, on February 19, the decision of the Supreme Court (MA) Number: 341 K / Pid / 2020 was executed. April 20, 2020, stated the defendant Br. Elperiansyah Nasution (Chairman of Pagaraja) was legally and convincingly proven guilty of a criminal act of fraud. This is as regulated and punishable under Article 378 of the Criminal Code (KUHP). Therefore, Br. Elperiansyah was sentenced to prison for 1.6 years.</p> <p>The conclusion is that the disputes that occurred in 2020 are not directly related to land disputes with PT Eastern Sumatra Indonesia.</p> <p>During this audit, there is no new land grievance submitted.</p>	
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable

5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
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 document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>Certificate holder can show the sample of contract with third party. The contract has contained fair, legal, transparent and have an agreed timeframe clause. Sighted the sample of contract for FFB transport: "Surat Perjanjian Kerja No.02/TDI/BNCP/I/2022 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 3 January 2022. The contract, section 5 stipulates timeframe 3 January 2022 – 31 December 2022.</p> <p>The payment process has been carried out in accordance with the agreement. Certificate holder able to show the payment via bank transfer on 17 January 2022 for work period of December 2021.</p> <p>Until this audit, there is no complaint submitted by the contractor related unfair, illegal or late payment.</p>	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Certificate holder can show the sample of contract with third party (local contractor). The contract has payment clause. Sample seen contract for FFB transport: "Surat Perjanjian Kerja No. 02/TDI/BNCP/I/2022 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 3 January 2022. Invoice No.045/BNCP/XII/2021 for transport of 466,670 kg FFB to Bukit Maradja POM, total Rp. 115,010,850.	Complied

		Evidence In House Transfer to Iwan Simarmata of Rp. 112,710,633. With deduction of tax PPh 23 of Rp.2,300,217.	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>Bukit Maradja POM:</p> <ul style="list-style-type: none"> PT. Eastern Sumatra Indonesia demonstrates "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Pematangsiantar Dinas Koperasi, Usaha Kecil Menengah dan Perdagangan Pemerintah Kota Pematang Siantar No.510.3/1049/X/ML.1-PS" for weighbridge brand: Avery Weigh Tronix; Serial Number 102750224; Capacity 40,000 kg; verified on 22 October 2021. Due for next verification on October 2022. PT. Eastern Sumatra Indonesia demonstrates "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Pematangsiantar Dinas Koperasi, Usaha Kecil Menengah dan Perdagangan Pemerintah Kota Pematang Siantar No.510.3/1050/X/ML.1-PS" for weighbridge brand: Avery Weigh Tronix; Serial Number 102750264; Capacity 40,000 kg; verified on 22 October 2021. Due for next verification on October 2022. 	Complied
5.1.8	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>PT. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in "Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2022", December 2021.</p> <ul style="list-style-type: none"> Smallholder partnership preparation: Selection of partner smallholder January – March 2022; collection document showing legal ownership of land January – March 2022; measurement the area January – March 2022. Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2022; Training on HCV and RSPO P&C July 2022; Field visit to smallholder plot May, August, October, December 2022. Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2022; ICS structure in cooperative May 2022; document preparation in cooperative May 2022; policy – SOP – smallholder member commitment establishment June 	Complied

		<p>2022; preparation smallholder member oil palm block (condition and ID) July 2022; HCV assessment August 2022; Construction of hazardous waste storage October 2022; Construction of tools and material storage November 2022; Pre audit Internal RSPO December 2022.</p> <p>PT. Kerasaan Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Kerasaan Estate 2021 -2022".</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – December 2022. • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – January – February 2022. • Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2021; Training on HCV and RSPO P&C June 2022; Field visit to smallholder plot June, August, October, December 2022. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2022; ICS structure in cooperative May 2022; document preparation in cooperative May 2022; policy – SOP – smallholder member commitment establishment June 2022; preparation smallholder member oil palm block (condition and ID) July 2022; HCV assessment August 2022; Construction of hazardous waste storage October 2022; Construction of tools and material storage November 2022; Pre audit Internal RSPO December 2022. <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in "Smallholder Program PT. Timbang Deli Indonesia" – target 195 Ha.</p>	
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		<ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – March 2022. • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – February - March 2022. <p>Smallholder partnership between Koperasi Pemasaran Tani Jaya Bersatu with PT Timbang Deli Indonesia on 25 September 2021.</p> <p>Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2021; Training on HCV and RSPO P&C June 2022; Field visit to smallholder plot June, August, October, December 2022.</p>	
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>Certificate holder has had the grievance mechanism that covered in company’s procedure as follows:</p> <ul style="list-style-type: none"> • PT. Eastern Sumatra Indonesia established SOP Grievance Procedure No.IAD-01-08/22-01-2020/Rev.0 dated 30 January 2020. The grievance mechanism applicable for internal and external parties. • PT Timbang Deli Indonesia has developed a complaint mechanism from external parties as stipulated in SOP No. SOP / TD07, Rev.1 (Grievance Procedure with External Parties) signed by Management on February 1, 2019. <p>During this audit, there is no information of grievance on critical issues such as land tenure, environmental, employment/worker welfare, pollution and social issues in each unit estate or mill submitted by internal/external parties. However, each unit recorded the list complaint submitted by internal or external parties. For example,</p> <ul style="list-style-type: none"> • Bukit Maradja Estate & Mill manages “Buku Keluh Kesah Internal Eksternal”. In year 2021 Bukit Maradja POM and Estate received 4 incoming letters. Generally, the incoming letter is a request for assistance or a loan of 	Complied

		<p>heavy equipment. For example, an incoming letter dated 9 September 2021 from Pangulu Nagori Marihat Bukit related to a backhoe loader loan, the Estate Manager responded to the letter on 11 September 2021.</p> <ul style="list-style-type: none"> • Kerasaan Estate manages "Buku Keluh Kesah Internal Eksternal". In year 2021 Kerasaan Estate received 9 incoming letters. For example: an incoming letter dated February 21, 2022 from the Pematang Bandar sub-district head regarding the loan of a minibus starwagon unit for the purpose of transporting MTQ contingent participants at the Dolok Batu Nanggar District level. Responded by estate manager on 23 February 2022 (approved). 	
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<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><i>There is no change information since the previous assessment.</i></p> <p>Company carried out communication and consultation on "Sosialisasi Tindak Lanjut Petani Kelapa Sawit Calon Mitra Perusahaan di Balai Desa Lingga", dated 18 February 2020. The company explains the program for smallholder partnership and form a cooperative for oil palm smallholder cooperative. The socialization meeting attended by 25 smallholders.</p> <p>Company carried out communication and consultation on "Sosialisasi Tindak Lanjut Petani Mitra Perusahaan di Kantor Pangulu Mariah Bandar", dated 17 February 2020. The company explains the program for smallholder partnership, yield, legality of the land, technical assistance, data collection and form a cooperative for oil palm smallholder cooperative. The socialization meeting attended by 16 potential smallholders.</p> <p>PT. Kerasaan Indonesia made consultation with smallholder Koperasi Pemasaran Maju Sawit Sejahtera, dated 17 February 2021 discuss agenda related to statement letter inconsistent with name stated on lands document; cooperative member agreed to have FFB sales transaction, payment will be transferred to Koperasi Maju Sawit Sejahtera bank account; Cooperative committee will complete all smallholder member documentation related to FFB transaction. The</p>	<p>Complied</p>

		<p>meeting was attended by 7 smallholder cooperative committee and Muhammad Abdin – Smallholder Service.</p> <p>PT. Timbang Deli Indonesia – Timbang Deli Estate made consultation with potential smallholder in Juhar Baru village, dated 4 December 2020. The meeting discussed agenda related to cooperative establishment, cooperative member agreed to have FFB sales transaction. The meeting was attended by 20 smallholder cooperative committee and Muhammad Abdin – Smallholder Staff.</p> <p>Based on interview with smallholder staff obtained information that due to Covid19 pandemic, some of meeting schedule has been postponed.</p>	
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. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in “Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2022”, December 2021.</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder January – March 2022; collection document showing legal ownership of land January – March 2022; measurement the area January – March 2022. • Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2022; Training on HCV and RSPO P&C July 2022; Field visit to smallholder plot May, August, October, December 2022. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2022; ICS structure in cooperative May 2022; document preparation in cooperative May 2022; policy – SOP – smallholder member commitment establishment June 2022; preparation smallholder member oil palm block (condition and ID) July 2022; HCV assessment August 2022; Construction of hazardous waste storage October 2022; Construction of tools and material storage November 2022; Pre audit Internal RSPO December 2022. <p>PT. Kerasaan Indonesia prepared smallholder partnership program, as documented in “Program Kerja Smallholder Kerasaan Estate 2021 -2022”.</p>	Complied

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		<ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – December 2022. • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – January – February 2022. • Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2021; Training on HCV and RSPO P&C June 2022; Field visit to smallholder plot June, August, October, December 2022. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2022; ICS structure in cooperative May 2022; document preparation in cooperative May 2022; policy – SOP – smallholder member commitment establishment June 2022; preparation smallholder member oil palm block (condition and ID) July 2022; HCV assessment August 2022; Construction of hazardous waste storage October 2022; Construction of tools and material storage November 2022; Pre audit Internal RSPO December 2022. <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in “Smallholder Program PT. Timbang Deli Indonesia” – target 195 Ha.</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – March 2022. • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – February - March 2022. 	
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		<p>Smallholder partnership between Koperasi Pemasaran Tani Jaya Bersatu with PT Timbang Deli Indonesia on 25 September 2021.</p> <p>Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2021; Training on HCV and RSPO P&C June 2022; Field visit to smallholder plot June, August, October, December 2022.</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>PT. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in “Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2022”, December 2021.</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder January – March 2022; collection document showing legal ownership of land January – March 2022; measurement the area January – March 2022. • Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2022; Training on HCV and RSPO P&C July 2022; Field visit to smallholder plot May, August, October, December 2022. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2022; ICS structure in cooperative May 2022; document preparation in cooperative May 2022; policy – SOP – smallholder member commitment establishment June 2022; preparation smallholder member oil palm block (condition and ID) July 2022; HCV assessment August 2022; Construction of hazardous waste storage October 2022; Construction of tools and material storage November 2022; Pre audit Internal RSPO December 2022. <p>PT. Kerasaan Indonesia prepared smallholder partnership program, as documented in “Program Kerja Smallholder Kerasaan Estate 2021 -2022”.</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – December 2022. 	Complied

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		<ul style="list-style-type: none"> • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – January – February 2022. • Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2021; Training on HCV and RSPO P&C June 2022; Field visit to smallholder plot June, August, October, December 2022. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2022; ICS structure in cooperative May 2022; document preparation in cooperative May 2022; policy – SOP – smallholder member commitment establishment June 2022; preparation smallholder member oil palm block (condition and ID) July 2022; HCV assessment August 2022; Construction of hazardous waste storage October 2022; Construction of tools and material storage November 2022; Pre audit Internal RSPO December 2022. <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in “Smallholder Program PT. Timbang Deli Indonesia” – target 195 Ha.</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – March 2022. • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – February - March 2022. <p>Smallholder partnership between Koperasi Pemasaran Tani Jaya Bersatu with PT Timbang Deli Indonesia on 25 September 2021.</p>	
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		Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2022; training related management and administration May 2021; Training on HCV and RSPO P&C June 2022; Field visit to smallholder plot June, August, October, December 2022.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>The supply base for PT. Eastern Sumatra Indonesia – Bukit Maradja POM does not include scheme smallholders. However, the company and its supply base prepare program to assist smallholder.</p> <p>PT. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in “Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2022” that covered the pest and disease and use of pesticide May 2022;</p> <p>PT. Kerasaan Indonesia also prepared smallholder partnership program, as documented in “Program Kerja Smallholder Kerasaan Estate 2022” that covered pest and disease and use of pesticide June 2022.</p> <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in “Program Kerja Smallholder PT. Timbang Deli Indonesia 2022” that covered pest and disease and use of pesticide May, July, September, November 2022.</p>	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Management Review Report (corporate level), dated 4 March 2022 covered issue as follows:</p> <ul style="list-style-type: none"> • Feedback from Interested parties: The major impact on relationships, communications, and engagement within the business and with all of our external stakeholders for 2021 was the evolving COVID-19 pandemic across the world; Statutory reporting all met in 2021; HGU renewal: impending for North Sumatera Estates; Plasma requirements: new and renewal HGU applications must be supported by a 20% plasma component. • Performance of External Supplier: Smallholder Department, External Suppliers. 	Complied

Principle 6: respect workers’ rights and conditions

Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
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>PT. Eastern Sumatra Indonesia established Equal Employment Opportunity Policy No.QMM-40-01-P03/27-03-2019 signed by President Director on 27 March 2019. The policy stated company is committed to a non-discriminatory workplace and will abide by the relevant anti-discrimination and equal employment legislation of the Republic of Indonesia. Company is not discriminating against anyone in the recruitment process of the company business operations. The company recruitment selection process is based on merit so all applicants with the desired qualifications and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the job. Promotions within the company are handled on the same basis.</p> <p>Dissemination of Company's Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p> <p>Latest dissemination of company policy at Timbang Deli Estate conducted on 15th February 2022 was attended by 22 workers.</p>	Complied
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>Bukit Maradja Estate shows list of employee year 2022 in the organization, total employee 405 workers, whereby shows company hires people from different religion (Islam 397 employees, Christian 8 employees); origin (local 394 employees, outside area 11 employees); gender (86 female workers, 319 male workers); ages (between 19 years to 50 years).</p> <p>Timbang Deli Estate shows list of employees in the organization, whereby shows company hires people from different religion (Islam 40 employees, Christian 1 employees); origin (local 41 employees); gender (7 female workers, 34 male workers); ages (between 28 years to 49 years).</p>	Complied

		<p>Timbang Deli Estate carried out recruitment dated 1 February 2021. The recruitment for kindergarten teacher position. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p>	
<p>6.1.3</p>	<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 Eatern Sumatera Indonesia – Bukit Maradja POM carried out recruitment. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p> <p>Recruitment - Bukit Maradja POM carried out recruitment for day worker PKWT through Memorandum Mill Manager “Rekrutmen Karyawan No.10/BM-RMO/I/2020” dated 9 May 2020. Job vacancy distributed to Marihat Bukit village. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, other documentation – sighted for candidate Dedi Ramdani (harvester) and Ramlan (dump truck helper).</p> <p>Promotion - Bukit Maradja POM obtains Letter for promotion based on Memorandum HR Department No.145/JWB-RMONS/VII/2021 dated 16 July 2021. Approved promotion for 15 employees; sample: Anda Elsa Sariska Manik (Payroll clerk & Admin) from P1 to P2, Deny Joko (Workshop supervision) from H to P1. The promotion status indicates all tribe, all sex, all ages are eligible for promotion.</p> <p>Treatment for contract worker - “Perjanjian Kerja Waktu Tertentu Mukisa dan PT. Eastern Sumatra Indonesia Bukit Maradja Estate”, Nomor: 001/PKWT/BMM/2022, namely Mr Andi Utama (Helprt in Warehouse) signed on 01/03/2022. The PWKT stipulates: Clause 1: PKWT for Mukisa as general worker; PKWT period 1st March 2022 – 28 February 2023 (a year). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,614,589. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to Jamsostek. (UMK: Rp 1,614,165 - based on</p>	<p>Complied</p>

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		<p>Governor of Sumatera Utara nomo: 188.44/839/KPTS/2021, dated 20 December 2021)</p> <p>Pension - Kerasaan Estate paid pension for employee under name Monang Lubis (Division 3 – Harvester Supervision), as per “Surat Persetujuan Pensiun Sekaligus No.01/SPB/KRE/2021” dated 24th April 2021. The agreement stipulates the worker pension effective 24th July 2021, the pension fund will be paid to worker account, company housing will be empty on 3 months after pension. Pension fund paid on 24th April 2021.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Based on interview with recruited female worker in Bukit Maradja Estate and Timbang Deli Estate, the selection and recruitment does not involve pregnancy testing</p> <p>Data verified: Absensi Karyawan Manuring – Spraying Tidak Hamil dan Tidak Menyusui (monthly), last testing in February 2022 – there was no women workers in</p>	Complied
6.1.5	<p>(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>	<p>PT. Eastern Sumatra Indonesia established SOP Gender Committee No.HRD-04-12/24-10-2019, signed on 19 March 2020. The SOP stated Gender Committee task is to give recommendation to BOD on decision making related to gender issue in the company; reviewing and evaluating management of gender issues in company; conduct meeting at least once per year; provides training on understanding of rights of female workers.</p> <p>Bukit Maradja POM has established Gender Committee Contact Group, dated 5 March 2020. Chairman Ricardo Sihombing (Mill Manager); Secretary Dicky Pratama (Office Assistant); Member: Sutranto, Elsa Sarisa Manik, Ade Rani Agustina. Sampled meeting and review on 13 February 2022 – agenda discussion gender matter during January 2021, no issue.</p> <p>Kerasaan Estate has established gender committee Contact Group, dated 13 March 2021. Chairman Burlen J Sihombing (Estate Manager); Secretary Sony Prianggara (Office Head Assistant); Member: Birmansyah Harahap, Siska, Sylvia Bianca Sihombing.</p>	Complied

		Timbang Deli Estate has established gender committee Contact Group. The gender committee prepared a program year 2022, such as: socialization gender committee program and company policy; gender committee meeting; Capacity building for female workers; Environment cleaning	
6.1.6	There is evidence of equal pay for the same work scope.	<p>PT Eastern Sumatera Indonesia has demonstrated the record of evidence of equal pay for the same work scope.</p> <p>Name: Mesno (register number: 2072, up-keep supervisor) Basic salary: Rp 3,010,000 Rice allowance: Rp 383,370 BPJS Ketenagakerjaan (accidents insurance): Rp 143,130 BPJS Kesehatan (health insurance): Rp 120,400 BPJS Pension: Rp 63,053 Overtime: Rp 1,275,620 Others: Rp 20,000 Gross salary: Rp 5,015,573</p> <p>Name: M Khaidir Ali (register number: 2155, officer) Basic salary: Rp 2,614,589. BPJS Ketenagakerjaan (accidents insurance): Rp 118,703. BPJS Kesehatan (health insurance): Rp 104,584. Overtime: Rp 914,347. Gross salary: Rp 3,752,223.</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>			
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the	PT. Eastern Sumatra Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang	Complied

	<p>workers in national languages and explained to them in language they understand.</p>	<p>Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020".</p> <p>The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1564/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <p>Berita Acara – dated 07/09/2021, has been conducted meeting with Labour Union (Serikat Pekerja Bukit Maradja Mandiri – SPBUMM), related to extension time of Collective Labour Agreement between PT Eastern Sumatra Indonesia and SPBUMM. The letter has been acknowledged by Dinas Ketenagakerjaan Kabupaten Simalungun (bapak Fhincer Ambarita).</p> <ul style="list-style-type: none"> • Regular working hours of 7 hours per day regulated under Chapter IV; • Salary regulated under Chapter V; • Deductions regulated under Chapter IV and VIII; • Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur"; • Sick leave regulated under Chapter VII; • Annual leave entitlement regulated under Chapter VII; • Maternity leave regulated under Chapter VII; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; <p>Sample of Pay Slip – month January 2022:</p>	
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		<p>Name: Mesno (register number: 2072, up-keep supervisor) Basic salary: Rp 3,010,000. Rice allowance: Rp 383,370. BPJS Ketenagakerjaan (accidents insurance): Rp 143,130. BPJS Kesehatan (health insurance): Rp 120,400. BPJS Pension: Rp 63,053. Overtime: Rp 1,275,620. Others: Rp 20,000. Gross salary: Rp 5,015,573.</p> <p>Name: M Khaidir Ali (register number: 2155, officer). Basic salary: Rp 2,614,589. BPJS Ketenagakerjaan (accidents insurance): Rp 118,703. BPJS Kesehatan (health insurance): Rp 104,584. Overtime: Rp 914,347. Gross salary: Rp 3,752,223.</p>	
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>PT. Eastern Sumatra Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1564/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> Regular working hours of 7 hours per day regulated under Chapter IV; 	Complied

		<ul style="list-style-type: none"> • Salary regulated under Chapter V; • Deductions regulated under Chapter IV and VIII; • Overtime regulated under Chapter X, referring to “Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur”; • Sick leave regulated under Chapter VII; • Annual leave entitlement regulated under Chapter VII; • Maternity leave regulated under Chapter VII; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; <p>Berita Acara – dated 07/09/2021, has been conducted meeting with Labour Union (Serikat Pekerja Bukit Maradja Mandiri – SPBUMM), related to extension time of Collective Labour Agreement between PT Eastern Sumatra Indonesia and SPBUMM. The letter has been acknowledged by Dinas Ketenagakerjaan Kabupaten Simalungun (Mr. Fhincer Ambarita).</p> <p>PT. Kerasaan Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under “Perjanjian Kerja Bersama (PKB) PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri (SPKIM) periode 2018-2020”. The document has been legalized through “Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1563/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri” dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> • Regular working hours of 7 hours per day regulated under Chapter IV; 	
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6.2.3	<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>PT. Eastern Sumatra Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1564/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> • Regular working hours of 7 hours per day regulated under Chapter IV; • Salary regulated under Chapter V; • Deductions regulated under Chapter IV and VIII; • Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur"; • Sick leave regulated under Chapter VII; • Annual leave entitlement regulated under Chapter VII; • Maternity leave regulated under Chapter VII; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; 	Complied

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6.2.4	<p>(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</p>	<p>The unit of certification provides adequate housing</p> <p>Bukit Maradja Estate updated in 2022:</p> <table border="1" data-bbox="1010 1310 1848 1362"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Facility	Unit	Facility	Unit					Complied
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<p>the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<table border="1"> <tr><td>Masjid</td><td>4</td><td>Volley-ball court</td><td>4</td></tr> <tr><td>Kindergarten</td><td>2</td><td>Football field</td><td>1</td></tr> <tr><td>Islamic school</td><td>3</td><td>Badminton court</td><td>2</td></tr> <tr><td>Employee Hall</td><td>3</td><td>School bus</td><td>1</td></tr> <tr><td>Clinic</td><td>1</td><td>Fertilizer store</td><td>1</td></tr> <tr><td>Employee house</td><td>83</td><td>Chemical store</td><td>1</td></tr> <tr><td>Staff house</td><td>8</td><td></td><td></td></tr> </table>	Masjid	4	Volley-ball court	4	Kindergarten	2	Football field	1	Islamic school	3	Badminton court	2	Employee Hall	3	School bus	1	Clinic	1	Fertilizer store	1	Employee house	83	Chemical store	1	Staff house	8					
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Islamic school	1	Fire tower	1
Employee Hall	1	School bus	1
Clinic	1	Fertilizer store	1
Employee house	96	Material store	1
Tennis value	1	Water tank	6

PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia regularly test the water quality for worker housing, compared against standard as per Peraturan Menteri Kesehatan No.32 tahun 2017 tentang Standar Baku Mutu Kesehatan dan Persyaratan Kesehatan Air untuk Keperluan Higiene Sanitasi, Kolam Renang, Solus Per Aqua dan Pemandian Umum”:

- Water quality test report for bore well water in Bukit Maradja POM housing “Laporan Hasil Uji PT. Mutuagung Lestari Medan No.0623/AB/MDN/XI/21” dated 16 December 2021. Test result:

Parameter	Test Result	Standard*
Turbidity	0.39 NTU	25 NTU
Color	0.69 TCU	-
Total Dissolved Solid	152 mg/L	1000 mg/L
Taste	No taste	No taste
Odor	No odor	No odor
Total Coliform	11/100 mL	50 /100 mL
<i>E. Coli</i>	<1.8/100 mL	0/100 mL
pH	6.87	6.5 – 8.5

		<table border="1"> <tbody> <tr> <td>Ferrit</td> <td>0.31 mg/L</td> <td>1 mg/L</td> </tr> <tr> <td>Fluoride</td> <td><0.062 mg/L</td> <td>1.5 mg/L</td> </tr> <tr> <td>Hardness (CaCO₃)</td> <td>46.1 mg/L</td> <td>500 mg/L</td> </tr> <tr> <td>Manganese</td> <td>0.1 mg/L</td> <td>0.5 mg/L</td> </tr> <tr> <td>Nitrate, as N</td> <td>0.076 mg/L</td> <td>10 mg/L</td> </tr> <tr> <td>Cyanide</td> <td><0.010 mg/L</td> <td>1 mg/L</td> </tr> <tr> <td>Detergent</td> <td>0.021 mg/L</td> <td>0.05 mg/L</td> </tr> <tr> <td>Arsenic</td> <td><0.00041 mg/L</td> <td>0.05 mg/L</td> </tr> <tr> <td>Cadmium</td> <td><0.0013 mg/L</td> <td>0.005 mg/L</td> </tr> <tr> <td>Chromium</td> <td>0.0011 mg/L</td> <td>0.05 mg/L</td> </tr> <tr> <td>Selenium</td> <td><0.005 mg/L</td> <td>0.01 mg/L</td> </tr> <tr> <td>Zinc</td> <td>0.21 mg/L</td> <td>15 mg/L</td> </tr> <tr> <td>Sulphate</td> <td>7.43 mg/L</td> <td>400 mg/L</td> </tr> <tr> <td>Lead</td> <td><0.0016 mg/L</td> <td>0.05 mg/L</td> </tr> <tr> <td>Organic Substance (KMnO₄)</td> <td>1.34 mg/L</td> <td>10 mg/L</td> </tr> </tbody> </table>	Ferrit	0.31 mg/L	1 mg/L	Fluoride	<0.062 mg/L	1.5 mg/L	Hardness (CaCO ₃)	46.1 mg/L	500 mg/L	Manganese	0.1 mg/L	0.5 mg/L	Nitrate, as N	0.076 mg/L	10 mg/L	Cyanide	<0.010 mg/L	1 mg/L	Detergent	0.021 mg/L	0.05 mg/L	Arsenic	<0.00041 mg/L	0.05 mg/L	Cadmium	<0.0013 mg/L	0.005 mg/L	Chromium	0.0011 mg/L	0.05 mg/L	Selenium	<0.005 mg/L	0.01 mg/L	Zinc	0.21 mg/L	15 mg/L	Sulphate	7.43 mg/L	400 mg/L	Lead	<0.0016 mg/L	0.05 mg/L	Organic Substance (KMnO ₄)	1.34 mg/L	10 mg/L	
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Field visit to housing area of Bukit Maradja Estate, Kerasaan Estate, Timbang Deli Estate, and interview with the housewives in the premise. During surveillance – March 2022, audit team found</p> <ul style="list-style-type: none"> • Company works together with employee cooperative in provision of rice, as part of in-kind benefit for worker. Koperasi Serba Usaha Bukit Maradja is distributing rice for all workers. • Company allows food seller to enter the housing compound. 	Complied																																													

		<ul style="list-style-type: none"> • Nearest market selling staple food, vegetables, meat, fish located 10 km from the company location. 	
6.2.6	<p>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>	<p>PT. Eastern Sumatra Indonesia has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> • Reference Family Size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2020). <i>Total Fertility Rate for Indonesia, year 2020 at 2.28 (BPS); Child Mortality Rates for Indonesia, year 2020 at 17.7/1000 births.</i> Reference Family Size at 4.23. • Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2020). <i>Labour Participation Force Rate for Indonesia, year 2020 at 69.32% (BPS); Unemployment Rate for Indonesia, year 2020 at 4.99% (BPS); People Working Part Time for Indonesia, year 2020 at 23.74% (BPS).</i> Full Time equivalent per family at 1.721. • Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; • Housing cost at 0 (provided by company); • Non-Food Non-Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company) based on sampling to 10 workers in Bukit Maradja POM, Bukit Maradja Estate, Kerasaan Estate. • Mandatory deduction (from tax and BPJS levy); • Sample of DLW calculation as follows: Bukit Maradja Estate, as follow: <ul style="list-style-type: none"> • Interviewed 7 workers with different pay grade and dependents (SKU B/K3, SKU B/K2, SKU B/K1. SKU B/K0, SKU H/K3, SKU H/K2, SKU H/K1, SKU H/K0, SKU H/TK, PKWT/TK). Calculated on annual basis 30 December 2021 • Minimum Wage of Simalungun Regency in 2021 is Rp. 2,607,089.49 – based 	Complied

		<p>on "Keputusan Gubernur Sumatera Utara nomor 188.44/597/KPTS/2020 tentang Pentapan Upah Minimum Kabupaten Simalungun tahun 2021" dated 30th November 2020.</p> <ul style="list-style-type: none"> • Gross Living Wage at Rp 2,549,665; • Prevailing wage at Rp. 4,806,557; • Living Wage Gap at Rp. 2,256,891 (positive). <p>Kerasaan Estate, as follow:</p> <ul style="list-style-type: none"> • Interviewed 12 workers with different pay grade and dependents (SKU B/K3, SKU B/K1, SKU H/K3, SKU H/K2, SKU H/K1, SKU H/TK, PKWT/TK). Calculated on annual basis 30 December 2020. • Minimum Wage of Simalungun Regency in 2021 is Rp. 2,607,089.49 – based on "Keputusan Gubernur Sumatera Utara nomor 188.44/597/KPTS/2020 tentang Pentapan Upah Minimum Kabupaten Simalungun tahun 2021" dated 30th November 2020. • Gross Living Wage at Rp 3,620,787; • Prevailing wage at Rp. 4,069.957; • Living Wage Gap at Rp. 449,170 (positive). <p>Timbang Deli Estate:</p> <ul style="list-style-type: none"> • Minimum Wage of Deli Serdang Regency in 2020 is Rp. 3.136.709. • Gross Living Wage at Rp 3,068,069; • Prevailing wage at Rp. 3,797,753; • Living Wage Gap at Rp. 729,684 (positive). 	
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	<p>Core work in Bukti Maradja POM such as process operators, boiler operators, tractor driver all permanent fulltime (SKU – Syarat Kecakapan Umum).</p> <p>Core work in Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate such as harvesters, spraying gang, manuring gang, FFB truck driver, pest & disease census was all permanent fulltime (SKU – Syarat Kerja Umum).</p>	Complied

		<p>Loose fruit pickers are part of harvesting activities (core work) and contracted as PKWT at the first time recruited. As refer to KEPMENAKER No. 100 Tahun 2004 that PKWT categorized as the process to become a permanent worker, then the company is allowed used PKWT in their core work operation.</p> <p>Because of PKWT is one of the requirements to be permanent employee, therefore this process shall be in accordance with the contract (maximum of 3 years) since the contract was signed, or according to the results of performance appraisal from the management/supervisor. Contract of PKWT signed between the company (Estate nor Mill) and the worker itself.</p>	
<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	<p>(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.</p>	<p>PT. Eastern Sumatra Indonesia established Freedom of Association Policy No.QMM-40-01-P13/27-03-2019 signed by President Director on 27 March 2019. The policy stated company recognises the role of lawful and independent workers and employees’ representative organizations in creating a constructive working environment. Company supports the implementation of the laws and regulations of the Republic of Indonesia relevant to freedom of association for workers and employees. The policy available in Bahasa Indonesia.</p> <p>Dissemination of Company’s Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p> <p>Employees of Timbang Deli Estate has attended the company’s policies dissemination on 15th February 2022, attended by 22 workers.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected,</p>	<p>Minute of meeting with labour Union, dated 10th March 2022, were attended by Bapak Agus Kurniawan (head of SP-BUMM) and management representative</p>	Complied

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	are documented in the national languages and available upon request.	(HRD, Senior Manager Administration, Senior Manager Operation). Agenda: Defined minimum wage year 2022.	
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 representative of worker union in Bukit Maradja Estate, Bukit Maradja POM and Timbang Deli Estate the management allows worker union formation to be independent. The worker union member participated in free election of worker union chairman in 2021.	Complied
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. Eastern Sumatra Indonesia established Child Labour Policy No.QMM-40-01-P08/27-03-2019 signed by President Director 27 March 2019. Company believes children should have the right to education and a healthy life, and is committed to ensuring that children under the age of 18 years are not employed by the company for any work related purpose. Company fully supports the relevant Republic of Indonesia laws and other international agreements, such as ILO Child Labour Convention, 1999. Company will not knowingly participate in any activities which could be classed as using child labour. In pursuing the objective, the company will ensure that at time of hiring, the age of all worker (permanent or not) is positively checked (if the person) has an ID card or another official document. When no documents are available to check the age, the company worker/manager in charge will use her/his best judgement and can refuse employment in case of doubt. People refused employment on this basis will be informed that they can file a grievance with the company, for a review of their situation. Contractors and other parties performing work for the company are to be informed of this policy, which will be considered as integral part of their contractual obligations toward the company. In the event of an occurrence of child labour being discovered, the relevant manager must be immediately informed and immediate action must be taken to correct the situation. It is the obligation of workers and managers to report child labour activities that they witness or that are reported to them. Disciplinary action is taken against company workers who willfully are in breach of this policy.	Complied

		<p>Dissemination of Company’s Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p> <p>Employees of Timbang Deli Estate has attended the company’s policies dissemination on 15th February 2022, attended by 22 workers.</p>	
6.4.2	<p>(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.</p>	<p>PT. Eastern Sumatra Indonesia demonstrated document Manpower establishment.</p> <ul style="list-style-type: none"> • Bukit Maradja Estate, as of February 2022; total manpower 405 personnel. Youngest worker Aria Akbar Purba, No323, birth date 22nd April 2003, first date of work 1st July 2021 – at 18 years and 3 months. KTP/ID card checked and verified. • Timbang Deli Estate, Estate, as of February 2022; total manpower 203 personnel. Youngest worker Giri Nanda No1771, birth date 4th January 1994, first date of work 1st August 2013 – at 19 years and 7 months. KTP/ID card checked and verified. • Kerasaan Estate, as of February 2022; total manpower 319 workers, Youngest worker Dedy Kurniawan birth date 15th December 2003, first date of work 1 August 2021 – at 18 years and 7 months. KTP/ID card checked and verified. • Contract: “Surat Perjanjian Kerja No.01/KI/KKK/I/2021 antara PT. Kerasaan Indonesia dengan Koperasi Konsumen Kerasaan tentang Rekondisi Packing Groove Sterilizer No.1” signed on 4th January 2021. The contract, section 6 stipulates Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old. Verification through medical certificate and ID card verification, the youngest worker born 2003. 	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>PT. Eastern Sumatra Indonesia demonstrated document Manpower establishment.</p>	Complied

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		<ul style="list-style-type: none"> Bukit Maradja Estate, as of February 2022; total manpower 405 personnel. Youngest worker Aria Akbar Purba, No323, birth date 22nd April 2003, first date of work 1st July 2021 – at 18 years and 3 months. KTP/ID card checked and verified. Timbang Deli Estate, Estate, as of February 2022; total manpower 203 personnel. Youngest worker Giri Nanda No1771, birth date 4th January 1994, first date of work 1st August 2013 – at 19 years and 7 months. KTP/ID card checked and verified. Kerasaan Estate, as of February 2022; total manpower 319 workers, Youngest worker Dedy Kurniawan birth date 15th December 2003, first date of work 1 August 2021 – at 18 years and 7 months. KTP/ID card checked and verified. <p>No worker under 18 years old employed by PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia, and PT. Timbang Deli Indonesia.</p>	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>Dissemination of Company's Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p> <p>Employees of Timbang Deli Estate has attended the company's policies dissemination on 15th February 2022, attended by 22 workers.</p>	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.	<p>PT. Eastern Sumatra Indonesia established Sexual Harassment Policy No.QMM-40-01-P10/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Eastern Sumatra Indonesia is committed to ensuring harmonious and productive work environment for its workers. This commitment recognizes that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome, and offensive behavior and will not be tolerated under any circumstances. PT. Eastern Sumatra Indonesia supports a strict implementation of the laws and regulations of Republic of Indonesia punishing sexual harassment.</p>	Complied

		<p>All report of sexual harassment will be dealt with a sympathetic and confidential manner to help achieve fair hearings of the reports. No person/whistleblower is to be victimized for reporting sexual harassment.</p> <p>Dissemination of Company's Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p> <p>Employees of Timbang Deli Estate has attended the company's policies dissemination on 15th February 2022, attended by 22 workers.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>Implementation policy to protect the reproductive rights of all, especially of women, as per Sexual Harassment Policy No.QMM-40-01-P10/27-03-2019 signed by President Director on 27 March 2019.</p> <p>Dissemination of Company's Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p> <p>Employees of Timbang Deli Estate has attended the company's policies dissemination on 15th February 2022, attended by 22 workers.</p>	Complied
6.5.3	<p>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>	<p>PT. Eastern Sumatra Indonesia and worker union has agreed on breastfeeding time, as stipulated in "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM)", Chapter XIV – Section 5.b. "Pengusaha memberikan kesempatan yang cukup kepada pekerja wanita untuk menyusukan anaknya" – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p>Consultation conducted via questionnaire "Formulir Interview dengan Ibu Baru Bersalin/Menyusui". The questionnaire: status of work? presence of children needing breastfeeding? exclusive breastfeeding? breastfeeding frequency?</p>	Complied

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		<p>breastfeeding timeframe? permission from company for breastfeeding time? breastfeeding frequency during working hour? breastfeeding time adequate? provision of specific place for breastfeeding? pay deduction for time used during breastfeeding time? Provision of access to information related to breastfeeding consultation, baby health and vaccination?</p>	
6.5.4	<p>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>	<p>PT. Eastern Sumatra Indonesia refers to Grievance Policy (Kebijakan Keluh Kesah) No.QMM-40-01-P12/27-03-2019/Rev, signed by President Director on 27 March 2019</p> <p>Grievance resolution refers to SOP "Grievance Procedure - Prosedur Keluh Kesah No.IAD-01-08/22-01-2020/Rev.0" dated 30 January 2020. This procedure provides guidance on how to accommodate grievance from external and internal. The procedure completed with flowchart. Internal Audit Department Manager receive complaint through email, whatsapp and message to grievance box. All complainants are to be given a response within 3 days. For grievance that cannot be handled locally this is issued by Internal Audit Department using the complainant contact details provided or directly send to email. For relevant grievances, Internal Audit Department will send information from complainant to the Department concerned, copying Director of Sustainability and President Director. Subject heading must read "Grievance, Operating Unit, Date". Department concerned collect information and documents to answer question of complainant. A formal response referencing the original grievance will be sent within 30 days and will be informed if more than 30 days.</p> <p>Informing the complainant have answer within two weeks. Complainants should confirm that they are satisfied within two weeks if no answer the case will be closed.</p> <p>Dissemination of Company's Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p>	Complied

		Employees of Timbang Deli Estate has attended the company's policies dissemination on 15 th February 2022, attended by 22 workers.	
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>Based on interview with workers, worker union representative, and manpower service Simalungun Regency, stated that the unit of certification does not practiced forced labour:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports: Interview with PKWT worker in Bukit Maradja POM, Kerasaan Estate, Timbang Deli Estate, their ID card was not hold by company. • Payment of recruitment fees: Interview with PKWT worker in Bukit Maradja POM, Kerasaan Estate, Timbang Deli Estate, during their application and recruitment in September 2020, not paying any recruitment fees. • Contract substitution: Interview with PKWT worker in Bukit Maradja POM, Kerasaan Estate, Timbang Deli Estate, their contract with company under PKWT signed and consistently implemented. • Involuntary overtime: Interview with harvesters in Kerasaan Estate and Bukit Maradja Estate, company offers overtime/additional harvesting work during peak crop (usually on Sunday), but it was up to individual worker to decide whether they joined overtime. • Lack of freedom of workers to resign: Based on interview with herbicide sprayers in Timbang Deli Estate, Kerasaan Estate, they can resign anytime – following regulation in PKB (one-month notice). • Penalty for termination of employment: Based on interview with herbicide sprayers in Timbang Deli Estate, Kerasaan Estate, they can resign any time and no penalty imposed – following regulation in PKB (one-month notice). • Debt bondage: Interview with harvesters in Timbang Deli Estate, Kerasaan Estate, they understand forced labor. There is no debt bondage. 	Complied

		<ul style="list-style-type: none"> Withholding of wages: Interview with fertilizer applicators in Timbang Deli Estate, Kerasaan Estate, wage paid every month. There is no salary withholding. 	
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>Treatment for contract worker - "Perjanjian Kerja Waktu Tertentu Mukisa dan PT. Eastern Sumatra Indonesia Bukit Maradja Estate", Nomor: 001/PKWT/BMM/2022, namely Mr Andi Utama (Helpert in Warehouse) signed on 01/03/2022. The PWKT stipulates: Clause 1: PKWT for Mukisa as general worker; PKWT period 1st March 2022 – 28 February 2023 (a year). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,614,589. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to Jamsostek. (UMK: Rp 1,614,165 - based on Governor of Sumatera Utara nomo: 188.44/839/KPTS/2021, dated 20 December 2021)</p>	Complied
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT. Eastern Sumatra Indonesia has established Occupational Health and Safety Policy No.QMM-40-01-P04/27-03-2019 dated 27 March 2019. PT. Tolan Tiga Indonesia recognizes that a safe and healthy workplace is of the utmost importance. We therefore committed to provide a safe working environment for our workers and all other stakeholders. Company in continually improving our health and safety and this will be achieved through hazards and risks identification and reduction, provision of adequate resources for effective implementation of the OHS programmes and procedures, including strict compliance reviews; Ensuring the OHS policy and procedures integrate with all other company policies. Dissemination of Company's Policies dated 15th February 2022 location in Division I was attended by 26 workers, on 17th February 2022 location in Division II was attended by 22 workers, on 21 February 2022 location in Division III was attended by 83 workers, on 18th February 2022 location in Division 4 was attended by 29 workers.</p>	Complied

		<p>Employees of Timbang Deli Estate has attended the company's policies dissemination on 15th February 2022, attended by 22 workers.</p> <p>Bukit Maradja Estate: Safety Officer, Mr. Dadang Sunaryo has competence as per "Sertifikat Pembinaan dan Pengawasan Norma Keselamatan dan Kesehatan Kerja (K3)" dated 4 December 2019. The safety officer appointment as per "Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/8816/AS.02.04/XII/2019 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Dadang Sunaryo" dated 4 December 2019 and valid 3 years.</p> <p>Kerasaan Estate Safety officer in Kerasaan Estate under name Ade Rani Agustina has competence as per "Sertifikat Pembinaan Pengawasan Norma Keselamatan dan Kesehatan Kerja (K3) No.5/7883/AS.02.04/XII/2019" dated 4 December 2019. The appointment of safety officer as per "Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/8814/AS.02.04/XII/2019 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Ade Rani Agustina" dated 4</p> <p>Timbang Deli Estate Safety officer in Timbang Deli Estate appointed as per "Keputusan Menteri Ketenagakerjaan RI No.KEP.17544/NAKER-BINWASK3/V/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Aprizal, dated 2 May 2018 – valid for 3 years. Kartu Tanda Kewenangan Ahli K3 No.Reg.53563/PK3/AJ/12/2018/P0, dated 2 May 2018 – 2 May 2021.</p> <p>Safety committee acknowledged by the manpower service Deli Serdang Regency, as per Keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja Provinsi Sumatera Utara No.101-7/DTK/WIL II/SU/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan PT. Timbang Deli Indonesia", dated 10 February 2021.</p>	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned	Accident and emergency procedures available in SOP First Aid No.OHS-01-04; SOP Land Fire and Prevention Control No. OHS-01-12; SOP Emergency Response	Complied

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	<p>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.</p>	<p>No.OHS-03-01. All SOP and work instruction available in Bahasa Indonesia and communicated in Bahasa Indonesia to worker.</p> <p>During interview with harvesters, they understand the implementation as identification of hazard and risk, provision of PPE, standing by first aider (mandors); BPJS Ketenagakerjaan and BPJS Kesehatan; referral to hospital when accident occurs</p> <p>Bukit Maradja Estate there was 8 accidents, LTA: 17 working day of lost time by accidents.</p> <p>Kerajaan Estate there was 1 accident, LTA: 9 working day of lost time by accidents.</p> <p>Timbang Deli Indonesia Estate there was 1 accident, LTA: 1 working day of lost time by accidents.</p>	
<p>6.7.3</p>	<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 workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM have provided training related to OHS and PPE in accordance with the result of risk assessment year 2022.</p> <p>The 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.</p> <p>Data verification:</p> <ul style="list-style-type: none"> • PPE provision and handover to worker recorded. Sighted: “Daftar Serah Terima Alat Pelindung Diri” stipulates 3 mechanics in workshop received PPE: safety glove on 6 November 2021. • PPE provision and handover to worker recorded. Sighted: “Dokumen Bukti Pemberian APD Spraying” stipulates 19 sprayers and spraying mandor received PPE: respirator mask, goggle in February 2022. • PPE provision and handover to worker recorded. Sighted: “Dokumen Bukti Pemberian APD Spraying” shoes 3 trunk injectors received PPE: respirator mask, earplug, goggle, hand gloves on January 2022. 	<p>Complied</p>

6.7.4	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 the unit of certification if applicable regulations do not provide protection.	<p>PT Eastern Sumatera Indonesia – Bukit Maradja POM provide all workers will medicalcare, and covered by accidents insurance, the statement as mentioned in Memorandum No: 436/MED-CIR/XII/2015, dated 2nd December 2015 was signed by Company Doctor.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers are provided with medical care and accident under BPJS Kesehatan and PBJs Ketenagakerjaan. An accident insurance is covered under “BPJS Ketenagakerjaan” with Accident and Life Program (JKK and JK).</p> <p>According to Employee Database February 2022:</p> <ul style="list-style-type: none"> • Bukit Maradja POM: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 87 permanent employees and 13 specified time work agreement (PKWT). • Bukit Maradja Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 297 permanent employees and 63 specified time work agreement (PKWT). • Kerasaan Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 211 permanent employees and 45 specified time work agreement (PKWT). • Timbang Deli Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 211 permanent employees and 5 specified time work agreement (PKWT), 19 free labour. Bill payment dated 16 Feb 2021, transaction reference No: 202102161404432578 (permanent workers) and 202102161405433196 (stwa/pkwt). 	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Eastern Sumatera Indonesia – Bukit Maradja POM has shown the record of injuries using lost time accident (LTA) metrics as in “Rekapitulasi Kejadian Kecelakaan Kerja– LTA” year 2021.</p> <p>Bukit Maradja Estate: 8 accidents, LTA: 17 mandays lost time by accidents.</p> <p>Kerasaan Indonesia Estate: 1 accident, LTA: 9 mandays lot time by accidents.</p>	Complied

		<p>Timbang Deli Indonesia Estate: 1 accident, LTA: 1 manday lot time by accidents. All the accidents have followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p>	
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>Integrated Pest Management plan in Bukit Maradja Estate is evident, as titled "Program Pengendalian Hama Terpadu 2022", established 2 January 2022. Program consist of monitoring of barn-owl box; Planting Turnera; Upkeep Turnera; census of leaf-eater caterpillar; identification of beneficial weeds and ganoderma census.</p> <p>Realization of IPM verified in document e.g. Summary Pest & Diseases Attack 2022; Nettle Caterpillar – January 3.97%, February 3.95%.</p> <p>Owl Monitoring February 2022 Division 1 BME, observed barn owl box in Block 05E03A and 97E26A in good condition. Field visit of barn-owl box was conducted in Block 97E26A, it was in good condition. In Division 4, barn-owl box available at Block 97E09A.</p> <p>Upkeep of beneficial plant verified as in document "Oil Palm, <i>Mucuna bracteata</i> and Beneficial Plant Nursery Report" dated 2 January 2022, observed that there is 31,000 polybag of <i>Mucuna bracteata</i>; 291,750 polybag of <i>Turnera subulatta</i>; 640 polybag of <i>Antigonon leptopus</i> and 1,262 polybag of <i>Casia cobanensis</i>. At Division 1 Bukit Maradja Estate has been planted 50 cuttings at Block 19D11A; 26 cuttings at Block 19D12A; 27 cuttings at Block 19D13A; 25 cuttings at Block D14A and 23 cuttings at Block D15A. At Division 4 has been planted Turnera 50 cuttings at Block 15E13; 50 cuttings at Block 15E14; 100 cuttings at Block 03F03A and 100 cuttings at Block 03F04A: planted Antigonon 20 bags at Block 97E10A; 20 bags at Block 97E11; 50 bags at Block 03F03A and 50 bags at Block 03F04A.</p>	<p>Complied</p>

		<p>Infestation of leaf eater caterpillar can be seen on "Laporan Pest & Disease", for period February 2022 in Bukit Maradja Estate Division 1, infestation of bagworm is light (441.69 Ha) and medium 34.50 Ha); nettle caterpillar infestation is light (398.88 Ha) and heavy (64.26 Ha). In Division 2, bagworm infestation is light (291.69 Ha); nettle caterpillar infestation is light (502.02 Ha), medium (25.97 Ha) and heavy (246.17 Ha). Control has been done by hand picking, trunk injection and biological method – imago trap.</p> <p>In February 2022, there are 11 unit of imago trap installed in Division 1; 60 unit in Div 2; 72 unit in Div 3; 52 unit in Div 4; total 195 unit in Bukit Maradja Estate. During February 2022, there were 158 imago trapped in Division 1; 2,351 in Div 2; 22,163 in Div 3; and 10,061 in Div 4; total 34,733 in Bukit Maradja Estate.</p> <p>Integrated Pest Management plan in Kerasaan Estate is evident, as titled "Program Pengendalian Hama Terpadu 2022", established 5 January 2022. Program consist of monitoring of barn-owl box; Planting <i>Turnera</i>; Upkeep <i>Turnera</i>; census of leaf-eater caterpillar; identification of beneficial weeds and ganoderma census.</p> <p>Realization of IPM verified in document e.g. "Pest & Disease Control of Bagworm – Nettle Caterpillar" Division 1 Kerasaan Estate. In February 2022 found that attack level have been reduced to "light". Planting beneficial plant observed on "Program Penanaman Beneficial Plant Tahun 2022" in Division 2 has been planted <i>Turnera subulatta</i> in 44 polybags in January and 48 polybags in February. Release of <i>Sycanus</i> sp. (predator of nettle caterpillar) in Kerasaan Estate reported 564 sycanus has been release on 2 March 2022 at Block 14C06 and 14C07, Division 1. Owl monitoring in Division 2 Kerasaan Estate, there are 21 barn-owl boxes, found 9 boxes are occupied, at Block I01, G02, G05, I05, J05, G06A, J09A, I08A and H09A.</p> <p>Integrated Pest Management plan in Timbang Deli Estate is evident, as titled "Program Pengendalian Hama Terpadu 2022", established 5 January 2022. Program consist of Nursery Beneficial Plant; Planting <i>Turnera</i>; Upkeep <i>Turnera</i>; Planting <i>Casia tora</i>, Upkeep <i>Casia tora</i>; Planting <i>Antigonon</i>; Upkeep <i>Antigonon</i>; Pest & Disease Census; upkeep Barn owl box and monitoring.</p>	
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		Based on document Nursery Beneficial Plant period February 2022, there are 1,807 polybags of <i>Turnera</i> sp., 1,900 polybags of <i>Casia</i> sp., 1,981 polybags of <i>Antigonon</i> sp. Based on document Beneficial Plant Planting on Field, stipulated in Block 18C03 and 00C03 has been planted 193 <i>Turnera</i> sp., 100 <i>Casia</i> sp. and 19 <i>Antigonon</i> sp. Barn-owl monitoring documented in Checklist Pemeriksaan Gupon, stipulated that in Oil Palm Division Timbang Deli Estate there are barn-owl boxes in Block 15B04, 17C02 and 16D01, all in good condition.																									
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 unit of certification has a list of Global Invasive Species, and evaluate the status of existence in Bukit Maradja Estate on 1 February 2022, in Kerasaan Estate on 22 February 2022, in Timbang Deli Estate on 17 February 2021. Some species are naturally exist in the area and the spreading are controlled manually, e.g. <i>Achatina fulica</i> , <i>Ageratum conizoides</i> , <i>Clidemia hirta</i> , <i>Imperata cylindrica</i> , <i>Lantana camara</i> , <i>Mikania micranta</i> and <i>Mimosa pudica</i> . There are no species in the list that used to managed areas in unit of certification.	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 field visit and document review, there is no use of fire for pest control in whole area of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	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.	<p>The unit of certification has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Smart 486 AS</td> <td>Isopropil amina glifosat 486 g/l</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119971313</td> <td>12/11/2023</td> </tr> <tr> <td>Becano 500 SL</td> <td>indaziflam</td> <td>III</td> <td>wood</td> <td>RI.01030120124279</td> <td>02/05/2022</td> </tr> <tr> <td>Basta 150 SL</td> <td>Amonium glufosinat 150 g/l</td> <td>III</td> <td>Grass weed, broad leaf</td> <td>RI.01030119921113</td> <td>12/11/2023</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart 486 AS	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030119971313	12/11/2023	Becano 500 SL	indaziflam	III	wood	RI.01030120124279	02/05/2022	Basta 150 SL	Amonium glufosinat 150 g/l	III	Grass weed, broad leaf	RI.01030119921113	12/11/2023	Complied
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		Supremo	Isopropilamina glifosat 480 g/l	U	Grasses weed	RI.01030120021712	02/05/2022	
		Metsulindo 20 WP	Metil metsulfuron 20%	U	Ferns, Broad Leaf, Sedges	RI.01030119991484	11/05/2026	
		Garlon Mix 333/17	Aminopiraliid potassium 17 g/l	III	<i>Tetracera indica, Melastoma malabatricum, Clidemia hirta, Lantana camara</i>	RI.01030120155148	31/01/2025	
		Starane 290 EC	Fluroksipir 290 g/l	U	Broad leaf	RI.0103011988854	12/11/2023	
		Starthene 75 WDG	Acephate 75%	III	Bagworm, nettle caterpillar	RI.01010120072983	08/08/2022	
		Thuricide WP	Bacillus thuringiensis 16,000 iu/mg	U	<i>Bagworm, nettle caterpillar</i>	RI.0101011977298	05/05/2022	
		Marshal 5 gr	Karbosulfan 5%	II	<i>Oryctes rhinoceros</i>	RI.01010119661279	06/10/2022	
		Marathon 500 SL	Dimehypo 500 gr/L	II	<i>bagworm</i>	RI.01010120103769	11/06/2025	
		Tikumin	Kumatetralil 0.0375 %	IV	Rat control	RI.0112012004670	30/09/2024	
		Photene 97 WG	Asefat 97%	III	<i>Bagworm, caterpillar, apogonia</i>	RI.01010120124498	16/04/2023	
		Dipel SC	Bacillus thuringiensis 16000 lu/mg	U	<i>Thosea, Bagworm</i>	RI.01010120186178	23/01/2024	

7.2.2	<p>(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.</p>	<p>Document "Rekapitulasi Penggunaan Pestisida Tahun 2020" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Bukit Maradja Estate in 2021:</p> <table border="1" data-bbox="1010 515 1592 1252"> <thead> <tr> <th>Trademark</th> <th>UoM</th> <th>Volume</th> </tr> </thead> <tbody> <tr><td>Basta 150 SL</td><td>liter</td><td>1,153.50</td></tr> <tr><td>Becano 500SC</td><td>liter</td><td>26.83</td></tr> <tr><td>Decis 2.5 EC</td><td>liter</td><td>37.35</td></tr> <tr><td>Garlon Mix 333/17</td><td>liter</td><td>109.00</td></tr> <tr><td>Marathon 500 SL</td><td>liter</td><td>195.98</td></tr> <tr><td>Marshall 5 GR</td><td>kg</td><td>1,093.00</td></tr> <tr><td>Metsulindo 24 WP</td><td>kg</td><td>279.67</td></tr> <tr><td>Phosthene 97 WG</td><td>liter</td><td>13,125.80</td></tr> <tr><td>Smart 486 AS</td><td>liter</td><td>4,515.20</td></tr> <tr><td>Starane 290 EC</td><td>liter</td><td>137.17</td></tr> <tr><td>Starthene 75 WDG</td><td>liter</td><td>2,000.00</td></tr> <tr><td>Supremo 480SL</td><td>liter</td><td>1,498.00</td></tr> <tr><td>Thuricide HP</td><td>liter</td><td>1,095.30</td></tr> <tr><td>Tikumin 0.0375 BB</td><td>kg</td><td>371.80</td></tr> </tbody> </table> <p>Pesticide use in Kerasaan Estate in 2021:</p> <table border="1" data-bbox="1010 1342 1581 1375"> <thead> <tr> <th>Trademark</th> <th>UoM</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Trademark	UoM	Volume	Basta 150 SL	liter	1,153.50	Becano 500SC	liter	26.83	Decis 2.5 EC	liter	37.35	Garlon Mix 333/17	liter	109.00	Marathon 500 SL	liter	195.98	Marshall 5 GR	kg	1,093.00	Metsulindo 24 WP	kg	279.67	Phosthene 97 WG	liter	13,125.80	Smart 486 AS	liter	4,515.20	Starane 290 EC	liter	137.17	Starthene 75 WDG	liter	2,000.00	Supremo 480SL	liter	1,498.00	Thuricide HP	liter	1,095.30	Tikumin 0.0375 BB	kg	371.80	Trademark	UoM	Volume				Complied
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Metsulindo 24 WP	kg	124.87
Meta Prima 20 WG	kg	6.00
Marshal 5 G	kg	73.05
Phosthene 97 WG	liter	4,744.16
Smart 486 AS	liter	2,675.91
Thuricide HP	liter	270.00
Marathon	liter	162.00
Supremo 480 SL	liter	1,008.40
Tikumin	kg	61.74
antracol	kg	62.00

Pesticides use in Timbang Deli Estate 2021:

Trademark	UoM	Volume	
		Semester 1	Semester 2
Becano 500 SC	liter	-	6.20
Benstar 50 WP	kg	-	-
Garlon 670 EC	liter	41.60	-
Marshall 5 GR	kg	368.00	369.40
Metsulindo 24 WP	kg	8.00	9.90
Smart 486 AS	liter	410.00	446.10
Starane 290 EC	liter	19.40	19.30

		Starthene 75 WDG	kg	57.35	57.35			
		Tikumin 0.0375 BB	kg	32.50	-			
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold. Several increase of pesticide uses are occurred in Bukit Maradja Estate, due to outbreak of leaf eater caterpillar based on census result. Justification have been given by Senior Manager Operation.					Complied	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There is no prophylactic use of pesticides throughout Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.					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: 7.2.5a Judgment of the threat and verify why this is a major threat.	There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2017. The company's General Manager of North Sumatera has issued Memorandum No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stated that the use of <i>paraquat</i> as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017. Based on visit in field operation and agrochemical storage in Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate, there was no paraquat found. Based on report of pesticide use in 2021 and 2022 – there were no paraquat noted in the report.					Complied	
	7.2.5b Why there is no other alternative which can be used.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.						
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.						

	7.2.5d Process to limit the negative impacts of the application.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	<p>All Estate (Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate) have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training. Chemical warehouse and its infrastructure is ready (see criterion 4.6.6). Standard PPE for sprayer: goggle, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: faceshield, masker, apron, rubber glove, safety boot.</p> <p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> - Attendance list of "Pelatihan Kaliberasi Sprayer dan Perawatan Alat kerja" dated 8 February 2022, location in Mixing Area Bukit Maradja Estate, was attended by 20 workers. - Attendance list of "Training Pencampuran Pestisida", dated 9 February 2022, location in Mixing Area Bukit Maradja Estate, was attended by 5 participants. 	Complied
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	<p>The storage for all pesticide is in good condition.</p> <p>Based on filed visit (dated 16th March 2022) in storage of pesticides and interview with storage keepers both in Bukit Maradja Pom and Kerasaan Estate; there was found the storage for all pesticide is in good condition.</p> <p>A standard storage system appears to be implemented across by the organization. The storage is equipped with sufficient air ventilation to provide air circulation.</p> <p>Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron, and mask) is available and ready for use.</p>	Complied

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		<p>Working instruction for pre-mixing, stacking, and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field are pre-mixed in designated mixing area.</p> <p>Awareness training for MSDS dated 21 February 2022 was attended by 8 workers in chemical storage.</p>										
7.2.8	<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>All chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 180 up to 365 days prior disposal.</p> <p>Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3".</p> <p>Record of disposal all of pesticides container as per "Berita Acara Serah Terima Barang Limbah Bahan Berbahaya dan Beracun (B3) – No: 001/I/ESI/2022" dated 7th January 2022, delivered to PT Aminda Barakah Sumut, consisted of:</p> <table border="1"> <thead> <tr> <th>Type of hazardous waste</th> <th>Volume (Ton)</th> <th>Manifest Elektronik</th> </tr> </thead> <tbody> <tr> <td>Ex pesticides container (B104d)</td> <td>0.076</td> <td>KLHK-16441372543</td> </tr> <tr> <td>Medicla waste (A337-1)</td> <td>0.012</td> <td>KLHK-16442751534</td> </tr> </tbody> </table>	Type of hazardous waste	Volume (Ton)	Manifest Elektronik	Ex pesticides container (B104d)	0.076	KLHK-16441372543	Medicla waste (A337-1)	0.012	KLHK-16442751534	Complied
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7.2.9	<p>(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.</p>	<p>Unit of Certification applying pesticides through manual by persons/sprayer. Therefore, no aerial spraying is available.</p>	Complied									

7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	The special annual medical surveillance for pesticides operators and workers consisted of pesticides applicators, chemical storage keeping, generator (electrical) operator. Special Medical Check Up – conducted by Klinik Spesialis Anugerah Ibu, was attended by 69 workers in Kerasaan Estate, dated 26 th October 2021. Data verified: "Laporan Hasil Pemeriksaan Kesehatan – Pekerja dengan Resiko Tinggi" (result of medical test has communicated to related workers).	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.	Bukit Maradja Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under "Daftar Absensi Tenaga Kerja Tidak Hamil dan Menyusui – periode January – December 2021". The record shows 19 female workers, but no pregnant or breastfeeding female workers. Timbang Deli Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under "Data Karyawan Tidak Hamil dan Menyusui – periode Februari 2022". The record shows 14 female workers (sprayers and fertilizer applicators), but no pregnant or breastfeeding female workers.	Complied
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
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.	All pesticide and agrochemical containers that produced from Estate and Mill are disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3) which located at Bukit Maradja POM. Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Bukit Maradja POM as referred number Nomor: 503/01/17.4/2021, dated 21 January 2021. Source of waste covering Bukit Maradja Pom and Bukit Maradja Estate. Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Kerasaan Estate as referred number Nomor: 503/29/17.4/2020, dated 30 July 2020. Source of waste covering Kerasaan Estate.	Complied

		<p>PT Eastern Sumatra Indonesia has an agreement with hazardous and toxic substances waste company PT Amindy Barokah Sumatera</p> <p>Record of disposal all of pesticides container as per "Berita Acara Serah Terima Barang Limbah Bahahn Berbahaya dan Beraacun (B3) – No: 001/I/ESI/2022" dated 7th January 2022, delivered to PT Amindy Barakah Sumut, consisted of:</p> <table border="1" data-bbox="1032 539 1778 754"> <thead> <tr> <th>Type of B3</th> <th>Volume (Ton)</th> <th>Manifest Elektronik</th> </tr> </thead> <tbody> <tr> <td>Kemasan Bekas B3 (B104d)</td> <td>0.076</td> <td>KLHK-16441372543</td> </tr> <tr> <td>Limbah Klinis (A337-1)</td> <td>0.012</td> <td>KLHK-16442751534</td> </tr> </tbody> </table>	Type of B3	Volume (Ton)	Manifest Elektronik	Kemasan Bekas B3 (B104d)	0.076	KLHK-16441372543	Limbah Klinis (A337-1)	0.012	KLHK-16442751534	
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Limbah Klinis (A337-1)	0.012	KLHK-16442751534										
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p> <p>Based on field visit at worker's compound Division 2 Bukit Maradja Estate and Central Compound Kerasaan Estate, the domestic wastewater management already installed in accordance with its permit.</p>	Complied									
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p>	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p>	Complied									

		Based on field visit at worker’s compound Division 2 Bukit Maradja Estate and Central Compound Kerasaan Estate, the domestic wastewater management already installed in accordance with its permit.	
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.	<p>The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP:</p> <ol style="list-style-type: none"> 1. OPM-06-01; Inorganic Fertiliser. 2. OPM-06-02; Organic Fertiliser. 3. OPM-06-03; Leaf Sampling Unit (LSU): Palm Marking. 4. OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) sample taking. <p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis. Available “Oil Palm Fertilizer Recommendation for PT Eastern Sumatra Indonesia – Bukit Maradja Estate 2022”, “Oil Palm Fertilizer Recommendation for PT Kerasaan Indonesia – Kerasaan Estate 2022” and “Oil Palm Fertilizer Recommendation for PT Timbang Deli Indonesia – Timbang Deli Estate 2022”. Fertilizer application records are documented in “Monthly Manuring Program Sheet”.</p> <p>Field visit conducted to fertilizer application activity at Block 10A03, 10A04 and 10A05 (96.4 Ha) Division 2 Bukit Maradja Estate. Type of fertilizer is Urea dosage 1 kg/palms. Fertilizer weighing 1 kg in a plastic bag is distributed into each oil palms, then the applicator applied it on the circle. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</p> <p>Field visit conducted to fertilizer application activity at Block 14H10A Division 2 Kerasaan Estate. Type of fertilizer is Urea dosage 1 kg/palms. Workers contains 8</p>	Complied

		<p>applicator and 4 distributors. Fertilizer weighing 1 kg in a plastic bag is distributed into each oil palms, then the applicator applied it on the circle. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</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>Last periodical leaf sample analysis in Bukit Maradja Estate conducted in March – April 2021 for preparing fertilizer recommendation 2022. Leaf and Rachis Analysis Report 2021 were evident. Leaf Analysis Report was issued by Verdant Bioscience Plant and Soil Nutrition Laboratory No.05603A1621, consist of 110 samples (55 leaf and 55 rachis). Sample seen Lab No. D1445; Sample type-Leaf; Estate: BME; Division: I; Block 16E16A/16E17A; Sampling date: 04/01/2021; Material PM02; Plant Year 2016; 45.46 Ha; Analysis Result: 2.72% N; 0.167% P; 0.67% K; 0.18% Mg; 0.66% Ca; 17 ppm B; 4 ppm Cu; and 9 ppm Zn. Sample seen Lab No. D1459; Sample type-Rachis; Estate-BME; Division: II; Block 14D20A, 14D21A; Sampling date 07/01/2021; Material PM02; Planting Year 2014; 54.36 Ha; Analysis Result: 0.40% N; 0.132% P; 2.16% K; 0.12% Mg and 0.54% Ca.</p> <p>Soil analysis in Bukit Maradja Estate evident in "Lembar Hasil Pengujian Analisa Soil" No. 430071620; Reference letter No. 01/RMO-Spt/III/20; consist of 112 samples; analysis date 15 February – 20 April 2021. Sample: lab No. C4230; Estate BME; Div III; Block 02A01A; Depth 0-20 cm; sampling date 27/11/2019; pH H₂O 4.52; SOM 2.7%; 0.14% N total; 35.29 ppm P₂O₅; 1.16 Al+H m.e./100g; 0.76 K; 0.58 Mg; 1.63 Ca; texture 13.7% clay; 21.0% silt and 65.3% clay.</p> <p>The last periodical leaf sample analysis in Kerasaan Estate conducted in March-April 2021 for preparing fertilizer recommendation 2022. Leaf and Rachis Analysis Report 2021 and fertilizer recommendation 2022 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory No. 05703A1721, number of samples 96 bags (48 leaf and 48 rachis), analysis date 26 March – 28 April 2021. Sample seen Lab No.D2212; Sample type-Leaf; Estate-KRE; Div-I; Block 14C08A; Sampling date 26/01/2021; Material PM01; Plant Year 2014; 30.8 Ha. Analysis result: 2.57% N; 0.153% P; 0.58% K; 0.22% Mg; 0.64% Ca; 19 ppm</p>	Complied

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		<p>B; 6 ppm Cu and 17 ppm Zn. Sample seen Lab No.D1749; Sample type-Rachis; Estate-KRE; Div-III; Block 06K03, K04; Sampling date 20/01/2021; Material PM01; Plant Year 2006; 37.19 Ha. Analysis result: 0.53% N; 0.183% P; 2.05% Mg; and 0.53% Ca.</p> <p>Soil analysis in Kerasaan Estate evident in "Lembar Hasil Pengujian Analisa Soil" No. 450071720; consist of 106 samples; analysis date 17 Maret – 7 May 2021. Sample: lab No. C4386; Estate KRE; Block 11M04, 11N04A; Depth 0-20 cm; sampling date 25/02/2020; pH H₂O 4.57; SOM 3.3%; 0.17% N total; 121.08 ppm P₂O₅; 0.90 Al+H m.e./100g; 0.52 K; 0.90 Mg; 2.01 Ca; texture 9.5% clay; 30.1% silt and 60.4% clay.</p> <p>The last periodical leaf sample analysis in Timbang Deli Estate conducted in August 2021. Leaf and Rachis Analysis Report 2021 and fertilizer recommendation 2022 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 22303A5121, samples received on 24 May 2021, number of samples 32 samples consist of 16 leaf and 16 rachis samples. Sample seen Lab No.D5397; Analysis date 16-20 December 2021; Sample type-Leaf; Estate-TDE; Block 17D01; Analysis result: 2.67% N; 0.165% P; 0.83% K; 0.25% Mg; 0.60% Ca; 19 ppm B; 4 ppm Cu and 12 ppm Zn. Sample seen Lab No.D5414; Sample type-Rachis; Estate-TDE; Block 18A03; Analysis date 16-20 August 2021; Analysis result: 0.054% P; 0.80% K; 0.13% Mg and 0.24% Ca.</p> <p>The latest soil sample analysis in Timbang Deli Estate conducted in April 2021. Annual Soil Analysis Report PT Timbang Deli Indonesia 2021 was evident, issued by Verdant Plant and Soil Nutrient Laboratory. Sample seen: Block 15B04; pH H₂O 4.93; SOM 3.72%; 0.13% N total; 29.00 ppm P₂O₅; 1.13 Al+H m.e./100g; 0.12 K; 0.21 Mg; 0.91 Ca; texture 10% clay; 29% silt and 61% clay.</p>	
7.4.3	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.	Permit of POME for land application as per "Peretujuan Pemenuhan Komitmen Izin Pembuangan Air Limbah Secara Aplikasi ke Tanah Kepada PT Eastern Sumatra Indonesia" No.503/08/17.4/2021 dated 29 January 2021, issued by "Dinas Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu", valid for 5 years. The unit of certification processed EFB and POME into compost.	Complied

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Compost are applied in Bukit Maradja Estate, recorded in "Aplikasi Compost ke Lapangan". Detail application record of composting period January – December 2021 are as follows:

Month	Trip	Mature Area		Immature	
		Tons	Ha	Tons	Ha
January	227	1,364.74	89.80	-	-
February	208	1,021.75	66.52	60,26	12.74
March	248	1,208.55	78.74	-	-
April	378	2,534.24	164.90	-	-
May	339	2,342.06	150.59	-	-
June	304	2,311.24	153.32	-	-
July	294	2,451.79	160.38	-	-
August	288	2,410.47	155.99	-	-
September	358	3,302.77	222.46	-	-
October	284	2,529.77	164.26	-	-
November	238	1,993.88	131.17	57,83	14.00
December	237	1,518.30	204.19	265.57	60.32
Total	3,403	24,989.56	1,742.32	383.66	87.06

In January 2022 composting applied 1,087.93 tons for 70.77 Ha in Mature area and 384.58 tons for 88.89 Ha in Immature area, using 191 trips of tractor. In February 2022 composting applied 1,471.04 tons for 93.38 Ha in Mature area using 160 trips of tractor. Dosage of compost for mature is 15 ton/Ha and for immature is 5 ton/Ha.

		<p>Bukit Maradja Estate applied POME residue from composting process into the field, based on record in January 2022 applied 1,633 m³ of POME and in February applied 745 m³. POME land application are controlled by Bukit Maradja POM.</p> <p>There is no application of EFB, POME or Composting in Timbang Deli Estate or Kerasaan Estate due to long distance from Bukit Maradja POM.</p>																																																																
7.4.4	Records of fertilizer inputs are maintained.	<p>Fertilizer recommendation 2021 described the fertilizer need for each Estate. Records of fertilizer inputs are available in "Monthly Manuring Program" for each division and "Rekapitulasi Penggunaan Fertilizer Tahun 2021" for estate recapitulation.</p> <p>Record of fertilizer input in Bukit Maradja Estate in 2021 are as follow:</p> <table border="1" data-bbox="1010 727 1767 1118"> <thead> <tr> <th rowspan="2">Fertilizer Type</th> <th colspan="2">Semester 1</th> <th colspan="2">Semester 2</th> </tr> <tr> <th>Budget (kg)</th> <th>Actual (kg)</th> <th>Budget (kg)</th> <th>Actual (kg)</th> </tr> </thead> <tbody> <tr> <td>Urea</td> <td>234,610</td> <td>234,500</td> <td>171,100</td> <td>171,000</td> </tr> <tr> <td>RP</td> <td>211,550</td> <td>211,400</td> <td>147,950</td> <td>147,850</td> </tr> <tr> <td>MOP</td> <td>113,450</td> <td>113,400</td> <td>107,450</td> <td>107,450</td> </tr> <tr> <td>Kieserite</td> <td>14,750</td> <td>14,750</td> <td>35,150</td> <td>35,150</td> </tr> <tr> <td>S. Dolomite</td> <td>94,200</td> <td>94,200</td> <td>38,550</td> <td>38,550</td> </tr> <tr> <td>HGFB</td> <td>23,970</td> <td>23,960</td> <td>-</td> <td>-</td> </tr> <tr> <td>ZinCop</td> <td>30,560</td> <td>30,560</td> <td>9,890</td> <td>9,890</td> </tr> </tbody> </table> <p>Record of fertilizer input in Kerasaan Estate in 2021 are as follow:</p> <table border="1" data-bbox="1010 1206 1805 1380"> <thead> <tr> <th rowspan="2">Fertilizer Type</th> <th colspan="2">Semester 1</th> <th colspan="2">Semester 2</th> </tr> <tr> <th>Budget (kg)</th> <th>Actual (kg)</th> <th>Budget (kg)</th> <th>Actual (kg)</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>24,225</td> <td>23,962</td> <td>-</td> <td>-</td> </tr> <tr> <td>Dolomite</td> <td>156,922</td> <td>156,900</td> <td>126,282</td> <td>112,150</td> </tr> </tbody> </table>	Fertilizer Type	Semester 1		Semester 2		Budget (kg)	Actual (kg)	Budget (kg)	Actual (kg)	Urea	234,610	234,500	171,100	171,000	RP	211,550	211,400	147,950	147,850	MOP	113,450	113,400	107,450	107,450	Kieserite	14,750	14,750	35,150	35,150	S. Dolomite	94,200	94,200	38,550	38,550	HGFB	23,970	23,960	-	-	ZinCop	30,560	30,560	9,890	9,890	Fertilizer Type	Semester 1		Semester 2		Budget (kg)	Actual (kg)	Budget (kg)	Actual (kg)	Borate	24,225	23,962	-	-	Dolomite	156,922	156,900	126,282	112,150	Complied
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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.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since			Complied																																																																																		

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7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Peta Blok dengan Topografi, 21 Jan 2010. Slope maximum 1%.</p>	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Peta Blok dengan Topografi, 21 Jan 2010. Slope maximum 1%.</p>	Complied
<p>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.</p>			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli</p>	Complied

	fragile soils, including steep terrain are available, in planning and operations.	Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. Periodical soil surveys aim to calculate the soil fertility and soil nutrition necessity, which will use for manuring recommendation. Planning of drainage, irrigation systems, roads and other infrastructure are covered within Environmental Assessment or AMDAL/UKL-UPL in part of Pre-Development activities.	
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.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. Periodical soil surveys aim to calculate the soil fertility and soil nutrition necessity, which will use for manuring recommendation. Planning of drainage, irrigation systems, roads and other infrastructure are covered within Environmental Assessment or AMDAL/UKL-UPL in part of Pre-Development activities.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied

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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.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied

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7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	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.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied
7.7.6	(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).	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Netherland Indie era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable

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>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Netherland Indie era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p>	<p>Not Applicable</p>
<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>Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate has prepared water management plan under "Program Pengelolaan Air" issued on 4 January 2022. The program consists of reporting of deep-water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area. The Estate management monitor the progress monthly. The Estate has provided access to clean water for the communities. The Estate has eliminated potential pollution to the watercourse by conduct mixing of pesticide in the mixing area only.</p> <p>Water management plan available in document "Water Management Plan & Praktek Meminimalisir Pengendalian Erosi dan Degradasi Tanah 2022", such as:</p> <ul style="list-style-type: none"> - Efficient of water usage in mill and estate, included water usage for FFB process. - Install the platform on hill. - Individual terrace. - Prevent contamination in river water: planting vetiver grass, install dam, upkeep "Bronjong". - Maintain water level and piezometer in peat areas. 	<p>Complied</p>

		- Planting legume cover crops such as <i>Mucuna bracteata</i> .																																																																						
	7.8.1b Workers have adequate access to clean water.	The unit of certification is located near the public settlements and is close to the main road. Then, employees consume drinking water by buying ready-to-use bottled water because they consider it more practical. Even, the company also provide an accessible clean water.																																																																						
7.8.2	(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).	Unit of Certification has developed a Water Management Plan, last updated in January 2021. In example, Bukit Maradja Estate 2022 has five programs, namely the washing water tank which was held on 5 January 2022; Groundwater analysis (ABT); Surface Water analysis (APU); socialization on the use of clean water and reservoir cleaning. The Groundwater Permit has been in accordance with the Decree of the Governor of North Sumatra Number: No.546.2/947/DIS.PM.PPTSP/6/X.3.f/V/2018, dated 24 May 2018 (valid until 23 May 2021). Max allowable discharge: 5 Litre / second.	Complied																																																																					
7.8.3	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.	Bukit Maradja POM has monitored the mill effluent in compliance with national regulation as per document "Laporan Hasil Analisa Limbah Cair year 2021. Measurement of mill effluent quality conducted by accreditation environmental testing and laboratory (sample seen periode July – December 2021)	Complied																																																																					
		<table border="1"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Sat</th> <th colspan="6">Outlet Limbah</th> <th rowspan="2">BM</th> </tr> <tr> <th>Jul</th> <th>Aug</th> <th>Sep</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> </tr> </thead> <tbody> <tr> <td>BOD₅</td> <td>mg/l</td> <td>378</td> <td>662</td> <td>1214</td> <td>1286</td> <td>910</td> <td>1241</td> <td>5000</td> </tr> <tr> <td>COD</td> <td>mg/l</td> <td>45</td> <td>1565</td> <td>2406</td> <td>1822</td> <td>781</td> <td>1248</td> <td></td> </tr> <tr> <td>pH</td> <td>-</td> <td>7.81</td> <td>6.35</td> <td>7.99</td> <td>7.88</td> <td>8.35</td> <td>7,85</td> <td>06 - 09</td> </tr> <tr> <td>Oil & Fat</td> <td>mg/l</td> <td>3.43</td> <td>11.6</td> <td>10.4</td> <td>9.2</td> <td>10</td> <td>9.37</td> <td></td> </tr> <tr> <td>Lead (Pb)</td> <td>mg/l</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td></td> </tr> <tr> <td>Copper (Cu)</td> <td>mg/l</td> <td>0.33</td> <td>0.015</td> <td>0.026</td> <td>0.45</td> <td>0.26</td> <td>0.31</td> <td></td> </tr> </tbody> </table>	Parameter	Sat	Outlet Limbah						BM	Jul	Aug	Sep	Oct	Nov	Dec	BOD ₅	mg/l	378	662	1214	1286	910	1241	5000	COD	mg/l	45	1565	2406	1822	781	1248		pH	-	7.81	6.35	7.99	7.88	8.35	7,85	06 - 09	Oil & Fat	mg/l	3.43	11.6	10.4	9.2	10	9.37		Lead (Pb)	mg/l	<0.00 17	<0.00 17	<0.00 17	<0.00 17	<0.00 17	<0.00 17		Copper (Cu)	mg/l	0.33	0.015	0.026	0.45	0.26	0.31		
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		Seng (Zn)	mg/l	2.21	0.25	0.42	0.33	0.46	0.28																																												
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	Bukit Maradja POM has shown the document of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2021 as per document "Laporan Pemakaian Air Pabrik per MT FFB tahun 2021". Standard 1.00									Complied																																										
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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	Unit of certification has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In Mukomuko POM, all emission are monitored.	Complied
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.			
7.10.1	(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>PT Eastern Sumatera Indonesia – Bukit Maradja POM has prepared procedure Calculation and Mitigation of Green House Gas Emission No.ENC 01-12/04-03-2019/Rev.1 dated 18 March 2019, whereby provide guidance to register source of emissions as a result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K₂O), Rock Phospate (P₂O₅), use of pesticide, use HSD fuel, planted area, mature oil palm, FFB production, distance estate to POM, distance POM to bulking tank, OER %, KER %, presence of methane capture facility, etc.</p> <p>Identification of pollution source has been documented under “Environmental Aspect & Impact List”. Assessments have been carried out on all recognized polluting activities and include gas and smoke emissions, particulate and soot emissions, effluent control, treatment and discharge. Any significant pollutants and emissions have been identified. There is a plan in place to reduce pollution – this is included in the aspects/impacts register.</p> <p>Assessment of polluting activities including gaseous emission, particulate emission and effluent has also been done identified in the document “Pengelolaan lingkungan hidup (RKL) dan Pemantauan lingkungan hidup (RPL)”.</p>	Complied

		<p>The company has GHG calculation based on PalmGHG calculator V4.0.1 database period January – December 2021 and provided in attachment Bukit Maradja POM GHG Palm Calculator Appendix C.</p> <p>GHG reduction plan identified under “Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission)”:</p> <table border="1" data-bbox="1012 539 1957 1374"> <thead> <tr> <th data-bbox="1012 539 1258 619">Stages/ Activity type</th> <th data-bbox="1258 539 1653 619">Mitigation Plan</th> <th data-bbox="1653 539 1957 619">Implementation</th> </tr> </thead> <tbody> <tr> <td data-bbox="1012 619 1258 1018" rowspan="4">Fertilizer application</td> <td data-bbox="1258 619 1653 707">Effective fertilizer application as per recommendation</td> <td data-bbox="1653 619 1957 1018" rowspan="4"> <ul style="list-style-type: none"> • Leaf sampling analysis for accurate fertilizer recommendation • Implement SOP fertilizer application </td> </tr> <tr> <td data-bbox="1258 707 1653 786">No fertilizer application in rainy season</td> </tr> <tr> <td data-bbox="1258 786 1653 874">No fertilizer application on river buffer zone/riparian area</td> </tr> <tr> <td data-bbox="1258 874 1653 1018">Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application</td> </tr> <tr> <td data-bbox="1012 1018 1258 1374" rowspan="4">Use of fossil fuel for transportation (FFB, fertilizer, manpower)</td> <td data-bbox="1258 1018 1653 1098">Maintenance the vehicle on regular basis</td> <td data-bbox="1653 1018 1957 1374" rowspan="4"> <ul style="list-style-type: none"> • Vehicle maintenance record • Planting record • Evaluation on vehicle use (incl. fuel efficiency) </td> </tr> <tr> <td data-bbox="1258 1098 1653 1153">Planting trees</td> </tr> <tr> <td data-bbox="1258 1153 1653 1233">Transportation arrangement (effective and efficient)</td> </tr> <tr> <td data-bbox="1258 1233 1653 1374">Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel</td> </tr> </tbody> </table>	Stages/ Activity type	Mitigation Plan	Implementation	Fertilizer application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> • Leaf sampling analysis for accurate fertilizer recommendation • Implement SOP fertilizer application 	No fertilizer application in rainy season	No fertilizer application on river buffer zone/riparian area	Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application	Use of fossil fuel for transportation (FFB, fertilizer, manpower)	Maintenance the vehicle on regular basis	<ul style="list-style-type: none"> • Vehicle maintenance record • Planting record • Evaluation on vehicle use (incl. fuel efficiency) 	Planting trees	Transportation arrangement (effective and efficient)	Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel	
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		Fertilizer and pesticide application	Planting beneficial plant Spraying knapsack calibration Spraying based on weed percentage >60% Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> • Leaf sampling analysis for accurate fertilizer recommendation • Implement SOP fertilizer application • Utilize recommended pesticide 	
		Use of fossil fuel for electric generation	Maintenance the machinery (genset) on regular basis Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency Emission monitoring on regular basis	<ul style="list-style-type: none"> • Vehicle maintenance record • Planting record • Evaluation on Genset's fuel efficiency 	
		Use of fossil fuel for transportation (FFB, CPO, PK, EFB)	Maintenance the vehicle on regular basis Socialization to all level of worker on GHG mitigation plan related to electricity efficiency	<ul style="list-style-type: none"> • Vehicle maintenance record • Evaluation on electricity efficiency 	
			Maintenance the POM's machinery on regular basis		

		Operation of POM's machinery including boiler	Socialization to all level of worker on GHG mitigation plan related to emission Emission monitoring on regular basis	<ul style="list-style-type: none"> • Machinery maintenance record • Evaluation on boiler's efficiency • Emission monitoring report 	
7.10.2	(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 plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.			Complied
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	Unit of Certification has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In Perlakuan POM, all emission are monitored.			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.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. During field visit 21D15A Div. 1 (replanting area already planted) and 21D16 Div.1 (replanting area for legume cover crops), no fire used for replanting land preparation.			Complied

		Unit of certification has no program for new development nor extend the existing area.	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Unit of Certification has list of "Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan" where the list fire equipment as referred to Minister of Agriculture Regulation No. 05/PERMENTAN/KB.410/1/2018.	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	Complied
<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>			
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>	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	Complied

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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 assessment conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</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>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM).</p> <p>There is no land clearing after 15 November 2018 by unit of certification.</p> <p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM).</p> <p>There is no land clearing after 15 November 2018 by unit of certification.</p>	Complied
7.12.3	<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>	Not applicable for Indonesia.	Not Applicable
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</p>	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The</p>	Complied

	<p>relevant wider landscape level considerations (where these are identified).</p>	<p>process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as “Badan Pertanahan Kabupaten Deli Serdang” and “Badan Lingkungan Hidup Kabupaten Deli Serdang”. As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> • <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist. • <i>Spermatophyta</i>: <ul style="list-style-type: none"> - <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected spesies as in “Peraturan Pemerintah No.7 tahun 1999”; and 1 spesies under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>). • <i>Angiospermae</i>: <ul style="list-style-type: none"> - <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected spesies noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; No spesies under category of CR, EN, VU based on IUCN Redlist. - <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected spesies noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; found 1 spesies under VU category which was “Mahoni” (<i>Swietenia macrophylla</i>). <p>Fauna: found 50 spesies from 34 families, consist of:</p>	
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		<ul style="list-style-type: none"> • <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. • <i>Aves</i>: found 41 species of birds from 26 <i>families</i> whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist. • <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara".</p>	
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		<p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.</p> <p>According to HCV management and monitoring plan, there are only two concern program that continuous implement, such as monitoring of threats activities along riparian area and wildlife animal monitoring. Certificate holders implement this plan in monthly basis and the record of monitoring is available in place.</p>	
7.12.5	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.	HCV assessment conducted in 2009. There is no land clearing after 15 November 2018.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The</p>	Complied

		<p>process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as “Badan Pertanahan Kabupaten Deli Serdang” and “Badan Lingkungan Hidup Kabupaten Deli Serdang”. As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> • <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist. • <i>Spermatophyta</i>: <ul style="list-style-type: none"> - <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected spesies as in “Peraturan Pemerintah No.7 tahun 1999”; and 1 spesies under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>). • <i>Angiospermae</i>: <ul style="list-style-type: none"> - <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected spesies noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; No spesies under category of CR, EN, VU based on IUCN Redlist. - <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected spesies noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; found 1 spesies under VU category which was “Mahoni” (<i>Swietenia macrophylla</i>). <p>Fauna: found 50 spesies from 34 families, consist of:</p>	
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		<ul style="list-style-type: none"> • <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. • <i>Aves</i>: found 41 species of birds from 26 <i>families</i> whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist. • <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist. <p>HCV programme that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	<p>HCV assessment conducted in 2009. There is no land clearing after 15 November 2018.</p> <p>HCV Area Monitoring Checklist dated 22 February 2022. All identified HCV in well condition and managed. HCV 6: Cemetery (Block C33 Division 2 Bukit Maradja Estate) – No RTE species founded, common birds and long tail macaque are identified; HCV 4: Buffer zone (Division 1 Kerasaan Estate) – No RTE species found, bushes bird founded.</p>	Complied
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.	<p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS (Provisional ALS160007HM).</p> <ul style="list-style-type: none"> • There is no land clearing after 15 November 2018 by unit of certification. Conversion from rubber to Oil Palm crops in Timbang Deli Estate only in 2018. NPP notification has been submitted on 12 February 2018 and is available on RSPO website (https://rspo.org/certification/new-planting-procedure/public-consultations/pt-timbang-deli-indonesia-sipef-group). 	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Bukit Maradja Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4. 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 **2021** for **Bukit Maradja Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.53
PKO	0.00

Extraction	%
OER	23.55
KER	4.92

Production	t/yr
FFB Process	122,768.88
CPO Produced	28,909.70
PKO Produced	0.00

Land Use	Ha
OP Planted Area	5,437.44
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	137.66
Total	5,575.10

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	22778.17	0.36	20426.18	0.34	0.00	0.00	43204.35	0.35
CO ₂ Emission from fertilizer	1998.89	0.03	1550.60	0.03	0.00	0.00	3549.49	0.03
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	308.12	0.00	409.18	0.17	0.00	0.00	717.30	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-18765.61	-0.30	-16367.28	-0.27	0.00	0.00	-35132.89	-0.21
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	9014.58	0.14	7450.24	0.12	0.00	0.00	16464.82	0.13

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	74.41	0.00
Grid Electricity Utilization	1884.46	0.02
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	1958.87	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

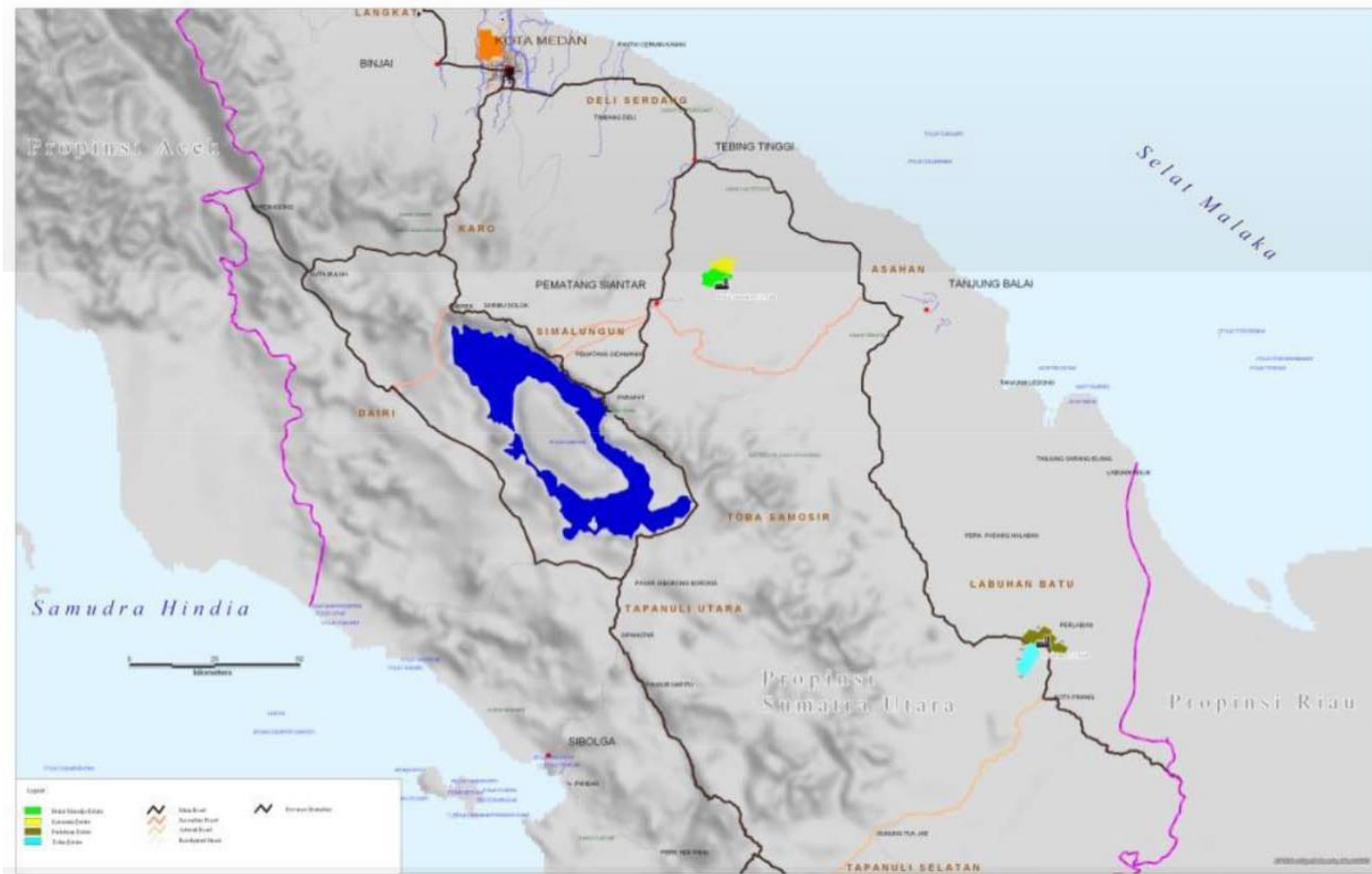
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

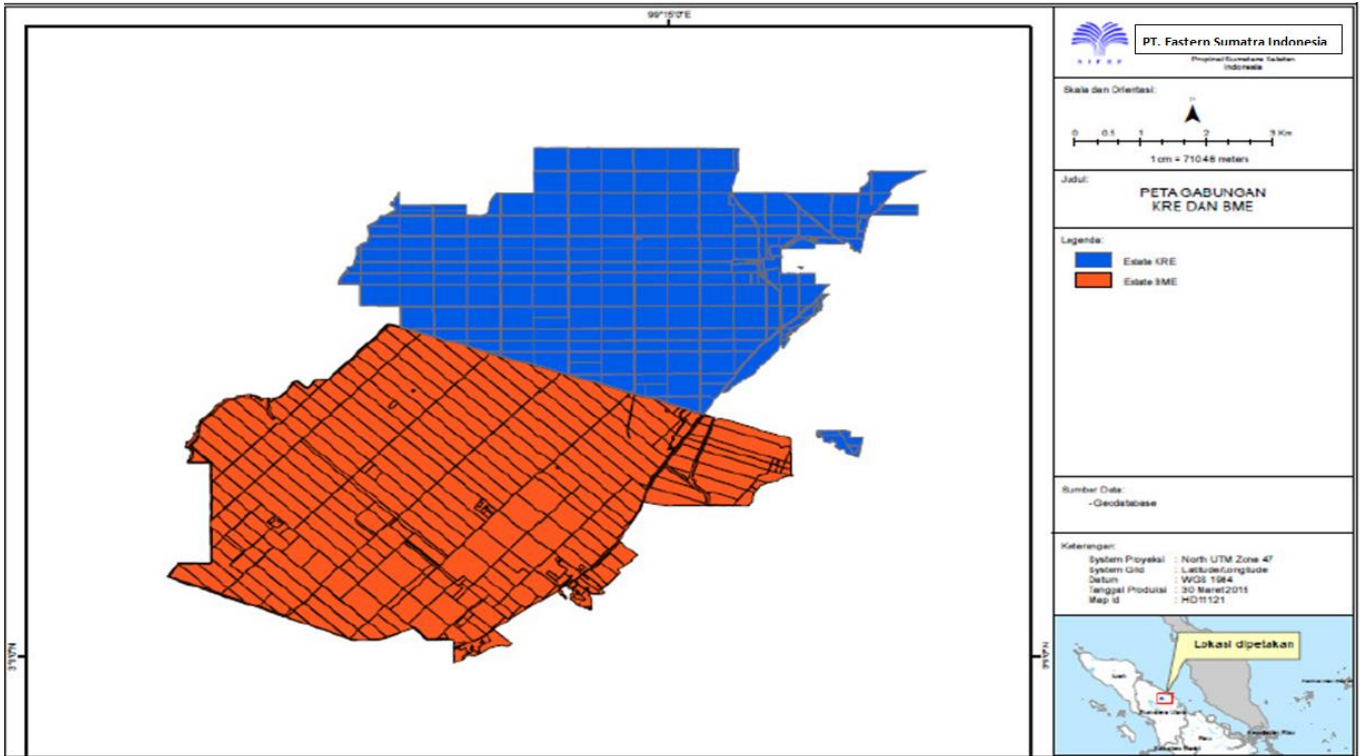
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	100
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



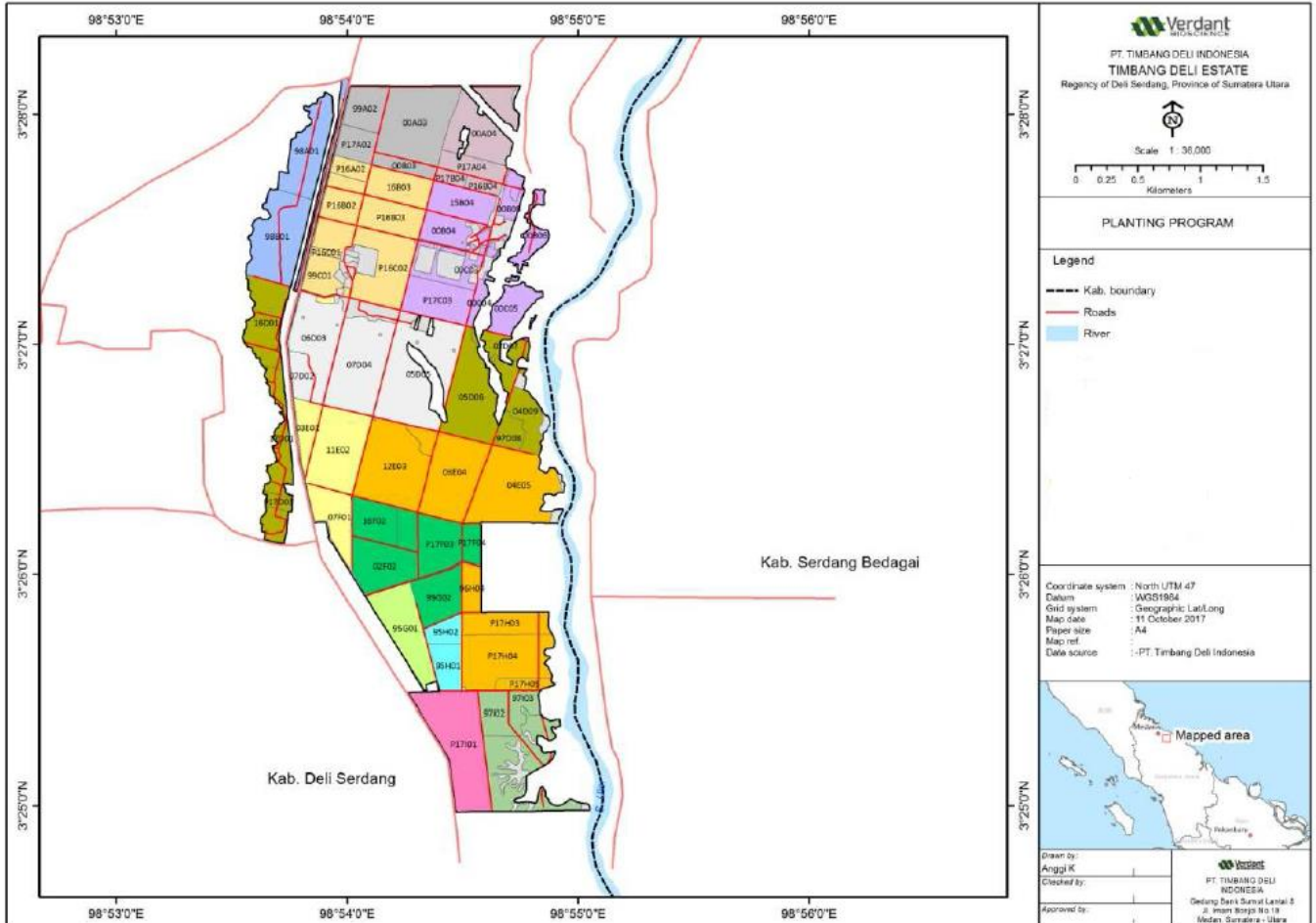
Appendix D: Estate Field Map

Bukit Maradja Estate and Kerasaan Estate

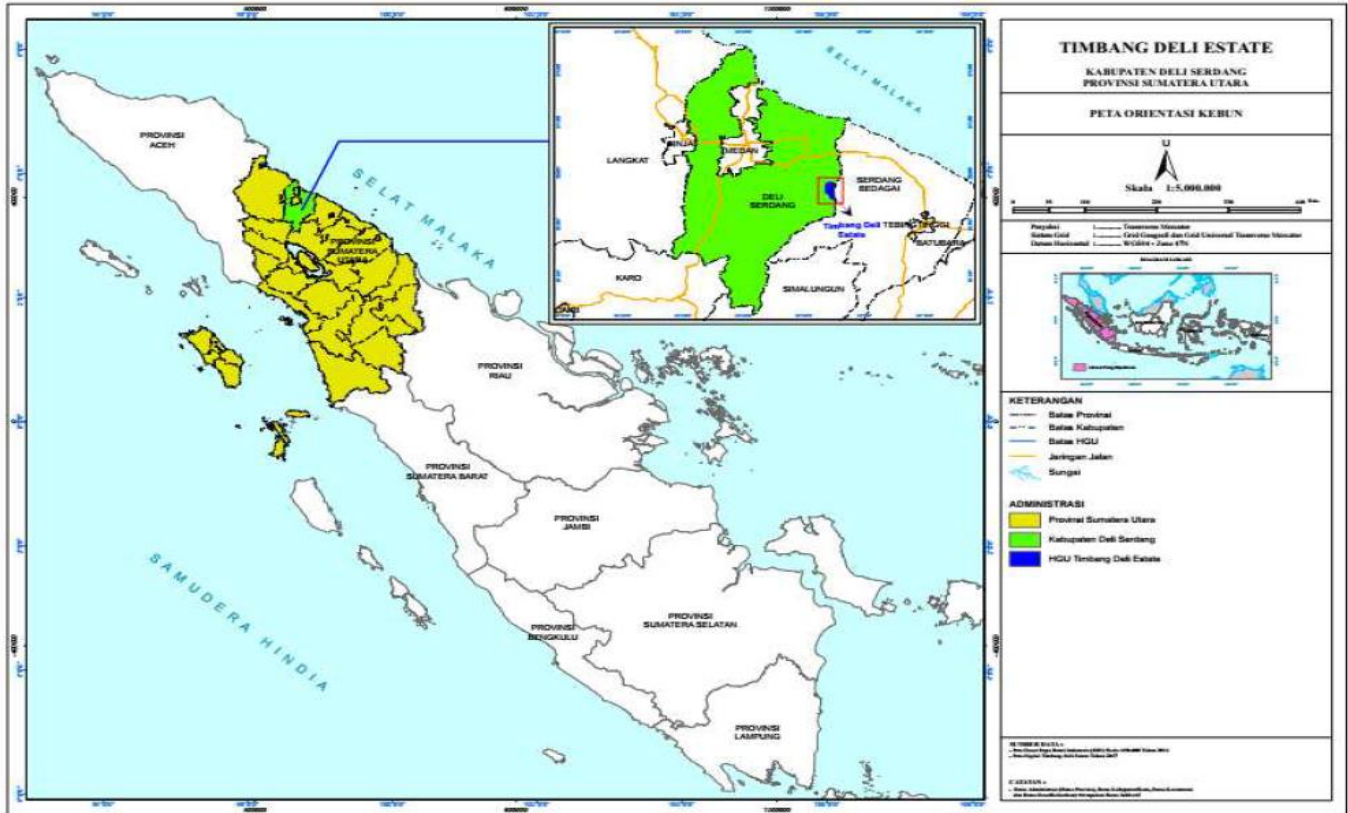


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Appendix E: List of Smallholder Registered and sampled

Not Applicable

Appendix F: List of Abbreviations

a.i	Active Ingredient
BME	Bukit Maradja Estate
BMPOM	Bukit Maradja Palm Oil Mill
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
ISPO	Indonesian Sustainable Palm Oil
ISS	Independent Smallholder Standard
KRE	Kerasaan Estate
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
TDE	Timbang Deli Estate