

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: <b>Golden Agri-Resources Ltd</b>
Client Company / Parent Company Address: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535
Certification Unit: <b>PT Paramitra Internusa Pratama – Belian Mill</b> Location of Certification Unit: Desa Nanga Seberuang, Kecamatan Semitau, Kabupaten Kapuas Hulu, Provinsi Kalimantan Barat, 78771 Indonesia
Date of Final Report: 28 November 2023

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### Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Golden Agri-Resources Ltd		
<b>RSPO Membership Number</b>	1-0096-11-000-00	<b>Membership Approval Date</b>	30 January 2005
<b>Address</b>	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535  Liaison Office: Sinar Mas Land Plaza, Tower II, 30 <sup>th</sup> Floor, JL. MH Thamrin No.51, Jakarta 10350, Indonesia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT Paramitra Internusa Pratama – Belian Mill		
<b>Location / Address</b>	Desa Nanga Seberuang, Kecamatan Semitau, Kabupaten Kapuas Hulu, Provinsi Kalimantan Barat, 78771 Indonesia		
<b>Website</b>	<a href="http://www.goldenagri.com.sg">http://www.goldenagri.com.sg</a>		
<b>Management Representative</b>	Yahya Mustakim	<b>E-mail</b>	<a href="mailto:yahya.mustakim@sinarmas-agri.com">yahya.mustakim@sinarmas-agri.com</a>
<b>Telephone</b>	+62-21 5033 8899	<b>Facsimile</b>	+62-21 5033 8899

2. Certification Information			
<b>Certificate Number</b>	RSPO 644391	<b>Certificate Start Date</b>	28/11/2023
<b>Date of First Certification</b>	28/11/2023	<b>Certificate Expiry Date</b>	27/11/2028
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK).		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	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		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	80 tons FFB/hour
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
SGS-ID-ISPO-0033	ISPO	SGS	4 Dec 2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Belian Mill	Desa Nanga Seberuang Kecamatan Semitau Kab Kapuas Hulu	0° 29' 14.87" N	111° 50' 40.93" E
Belian Estate	Desa Nanga Seberuang Kecamatan Semitau Kab Kapuas Hulu	0° 29' 05.85" N	111° 50' 58.31" E
Tengkawang Estate	Desa Tua Abang Kecamatan Semitau Kabupaten Kapuas Hulu	0° 32' 10.31" N	111° 47' 54.69" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Belian Estate	1,887.37	*474.60	1,754.91	***4,116.88	45.84
Tengkawang Estate	3,158.30	**1,774.95	4,116.50	9,049.75	34.90
<b>Total</b>	<b>5,045.67</b>	<b>2,249.55</b>	<b>5,871.41</b>	<b>13,166.63</b>	<b>38.32</b>

**Note:**

\* Total HCV in Belian Estate is 540.18 Ha, whereas based on Area Statement which refer to HGU legal framework. There is HCV inside planted area 65.58 Ha, however there are no cultivation or upkeep activities in the area.

\*\* Total HCV in Tengkawang Estate is 1,913.43 Ha, whereas based on Area Statement which refer to HGU legal framework. There is HCV inside planted area 138.48 Ha, however there are no cultivation or upkeep activities in the area.

\*\*\* Total HGU Belian Estate is 4,139.32 Ha due to calculation of area is using TM3 projection, whilst for LUCA from RSPO using UTM projection.

Infrastructure & Other areas consist of areas consist of buildings, roads, ditches/swamps/rivers, reserve areas, other areas (community fields, power lines, and quarries).

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<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Belian Estate	-	1,887.37	-	-	1,887.37	-
Tengkawang Estate	-	3,158.30	-	-	3,158.30	-
<b>Total (ha)</b>	-	<b>5,045.67</b>	-	-	<b>5,045.67</b>	-

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

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (key in period)	Actual (key in period)		Forecast (Nov 2023 – Oct 2024)
		Previous license period (key in period covered)	Current license period (key in period covered)	
Belian Estate	N/A	N/A	N/A	50,811
Tengkawang Estate	N/A	N/A	N/A	81,885
<b>Total</b>				<b>132,696</b>

**Note:**

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (key in period)	Actual (key in period)		Forecast (Nov 2023 – Oct 2024)
		Previous license period (key in period covered)	Current license period (key in period covered)	
N/A		N/A	N/A	
<b>Total</b>		N/A		

**Note:**

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<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (key in period)</b>	<b>Actual (key in period)</b>		<b>Forecast (Nov 2023 – Oct 2024)</b>
		<b>Previous license period (key in period covered)</b>	<b>Current license period (key in period covered)</b>	
Kapuas Hulu KKPA (KHLA)	N/A	N/A	N/A	27,510
Belian KKPA (BLNA)	N/A	N/A	N/A	33,156
Muara Tawang KKPA (MTNA)	N/A	N/A	N/A	19,425
<b>Total</b>				<b>80,091</b>

**Note:**

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	November 2021	N/A	23,795.54	23,795.54
2	December 2021	N/A	24,264.30	24,264.30
3	January 2022	N/A	27,196.15	27,196.15
4	February 2022	N/A	23,878.63	23,878.63
5	March 2022	N/A	28,545.07	28,545.07
6	April 2022	N/A	22,723.46	22,723.46
7	May 2022	N/A	25,226.04	25,226.04
8	June 2022	N/A	28,240.95	28,240.95
9	July 2022	N/A	29,004.88	29,004.88
10	August 2022	N/A	33,537.11	33,537.11
11	September 2022	N/A	30,321.69	30,321.69
12	October 2022	N/A	26,496.83	26,496.83
	<b>TOTAL</b>	N/A	<b>323,230.65</b>	<b>323,230.65</b>

**Note:**

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (key in period)	Actual (key in period)			Forecast (Nov 2023 – Oct 2024)
	Previous license period (key in period covered)		Current license period (key in period covered)	
<b>FFB</b>	<b>FFB</b>			<b>FFB</b>
N/A	N/A		N/A	132,696 mt
	<b>TOTAL</b>	N/A		
<b>CPO (OER: %)</b>	<b>CPO (OER: %)</b>			<b>CPO (OER: 24.00 %)</b>
N/A	N/A		N/A	31,847 mt
	<b>TOTAL</b>	N/A		
<b>PK (KER: %)</b>	<b>PK (KER: %)</b>			<b>PK (KER: 6.00 %)</b>
N/A	N/A		N/A	7,961 mt
	<b>TOTAL</b>	N/A		

**Note:**

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	N/A	N/A	N/A
	<b>TOTAL</b>	<b>N/A</b>	<b>N/A</b>

**Note:** Not applicable, this is Initial Certification Audit.

11. Summary of Actual Volume sold					
Current License period (key in period)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	N/A	N/A	N/A	N/A	N/A
<b>PK (MT)</b>	N/A	N/A	N/A	N/A	N/A
<b>Credits</b>	N/A	N/A	N/A	N/A	N/A
Previous License period (key in period)					
<b>CPO (MT)</b>	N/A	N/A	N/A	N/A	N/A
<b>PK (MT)</b>	N/A	N/A	N/A	N/A	N/A
<b>Credits</b>	N/A	N/A	N/A	N/A	N/A

**Note:** Not applicable, this is Initial Certification Audit.

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<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>
<b>Note:</b> Not applicable, this is Initial Certification Audit.				

<b>11B. Records of certified CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>
<b>Note:</b> Not applicable, this is Initial Certification Audit.				

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	N/A	N/A	N/A
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>
<b>Note:</b> Not applicable, this is Initial Certification Audit.			

<b>11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>
<b>Note:</b> Not applicable, this is Initial Certification Audit.			



12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	N/A	N/A	N/A	N/A	N/A	N/A
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

**Note:** N/A – this is not an ISH certification

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (key in period)</b>							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A			
<b>Previous License period (key in period)</b>							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

**Note:** N/A – this is not an ISH certification

## Section 2: Assessment Process

### Certification Body:

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

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 6 – 10 December 2022. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 4 November 2022. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020.

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

The Critical NC close out on-site assessment was conducted on 30 October 2023. The audit programs are included in Section 2.3.

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

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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.

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Belian Palm Oil Mill	√	√	√	√	√
Belian Estate	√	√	√	√	√
Tengkawang Estate	√	√	√	√	√

**Tentative Date of Next Visit: September 2, 2024 - September 5, 2024**

**Total Number of Mandays: 14 Mandays**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Eko Purwanto (EP)	Team Leader	<p><b>Education:</b> Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB), 2001.</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> Has completed the following training – SMETA Requirements Training; ISPO Permentan 38/2020; HCV-HCS Assessment Training, February 2021; CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course (PR357); ISO 37001:2016 Anti-bribery Management System Implementing Training Course; Endorsed RSPO P&amp;C 2018 Training; ISO 17021:2015 Certificate Transfer; Sustainability Reporting Assurance Training; RSPO P&amp;C Lead Auditor Refresher Course; RSPO Supply Chain Certification Refresher Course; RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat; Elaborating on the RSPO P&amp;C Social and Labour Standards and the Mechanics of Social Auditing; RABQSA accredited Lead Auditor Training of Environment Management System; Endorsed RSPO Green House Gas (GHG) Training for Trainer; Endorsed RSPO P&amp;C Lead Auditor Training; Understanding Environmental Management System (EMS); Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training; Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training; RABQSA accredited Lead Auditor Training of Quality Management System and RSPO Independent Smallholder Training by RSPO Secretariat.</p>

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		<p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupation Health Safety requirement, Environment responsibility and Supply Chain.</p> <p><b>Language proficiency:</b> Bahasa Indonesia and English</p>
Andi Pratama Pasaribu (APP)	Team Member	<p><b>Education:</b> Holds a Bachelor degree, majoring Social Economy (Agribusiness), Faculty of Agriculture, University of Jember.</p> <p><b>Work Experience:</b> Has more than 5 years as Field Agronomy Assistant (2008 – 2013), Sustainability Auditor (8 years).</p> <p><b>Training attended:</b> Has completed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO), Endorsed RSPO P&amp;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, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p><b>Aspect covered in this audit:</b> Social requirements, Stakeholder Consultation, workers' welfare, smallholder welfare.</p> <p><b>Language proficiency:</b> Bahasa Indonesia and English</p>
Yudwi Wisnu Rahmanto (YWR)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree of Forestry, Faculty of Forestry, University of Gadjah Mada graduated in 2006.</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> Has completed Quality Management System (QMS) ISO 9001:2008 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&amp;C Lead Auditor Course, RSPO P&amp;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, 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 Training Course, RSPO P&amp;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><b>Aspect covered in this audit:</b> Legal Requirements, Land &amp; Legal issue, natural and biodiversity conservation, HCV and Stakeholder Consultation.</p> <p><b>Language proficiency:</b> Bahasa Indonesia and English</p>
Arif Faisal Simatupang (AFS)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Agriculture, Majoring Agronomy, Gadjah Mada University</p> <p><b>Work Experience:</b> Over 3 years of working experience in palm oil estate as Land Acquisition Officer and later as Division Manager with PT PP London Sumatera Indonesia Tbk. 8 years working experience as auditor since 2014 covering RSPO P&amp;C and ISPO.</p>

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		<p><b>Training attended:</b> Completed ISO9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training, SA8000 Auditor training and Endorsed RSPO Refresher Trainings.</p> <p><b>Aspect covered in this audit:</b> Economic management plan, mill best practices, estate best practices and competency training.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p>
<p>Dr. Suhaili Bin Sahari</p>	<p>Peer Reviewer</p>	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategize the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. Occupation Health &amp; Safety</li> <li>3. ISO 14001:2015 Standard</li> <li>4. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>5. MSPO Standards: MS 2530:2013 part 1, 2, 3 and 4</li> <li>6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS</li> <li>7. HACCP MS 1480:2019</li> <li>8. GAP Standard: Global GAP, Euro GAP</li> <li>9. ASI Peer Reviewer training</li> </ol>

**Accompanying Persons:**

Name	Role
Pratama Agung Sedayu (PS)	Conducted qualifying review for Eko Purwanto (PRSP0-LA, PRSP0-OHS, PRSP0-EMS) and Andi Pratama Pasaribu (PRSP0-SA)

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### 2.3 Assessment Plan

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

Date	Time	Subjects	Auditor			
			EP	APP	AFS	YWR
Tuesday, 06/12/2022	08.25-10.45	Flight    Jakarta – Pontianak (Garuda GA502)	√	√	√	√
	14.00-14.30	<b>Opening Meeting: (@ Hotel Ibis)</b> - Presentation By Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan	√	√	√	√
	14.30-17.00	<b>Document Review</b> - Review of Basic Information Data, Time bound plan, partial certification verification	√	-	√	√
		<b>Stakeholder consultation (by phone)</b> - Stakeholder consultation to relevant agencies of Kapuas Hulu Regency - Stakeholder consultation with NGO	-	√	-	-
Wednesday, 07/12/2022	08.10-08.55	Flight    Pontianak – Sintang (Wings Air IW1370)	√	√	√	√
	09.00-13.00	Traveling to Site	√	√	√	√
	13.00-14.00	Break	√	√	√	√
	14.00-17.00	<b>Document and record verification</b> - Verification of Supply Chain Data - Data verification of RSPO P&C (Best management practices Mill, OHS, EMS, Social and Labour)	√	√	√	√
Thursday, 08/12/2022	08.00-12.00	<b>Field Visit to Belian Palm Oil Mill to verify:</b> - Best Management Practice for Mill Processing and RSPO Supply Chain Certification Standard - Element for Palm Oil Mill – site visit to check on FFB receiving, FFB process, CPO and PK dispatch, document, and record keeping. - Visit to Belian POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities. - Implementation of OHS (loading ramp, processing stations, workshop, boiler, turbine, diesel bowser, material warehouse, fire-fighting equipment) - Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, hazardous waste storage, Biogas Plant (if any)) - Interview with workers related to human resource management, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Interview with workers related to health and safety condition, training provision, worker right and condition, etc.	√	-	√	√
		<b>Stakeholder consultation</b> - Village Head, Community leader, Contractor (FFB Transporter, Land Clearing, etc).	-	√	-	-

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Date	Time	Subjects	Auditor			
			EP	APP	AFS	YWR
		<ul style="list-style-type: none"> <li>- Worker union, Gender committee</li> <li>- Local NGO</li> <li>- Previous Landowner</li> </ul>				
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	<b>Document and records verification</b>	√	√	√	√
		<b>Stakeholder consultation</b>	√	√	√	√
	16.30-17.00	<b>Wash up meeting and Reporting</b>	√	√	√	√
Friday, 09/12/2022	08.00-12.00	<b>Field visit to Belian Estate</b> <ul style="list-style-type: none"> <li>- Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope</li> <li>- Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery.</li> <li>- Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc.</li> <li>- Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities</li> <li>- Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment.</li> <li>- Visit to HGU boundary poles, border with surrounding entities</li> <li>- Visit to HCV area, riparian zone</li> </ul>	√	√	-	-
		<b>Field visit to Tengkwang Estate</b> <ul style="list-style-type: none"> <li>- Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope</li> <li>- Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery.</li> <li>- Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc.</li> <li>- Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities</li> <li>- Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment.</li> <li>- Visit to HGU boundary poles, border with surrounding entities</li> <li>- Visit to HCV area, riparian zone</li> </ul>	-	-	√	√
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	<b>Document and records verification</b>	√	√	√	√
	16.30-17.00	<b>Wash up meeting and Reporting</b>	√	√	√	√

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Date	Time	Subjects	Auditor			
			EP	APP	AFS	YWR
Saturday, 10/12/2022	08.00-11.00	<b>Document and records verification</b> <i>Document review and discussion if there any outstanding issues</i>	√	√	√	√
	11.00-12.00	<b>Closing Meeting (tentative)</b>	√	√	√	√
	12.00-14.00	Break	√	√	√	√
	14.00-18.00	Travel to Sintang (overnight at Sintang)	√	√	√	√
Sunday 11/12/2022	09.15-10.00	Flight    Sintang – Pontianak (Wings Air IW1371)	√	√	√	√
	13.45-15.15	Flight    Pontianak – Jakarta (Batik Air ID8221)	√	√	√	√

**NCR Close out**

Date	Time	Subjects	Auditor
Monday, 30/10/2023	08.00-08.30	<b>Opening Meeting:</b> - Presentation By Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan	EP
	08.30-12.00	Document Review and interview related to Critical NC - RSPO P&C 2018 – Indonesia NI 2020, Indicator 7.12.8 (Critical)	EP
	12.00-12.30	<b>Closing Meeting</b> - Presentation of Report of NCR - Comments, Responses and Questions	EP



### 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?	Yes. Golden Agri-Resources Ltd.'s RSPO Timebound Plan 2022-2025 dated 19 May 2022. The timebound plan include name of all subsidiary companies, all estates and all mills under Golden Agri Resources Ltd.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No, there are numbers of estates and mills which has not been certified yet, due to reasons such as new acquisitions, RaCP in progress and land title in progress. The RS PO Membership for Golden Agri-Resources Ltd. dated 30 January 2005. Golden Agri-Resources Ltd. submitted the updated RSPO Timebound Plan approved by RSPO Secretariat on 23 November 2023.	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. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	Yes, there are 22 units of new acquisitions made in 2021, therefore target year for new acquisition to be certified is 2024. Golden Agri-Resources Ltd. reported new acquisition in RSPO Timebound Plan approved by RSPO Secretariat on 23 November 2023.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there are deviations from the maximum 5 years period since membership obtained in 30 Jan 2005. Golden Agri-Resources Ltd. has reported reason for deviation in RSPO Timebound Plan 2022-2025. RSPO Secretariat has approved by RSPO Secretariat on 23 November 2023.	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?	Yes, there is change in time-bound plan and has been approved by RSPO Secretariat on 23 November 2023.  This change was made for management units which were scheduled to be certified in 2023. However, approaching the end of 2023, a number of units still had not completed their RaCP and Land Title processes.  Because this change was made in 2023, it will be adjusted to the 2023 ACOP which will be reported in 2024. Based on ACOP 2022, the target for 100% certified is 2025, whilst based on the revised TBP, the target for 100% certified is 2027.	Complied

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<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>There is change in time-bound plan and has been approved by RSPO on 23 November 2023.</p> <p>This change was made for management units which were scheduled to be certified in 2023. However, approaching the end of 2023, a number of units still had not completed their RaCP and Land Title processes.</p> <p>Based on the revised time bound plan, there is no isolated lapses in implementation of the plan. Each certification unit has a specified timeline for the audit implementation.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>There is change in time-bound plan and has been approved by RSPO on 23 November 2023.</p> <p>This change was made for management units which were scheduled to be certified in 2023. However, approaching the end of 2023, a number of units still had not completed their RaCP and Land Title processes.</p> <p>Based on the revised time bound plan, there is no fundamental failure to proceed with implementation of the plan. Each certification unit has a specified timeline for the audit implementation.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Golden Agri Resources (GAR) has reported all replacement of primary forest to maintain HCV and HCS through submission of LUCA.</p> <p>Several companies under GAR initiated plantation development after November 2005, while the HCV/NKT assessment took place during the period 2010 - 2013.</p> <p>GAR and its subsidiaries initiated the Remediation and Compensation Procedure (RaCP), starting with the disclosure and Zero Liability reporting to RSPO via email on 29 August 2014. Among the 25 companies, 7 of them are certified units, while the remaining 18 are uncertified units. Here is the progress update for RaCP as of 27 January 2022, for uncertified units:</p> <p>a) 4 companies are in the process of having their RaCP Proposal (LC Batch 1) reviewed by an Independent Evaluator, namely:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai (Delima Estate) – West Kalimantan (supply base KNNM-certified)</li> <li>2. PT Sumber Indah Perkasa - Papua</li> <li>3. PT Kresna Duta Agroindo – East Kalimantan</li> </ol>	<p>Complied</p>

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	<p>4. PT SKU (BGDE) - Jambi</p> <p>The latest progress indicates that the payment to the RSPO independent evaluator was made on 11 January 2023, and the review is currently ongoing.</p> <p>b) There are 2 companies undergoing the review of their Concept Note (LC Batch-2), namely:</p> <ol style="list-style-type: none"> <li>1. PT Paramitra Internusa Pratama – West Kalimantan</li> <li>2. PT Agrolestari Sentosa – Central Kalimantan.</li> </ol> <p>The latest progress indicates that the company has sent the revised Concept Note to RSPO on 17 January 2023.</p> <p>c) The companies currently in the process of preparing their Concept Note (LC Batch-3) are:</p> <ol style="list-style-type: none"> <li>1. PT Cahaya Nusa Gemilang - West Kalimantan</li> <li>2. PT Agrolestari Mandiri - West Kalimantan</li> <li>3. PT Persada Graha Mandiri - West Kalimantan</li> <li>4. PT Mitrakarya Agroindo - Central Kalimantan</li> <li>5. PT Sawita Karya Manunggul – South Kalimantan</li> <li>6. The LUCA (Land Use Change Analysis) reports that are still in progress include:</li> <li>7. PT Bangun Nusa Mandiri – West Kalimantan</li> <li>8. PT Satya Kisma Usaha (Medang Sari Estate) – Central Kalimantan 1</li> <li>9. PT Binasawit Abadi Pratama – Central Kalimantan 3</li> <li>10. PT Aditunggal Mahajaya - Central Kalimantan</li> <li>11. PT Agrokarya Primalestari - Central Kalimantan</li> <li>12. PT Buana Adhithama - Central Kalimantan</li> <li>13. PT Sinar Kencana Inti Perkasa – South Kalimantan</li> </ol>	
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	<p>14. PT Sawit Mas Sejahtera – South Sumatra 2 (Lahat)</p> <p>HCV assessments for the 18 reports were conducted between 2010 and 2018 by both external consultants and internal teams. The assessments were carried out by an assessment team led by a Team Leader approved by RSPO. The Reference for HCV assessments was the "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia" (Toolkit HCV 2008). Peer review was conducted by an independent consultant, also approved by RSPO.</p> <p>In the case of PT Sawit Mas Sejahtera – South Sumatra, the assessment utilized the Integrated HCV-HCS approach with a consultant licensed by HCVN and HCSA.</p> <p>The company consistently follows up on the RaCP process, ensuring that RSPO's timebound requirements for units that are not yet certified are promptly fulfilled.</p>	
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>GAR and its subsidiaries conducted planting after January 2010. There are 18 companies that have undergone the RSPO New Planting Procedure (NPP) and completed a 30-day public consultation process in April 2014. Out of these, 3 companies have undergone the certification process, namely PT TN (JLYM), PT BSP (BSWM), and PT BAS (SMLM). However, 15 companies have not yet obtained RSPO certification.</p> <ol style="list-style-type: none"> <li>1. PT Satya Kisma Usaha (Batang Gading Estate) – Jambi,</li> <li>2. PT Kresna Duta Agroindo – Kaltim,</li> <li>3. PT Mitra Karya Agroindo – Kalteng,</li> <li>4. PT Binasawit Abadipratama – Kalteng,</li> <li>5. PT Aditunggal Mahajaya – Kalteng,</li> <li>6. PT Agrolestari Sentosa – Kalteng</li> <li>7. PT Agrokarya Primalestari – Kalteng,</li> <li>8. PT Buana Adhitama – Kalteng,</li> <li>9. PT Agrolestari Mandiri – Kalbar,</li> <li>10. PT Paramitra Internusa Persada – Kalbar</li> <li>11. PT Persada Graha Mandiri – Kalbar</li> <li>12. PT Bangun Nusa Mandiri – Kalbar,</li> <li>13. PT Kartika Prima Cipta – Kalbar,</li> <li>14. PT Kencana Graha Permai (Delima Estate) – Kalbar,</li> <li>15. PT Cahaya Nusa Gemilang – Kalbar.</li> </ol>	<p>Complied</p>

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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&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>There are no land conflicts. The company has established a mechanism for resolving land conflicts in accordance with RSPO criteria 4.2, 4.6, 4.7, and 4.8. These procedures are outlined in the Standard Operating Procedure (SOP) for Social Conflict Handling, registered under SOP/SMART/SCRD/NSDV/I/002 with revision 1 dated 18 May 2016, and the SOP for Handling Complaints and Dissatisfaction, registered under SOP/SMART/GIMS-SCMD/USDV/I/001 with revision 2 dated 11 April 2017. These procedures govern agreed-upon social conflict resolution. Conflict resolution can be conducted in a participatory manner or involve third-party mediation.</p> <p>The company also has procedures for addressing complaints before they escalate into conflicts. The specific process is outlined in SOP/SMART/GIMS-SCMD/USDV/I/001 with revision 2 dated 11 April 2017, which ensures that complaints are handled promptly and appropriately. GAR has initiated the process of becoming an RSPO DSF (Dispute Settlement Facility) member under the "Grower" category.</p> <p>Here's a summary of the complaint progress related to GAR as found on the RSPO website:</p> <ol style="list-style-type: none"> <li>1. Complaint RSPO/2021/12/CRP, date submitted 8 Nov 2021, date accepted 14 Feb 2022, addressed to PT Ramajaya Pramukti (a subsidiary of Golden Agri Resources Ltd) by Lembaga Adat Kenegerian Petapahan (Ninik Mamak Kenegerian Petapahan), Bahtera Alam &amp; Sawit Watch.</li> </ol> <p><b>Update as of 26 September 2023:</b></p> <p>The Briefing Note has gone through the peer review process, with further clarification required from the Certification Body (CB), Respondent and GIS Unit.</p> <ol style="list-style-type: none"> <li>2. Complaint RSPO/2020/04/IR dated 2 March 2020, against GAR (Central Kalimantan Region) by the Forest Peoples Programme &amp; Elk Hills Research concerning allegations of land legality and bribery cases. From GAR's side, GIS-2 analysis for alert land clearance after November 2014, following discussions with the RSPO GIS manager on 21 May 2021, approved the sampling methodology. GAR's clarification report was submitted on 8 September 2021. However, regarding the legal review of anti-bribery policies and</li> </ol>	<p>Complied</p>
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	<p>practices, the company rejected the ToR for the Legal Review on 26 March 2021. As of December 15, 2021, RSPO is awaiting the review results from the consultant.</p> <p>As of 31 May 2023, procurement process for the independent investigation is ongoing. The Expression of Interest along with the ToR has been published on the RSPO website.</p> <p><b>Update as of 26 September 2023:</b>  Procurement process for the engagement of the Independent Investigator ongoing.</p> <p>3. Complaint PreCAP/2014/03/IR was lodged on 13 October 2014, against PT Kartika Prima Cipta (West Kalimantan) by the Forest Peoples Programme (FPP) &amp; Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the Free, Prior, and Informed Consent (FPIC) process and 6 other issues. With the consent of GAR and FPP, RSPO divided the conflict resolution verification process into 5 phases (Phase 1 for NPP, maximum land holding, and new land development; Phase 2 for legality; Phase 3 for smallholders; Phase 4 for FPIC; and Phase 5 for HCV). GAR has responded up to Phase 5 on 26 August 2021, addressing all stages. The latest status as of 15 December 2021, indicates that the RSPO Complaint Panel has reached a decision for Phase 2 and is awaiting discussions for Phase 3 and 4.</p> <p><b>Update as of 26 September 2023:</b>  Peer review of Briefing Notes for Phases 3 &amp; 5 completed with further clarification required.</p> <p>Pending receipt of input from the Technical Director with respect to Phase 4.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>In the RSPO Case Tracker, Audit team noted there was no active complaint related to labour disputes.</p> <p>The company has established procedures for addressing employee complaints before they escalate into conflicts. The procedure is the Complaint and Conflict Handling SOP, designated as SOP/SMART/SUST/IV/003, issued on 1 July 2014, with revision 3 on 8 March 2022.</p> <p>Procedures regarding employee issues are outlined in an internal flowchart because employees fall under the category of internal stakeholders. The means of lodging complaints</p>	<p>Complied</p>

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	involve official letters submitted through labour unions or deposited into suggestion boxes strategically placed in accessible locations.	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>In the RSPO Case Tracker, Audit team noted there was no active complaint related to legal non-compliance.</p> <p>The company has established procedures for addressing employee complaints before they escalate into conflicts. The procedure is the Complaint and Conflict Handling SOP, designated as SOP/SMART/SUST/IV/003, issued on 1 July 2014, with revision 3 on 8 March 2022.</p> <p>Procedures regarding employee issues are outlined in an internal flowchart because employees fall under the category of internal stakeholders. The means of lodging complaints involve official letters submitted through labour unions or deposited into suggestion boxes strategically placed in accessible locations.</p>	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	<p>The company has conducted a Compliance Audit/Internal Sustainability Verification (ISV) to assess conformity with RSPO standards and has also established a System within the company unit to be certified.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Bukit Kapur Mill and its supply bases carried out 12 December 2022.</li> <li>- Internal audit for PT Agrolestari Sentosa – Jalemo Mill and its supply bases carried out 21 November 2022.</li> <li>- Internal audit for PT Binasawit Abadi Pratama – Perdana Mill and its supply bases carried out 13 June 2022.</li> <li>- Internal audit for PT Aditunggal Mahajaya – Sako Mill and its supply bases carried out 14 November 2022.</li> </ul>	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	<p>Yes, there are critical non-compliance raised during internal audits to uncertified management units. Management has prepared correction and corrective action.</p> <ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Bukit Kapur Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 6.2.1, 6.7.1, 7.2.6, 7.12.2; management has prepared correction and corrective action.</li> <li>- Internal audit for PT Agrolestari Sentosa – Jalemo Mill and its supply bases; Internal audit</li> </ul>	Complied

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	<p>team issued NC related to 2.1.1, 3.6.2, 7.2.11, 7.12.8; management has prepared correction and corrective action.</p> <ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Perdana Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 3.6.1, 7.12.8; management has prepared correction and corrective action.</li> <li>- Internal audit for PT Aditunggal Mahajaya – Sako Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 3.6.2, 6.2.2, 6.7.1, 7.12.8; management has prepared correction and corrective action.</li> </ul>	
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Audit team checked on internal audit reports and verified the stakeholder consultation has been carried out. Internal audit report checked:</p> <ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Bukit Kapur Mill and its supply bases carried out 12 December 2022.</li> <li>- Internal audit for PT Agrolestari Sentosa – Jalemo Mill and its supply bases carried out 21 November 2022.</li> <li>- Internal audit for PT Binasawit Abadi Pratama – Perdana Mill and its supply bases carried out 13 June 2022.</li> <li>- Internal audit for PT Aditunggal Mahajaya – Sako Mill and its supply bases carried out 14 November 2022.</li> <li>- Audit team sent email to Wetlands, Sawit Watch, Aid Environment, WALHI, WWF, Forest Watch Indonesia, WCS Indonesia, LINKS and Solidaridad, until assessment ends, audit team did not received any response.</li> </ul>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>This is Initial Assessment, scheme smallholders and/or scheme outgrowers are not included yet in certification program.</p>	<p>Not Applicable</p>



**Approved Time Bound Plan**

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				Latitude	Longitude				
Padang Halaban Mill	Indonesia	Padang Halaban Mill	Aek Kuo Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.3442	99.8394	-	Certified	-	2011
Padang Halaban Mill	Indonesia	Padang Halaban Estate	Merbau Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.3442	99.8394	7,464.92	Certified	-	2011
Padang Halaban Mill	Indonesia	Pernantian Estate	Merbau Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.2608	99.7808	2,387.07	Certified	-	2011
Padang Halaban Mill	Indonesia	Adipati Estate	Merbau Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.3108	99.9564	2,490.00	Certified	-	2011
Padang Halaban Mill	Indonesia	Kanopan Ulu Estate	Kuala Hulu Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.5942	99.6161	4,845.85	Certified	-	2011
Langga Payung Mill	Indonesia	Langga Payung Mill	Halongonan Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.6775	99.8869	-	Certified	-	2012
Langga Payung Mill	Indonesia	Langga Payung Estate	Halongonan Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.7275	99.8436	5,308.53	Certified	-	2012
Langga Payung Mill	Indonesia	Paya Baung Estate	Simangambat Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.6275	99.9625	2,651.09	Certified	-	2012
Langga Payung Mill	Indonesia	Normark Estate	Kota Pinang Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.8275	99.9711	2,195.10	Certified	-	2012
Sungai Bengkal Mill	Indonesia	Sungai Bengkal Mill	Betung Bedarah Barat Village, Tebo Ilir Sub District, Tebo District, Jambi Province, Indonesia	1.6117	102.6100	-	Certified	-	2015

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Sungai Bengkal Mill	Indonesia	Sungai Bengkal Estate	Betung Bedarah Barah Village, Tebo Iilir Sub District, Rantau Api, Penapalan Village, Tanah Iilir Sub District, Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.5950	102.6100	2,364.49	Certified	-	2015
Sungai Bengkal Mill	Indonesia	Muara Kilis Estate	Muara Kilis Village, Tebo Iilir Sub District, Kandang, Pelayangan and Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.4450	102.5686	1,460.54	Certified	-	2015
Sungai Bengkal Mill	Indonesia	Sungai Bengkal KKPA	Betung Bedarah Barah Village, Tebo Iilir Sub District, Rantau Api, Penapalan Village, Tanah Iilir Sub District, Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.5950	102.6100	1,062.58	Certified	-	2015
Sungai Bengkal Mill	Indonesia	Muara Kilis KKPA	Muara Kilis Village, Tebo Iilir Sub District, Kandang, Pelayangan and Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	2.2117	102.6422	938.77	Not Certified	2024	-
Pelakar Mill	Indonesia	Pelakar Mill	Tanjung Village, Bathin VIII Sub-District, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	2.2117	102.6464	-	Certified	-	2020
Pelakar Mill	Indonesia	Pelakar Estate	Tanjung Village, Bathin VIII Sub-District, Sarolangun District, Jambi Province, Indonesia	2.2117	102.6931	4,405.90	Certified	-	2020
Pelakar Mill	Indonesia	Batang Merangin Estate	Kasang Melintang Village, Pauh Sub-District, Sarolangun District, Jambi Province, Indonesia	2.1117	102.3661	5,226.47	Certified	-	2020
Pelakar Mill	Indonesia	Tiga Serumpun KKPA	Tanjung Village, Bathin VIII Sub-District, Sarolangun District, Jambi Province, Indonesia	2.1283	102.3761	2,787.83	Not Certified	2026	Land Title in progress

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Jelatang Mill	Indonesia	Jelatang Mill	Jelatang Village,Pamenang Sub-District,Merangin District, Jambi Province, Indonesia	2.1283	102.3753	-	Certified	-	2014
Jelatang Mill	Indonesia	Bangko Estate	Jelatang Village,Pamenang Sub-District,Merangin District, Jambi Province, Indonesia	2.1117	102.3661	237.96	Certified	-	2014
Langling Mill	Indonesia	Langling Mill	Langling Village,Bangko Sub-District,Merangin District, Jambi Province, Indonesia	2.1283	102.3753	-	Certified	-	2014
Langling Mill	Indonesia	Bangko Estate	Langling Village,Bangko Sub-District,Merangin District, Jambi Province, Indonesia	2.1117	102.3661	955.36	Certified	-	2014
Langling Mill	Indonesia	Batang Gading Estate	Bukit Kemang Village, Tanah Bumbu Sub District, Kab. Muara Bungo District,Jambi Province, Indonesia	-1.5503	101.8828	1,917.17	Not Certified	2025	Land Title in progress
Langling Mill	Indonesia	Batang Gading KKPA	Bukit Kemang Village, Tanah Bumbu Sub District, Kab. Muara Bungo District,Jambi Province, Indonesia	-1.5510	101.8590	1,494.39	Not Certified	2026	Land Title in progress
Muara Kandis Mill	Indonesia	Muara Kandis Mill	Lubuk Pandan Village, Muara Lakitan Sub District, Karya Sakti Village, Muara Kelingi Sub-District,Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9453	103.1708	-	Certified	-	2015
Muara Kandis Mill	Indonesia	Muara Kandis Estate	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District,Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9286	103.1772	6,635.44	Certified	-	2015
Muara Kandis Mill	Indonesia	Muara Tawas Estate	Karya Mukti Village, Lubuk Tua Village, Muara Kelingi Sub-District, Muara Megang Village, Megang Sakti Sub-District,Musi	2.9953	103.1186	4,322.84	Certified	-	2015

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			Rawas District, Sumatera Selatan Province, Indonesia						
Muara Kandis Mill	Indonesia	Pendawa Plasma	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	-2.9021	103.2113	1,795.50	Not Certified	2026	RaCP in progress Land Title in progress
Pangkalan Panji Mill	Indonesia	Pangkalan Panji Mill	Pangkalan Panji Village, Banyuasin III District, Banyuasin District, South Sumatera, Province Indonesia	2.9622	104.4664	-	Certified	-	2015
Pangkalan Panji Mill	Indonesia	Sawit Mas Estate	Pangkalan Panji Village, Banyuasin III District, Banyuasin Regency, South Sumatera Province, Indonesia	2.9456	104.4643	3,753.00	Certified	-	2015
Bumi Sawit Mill	Indonesia	Bumi Sawit Mill	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5456	104.3442	-	Certified	-	2015
Bumi Sawit Mill	Indonesia	Bumi Sawit Estate	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5289	104.3347	8,823.90	Certified	-	2015
Bukit Perak Mill	Indonesia	Bukit Perak Mill	Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8458	105.5508	-	Certified	-	2015
Bukit Perak Mill	Indonesia	Bukit Perak Estate	Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8125	105.4951	4,111.50	Certified	-	2015
Bukit Perak Mill	Indonesia	Bukit Permata Estate	Terentang and Kacung Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8625	105.4778	1,973.45	Certified	-	2015
Bukit Perak Mill	Indonesia	Bukit Permai Estate	Desa Sarang Mandi Village, Desa Romadhon Village, Sungai Selan Sub District, Bangka	-2.2666	105.9378	3,151.07	Not Certified	2026	RaCP in progress

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			Tengah District, Bangka Belitung Province Indonesia						
Bukit Perak Mill	Indonesia	Bukit Lestari Estate	Desa Sarang Mandi Village, Desa Romadhon Village, Sungai Selan Sub District, Bangka Tengah District, Bangka Belitung Province Indonesia	-2.2666	105.9378	664.27	Not Certified	2026	RaCP in progress
Leidong West Mill	Indonesia	Leidong West Mill	Terentang Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.9292	105.4764	-	Certified	-	2014
Leidong West Mill	Indonesia	Leidong West Selatan Estate	Berang Village, Simpang Teritip Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.9958	105.4997	642.73	Certified	-	2014
Leidong West Mill	Indonesia	Leidong West Utara Estate	Milsak, Tumbak Petar, Jebus & Ranggi Asam Village, Jebus Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.7625	105.4981	746.52	Certified	-	2014
Leidong West Mill	Indonesia	Bukit Intan Estate	Terentang, Kacung Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.8958	105.5097	5,055.02	Certified	-	2014
Leidong West Mill	Indonesia	Bukit Mas Estate	Ibul Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.9292	105.4681	3,183.50	Certified	-	2014
Tanjung Kembiri Mill	Indonesia	Tanjung Kembiri Mill	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	3.0464	107.7717	-	Certified	-	2014
Tanjung Kembiri Mill	Indonesia	Tanjung Kembiri Estate	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	3.0297	107.7689	6,089.30	Certified	-	2014
Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Estate	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	3.0631	107.7542	5,251.28	Certified	-	2014

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Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Plasma,	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	-3.0970	107.7630	496.99	Not Certified	2026	RaCP in progress Land Title in progress
Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Estate (Non Certified)	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	3.0631	107.7542	49.00	Not Certified	2026	Land Title in progress
Tanjung Kembiri Mill	Indonesia	Tanjung Sawit Estate	Perpat Village, Membalong District, Belitung Regency, Bangka Belitung Province, Indonesia	-3.0783	107.6437	2,633.80	Not Certified	2026	RaCP in progress Land Title in progress
Tanjung Kembiri Mill	Indonesia	Tanjung Sawit KKPA	Perpat Village, Membalong District, Belitung Regency, Bangka Belitung Province, Indonesia	-3.1520	107.6490	675.80	Not Certified	2026	RaCP in progress Land Title in progress
Sungai Buaya Mill	Indonesia	Sungai Buaya Mill	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1458	105.4386	-	Certified	-	2014
Sungai Buaya Mill	Indonesia	Sungai Buaya Estate	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1792	105.4358	5,114.39	Certified	-	2014
Sungai Buaya Mill	Indonesia	Mesuji (plasma)	Brabasan Village, Tanjung Raya Sub District, Mesuji District, Lampung Province, Indonesia	3.9958	105.3472	5,194.76	Certified	-	2014
Sungai Buaya Mill	Indonesia	Gedung Aji Lama (plasma)	Panduan Rajawali Village, Meraksa Aji Sub District, Tulang Bawang District, Lampung Province, Indonesia	4.3125	105.4317	5,009.95	Certified	-	2014
Sungai Merah Mill	Indonesia	Sungai Merah Mill	Sidomukti Village, Gedung Aji Baru Sub District, Tulang Bawang District, Lampung Province, Indonesia	4.2458	105.5889	-	Certified	-	2014

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Sungai Merah Mill	Indonesia	Sungai Merah Estate	Sidang Gunung Tiga Village,Rawajitu Utara Sub District,Mesuji District,Lampung Province, Indonesia	4.2292	105.6347	4,046.01	Certified	-	2014
Sungai Merah Mill	Indonesia	Gedung Aji Baru (plasma)	Sidoarjo Village,Penawartama Sub District,Tulang Bawang District,Lampung Province, Indonesia	4.1792	105.4400	4,505.75	Certified	-	2014
Muara Wahau Mill	Indonesia	Muara Wahau Mill	Sukamaju Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1325	117.0065	-	Certified	-	2014
Muara Wahau Mill	Indonesia	Muara Wahau Estate	Makmur Jaya Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1658	117.0065	3,603.12	Certified	-	2014
Muara Wahau Mill	Indonesia	Gunung Kombeng Estate	Sukamaju Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1325	117.0203	3,274.42	Certified	-	2014
Jak Luay Mill	Indonesia	Jak Luay Mill	Jakluay Village,Muara Wahau Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	0.1322	116.9144	-	Certified	-	2015
Jak Luay Mill	Indonesia	Jak Luay Estate	Jakluay Village,Muara Wahau Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	0.1656	116.9313	3,845.74	Certified	-	2015
Jak Luay Mill	Indonesia	Pantun Mas Estate	Sidomulyo Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	1.0322	116.9526	5,072.32	Certified	-	2015
Jak Luay Mill	Indonesia	Long Buluh Estate	Jakluay Village,Muara Wahau Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	0.1656	116.9509	3,489.14	Certified	-	2015
Jak Luay Mill	Indonesia	Bukit Subur Estate	Jakuyak Village,Telen Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	0.1822	116.8416	3,264.55	Certified	-	2015

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Jak Luay Mill	Indonesia	Jakluay Plasma	Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.9378	116.8812	2,979.56	Not Certified	2026	Land Title in progress
Jak Luay Mill	Indonesia	Bukit Subur Plasma	Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.8673	116.8580	712.29	Not Certified	2026	Land Title in progress
Batu Ampar Mill	Indonesia	Batu Ampar Mill	Serongga Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2156	116.0170	-	Certified	-	2012
Batu Ampar Mill	Indonesia	Batu Ampar Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2656	116.0170	3,944.07	Certified	-	2012
Batu Ampar Mill	Indonesia	Batu Mulia Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2156	116.1047	2,929.02	Certified	-	2012
Sungai Kupang Mill	Indonesia	Sungai Kupang Mill	Sungai Kupang Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.0822	116.0142	-	Certified	-	2020
Sungai Kupang Mill	Indonesia	Sungai Kupang Estate	Sangking Baru Village, Kelumpang Selatan Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.0656	116.1181	5,196.11	Certified	-	2020
Sungai Kupang Mill	Indonesia	Sungai Panci Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.1822	116.0256	4,077.40	Certified	-	2012
Sungai Kupang Mill	Indonesia	Sungai Panci (plasma)	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.1819	115.9986	3,822.17	Certified	-	2012
Sungai Kupang Mill	Indonesia	Sungai Kupang KKPA	Telagasari Village, Kelumpang Hilir District, Kota Baru Regency, Kalimantan Selatan Province, Indonesia	-3.1129	116.1855	3,858.70	Not Certified	2025	Land Title in progress



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Sungai Kupang Mill	Indonesia	Sungai Manunggul Estate	Sang Sang Village, Kelmpang Hilir District, Kota Baru Regency, Kalimantan Selatan Province, Indonesia	-2.7797	116.1733	1,174.68	Not Certified	2027	RaCP in progress
Tanah Laut Mill	Indonesia	Tanah Laut Mill	Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2831	-	Certified	-	2012
Tanah Laut Mill	Indonesia	Tanah Laut Estate	Sungai Cuka, Sumber Jaya, Bukit Mulya Pasir Putih, Kintap Kecil Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2953	2,750.31	Certified	-	2012
Tanah Laut Mill	Indonesia	Kintapura Estate	Kintapura, Salaman Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8319	115.1400	1,443.50	Certified	-	2012
Libo Mill	Indonesia	Libo Mill	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.2061	-	Certified	-	2013
Libo Mill	Indonesia	Libo Estate	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.2061	4,871.77	Certified	-	2013
Libo Mill	Indonesia	Nenggala Estate	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.8947	101.2342	2,203.84	Certified	-	2013
Libo Mill	Indonesia	Sungai Rokan Estate	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9114	101.2172	4,139.72	Certified	-	2013
Libo Mill	Indonesia	Sungai Tapung (plasma)	Sukamaju & Kota Bangun Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7781	101.2458	5,585.00	Certified	-	2013
Samsam Mill	Indonesia	Samsam Mill	Bekalar Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9614	101.3000	-	Certified	-	2013
Samsam Mill	Indonesia	Samsam Estate	Bekalar Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9614	101.3000	2,812.13	Certified	-	2013
Samsam Mill	Indonesia	Kandista Estate	Belutu Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.3514	3,562.64	Certified	-	2013

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				Latitude	Longitude				
Samsam Mill	Indonesia	Palapa Estate	Bekalar Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9614	101.2808	3,209.80	Certified	-	2013
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Mill	Jambai Makmur Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2975	-	Certified	-	2013
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Estate	Jambai Makmur Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2650	3,253.00	Certified	-	2013
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Estate (Non Certified)	Jambai Makmur Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2650	557.00	Not Certified	2025	Land Title in progress
Ujung Tanjung Mill	Indonesia	Kandis Sejahtera KKPA	Pencing Bekulo Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9817	101.1525	418.01	Not Certified	2025	Land Title in progress
Ujung Tanjung Mill	Indonesia	Swadaya Mas Bersama KKPA	Libo Jaya Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9602	101.3692	450.79	Not Certified	2025	Land Title in progress
Kijang Mill	Indonesia	Kijang Mill	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.0450	-	Certified	-	2012
Kijang Mill	Indonesia	Kijang Mas Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8447	101.0494	2,369.39	Certified	-	2012
Kijang Mill	Indonesia	Kijang Kencana (plasma)	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8547	101.0911	8,147.79	Certified	-	2012
Nagasakti Mill	Indonesia	Nagasakti Mill	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0503	-	Certified	-	2012
Nagasakti Mill	Indonesia	Nagamas Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0464	5,042.58	Certified	-	2012
Nagasakti Mill	Indonesia	Nagasakti Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8114	101.0875	5,167.22	Certified	-	2012

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Nagasakti Mill	Indonesia	Ramabakti Estate	Beringin Lestari Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.1722	2,903.79	Certified	-	2012
Ramarama Mill	Indonesia	Ramarama Mill	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5614	101.0764	-	Certified	-	2012
Ramarama Mill	Indonesia	Ramarama Estate	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	4,091.94	Certified	-	2012
Ramarama Mill	Indonesia	Amarta Jaya (plasma)	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5341	101.0798	4,426.00	Certified	-	2012
Ramarama Mill	Indonesia	Ramarama KKPA	Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5600	100.9980	760.00	Not Certified	2026	Land Title in progress
Ramarama Mill	Indonesia	Berkat Ridho KKPA	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.0450	739.99	Not Certified	2025	Land Title in progress
Ramarama Mill	Indonesia	Produsen Rama Sawit KKPA	Petapahan Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	174.95	Not Certified	2025	Land Title in progress
Indrasakti Mill	Indonesia	Indrasakti Mill	Sungai Limau Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	0.5950	102.3050	-	Certified	-	2013
Indrasakti Mill	Indonesia	Indrasakti Estate	Sungai Limau Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	0.5783	102.3325	820.87	Certified	-	2013
Indrasakti Mill	Indonesia	Indrasakti (plasma)	Sungai Limau Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.3088	-0.5693	5,023.50	Certified	-	2013
Indrasakti Mill	Indonesia	Indralestari (plasma)	Talang Bersemi Village, Batang Cenaku Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.1495	-0.7280	4,245.50	Certified	-	2013

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Indrasakti Mill	Indonesia	Indragiri (plasma)	Kuala Gading Village,Batang Cenaku Sub District,Indragiri Hulu District, Riau Province, Indonesia	102.2672	-0.6351	5,295.00	Certified	-	2013
Indrasakti Mill	Indonesia	Mandian Jaya PLASMA	Bandar Padang Village, Kec Seberida Sub District, Indragiri Hulu District, Riau Province, Indonesia	-0.5930	102.3600	404.62	Certified	-	2022
Bumi Palma Mill	Indonesia	Bumi Palma Mill	Bagan Jaya Village,Tempuling Sub District,Indragiri Hilir District,Riau Province, Indonesia	0.5981	102.9836	-	Certified	-	2014
Bumi Palma Mill	Indonesia	Bumi Palma Estate	Bagan Jaya Village,Tempuling Sub District,Indragiri Hilir District,Riau Province, Indonesia	0.6039	102.9886	3,404.80	Certified	-	2014
Bumi Palma Mill	Indonesia	Bumi Lestari Estate	Pebanaan Village,Kritang Sub District,Indragiri Hilir District,Riau Province, Indonesia	0.5997	103.0264	3,285.20	Certified	-	2014
Bumi Palma Mill	Indonesia	Kharisma Estate	Talang Perigi Village, Rakit Kulim Sub District, Indragiri Hulu District,Riau Province, Indonesia	-0.5710	102.2390	344.94	Not Certified	2026	RaCP in progress
Bumi Palma Mill	Indonesia	Kharisma Plasma	Talang Perigi Village, Rakit Kulim Sub District, Indragiri Hulu District,Riau Province, Indonesia	-0.5620	102.2400	380.53	Not Certified	2026	RaCP in progress
Hanau Mill	Indonesia	Hanau Mill	Hanau Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.4114	112.1092	-	Certified	-	2012
Hanau Mill	Indonesia	Hanau Estate	Hanau Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.4114	112.1092	4,890.00	Certified	-	2012
Hanau Mill	Indonesia	Tasik Mas Estate	Hanau Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.3414	112.0928	5,045.48	Certified	-	2012

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Hanau Mill	Indonesia	Tanjung Paring Estate	Batu Ampar Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.2803	112.1325	4,717.06	Certified	-	2012
Hanau Mill	Indonesia	Langadang Estate	Batu Ampar Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.2347	112.1078	2,409.57	Certified	-	2012
Hanau Mill	Indonesia	Medang Sari Estate	Desa Runtu Village, Arut Selatan Sub District, Kotawaringin Barat District Kalimantan Tengah Province Indonesia	-2.4179	111.6959	2,436.00	Not Certified	2027	Land Title in progress
Sungai Rungau Mill	Indonesia	Sungai Rungau Mill	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3206	112.3339	-	Certified	-	2013
Sungai Rungau Mill	Indonesia	Sungai Rungau Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3286	112.3161	3,073.15	Certified	-	2013
Sungai Rungau Mill	Indonesia	Sungai Seruyan Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3089	112.2578	4,870.84	Certified	-	2013
Sungai Rungau Mill	Indonesia	Terawan Estate	Selunuk Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3453	112.3786	4,481.87	Certified	-	2013
Sungai Rungau Mill	Indonesia	Tangar Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2292	112.2928	4,445.15	Certified	-	2013
Sungai Rungau Mill	Indonesia	Bukit Tiga Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.1864	112.3222	3,281.78	Certified	-	2013

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Semilar Mill	Indonesia	Semilar Mill	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2483	112.3406	-	Certified	-	2013
Semilar Mill	Indonesia	Semilar Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2517	112.3497	4,288.63	Certified	-	2013
Semilar Mill	Indonesia	Sei Rindu Estate	Pantap Village, Mentaya Hulu District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.2536	112.4081	3,990.60	Certified	-	2013
Semilar Mill	Indonesia	Mandang Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2744	112.3381	5,170.35	Certified	-	2013
Semilar Mill	Indonesia	Puri Estate	Biru Maju Village, Telawang District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.3061	112.4203	3,638.42	Certified	-	2013
Kenanga Mill	Indonesia	Kenanga Mill	Randai Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1197	110.5939	-	Certified	-	2015
Kenanga Mill	Indonesia	Kencana Estate	Rangkung Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1325	110.5775	3,243.64	Certified	-	2015
Kenanga Mill	Indonesia	Cendana Estate	Belaban Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1053	110.6086	3,591.85	Certified	-	2015
Kenanga Mill	Indonesia	Kenanga Estate	Randai Village, Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1396	110.5079	2,618.10	Not Certified	2026	RaCP in progress
Kenanga Mill	Indonesia	Delima Estate	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1231	110.5572	1,857.49	Not Certified	2024	RaCP in progress
Kenanga Mill	Indonesia	Kencana Kemitraan	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.0833	110.5835	1,108.22	Not Certified	2026	RaCP in progress

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Kenanga Mill	Indonesia	Kenanga Kemitraan	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.0896	110.5516	439.00	Not Certified	2026	RaCP in progress
Belian Mill	Indonesia	Belian Mill	Desa Tua Abang Village, Semitau Sub District, Kapuas Hulu District Propinsi Kalimantan Barat Province, Indonesia	0.4875	111.8447	-	Not Certified	2022	Audited in December 2022
Belian Mill	Indonesia	Muara Tawang Estate	Mantan Village, Suhaid Sub District, Kapuas Hulu District, Kalimantan Barat Province, Indonesia	-2.0149	112.2989	2,376.91	Not Certified	2025	RaCP in progress
Belian Mill	Indonesia	Belian Estate	Seberuang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4850	111.8495	1,948.58	Not Certified	2022	Audited in December 2022
Belian Mill	Indonesia	Tengkawang Estate	Tua Abang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5362	111.7985	3,467.01	Not Certified	2022	Audited in December 2022
Belian Mill	Indonesia	Kapuas Hulu Estate	Perigi Village, Silat Hilir Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4069	111.7451	2,703.41	Not Certified	2025	RaCP in progress
Belian Mill	Indonesia	Sungai Beran Estate	Sentabai Village, Silat Hilir Sub District, Kab. Kapuas Hulu District, Kalimantan Barat Province, Indonesia	0.4509	111.7400	2,810.85	Not Certified	2025	RaCP in progress
Belian Mill	Indonesia	Belian Kkpa	Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5361	111.8600	1,798.13	Not Certified	2026	RaCP in progress
Belian Mill	Indonesia	Muara Tawang Kkpa	Suhaid Sub District, Kapuas Hulu District, Kalimantan Barat Province, Indonesia	0.5272	112.0851	1,052.36	Not Certified	2026	RaCP in progress
Belian Mill	Indonesia	Kapuas Hulu Kkpa	Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4729	111.7439	1,187.94	Not Certified	2026	RaCP in progress
Pekawai Mill	Indonesia	Pekawai Mill	Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province Indonesia	-1.5212	110.4589	-	Not Certified	2024	Audit scheduled on

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									27 Nov – 1 Dec 2023
Pekawai Mill	Indonesia	Kayung Estate	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5452	110.4578	2,210.35	Not Certified	2024	Audit scheduled on 27 Nov – 1 Dec 2023
Pekawai Mill	Indonesia	Pekawai Estate	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5215	110.4617	2,867.93	Not Certified	2024	Audit scheduled on 27 Nov – 1 Dec 2023
Pekawai Mill	Indonesia	Sungai Kelik Estate	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.6174	110.4144	2,466.81	Not Certified	2024	Audit scheduled on 27 Nov – 1 Dec 2023
Pekawai Mill	Indonesia	Nanga Tayap Estate	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5750	110.5309	2,007.59	Not Certified	2024	Audit scheduled on 27 Nov – 1 Dec 2023
Pekawai Mill	Indonesia	Kayung Kemitraan	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5727	110.4223	2,650.57	Not Certified	2026	Land Title in progress & RaCP Process
Sawita Mill	Indonesia	Sawita Mill	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5477	116.1401	-	Not Certified	2024	Audited on 18-23 September 2023
Sawita Mill	Indonesia	Sawita Estate	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5516	116.1416	3,809.69	Not Certified	2024	Audited on 18-23 September 2023
Sawita Mill	Indonesia	Pamukan Estate	Manunggul Baru Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.5533	116.2249	2,971.57	Not Certified	2024	Audited on 18-23 September 2023



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Sawita Mill	Indonesia	Sawita Kkpa	Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-1.5503	101.8828	1,154.47	Not Certified	2025	RaCP Process Land Title in progress
Rantau Panjang Mill	Indonesia	Rantau Panjang Mill	Jak Luay Village, Muara Wahau Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	-	Not Certified	2023	Audited on 23-27 October 2023
Rantau Panjang Mill	Indonesia	Rantau Panjang Estate	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	4,688.77	Not Certified	2023	Audited on 23-27 October 2023
Rantau Panjang Mill	Indonesia	Rantau Panjang KKPA	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9726	116.8412	981.76	Not Certified	2026	RaCP Process, Land Title in progress
Sungai Kikim Mill	Indonesia	Sungai Kikim Mill	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6343	103.2197	-	Not Certified	2023	Audited on 21-25 August 2023
Sungai Kikim Mill	Indonesia	Sungai Kikim Estate	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6293	103.2387	1,845.29	Not Certified	2023	Audited on 21-25 August 2023
Sungai Kikim Mill	Indonesia	Sungai Pangi Estate	Ulak Bandung Village, Kikim Barat Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.5507	103.1897	3,118.59	Not Certified	2023	Audited on 21-25 August 2023
Sungai Kikim Mill	Indonesia	Sungai Musi Estate	Gunung Kembang Lama Village, BTS Ulu Sub District, Musi Waras District, Sumatera Selatan Province, Indonesia	-3.5018	103.2300	1,736.24	Not Certified	2023	Audited on 21-25 August 2023
Sungai Kikim Mill	Indonesia	Sungai Saling Estate	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6249	103.2398	2,161.22	Not Certified	2023	Audited on 21-25 August 2023

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Sungai Kikim Mill	Indonesia	Sungai Enim Estate	Arahan Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6300	103.6489	1,724.54	Not Certified	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Lematang Estate	Arahan Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6300	103.6489	2,081.48	Not Certified	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Bungur Estate	Patikal Lama Village, Kikim Timur District, Lahat Regency, Sumatera Selatan Province, Indonesia	-3.6581	103.4236	2,322.95	Not Certified	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Lingsing Estate	Tanjung Lontar Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6359	103.3057	1,024.88	Not Certified	2025	RaCP in progress
Gunung Kongbeng Mill	Indonesia	Gunung Kongbeng Mill	Sukamaju Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	1.1113	117.0210	-			Excluded from timebound plan due to operation discontinued.
Gunung Kongbeng Mill	Indonesia	Gunung Kongbeng KKPA	Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	1.0992	117.0117	2,214.00	Not Certified	2025	Land Title in progress,
Sungai Magalau Mill	Indonesia	Sungai Magalau Mill	Sangsang Village, Kelumpang Tengah Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.7866	116.1707	-	Not Certified	2026	RaCP in progress
Sungai Magalau Mill	Indonesia	Senakin Estate	Sangsang Village, Sampanahan Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.8081	116.1867	2,786.98	Not Certified	2026	RaCP in progress
Sungai Magalau Mill	Indonesia	Sungai Magalau Estate	Sukamaju Village, Kelumpang Tengah Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.6658	116.1611	1,706.51	Not Certified	2026	RaCP in progress

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Bukit Kapur Mill	Indonesia	Bukit Kapur Mill	Bangkalan Melayu Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.9427	116.0461	-	Not Certified	2025	-
Bukit Kapur Mill	Indonesia	Sungai Cantung Estate	Bangkalan Melayu Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.9591	116.0020	3,473.00	Not Certified	2025	-
Bukit Kapur Mill	Indonesia	Bukit Kapur Estate	Karang Liwar Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.8903	116.0432	2,950.00	Not Certified	2025	-
Kasuari Mill	Indonesia	Kasuari Mill	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9731	140.0299	-	Not Certified	2023	Audited on 21-25 August 2023
Kasuari Mill	Indonesia	Cendrawasih Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9314	139.9666	2,691.32	Not Certified	2023	Audited on 21-25 August 2023
Kasuari Mill	Indonesia	Nuri Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.8949	139.9259	2,532.16	Not Certified	2023	Audited on 21-25 August 2023
Kasuari Mill	Indonesia	Rajawali Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9938	140.0926	3,675.16	Not Certified	2023	Audited on 21-25 August 2023
Kasuari Mill	Indonesia	Mambruk Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-3.0306	140.0458	3,472.87	Not Certified	2025	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Air Jernih Mill	Pauh Village, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0853	102.4697	-	Not Certified	2026	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Air Jernih Estate	Pauh Village, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0844	102.8033	2,962.69	Not Certified	2025	RaCP in progress

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Sungai Air Jernih Mill	Indonesia	Sungai Mentawak Estate	Baru Village, Air Hitam Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0603	102.7106	2,754.24	Not Certified	2025	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Merak Estate	Wentawak Baru Village, Air Hitam District, Sarolangun Regency, Jambi Province, Indonesia	-2.0194	102.6364	3,969.33	Not Certified	2025	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Badak Estate	Wentawak Baru Village, Air Hitam District, Sarolangun Regency, Jambi Province, Indonesia	-2.0194	102.6364	1,576.24	Not Certified	2025	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Mentawak Kkpa	Baru Village, Air Hitam Sub District, Sarolangun District, Jambi Province, Indonesia	-2.1070	102.7030	922.31	Not Certified	2026	RaCP in progress, Land title in progress
Perdana Mill	Indonesia	Perdana Mill	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4225	112.3596	-	Not Certified	2025	-
Perdana Mill	Indonesia	Perdana Estate	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4202	112.3645	4,006.88	Not Certified	2025	-
Perdana Mill	Indonesia	Lenggana Estate	Selunuk Village, Seruyan Raya Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4185	112.4174	2,274.97	Not Certified	2025	-
Perdana Mill	Indonesia	Semandau Estate	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4317	112.3082	3,789.18	Not Certified	2025	-
Perdana Mill	Indonesia	Muara Dua Estate	Terawan Village, Seruyan Raya Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4526	112.3852	4,116.37	Not Certified	2025	-

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				Latitude	Longitude				
Kuayan Mill	Indonesia	Kuayan Mill	Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9712	112.3698	-	Not Certified	2025	-
Kuayan Mill	Indonesia	Bukit Santuhai Estate	Tumbang Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9490	112.3935	3,634.93	Not Certified	2025	-
Kuayan Mill	Indonesia	Seranau Estate	Tumbang Sapiri Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0334	112.4052	3,653.62	Not Certified	2025	-
Kuayan Mill	Indonesia	Sapiri Estate	Tukang Langit Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.8724	112.5321	2,392.25	Not Certified	2025	-
Kuayan Mill	Indonesia	Tajar Beras Estate	Pematang Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0870	112.4630	3,667.46	Not Certified	2025	-
Kuayan Mill	Indonesia	Bukit Dua Estate	Rantau Katang Village, Telaga Antang Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.7376	112.5294	1,804.56	Not Certified	2025	-
Kuayan Mill	Indonesia	Sapiri Plasma	Tukang Langit Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9371	112.7821	435.00	Not Certified	2025	-
Kuayan Mill	Indonesia	Sungai Sambon Plasma	Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0724	112.4382	470.29	Not Certified	2025	-
Tangar Mill	Indonesia	Tangar Mill	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2438	112.2981	-	Not Certified	2025	-
Tangar Mill	Indonesia	Sulin Estate	Wanatirta Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2238	112.2625	4,173.17	Not Certified	2025	-

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				Latitude	Longitude				
Tangar Mill	Indonesia	Nahiyang Estate	Sandul Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2469	112.1932	3,723.32	Not Certified	2025	-
Tangar Mill	Indonesia	Katayang Estate	Sahabu Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.1285	112.2342	3,443.31	Not Certified	2025	-
Tangar Mill	Indonesia	Sulin Plasma	Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2470	112.1931	1,677.28	Not Certified	2025	-
Sako Mill	Indonesia	Sako Mill	Suka Mandang Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0356	112.2387	-	Not Certified	2025	-
Sako Mill	Indonesia	Mentaya Estate	Ayawan Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0149	112.2989	3,341.84	Not Certified	2025	-
Sako Mill	Indonesia	Kuayan Estate	Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9751	112.3566	3,519.82	Not Certified	2025	-
Sako Mill	Indonesia	Sungai Nusa Estate	Gantung Pengayuh Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0960	112.2343	3,218.56	Not Certified	2025	-
Sako Mill	Indonesia	Sungai Ayawan Estate	Suka Mandang Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0744	112.2426	3,732.70	Not Certified	2025	-
Sako Mill	Indonesia	Sako Plasma	Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2470	112.1931	1,014.42	Not Certified	2025	-
Jalemo Mill	Indonesia	Jalemo Mill	Jalemo Village, Tumbang Jutu Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3482	113.5022	-	Not Certified	2025	-

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				Latitude	Longitude				
Jalemo Mill	Indonesia	Manuhing Estate	Tumbang Kalaken Village, Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3745	113.4438	2,120.91	Not Certified	2025	-
Jalemo Mill	Indonesia	Kajui Estate	Tumbang Sepan Village, Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3907	113.4877	3,570.95	Not Certified	2025	-
Jalemo Mill	Indonesia	Jalemo Estate	Hujung Prata Village, Rungan Barat Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3593	113.5048	3,350.89	Not Certified	2025	-
Jalemo Mill	Indonesia	Manuhing KKPA	,Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3745	113.4438	64.86	Not Certified	2025	-
Kenari Mill	Indonesia	Kenari Mill	Pangkalan Baru Village, Tribun Jaya Sub District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1655	110.9210	-	Not Certified	2025	-
Kenari Mill	Indonesia	Gaharu Estate	Periangan Village, Jelai Hulu District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1000	110.8647	1,885.97	Not Certified	2025	-
Kenari Mill	Indonesia	Kenari Estate	Kenari Sub District District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1708	110.9236	3,132.08	Not Certified	2025	-
Kenari Mill	Indonesia	Gaharu Plasma	Jelai Hulu District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1119	110.9264	557.47	Not Certified	2025	-
Kenari Mill	Indonesia	Kenari Plasma	Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.2064	110.8981	52.00	Not Certified	2025	-
Sungai Perak Mill	Indonesia	Sungai Perak Mill	Besiq, Bermai, Muara Niliq, Mantar, Muara Begai Village, Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6619	115.5892	-	Not Certified	2024	-

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				Latitude	Longitude				
Sungai Perak Mill	Indonesia	Sungai Perak Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6820	115.6030	2,810.00	Not Certified	2024	-
Sungai Perak Mill	Indonesia	Sungai Basung Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6421	115.6085	2,810.00	Not Certified	2024	-
Sungai Perak Mill	Indonesia	Sungai Pikan Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.5957	115.6298	2,351.00	Not Certified	2024	-
Sungai Perak Mill	Indonesia	Sungai Pilos Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6776	115.5297	3,361.00	Not Certified	2024	-
Sungai Perak Mill	Indonesia	Sungai Pikan Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.5957	115.6298	2,266.34	Not Certified	2024	-
Sungai Kedang Mill	Indonesia	Sungai Tohan Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6267	115.5141	1,773.00	Not Certified	2024	-
Sungai Kedang Mill	Indonesia	Sungai Kedang Mill	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6587	115.4964	-	Not Certified	2024	-
Sungai Kedang Mill	Indonesia	Sungai Kedang Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6843	115.5019	3,338.00	Not Certified	2024	-
Sungai Kedang Mill	Indonesia	Sungai Tohan Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6267	115.5141	3,597.00	Not Certified	2024	-
Sungai Kedang Mill	Indonesia	Kedang Pahu Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6679	115.4458	1,928.00	Not Certified	2024	-



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				Latitude	Longitude				
Sungai Kedang Mill	Indonesia	Sungai Pahu Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6141	115.4520	2,803.00	Not Certified	2024	-
Sungai Kedang Mill	Indonesia	Sungai Pahu Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6679	115.4458	567.56	Not Certified	2024	-

Note:

1. Based on GAR's Revised TBP approved by RSPO on 23 November 2023.
2. On 20 October 2023, RSPO informed that Remediation & Compensation Plan for GAR Batch 1 & 2 has achieved Satisfactory results. The units involved in the project:

No.	Name of Subsidiary	Management Unit	Supply Base
1	PT Agro Lestari Sentosa (PT ALS)	PT Agro Lestari Sentosa: Jalemo Mill (Gumas)	Jalemo Estate, Kajui Estate, Manuhing Estate
2	PT Buana Artha Sejahtera	PT Buana Artha Sejahtera: Semilar Mill (Kalteng 3)	Mandang Estate, Puri Estate
3	PT Bumi Sawit Permai	Bumi Sawit Mill (Sumsel 1)	Bumi Sawit Estate
4	PT Kencana Graha Permai	Kenanga Mill	Cendana Estate, Delima Estate, Kencana Estate
5	PT Kresna Duta Agroindo	Rantau Panjang Mill	Rantau Panjang Estate
6	PT Paramitra Internusa Pratama	Belian Mill	Belian Estate, Tengkwang Estate
7	PT Sumber Indah Perkasa	Kasuari Mill	Mambruk Estate
8	PT Tapian Nadenggan	Semilar Mill (Kalteng 3)	Sei Rindu Estate, Semilar Estate
9	PT Tapian Nadenggan	Jak Luay Mill (Kaltim 2)	Long Buluh Estate, Jak Luay Estate, Pantun Mas Estate
10	PT Satya Kisma Usaha Jambi	Sungai Bengkal Mill Sungai Bengkal Mill Langling Mill	Muara Kilis Estate Sungai Bengkal Estate Batang Gading Estate (BDGE)

### 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 one (1) Critical; no (0) Minor nonconformities and two (2) Opportunity For Improvement raised. The PT Paramitra Internusa Pratama – Belian POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<b>NCR Ref #</b>	2284908-202212-M1	<b>Issued Date</b>	10 December 2022
<b>Due Date</b>	9 December 2023	<b>Closure Date</b>	30 October 2023
<b>Indicator &amp; Category (Critical / Minor)</b>	Indicator 7.12.8 (Critical)		
<b>Statement of Nonconformity:</b>	According to the Area Statement, there are some areas which cleared prior to HCV Assessment 2011. However, the unit of certification cannot provide evidence to demonstrate that the HCV compensation project plan against Final Conservation Liability and Environmental Remediation Plan has been developed and accepted by the RSPO Compensation Panel.		
<b>Requirement Reference:</b>	(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. - Critical (Major) compliance -		
<b>Objective Evidence:</b>	Unit of certification, PT Paramitra Internusa Pratama, as subsidiary of Golden Agri Resources (GAR) has demonstrated the updated evidence of Remediation and Compensation Procedures (RaCP) processes as below: <ul style="list-style-type: none"> <li>- 29/8/2014: GAR submitted liability data and zero liability disclosure to RSPO for all subsidiaries, including PT Paramitra Internusa Pratama.</li> <li>- 15/12/2015: Submission of Land Use Change Analysis (LUCA) for GAR concessions. There are 12 companies were submitted, including PT Paramitra Internusa Pratama.</li> <li>- 19/04/2022: RSPO send LUCA status of PT Paramitra Internusa Pratama, where the LUCA status is Pass with Final Conservation Liability is 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha.</li> <li>- 29/07/2022: Submission of Concept Note Batch 2.</li> <li>- 08/11/2022: Respond from RSPO against submission of the concept note by GAR Batch 2.</li> <li>- 14/11/2022: Reply from GAR to RSPO against result of concept note review.</li> <li>- 07/12/2022: GAR asking for update of Concept Note review.</li> </ul>		
<b>Corrections:</b>	The company has inquired with the RSPO Compensation Panel regarding the review process of the Concept Note on 7 December 2022, and was replied by Siti		

	<p>Joanni (RSPO) who informed that: "the secretariat is following up for another panel feedback related to your concerns as well. They will prompt the company once they receive a complete quorum of the panel's feedback". The company was informed that once the RSPO secretariat has received a complete quorum of the panel's feedback, they will prompt the company with an update.</p>
<p><b>Root Cause Analysis:</b></p>	<p>The company has followed the sustainable palm oil production standards set by the Roundtable on Sustainable Palm Oil (RSPO) by submitting its RaCP Concept Note on 29 July 2022. The Concept Note serves as an introduction of the company's plan for Remediation and Compensation (RaCP) in its palm oil production process.</p> <p>Since the submission, the company has been working with the RSPO to receive feedback and make any necessary resubmissions to ensure that the Concept Note meets all the requirements and standards set by the RSPO. However, as of the initial certification assessment, the Concept Note has not yet been approved by the RSPO Compensation Panel or Secretariat.</p> <p>According to the 2015 RaCP Procedure, the next step in the RaCP process is the preparation of a Remediation and Compensation Proposal, which can only be carried out after the Concept Note has been approved. The proposal outlines the specific actions and measures the company plans to take to address any environmental or social impacts from its palm oil production and compensate for them accordingly.</p>
<p><b>Corrective Actions:</b></p>	<p>The company is taking a proactive approach to monitor the progress of its Remediation and Compensation Plan (RaCP) of PT Paramitra Internusa Pratama. To ensure that the RaCP is moving forward as planned, the company checks on its progress on monthly basis. This helps the company to stay updated on the progress and make any necessary adjustments to the RaCP, if needed.</p> <p>In addition to regular progress monitoring, the company also maintains regular communication with the RSPO to keep updated on the latest status of the RaCP, by emails every two weeks.</p> <p>The company committed to inform the CB, BSI, if and when the Remediation and Compensation Proposal is approved by the RSPO Compensation Panel or Secretariat.</p>
<p><b>Assessment Conclusion:</b></p>	<p>During NCR close out verification on 30 October 2023, the parent company of PT Paramitra Internusa Pratama has provided evidence of Compensation Plan Evaluation Report Golden Agri-Resources (100961100000) with Final Evaluation Score is Satisfactory, dated 19 October 2023. The document mentioned name of subsidiary(ies)/management units relevant to the compensation and remediation liability, that are:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai (KGP)</li> <li>2. PT Buana Artha Sejahtera (BAS)</li> <li>3. PT Tapian Nadenggan Kalteng 3 (TN Kalteng 3)</li> <li>4. PT Tapian Nadenggan Kaltim 2 (TN Kaltim 2)</li> <li>5. PT Bumi Sawit Permai (BSP)</li> <li>6. PT Kresna Duta Agroindo (KDA)</li> <li>7. PT Sumber Indah Perkasa (SIP)</li> <li>8. PT Satya Kisma Usaha Jambi (SKU Jambi)</li> <li>9. PT Paramitra Internusa Pratama (PT PIP)</li> </ol>

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	<p>10. PT Agro Lestari Sentosa (PT ALS)</p> <p>Total Final Conservation Liability: 4,727.69 Ha</p> <p>Total area requiring environmental remediation:</p> <ul style="list-style-type: none"> <li>• Riparian zone : 1,456.76 Ha</li> <li>• Peat land : 2.92 Ha</li> <li>• Steep slope : 84.26 Ha</li> </ul> <p>History of correspondence between GAR and RSPO after 7 December 2022 are as follow:</p> <ul style="list-style-type: none"> <li>- Concept Note (Annex 7) PT PIP – Belian Mill has been approved (endorsed) on 8 February 2023</li> <li>- Proposal Compensation Plan (Annex 8) PT PIP has been submitted on 28 March 2023</li> <li>- Revised Proposal of Compensation Plan (Annex 8) PT PIP – Belian Mill has been submitted on 1 September 2023</li> <li>- Update from RSPO on 12 September 2023, stated that the independent evaluator is currently reviewing the compensation plan.</li> <li>- On 18 September 2023: RSPO sent feedback from the independent evaluator.</li> <li>- On 29 September 2023: GAR resubmit the revised RaCP Annex 8 of GAR – Batch 1 &amp; Batch 2 following the feedback from the evaluator shared on 18 September 2023. Responded by RSPO on 2 October 2023.</li> <li>- On 9 October 2023: RSPO sent feedback from evaluator that requiring further clarification about the budget.</li> <li>- On 12 October 2023: GAR give explanation to RSPO regarding the budget. Responded by RSPO on 12 October 2023 stating that RSPO will forward the information along with the clarification note to the Evaluator in order for the evaluator to continue the evaluation process.</li> <li>- Update from RSPO on 20 October 2023, officially inform that the Remediation &amp; Compensation Plan for GAR Batch 1 &amp; 2 has achieved Satisfactory results, and thus, the RaCP process for the units involved in this project is now completed.</li> </ul> <p>PT Paramitra Internusa Pratama and its parent company has demonstrated consistent correction and corrective action planned. Critical NC is closed satisfactorily.</p>
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<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<p><b>Indicator 2.1.2</b></p> <p>PT Paramitra Internusa Pratama has coordinated with the DPPLH Kapuas Hulu Regency to combine environmental approvals of biogas plant with the previous AMDAL and has received a directive letter No.660/47/DPPLH/TL dated 13 June 2022, and communication has been made with third parties for the implementation of environmental impact analysis. Expected to speed up the process of ANDAL and RKL-RPL documents addendum with type A categories in accordance with statutory regulations.</p>
<b>OFI 2</b>	<p><b>Indicator 6.5.3</b></p> <p>PT Paramitra Internusa Pratama has conducted assessment of the needs of new mothers and has implemented the results, among others, by providing lactation rooms for breastfeeding mothers and</p>

	providing time/opportunity to breastfeed their children. Equal understanding is needed regarding the needs of new mothers.
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Positive Findings	
PF #	Description
<b>PF 1</b>	<p>PT Paramitra Internusa Pratama (PT PIP) is taking steps to ensure the safety of its workers by providing a special warehouse for the storage of its harvesting equipment. By having a dedicated and secure storage space, the company can ensure that the equipment is properly maintained and stored, reducing the risk of accidents or damage during use.</p> <p>Furthermore, by investing in a safe and secure storage solution for its harvesting equipment, PT PIP is demonstrating its commitment to providing a safe and healthy work environment for its employees. By prioritizing the well-being of its workers, the company can help to increase employee satisfaction, reduce turnover, and attract and retain the best workers in the industry.</p>
<b>PF 2</b>	<p>PT Paramitra Internusa Pratama (PT PIP) has taken a significant step in preserving the biodiversity of the region by designating HCV 1 in Belian Estate as a protected location for the species <i>Kantong Semar</i> (<i>Nephentes</i> sp.). This species is a unique and important part of the local ecosystem, and its preservation is essential for maintaining the region's natural balance.</p> <p>The location of <i>Kantong Semar</i> preservation in Belian Estate also serve as an educational facility for school students. Through this initiative, PT PIP is providing students with a hands-on learning experience and exposing them to the importance of preserving the region's natural resources. The education program will help students develop a deeper understanding of the role of the <i>Kantong Semar</i> and other species in the local ecosystem and encourage them to take an active role in protecting and conserving these resources.</p>

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	N/A	<b>Issued Date</b>	
<b>Due Date</b>		<b>Closure Date</b>	
<b>Indicator &amp; Category (Critical / Minor)</b>			
<b>Statement of Nonconformity:</b>			
<b>Requirement Reference:</b>			
<b>Objective Evidence:</b>			
<b>Corrections:</b>			
<b>Root Cause Analysis:</b>			
<b>Corrective Actions:</b>			
<b>Assessment Conclusion:</b>			

<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	
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Opportunity for Improvement	
OFI#	Description
OFI 1	<b>OFI Statement:</b> N/A <b>Verification / Follow-up actions:</b>

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2284908-202212-M1	Critical	7.12.8	10/12/2022	30/10/2023

### 3.4 Stakeholders and previous landowner / 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 Paramitra Internusa Pratama 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)
Government Department	Environmental Agency of Kapuas Hulu Regency	Phone interview
Government Department	Plantation Agency of Kapuas Hulu Regency	Phone interview
Government Department	Labour Agency of Kapuas Hulu Regency	Phone interview

Government Department	National Park of Sentarum Lake	Phone interview
Village/Customary Leader	Nanga Seberuang, Seberuang Kecil, Nanga Lemedang and Tua' Abang Village	Phone interview
NGO	World Wildlife Fund	Phone interview

Stakeholders comment	
<b>1</b>	<p><b>Feedback:</b>            Environmental Agency of Kapuas Hulu Regency</p> <ul style="list-style-type: none"> <li>The company has environmental documents such as environmental permits (AMDAL), land application permits, permit for temporary hazardous waste and domestic waste management permits.</li> <li>Environmental management reports are submitted routinely according to regulations.</li> <li>PT PIP has implemented environmental regulations. There were issues/complaints about pollution from the public in 2020-2021 (related to the presence of water hyacinth) in the Jentu River. This has been followed up by the company. and there have been no more complaints until this assessment.</li> <li>So far, no social and environmental issues have been raised by stakeholders.</li> </ul> <p><b>Audit Team verification and response:</b>            No negative issue found during the assessment, no need to further verification.</p>
<b>2</b>	<p><b>Feedback:</b>            Plantation Agency of Kapuas Hulu Regency</p> <ul style="list-style-type: none"> <li>The company has a plantation business permit in accordance with applicable regulations. Apart from that, the company has also built smallholders block/plasma for local communities.</li> <li>Based on the results of plantation business assessment/PUP that conducted by plantation agency period 2020, the assessment team recommends strengthening plasma cooperative management as one of the social subsystem values that needs to be improved.</li> <li>Plantation business reporting is submitted regularly in accordance with applicable regulations.</li> <li>The company has fulfilled its obligation to pay for FFB plasma according to the price set by the government.</li> <li>There have been no negative issues in the last 2 years related to land fires in the company's operational areas, delays in plasma FFB payments or land disputes.</li> <li>The company has adequate firefighting facilities including firefighter personnel who have received training from Manggala Agni every year.</li> </ul> <p><b>Audit Team verification and response:</b>            No negative issue found during the assessment, no need to further verification.</p>
<b>3</b>	<p><b>Feedback:</b>            Labour Agency of Kapuas Hulu Regency</p> <ul style="list-style-type: none"> <li>PT PIP is one of the companies that complies with regulations related to employment in Kapuas Hulu Regency. Companies routinely send employment-related reports such as reports on the number of workers each semester, requests for labour mobilization permits and registration of collective work agreements.</li> <li>There are no negative issues such as wage payment violations, industrial disputes or unilateral termination of employment.</li> </ul>



	<p>All workers have been registered in the health insurance (BPJS Kesehatan) program.</p> <p><b>Audit Team verification and response:</b>          No negative issue found during the assessment, no need to further verification.</p>
<b>4</b>	<p><b>Feedback:</b>          National Park of Sentarum Lake</p> <ul style="list-style-type: none"> <li>• The company's operational area does not directly border the national park area.</li> <li>• There are no territorial conflicts between national parks and companies.</li> <li>• So far, the company has had several synergies with the national park team and Manggala Agni, for example related to the formation of a sub-district level land fire emergency response team. Apart from that, Manggala Agni also provides routine training to the PT PIP land fire emergency response team.</li> </ul> <p><b>Audit Team verification and response:</b>          No negative issue found during the assessment, no need to further verification.</p>
<b>5</b>	<p><b>Feedback:</b>          Nanga Seberuang, Seberuang Kecil, Nanga Lemedang and Tua' Abang Village</p> <ol style="list-style-type: none"> <li>1. The villagers/community representatives feel the positive impact of the company's business/operational activities. This is due to better access to transportation, access to employment and business opportunities, access to education, health and better community empowerment.</li> <li>2. Relations between the community and the company have been running well and harmoniously.</li> <li>3. The land compensation process (Simpak Beliung) is carried out based on an agreement with village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</li> <li>4. To date there have been no land disputes between the company and the community.</li> <li>5. Currently the community has become the owner of plasma land which is managed under a scheme managed entirely by the company where plantation development is in accordance with the farmer's credit agreement with the bank. Distribution of blocks production results is carried out every month directly to farmers who own the land after deducting credit, operational costs (care and harvest) and management costs.</li> <li>6. Payments are generally made on the 25th – 30th of each month. So far there have been no complaints regarding late payments.</li> <li>7. Community aspirations:             <ul style="list-style-type: none"> <li>• Smallholders who own plasma land hope that the distribution of results will be carried out more openly, easily understood and understood by all members.</li> <li>• Village heads and community leaders receive priority in obtaining information regarding job vacancies. Job vacancies are expected to prioritize employment opportunities for local communities compared to communities outside the region to reduce social conflict.</li> <li>• The company's CSR program, especially the scholarship program for regional children with achievements, can be continued every year. This is a joint effort to improve the level of community education.</li> </ul> </li> </ol> <p><b>Audit Team verification and response:</b>          Regarding the aspirations from communities, management of PT PIP has committed to:         <ul style="list-style-type: none"> <li>• Organized meetings or workshops to explain the distribution process to smallholders, ensuring they are informed and confident about their share of the profits.</li> </ul> </p>



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	<ul style="list-style-type: none"> <li>The company can establish a communication channel with village heads and community leaders to ensure they receive timely and accurate information regarding job vacancies, prioritize local hiring for job vacancies whenever possible.</li> <li>Commit to continuing the CSR programs, including the scholarship program for children with achievements, on an annual basis.</li> </ul> <p>Audit team acknowledge commitment statement from the company and will be verified on next assessment.</p>
<b>6</b>	<p><b>Feedback:</b> World Wildlife Fund</p> <ul style="list-style-type: none"> <li>So far there are no issues of conflict with society/environment.</li> <li>Belian Mill does not accept FFB from the community. In the future, consideration needs to be given to accepting community FFB.</li> </ul> <p><b>Audit Team verification and response:</b> Top management accepted the aspiration to receive FFB from smallholders as long as the FFB comes from the legal areas and agree to be certified areas within the time bound plan.</p>

List of landowner / 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
Riki Darmawan Surya	2014	1.77	Yes	Yes	Comply
Kudim	2017	3.02	Yes	Yes	Comply
Paulus Sarman	2019	1.14	Yes	Yes	Comply
Agus Awi	2014	13.54	Yes	Yes	Comply
Yanti	2015	2.26	Yes	Yes	Comply
Rangga Warsito	2016	2.26	Yes	Yes	Comply
Yohanes Ramai	2015	5.67	Yes	Yes	Comply
Kristin Canggan	2020	5.52	Yes	Yes	Comply
<b>Notes:</b>					

Previous landowner / user comment	
<b>1</b>	<p><b>Feedback:</b> Riki Darmawan Surya from Tua' Abang Village He handed over 1.77 hectares of land located in Tua' Abang Village on 19 December 2014. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b> There is no issue on this, no further verification needed.</p>
<b>2</b>	<p><b>Feedback:</b> Kudim from Tua' Abang Village</p>

	<p>He handed over 3.02 hectares of land located in Tua' Abang Village on 3 August 2017. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</p>
<b>3</b>	<p><b>Feedback:</b>          Paulus Sarman from Tua' Abang Village          He handed over 1.14 hectares of land located in Tua' Abang Village on 9 August 2019. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</p>
<b>4</b>	<p><b>Feedback:</b>          Agus Awi from Tua' Abang Village          He handed over 13.54 hectares of land located in Tua' Abang Village on 19 December 2014. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</p>
<b>5</b>	<p><b>Feedback:</b>          Yanti from Tua' Abang Village          She handed over 2.26 hectares of land located in Tua' Abang Village on 20 June 2015. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</p>
<b>6</b>	<p><b>Feedback:</b>          Rangga Warsito from Nanga Lemedak Village          He handed over 5.18 hectares of land located in Nanga Lemedak Village on 28 June 2016. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</p>
<b>7</b>	<p><b>Feedback:</b>          Yohanes Ramai from Nanga Lemedak Village          He handed over 5.67 hectares of land located in Nanga Lemedak Village on 18 April 2015. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</p>
<b>8</b>	<p><b>Feedback:</b>          Kristin Cangan from Nanga Seberuang Village          He handed over 5.52 hectares of land located in Nanga Seberuang Village on 8 February 2020. The handover was carried out voluntarily and witnessed by customary leaders and the village head.</p> <p><b>Audit Team verification and response:</b>          There is no issue on this, no further verification needed.</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.

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**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 Paramitra Internusa Pratama – Belian Mill 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 Paramitra Internusa Pratama – Belian Mill is certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> Eko Purwanto	<b>Name:</b> Yahya Mustakim
<b>Company Name:</b> BSI Malaysia Services Sdn. Bhd.	<b>Company Name:</b> PT Paramitra Internusa Pratama
<b>Title:</b> Lead Assessor	<b>Title:</b> Sustainability Management System and Certification
<b>Signature:</b>  	<b>Signature:</b> <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>  
<b>Date: 30 October 2023</b>	<b>Date: 10 November 2023</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b>            Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.            - Critical (Major) compliance -</p>	<p>According to document "Daftar Informasi Untuk Stakeholder – F/SMART/UMUM/SADV/004/003)" listed the accessible document for stakeholders as follows:</p> <ol style="list-style-type: none"> <li>1. Total employee and its minimum wage.</li> <li>2. Data of taxpayer ID number and land/building tax.</li> <li>3. Receipt payment of local tax/retribution.</li> <li>4. Environmental document.</li> <li>5. Company establishment deeds and its amendments, hectare statement, production data and application data.</li> <li>6. Land title evidence</li> <li>7. High Conservation Value (HCV) report</li> <li>8. Social Impact Assessment (SIA) report</li> <li>9. Report of community empowerment program</li> <li>10. Occupational Health and Safety (OHS/P2K3) committee report</li> <li>11. Continuous improvement report</li> <li>12. Human Rights Policy in GSEP</li> <li>13. Village participatory mapping</li> <li>14. Recap of health/worker insurance payment</li> <li>15. Complaint and grievance submission chart</li> </ol>	<p>Complied</p>

		16. Dispute settlement process. All of this document is publicly available.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	The company provide all public document in Bahasa Indonesia. For example, company policy (GSEP) available in public area, estate and mill office and clinic.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	PT Paramira Internusa Pratama maintain records for information and responses title "Buku Catatan Permintaan dan Tanggapan Informasi". Within 2022, there is only one information request coming from centre Bureau Statistic of Kapuas Hulu Regency on 27 May 2022. Those requests related to employee data responded on 31 May 2022.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -	PT Paramitra Internusa Pratama refers to communication and consultation procedure under "SOP Komunkasi dan Konsultasi No. SOP/SMART/ UMUM/SADV/I/004" dated 1 July 2014. The document stipulates type of communication: aspiration and suggestion, information for stakeholders, incident report, consultation with internal and external parties. The procedure stipulates upon receiving aspiration/incoming letter, unit head inform related Department max.1 week after correspondence received; Unit Head prepare response plan max.3 weeks after correspondence received; Unit Head send for Top management max. 1 week to obtain guidance and approval. PT Paramitra Internusa Pratama has appointed management official to consult and communicate with stakeholders: <ul style="list-style-type: none"> <li>• Production Controller – PSM 7 appointed Unit Head Belian Mill as a Personnel in Charge of Communication and Consultation to Local Communities based on appointment letter No. 01/PC-SPO/VII/2020 dated 10 January 2022.</li> <li>• Regional Controller Semitau appointed Unit Head Belian Estate as a Personnel in Charge of Communication and Consultation to Local</li> </ul>	Complied

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		<p>Communities based on appointment letter No. 011/RC-Semitaui/08/2019 dated 1 September 2019.</p> <ul style="list-style-type: none"> <li>Regional Controller Semitau appointed Unit Head Tengkwang Estate as a Personnel in Charge of Communication and Consultation to Local Communities based on appointment letter No. 04/RC-RSPO /05/2019 dated 7 May 2019.</li> </ul> <p>This document has been communicated to stakeholders, for example:</p> <ul style="list-style-type: none"> <li>Dissemination of GAR Sustainability Policy to the villager of Tua Abang on 9 November 2021. Attended by 52 participants.</li> <li>Dissemination of GAR Sustainability Policy to the workers of Belian Mill on 7 February 2022. Attended by 70 mill workers.</li> </ul>	
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama demonstrated contact and detailed stakeholder information, latest update 13 June 2022. The list comprises of:</p> <ul style="list-style-type: none"> <li>Government: Semitau District Head, Kapolsek Semitau, Danramil Semitau, Puskesmas Semitau, Manpower Service Kapuas Hulu Regency, Environmental Service Kapuas Hulu Regency, Lands Office Kapuas Hulu Regency.</li> <li>Villages: Nanga Seberuang, Seberuang Kecil, Nanga Lemedang and Tua' Abang.</li> <li>Worker organization: Labour Union Serikat Pekerja Mandiri PT. PIP and Gender Committee.</li> <li>Local contractor: PT. Satrindo Jaya Agropalma, PT BSA Logistic Indonesia, CV Lintas Batas Sejahtera, Lim Mardy</li> <li>Cooperative: KOPSA Mitra Puyang Gana (Belian Plasma)</li> <li>Academy: Universitas Tanjung Pura in Pontianak.</li> <li>NGO: World Wildlife Funds – Kapuas Hulu Landscape.</li> </ul>	Complied

**Criteria 1.2:** The unit of certification commits to ethical conduct in all business operations and transactions.

<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama referring to “Kode Etik Golden Agri Resources” signed by Chairman, June 2021. The content of the code of ethical conduct is applicable in upholding integrity for employee, company, business partner, shareholder and community.</p> <ul style="list-style-type: none"> <li>- Upholding integrity for employee covers respecting diversity, avoid discrimination, avoid harassment and violence, respect employee privacy, creating safe workplace environment, zero tolerance on illegal substance, and fair industrial relation practices including recruitment.</li> <li>- Upholding integrity for company covers protection of company assets, correct use of technology, responsible use of social media, confidential information, and intellectual asset protection, avoid conflict of interest, working outside and business affiliate activity, financial interest, gift and hospitality regulation.</li> <li>- Upholding integrity for business partner covers provision of safe and high quality product and service, fair treatment of business partner through fair deal with customer, fair treatment for supplier, government customer, fair competition through antitrust law, ethical sales and marketing, competitor information, prevent bribery and corruption, anti-money laundering, international business activity in dealing with import and export, reviewing economic sanction and boycotting.</li> <li>- Upholding integrity for shareholder covers accurate accounting book-keeping and recording, disclosure of financial report and fraud, management note, stock exchange transaction, insider trading, good corporate governance, communication with shareholders.</li> <li>- Upholding integrity for community explains upholding environmental and social sustainability, political activity, external communication.</li> </ul> <p>The document code of ethical conduct including raising concerns through email and telephone number.</p>	<p>Complied</p>
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		PT Paramitra Internusa Pratama has disseminated the ethical policy to the respective stakeholders. For example: dissemination of the ethical policy on 7 February 2022 in Belian Mill attended by 90 workers and contractor.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>PT Paramitra Internusa Pratama carried out internal audit against RSPO P&amp;C and operational procedures on annual basis, covering indicator related to code of ethical conduct implementation in company operation and contractor:</p> <ul style="list-style-type: none"> <li>• Unit of Certification has regular internal audit schedule. The recent internal audit was conducted on 20 – 25 June 2022. There was one nonconformity related to supply chain during the audit. Moreover, has been observed the documentation of Regional Controller (RC) visit and Production Controller (PC) visit.</li> <li>• Internal audit sustainability for PT PIP that conducted by sustainability department from Jakarta Head Office on 21 – 26 March 2022 to ensure the implementation of sustainability aligned with the procedure.</li> </ul> <p>Financial internal audit that conducted by public accountant on behalf of Tanubrata Sutanto Fahmi Bambang &amp; Rekan for book-keeping of 2021. The report stated that the company has demonstrated financial report in accordance with national accountancy standard.</p>	Complied
<b>Principle 2: Operate legally and respect rights</b>			
Implement legal requirements as the basic principles of operation in any jurisdiction.			
<b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The unit of certification complies to relevant regulations. - Critical (Major) compliance -	<p>PT Paramitra Internusa Pratama as unit of certification have already comply with relevant regulations as below:</p> <ul style="list-style-type: none"> <li>- Deed of Establishment: "Akta Pendirian Perseroan Terbatas PT. Paramitra Internusa Pratama No. 05, tanggal 8 June 2006". Approval</li> </ul>	Complied

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		<p>Ministry of Law and Human Rights Nomor: W7-05304 HT.01.01-TH.2007, dated 10 May 2007.</p> <ul style="list-style-type: none"> <li>- Changes of Deed: "Berita Acara RUPS Luar Biasa PT Paramitra Internusa Pratama" No. 10, dated 1 Apr 2019. Approval Ministry of Law and Human Rights Nomor: AHU-AH.01.03-0222755, dated 28 April 2019.</li> <li>- Taxpayer Number/NPWP: 02.275.842.9-021.000, registered since 30 August 2006.</li> <li>- Location Permit:             <ul style="list-style-type: none"> <li>• "SK Bupati Kapuas Hulu Nomor 14 Tahun 2007" regarding Location Permit PT Paramitra Internusa Pratama for area ± 20,000 Ha.</li> <li>• 1<sup>st</sup> Revision of location permit "SK Bupati Kapuas Hulu Nomor 139 Tahun 2009", dated 12 May 2009 regarding 1<sup>st</sup> extension permit for area ± 20,000 Ha.</li> <li>• 2<sup>nd</sup> Revision of location permit "SK Bupati Kapuas Hulu Nomor 305 Tahun 2012", dated 12 July 2012 regarding 2<sup>nd</sup> extension permit for area ± 20,000 Ha.</li> </ul> </li> <li>- Environmental Permit / AMDAL/ Izin Lingkungan: refer to "Keputusan Bupati Kapuas Hulu Nomor 289 Tahun 2006", dated 22 December 2006 regarding "Kelayakan Lingkungan Kegiatan Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama" in effective area 12,000 Ha.</li> <li>- Timber Utilization Permit (Izin Pemanfaatan Kayu): "Surat Gubernur Kalimantan Barat Nomor: 522/3457/DISHUT/2008", dated 28 November 2008 regarding Principle Permit of Timber within Non-Forest Designated Area (APL) of PT Paramitra Internusa Pratama. The permit describes that area of PT Paramitra Internusa Pratama ± 20,000 Ha clearly located in Non-Forest Designated Area (Kawasan Budidaya Non Kehutanan/Area Penggunaan Lain) refer to Ministry of</li> </ul>	
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		<p>Forestry decree SK Menhutbun Nomor: 259/Kpts-II/2000, Forest Designated Area of Kalimantan Barat.</p> <ul style="list-style-type: none"> <li>- Plantation Permit: "Keputusan Bupati Kapuas Hulu Nomor 239 Tahun 2012", dated 12 July 2012 regarding "Izin Usaha Perkebunan" of PT Paramitra Internusa Pratama for area 20,000 Ha and Mill capacity 80 MT/hour.</li> <li>- Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8) parcels of land title with total area is <b>13,173.93 Ha</b>. Land title certificate as below:             <ol style="list-style-type: none"> <li>1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate)</li> <li>2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate)</li> <li>3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate)</li> <li>4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate)</li> <li>5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate)</li> <li>6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate)</li> <li>7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate)</li> </ol> </li> </ul>	
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		<p>8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate)</p> <p>- Building Rights (HGB) for Belian POM, covering area <b>15.14 Ha</b> refer to legal documents as below:</p> <ol style="list-style-type: none"> <li>1. Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m<sup>2</sup> (2.44 Ha), land use for POME pond.</li> <li>2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m<sup>2</sup> (6.62 Ha), land use for Mill.</li> <li>3. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m<sup>2</sup> (6.08 Ha), land use for Reservoir.</li> </ol> <p>There are 37 licenses for Belian POM machineries, sample of licenses as below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Machineries</th> <th>License No</th> <th>CF (yr)</th> <th>IF (yr)</th> <th>LI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Steam Turbine 1</td> <td>01/TU/NAKERTRANSOS/2013</td> <td>5</td> <td>1</td> <td>Jun-22</td> </tr> <tr> <td>2</td> <td>Steam Turbine 2</td> <td>02/TU/NAKERTRANSOS/2013</td> <td>5</td> <td>1</td> <td>Jun-22</td> </tr> <tr> <td>3</td> <td>Steam Turbine 3</td> <td>560/681/WASNAKER</td> <td>5</td> <td>1</td> <td>Jun-22</td> </tr> <tr> <td>4</td> <td>Motor Diesel (400KW)</td> <td>03/MD/NAKERTRANSOS/2013</td> <td>5</td> <td>1</td> <td>Jun-22</td> </tr> <tr> <td>5</td> <td>Motor Diesel (564KW)</td> <td>04/MD/NAKERTRANSOS/2013</td> <td>5</td> <td>1</td> <td>Jun-22</td> </tr> <tr> <td>6</td> <td>Steam Boiler 1</td> <td>17/RH.001A</td> <td>2</td> <td>2</td> <td>Jun-21</td> </tr> <tr> <td>7</td> <td>Steam Boiler 2</td> <td>566/10/DTTS/TK-B</td> <td>2</td> <td>2</td> <td>Jun-22</td> </tr> <tr> <td>8</td> <td>Steam Vessel</td> <td>17/KH/002A</td> <td>4</td> <td>4</td> <td>Jun-20</td> </tr> <tr> <td>9</td> <td>Sterilizer 1</td> <td>17/KH/003A</td> <td>4</td> <td>4</td> <td>Jun-20</td> </tr> <tr> <td>10</td> <td>Sterilizer 2</td> <td>17/KH/004A</td> <td>4</td> <td>4</td> <td>Jun-21</td> </tr> <tr> <td>11</td> <td>Sterilizer 3</td> <td>566/09/DTTS/TK-B</td> <td>4</td> <td>4</td> <td>Jun-21</td> </tr> <tr> <td>12</td> <td>Sterilizer 4</td> <td>566/11/DTTS/TK-B</td> <td>4</td> <td>4</td> <td>Jun-20</td> </tr> <tr> <td>13</td> <td>Steam Separator 1</td> <td>17/RH/002A</td> <td>4</td> <td>4</td> <td>Jun-21</td> </tr> </tbody> </table>	No	Machineries	License No	CF (yr)	IF (yr)	LI	1	Steam Turbine 1	01/TU/NAKERTRANSOS/2013	5	1	Jun-22	2	Steam Turbine 2	02/TU/NAKERTRANSOS/2013	5	1	Jun-22	3	Steam Turbine 3	560/681/WASNAKER	5	1	Jun-22	4	Motor Diesel (400KW)	03/MD/NAKERTRANSOS/2013	5	1	Jun-22	5	Motor Diesel (564KW)	04/MD/NAKERTRANSOS/2013	5	1	Jun-22	6	Steam Boiler 1	17/RH.001A	2	2	Jun-21	7	Steam Boiler 2	566/10/DTTS/TK-B	2	2	Jun-22	8	Steam Vessel	17/KH/002A	4	4	Jun-20	9	Sterilizer 1	17/KH/003A	4	4	Jun-20	10	Sterilizer 2	17/KH/004A	4	4	Jun-21	11	Sterilizer 3	566/09/DTTS/TK-B	4	4	Jun-21	12	Sterilizer 4	566/11/DTTS/TK-B	4	4	Jun-20	13	Steam Separator 1	17/RH/002A	4	4	Jun-21	
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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>- Minor compliance -</p>	<p>PT. Paramitra Internusa Pratama implementing legal compliance and evaluation refers to "SOP SMART Pemenuhan Peraturan dan Persyaratan Lainnya" dated 1 July 2014. The identification and register of applicable legal and other requirement under form "Daftar Peraturan dan Persyaratan Lainnya".</p> <p>The compliance evaluation of applicable legal and other requirement carried out minimum once per annum. The compliance evaluation recorded under form "Formulir Evaluasi Kepatuhan Terhadap Peraturan dan Persyaratan Lainnya (F/SMART/UMUM/SADV/002/002)". Update on 6 June 2022 and divided into several aspects covering Manpower, Conservation, OHS, Environmental, Social and Plantation.</p> <p>Evaluation and review in 2022 for the latest law and regulation changes, in example:</p> <ol style="list-style-type: none"> <li>1. Manpower aspect: Government Regulation "PP RI No. 36 Tahun 2021" regarding Remuneration; "PP RI No. 34 Tahun 2021" regarding Use of Foreign Workers; "Permenaker RI No. 5 Tahun 2021" regarding Program Implementation Procedures of Social Insurance. Percentage of achievement compliance is 97.18%, Not Applicable is 0.82%.</li> <li>2. Conservation aspect: Ministry Regulation "Permen LHK No. P.106/MENLHK/SETJENKUM.1/8/2018" regarding 2<sup>nd</sup> Revising on Protected Species of Animal and Plants; Governor Regulation</li> </ol>	OFI																														

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		<p>“Peraturan Gubernur Kalimantan Barat Nomor 115 Tahun 2020” regarding Protection, Management and Assistance on Business Management Sustainable Land Base in Conservation Area; Percentage of achievement compliance is 93%, Not Applicable is 7%.</p> <p>3. Environmental aspect: Ministry Regulation “Permen LHK No. 74 Tahun 2019” regarding Emergency Program on Management of Hazardous Substances and its Waste; “Permen LHK No. P.15/MENLHK/SETJENKUM.1/4/2019” regarding Emission Threshold in Thermal Power Plant.</p> <p>Social aspect: National Law “UU RI No. 31 Tahun 2014” regarding Protection on Victims and Witnesses.</p> <p><b>Opportunity for Improvement:</b></p> <p>PT Paramitra Internusa Pratama has coordinated with the DPPLH Kapuas Hulu Regency to combine environmental approvals of biogas plant with the previous AMDAL and has received a directive letter No.660/47/DPPLH/TL dated 13 June 2022, and communication has been made with third parties for the implementation of environmental impact analysis. Expected to speed up the process of ANDAL and RKL-RPL documents addendum with type A categories in accordance to statutory regulations.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>Legal boundaries are clearly demarcated and visibly maintained by unit of certification.</p> <p>PT. Paramitra Internusa Pratama performs monitoring of the HGU boundary poles based on procedure “SOP Pemeliharaan Patok HGU/HGB No.SOP/SMART/CERS-EHSD/SADV/I/004” dated 1 July 2014.</p> <p>Belian Estate (updated November 2022, 70 poles):</p>	Complied

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Poles #</th> <th style="width: 40%;">GPS coordinates monitoring in October 2022.</th> <th style="width: 50%;">GPS coordinates verified by auditor</th> </tr> </thead> <tbody> <tr> <td>PIP067</td> <td>0°27'57.96" N   111°52'17.76" E</td> <td>0°27'58.03" N   111°52'17.83" E</td> </tr> <tr> <td>PIP036</td> <td>0°30'03.61" N   111°51'07.42" E</td> <td>0°30'03.44" N   111°51'07.92" E</td> </tr> <tr> <td>PIP118</td> <td>0°26'42.44" N   111°51'10.63" E</td> <td>0°26'42.32" N   111°51'11.03" E</td> </tr> </tbody> </table> <p style="text-align: center;">Tengkawang Estate (updated 25 October 2022, 65 poles:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Poles #</th> <th style="width: 40%;">GPS coordinates monitoring in October 2022.</th> <th style="width: 50%;">GPS coordinates verified by auditor</th> </tr> </thead> <tbody> <tr> <td>E002</td> <td>0°34'28.98" N   111°45'31.98" E</td> <td>0°34'28.74" N   111°45'32.24" E</td> </tr> <tr> <td>PIP233</td> <td>0°32'30.35" N   111°47'13.68" E</td> <td>0°32'30.43" N   111°47'13.59" E</td> </tr> <tr> <td>PIP234</td> <td>0°32'37.35" N   111°47'26.58" E</td> <td>0°32'37.57" N   111°47'26.10" E</td> </tr> </tbody> </table> <p>During field verification to boundaries marks, there was clear that no planting beyond these legal boundaries.</p>	Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor	PIP067	0°27'57.96" N   111°52'17.76" E	0°27'58.03" N   111°52'17.83" E	PIP036	0°30'03.61" N   111°51'07.42" E	0°30'03.44" N   111°51'07.92" E	PIP118	0°26'42.44" N   111°51'10.63" E	0°26'42.32" N   111°51'11.03" E	Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor	E002	0°34'28.98" N   111°45'31.98" E	0°34'28.74" N   111°45'32.24" E	PIP233	0°32'30.35" N   111°47'13.68" E	0°32'30.43" N   111°47'13.59" E	PIP234	0°32'37.35" N   111°47'26.58" E	0°32'37.57" N   111°47'26.10" E	
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<b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																											
2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>PT. Paramitra Internusa Pratama can demonstrate list of contractors, including FFB suppliers. The list of local contractors is documented in "Rekap Kontrak Lokal Belian Estate 2022", dated 17 Nov 2022. Where total contractor comprises of 48 local contractors. Type of contractors Empty Bunch vehicle rent, painting, drainage, road maintenance, water transportation, etc.</p>	Complied																								
2.2.2	<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>- Minor compliance -</p>	<p>Sample contract agreement "Surat Perjanjian Kerja No.074/BLNE/SPKL/09/2022 – Sewa Alat Berat Gorong-gorong Emdek di BLNE", dated 2 September 2022. Contractor name: CV Lintas Batas Sejahtera. Specific clause on meeting relevant legal requirements is</p>	Complied																								

		listed in Article 7 of the contract, which mentioned that the contractor shall adhere the legal requirements and PT Paramitra Internusa Pratama policy, such as minimum payment, insurance, and OHS/PPE provision to workers. Moreover, all workers also have been enrolled in National Health Insurance (BPJS Kesehatan) and National Employment Insurance (BPJS Ketenagakerjaan).													
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. - Minor compliance -	Sample contract agreement "Surat Perjanjian Kerja No.074/BLNE/SPKL/09/2022 – Sewa Alat Berat Gorong-gorong Emdek di BLNE", dated 2 September 2022. Contractor name: CV Lintas Batas Sejahtera. Specific clause disallowing child, forced and trafficked labour is listed in Article 7 of the contract, which mentioned that the contractor shall adhere the legal requirements and PT Paramitra Internusa Pratama policy, such as disallowing child, forced and trafficked labour. It has been verified based on the list of workers, sample of contractual agreements, and interview, that there is no child, forced or trafficked labour employed by the contractors.	Complied												
<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.															
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul> <p>- Critical (Major) compliance -</p>	<p>PT. Paramitra Internusa Pratama – Belian POM reviewed all information on geolocation of FFB origins, legal ownership of the land, operational license for buying and selling of FFB. The document titled "Data Supplier TBS Belian Mill", updated 25 March 2022. The document listed 8 FFB supplier, both company-owned and smallholder scheme.</p> <p>For direct sourced FFB coming from company-owned plantation, see 2.1 and 4.4.1.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Supply Bases</th> <th>Lat</th> <th>Long</th> <th>Ownership status</th> <th>Operation License</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Muara Tawang Estate (PT Karya Prima Cipta)</td> <td>0°34'31.45 N</td> <td>112°02'48.73 E</td> <td>HGU No.118/HGU/KE M-ATR/BPN/2017</td> <td>IUP No. 245 Tahun 2012</td> </tr> </tbody> </table>	No	Supply Bases	Lat	Long	Ownership status	Operation License	1	Muara Tawang Estate (PT Karya Prima Cipta)	0°34'31.45 N	112°02'48.73 E	HGU No.118/HGU/KE M-ATR/BPN/2017	IUP No. 245 Tahun 2012	Complied
No	Supply Bases	Lat	Long	Ownership status	Operation License										
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		2	Muara Tawang Plasma (PT Karya Prima Cipta)	0°31'32.81 N	112°05'11.35 E	HGU No.118/HGU/KE M-ATR/BPN/2017	SHM	
		3	Kapuas Estate Persada Mandiri) Hulu (PT Graha	0°24'24.76 N	111°44'41.89 E	HGU No.34/HGU/KEM -ATR/BPN/2015	IUP No. 241 Tahun 2012	
		4	Sungai Estate Persada Mandiri) Beran (PT Graha	0°27'02.65 N	111°44'25.29 E	HGU No.34/HGU/KEM -ATR/BPN/2015	IUP No. 241 Tahun 2012	
		5	Kapuas Plasma Persada Mandiri) Hulu (PT Graha	0°27'02.65 N	111°44'25.29 E	HGU No.34/HGU/KEM -ATR/BPN/2015	SHM	
		6	Belian Estate Internusa Pratama) (PT Paramitra	0°29'05.83 N	111°50'58.29 E	HGU No.35/HGU/KEM -ATR/BPN/2015	IUP No. 239 Tahun 2012	
		7	Tengkawang Estate Paramitra Internusa Pratama) (PT	0°32'10.29 N	111°47'54.66 E	HGU No.35/HGU/KEM -ATR/BPN/2015	IUP No. 239 Tahun 2012	
		8	Belian Plasma (PT Paramitra Internusa Pratama)	0°32'10.29 N	111°47'54.66 E	HGU No.35/HGU/KEM -ATR/BPN/2015	IUP No. 239 Tahun 2012	
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. - Minor compliance -	Belian POM receives FFB from own Estates, sister company and scheme smallholders, where those supply bases already listed in Time Bound Plan for upcoming certification. Belian POM did not receives FFB from the collection centres, agents, or other intermediaries.						Complied

<b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>													
Implement plans, procedures and systems for continuous improvement.													
<b>Criteria 3.1:</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.													
3.1.1	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The company has business management plan named Economic Feasibility Analysis 2022 – 2026. The plan comprises variable for Estate and Plasma in area statement, planting material, harvesting and productivity projection, mill’s extraction rate, production costs, price estimates, and other financial indicators.</p> <p>For instance, the projection of productivity (ton FFB/ha) from 2022 – 2026 as follows:</p> <table border="1" data-bbox="1133 751 1971 850"> <thead> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>20.71</td> <td>23.35</td> <td>23.56</td> <td>23.56</td> <td>23.94</td> </tr> </tbody> </table>	2022	2023	2024	2025	2026	20.71	23.35	23.56	23.56	23.94	Complied
2022	2023	2024	2025	2026									
20.71	23.35	23.56	23.56	23.94									
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Based on the Area Statement has known that the year of planting were in the period of 2008 – 2014 (14 years oldest). Therefore, the replanting will not be conducted for the next five years. In accordance with company’s procedure, the replanting will be carried out when the oil palm are 25-30 years old and/or considering the yield.</p>	Complied										
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>- Minor compliance -</p>	<p>The management review conducted in several ways, such as monthly management report, annual management review, internal audit and external audit of RSPO, internal financial audit or external financial audit by public accountant.</p> <p>For instance, the external financial audit for book-keeping of 2021 has been conducted based on public accountant report of Tanubrata Sutanto Fahmi Bambang &amp; Rekan, stated that the company has demonstrated financial report in accordance with national accountancy standard.</p>	Complied										

<p><b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p><b>(C)</b> 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> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>The company regularly conducted monitoring of continuous improvements, documented in Innovation Implementation Monitoring, among others:</p> <p>Belian Mill:</p> <ul style="list-style-type: none"> <li>- GAR Sustainability Information System, a platform to integrate sustainability documentation system, including module fire and GHG.</li> <li>- Bolard capstand replacement with Roller.</li> <li>- Separation of kernel and shell without claybath.</li> </ul> <p>Belian Estate:</p> <ul style="list-style-type: none"> <li>- GAR Sustainability Information System, a platform to integrate sustainability documentation system, including module fire and GHG.</li> <li>- Beneficial plant watering system using infuse system in dry season.</li> <li>- E-fact, electronic FFB delivery system.</li> </ul>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>The unit of certification has filled the RSPO Metric Template version 2.1 for year January – December 2021 and November 2021 to October 2022. The RSPO Metric Template has been reviewed by auditor during audit.</p>	Complied
<p><b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>Unit of certification has operational procedure in estate and mill as follows:</p> <p><b>Oil Palm Agronomy Procedure</b></p> <p>Procedure of Agronomy is arranged by Management Committee Agronomy and Research (MCAR) revised on 15 July 2020. Procedures</p>	Complied

		<p>were included new area and replanting planning, nursery, land clearing, preparation before planting, fertilising, upkeep, integrated pest management (IPM), road maintenance, peat land management, drainage system, mature and immature upkeep, integrated pest management and harvesting. Other than that, there were also procedures for several processes including riparian zone management, application of agrochemical. Procedure also described required PPE and other safe working practices.</p> <p>Samples of Standard Operational Procedure for agronomy are as follows:</p> <ul style="list-style-type: none"> <li>• Procedure No. SOP/SMART/MCAR/I/TA-PPL about new planting.</li> <li>• Procedure No. SOP/SMART/MCAR/II/TA-PPJ about replanting.</li> <li>• Procedure No. SOP/SMART/MCAR/III/TA-BBT about nursery.</li> <li>• Procedure No. SOP/SMART/MCAR/IV/TA-PLB about land preparation.</li> <li>• Procedure No. SOP/SMART/MCAR/V/TA-TNM about planting.</li> <li>• Procedure No. SOP Nomor SOP/SMART/MCAR/VI/TA-HPT replanting.</li> <li>• Procedure No. SOP/SMART/MCAR/VII/TA-TNM about integrated pest management.</li> <li>• Procedure No. SOP/SMART/MCAR/VIII/TA-PGM about weeding management.</li> <li>• Procedure No. SOP/SMART/MCAR/IX/TA-PPK about manuring.</li> <li>• Procedure No. SOP/SMART/MCAR/X/TA-PTB about field upkeep on immature area.</li> <li>• Procedure No. SOP No. SOP/SMART/MCAR/XI/TA-PMP about harvesting preparation.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Procedure No. SOP No. SOP/SMART/MCAR/XIII/TA-PNN about harvesting.</li> <li>• Procedure No. SOP/SMART/MCAR/XIV/TA-PPT about FFB transportation and delivery.</li> <li>• Procedure No. SOP/SMART/MCAR/XV/TA-PCH about rainfall measurement.</li> </ul> <p>Hardcopy of procedure are available and controlled. SOPs made were available at the point of use (in all section and division of estate). Copy of the procedure was available on site and is it documented in <i>Bahasa Indonesia</i>. SOP distribution to all section and division were well documented in the Form F/SMART/UMUM/SADV/001/002 (document distribution register).</p> <p>Procedure have been disseminated to all related employee (harvesting, loose fruit pickers and upkeep employee). Every morning, there is morning musters performed, basically to disseminate working procedure and instruction, and to monitor employee attendance as well.</p> <p><b>Palm Oil Mill:</b></p> <p>Procedure regarding best manufacturing practice operation in POM is available in document of "SOP Management Committee for Mill Development (MCMD). As documented in SOP/SMART/MCMD/I/TM-PKS/Rev.06, Standard Operational Procedure of Palm Oil Process, revision 6 issued by Head Office Jakarta dated 1 Nov 2012. The procedure describes operation instruction from FFB receiving through production, processing (grading, sterilization, threshing, pressing, clarification, nut and kernel processing) and dispatch of CPO and PK.</p> <p>The Organization has also developed work instruction for each proces and equipment to described specifically stages of process and</p>	
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		<p>equipment utilization (e.g. Loading Ramp; Weighing Bridge; Sterilisation Station; Threshing Station; Pressing Station; Clarification Station; Recycling CPO; Nut and Kernel; Engine Room; Boiler; Water Treatment; Final Effluent; laboratory).</p> <p>SOP for RSPO Supply Chain has been established in "SOP Supply Chain Certification Standard Mass Balance" (PT.BPL.BPRM/SOP/SCCS-MB/17) dated 24 March 2022). The procedures cover job and responsibility, workflow, receiving of raw material, verification of delivery note, weighing, checking of raw material quality, processing, monitoring of process, validation of quality and quantity report, mass balance calculation, product delivery, registration of transaction and document control.</p> <p><b>Safety Aspect</b></p> <p>During the pandemic situation, certificate holder also release procedure related to COVID-19 in all Golden Agri Resources unit. The procedure signed by Head of Upstream dated 26 June 2020. Those procedure covered guidance for all employee since they traveling to office, workplace activity in office/estate/mill/workshop/school/creche/worship place/sport facility/mess/onsite visit/on leave. It also covered the rights and obligation of employee during self-isolation, guest received procedure and suspect handling. During onsite audit, all auditors are tested for COVID-19 Swab Antigen prior to entering the site. All the results are negative therefore audit team can enter the site. Auditors and auditees wear masks during the audit in the closed room.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Certificate holder has regular internal audit refer to procedure SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&amp;C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Paramitra Internusa</p>	Complied

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		<p>Pratama issued by Sustainability Compliance – OSDV. Internal audit conducted on 28 Mar 2022 to 4 Apr 2022.</p> <p>The company has also audit system to check operational performance which is Regional Controller (RC) visit and Production Controller (PC) visit.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>Unit of certification has regular internal audit schedule. The recent internal audit was conducted on 20 – 25 June 2022. There was one nonconformity related to supply chain during the audit. Moreover, has been observed the documentation of Regional Controller (RC) visit and Production Controller (PC) visit.</p>	Complied
<p><b>Criteria 3.4:</b> 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><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama as unit of certification established Environment Impact Assessment document known as AMDAL, consist of:</p> <ol style="list-style-type: none"> <li>1. <i>Analisis Dampak Lingkungan (ANDAL) Rencana Pembangunan Perkebunan Kelapa Sawit</i> PT Paramitra Internusa Pratama, conducted independently by third party CV Intergraha Citra Persada, approved based on Kapuas Hulu Regent No.289/2006 dated 22 Dec 2006.</li> <li>2. <i>Rencana Pengelolaan Lingkungan Hidup (RKL) Rencana Pembangunan Perkebunan Kelapa Sawit</i> PT Paramitra Internusa Pratama, approved based on Kapuas Hulu Regent No.289/2006 dated 22 Dec 2006.</li> <li>3. <i>Rencana Pemantauan Lingkungan Hidup (RPL) Rencana Pembangunan Perkebunan Kelapa Sawit</i> PT Paramitra Internusa Pratama, approved based on Kapuas Hulu Regent No.289/2006 dated 22 Dec 2006.</li> </ol>	Complied

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		<p>4. <i>Upaya Pengelolaan Lingkungan Hidup (UKL) dan Upaya Pemantauan Lingkungan Hidup (UPL) Pembangunan Pabrik Pengolahan Kelapa Sawit</i> – Environment management and monitoring plan for establishment of Palm Oil Mill at Silat Hilir and Semitau District, Kapuas Hulu Regency, October 2011 with Mill capacity is 80 MT FFB/hour.</p> <p>5. PT Paramitra Internusa Pratama operates biogas plant, environment management and monitoring (RKL-RPL) or “Addendum AMDAL Tipe A” is under process, evident by communication letter between unit of certification and consultant, PT Alam Indo Lestari, starts on 1 Jul 2022 up until 25 Nov 2022. There are also letter from Environment Agency of Kapuas Hulu Regency No.660/47/DPPLH/TL dated 13 Jun 2022 regarding direction to the revision of environment management and monitoring.</p> <p>Scope of AMDAL is covering environmental and social aspects assessment for all plantation and mill operations. Hectarage of AMDAL scope is referred to location permit (<i>“Surat Pengarahan Lahan dari Bupati Kapuas Hulu”</i>) No.525/993/BANG-I-A dated 4 Aug 2006 with total area is 20,000 Ha.</p> <p>Participatory with affected parties was conducted during SEIA assessment through Economic and Social Questionnaire, Focus Group Discussion with adjacent communities of certification unit.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Environmental Management and Monitoring Plan (RKL-RPL) is part of SEIA or AMDAL document, where the participatory of affected parties was conducted during the assessment.</p> <p>Available report of Management and Monitoring Plan (RKL-RPL) PT Paramitra Internusa Pratama, 1<sup>st</sup> Semester 2022. Report has been submitted to Ministry of Environment and Forestry on 30 Jul 2022, Kapuas Hulu Regency Office of Environmental, Plantation and Manpower on 10 Oct 2022. The report summarized that:</p>	Complied



		<ul style="list-style-type: none"> <li>- Ambient air quality is compiled to PP No.41/1999.</li> <li>- Air emissions are according to KepMenLH No.13/2009.</li> <li>- Forest fire trend is decrease during management period due to no land clearing conducted by local communities, and routine patrol performed by the company in concession area.</li> <li>- Erosion level is in light level, need to be maintained to achieve lower level of erosion.</li> <li>- River water quality analysis shows that main parameters (BOD and COD) are still under the threshold according to PP No.82/2001.</li> </ul> <p>For social impact, available Social Impact Assessment report, January 2015. Participation of stakeholders analysed based on literature, survey, structured interview, FGD and questionnaire. Public Consultation and interview done on 9 Dec 2014. Social Impact Management and Monitoring Plan established in February 2015.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Environmental Management and Monitoring Plan (RKL-RPL) is part of SEIA or AMDAL document, where the participatory of affected parties was conducted during the assessment.</p> <p>Environmental management and monitoring plan is implemented, reviewed and updated regularly. Available report of Management and Monitoring Plan (RKL-RPL) PT Paramitra Internusa Pratama, 1<sup>st</sup> Semester 2022. Report has been submitted to Ministry of Environment and Forestry on 30 Jul 2022, Kapuas Hulu Regency Office of Environmental, Plantation and Manpower on 10 Oct 2022.</p> <p>Social impact management and monitoring plan is implemented, reviewed and updated as documented in "<i>Laporan Review Rencana Pengelolaan dan Pemantauan Dampak Sosial Perkebunan dan Pabrik Kelapa Sawit PT Paramitra Internusa Pratama</i>" period 2019-2021. Methods of data collection consist of observation, deep interview and FGD. Social impact management rated as effective in anticipating</p>	Complied

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		<p>negative impact and promote positive impact. Main issue managed by PT PIP for period 2019-2021 is road dust caused by operational of vehicle at Sentabai Village. There is also aspiration recorded from Nanga Lemedak Village, Nanga Seberuang Village and MPG Cooperative.</p> <p>Environmental impact assessment of biogas plant has been conducted by unit of certification and documented in Identification and Evaluation of Environmental Aspects (F/SMART/LEMS-EHSD/SADV/001/001) dated 5 Jan 2022. Identified environmental aspects include exhaust emissions from chimney flares, waste droplets from biodigesters and GHG emissions from liquid waste.</p>	
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
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>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has defined the procedure related to new employment recruitment.</p> <ul style="list-style-type: none"> <li>• Recruitment: according to "<i>SOP Rekrutmen dan Seleksi Karyawan</i>" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications.</li> <li>• Promotion: according to "<i>SOP Promosi dan Mutasi</i>" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade.</li> <li>• Retirement, and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination.</li> </ul>	Complied
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>Implementation records on employment procedures are available during this initial certification audit, such as:</p> <ul style="list-style-type: none"> <li>• Recruitment:</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>○ Application letter of Hendrikus Soo (harvester applicant), dated 2 February 2022. Attachment: copy of ID card, medical test result and other related certificate.</li> <li>○ Temporary Work Letter Agreement (PKWT), No. 076/BLNE/PT3/02/2022, namely Hendrikus Soo (harvester), dated 14 February 2022.</li> <li>• Promotion and rotation:             <ul style="list-style-type: none"> <li>○ Records of Employee Assessment dated 1 March 2022 on behalf of Sukimi (grade increment) from temporary workers to permanent workers (permanent worker PT 4B).</li> <li>○ Worker Letter Agreement (Increment Letter), No. 001/SK-PT/BPRM/I/2022 of Mr. Sarmedi, date of join 8 May 2019, division: Administration, dated 1 May 2022.</li> </ul> </li> <li>• Retirement:             <p>There is no record of retirement for the last 2 years.</p> </li> </ul>	
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has prepared procedures and work instruction related to OHS management system (to comply with Government Regulation 50, year 2012 – "<i>Sistem Manajemen Keselamatan dan Kesehatan Kerja</i>", such as:</p> <ul style="list-style-type: none"> <li>• Development and Communication Policy (SOP/SMART/HESS-EHSD/SADV/I/01).</li> <li>• Hazard Identification and Risk Assessment (SOP/SMART/HESS-EHSD/SADV/I/02).</li> <li>• OHS objectives and targets (SOP/SMART/HESS-EHSD/SADV/I/03).</li> <li>• OHS Programmes (SOP/SMART/HESS-EHSD/SADV/I/04).</li> <li>• Incident and Occupational Disease Handling (SOP/SMART/HESS-EHSD/SADV/I/05).</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Material Handling (SOP/SMART/HESS-EHSD/SADV/I/06).</li> <li>• Design Review (SOP/SMART/HESS-EHSD/SADV/I/07).</li> <li>• Infrastructures Maintenance and Changes (SOP/SMART/HESS-EHSD/SADV/I/08).</li> <li>• Lock Out Tag Out (SOP/SMART/HESS-EHSD/SADV/I/009).</li> <li>• PPE Management (SOP/SMART/HESS-EHSD/SADV/I/010).</li> <li>• First Aid (SOP/SMART/HESS-EHSD/SADV/I/011) .</li> <li>• Health Measurement (SOP/SMART/HESS-EHSD/SADV/I/012).</li> <li>• Fire Extinguisher (SOP/SMART/HESS-EHSD/SADV/I/013).</li> <li>• Hydrant Utilization (SOP/SMART/HESS-EHSD/SADV/I/014).</li> <li>• Safe work permit (SOP/SMART/HESS-EHSD/SADV/I/015).</li> <li>• OHS Measurement and Monitoring (SOP/SMART/HESS-EHSD/SADV/I/016).</li> <li>• OHS Management Review (SOP/SMART/HESS-EHSD/SADV/I/017).</li> </ul> <p>Risk Assessment for all operations regarding health and safety was available within the scope of palm oil mill processes activities and plantation activities. As it was considered the stages of OHS risk control hierarchy, that is elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment).</p> <p>Verified risk assessment record:</p> <ul style="list-style-type: none"> <li>• Belian POM – has defined risk assessment (ISBPPR) year 2022, last review on 10 January 2022 cover processes and activities related to production of CPO, such as: transportation, security, weighbridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, CPO dispatch, firefighting simulation, water treatment, chemical warehouse, medical surveillance, Covid-19, housekeeping, etc.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Belian Estate and Tengawang Estate – has defined risk assessment (ISBPPR) last review on 6 Jan 2022, the document covers processes and activities such as: IPM, fertilizing, spraying, weeding, road maintenance, firefighting simulation harvesting, transportation, warehouse, workshop, infrastructure, polyclinic, etc. It also covered all the risk attached to the products.</li> <li>• Risk assessment of biogas plant has been documented in ISBPR (F/SMART/HESS-EHSD/SADV/002/002) dated 9 Jan 2022 of unit BLNF (Belian Flare) period January – December 2022. Risk assessment includes Biodigester system, Biogas system, Control room system, open fire extinguisher and covid-19 pandemic.</li> <li>• The risk assessment has been communicated to all employee, as evident below:             <ul style="list-style-type: none"> <li>○ Records of dissemination dated 27 Jul 2022, located at Belian Estate, attended by 17 workers. Data verified: Training material, attendance list and photograph.</li> <li>○ Records of dissemination dated 3 Aug 2022, located at Tengakawan Estate, attended by 47 workers. Data verified: Training material, attendance list and photograph.</li> <li>○ Records of dissemination dated 4 – 5 Jul 2022, located at Belian Mill, attended by 36 workers. Data verified: Training material, attendance list and photograph.</li> </ul> </li> </ul>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has prepared OHS plan to address health and safety as per “<i>Program Kerja</i>” updated on 10 January 2022, consisted of:</p> <ul style="list-style-type: none"> <li>• Review on Risk Assessment (ISBPR) -&gt; planned in January 2022</li> <li>• Evaluation of law, legal and others applicable requirement -&gt; planned in July 2022</li> <li>• Safety Induction -&gt; monthly</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• PPE: distribution, monitoring, inspection -&gt; monthly</li> <li>• First Aid: monitoring (monthly), distribution (Mar and Sep)</li> <li>• OHS Program Monitoring (Jan, Jul &amp; Dec)</li> <li>• OHS Meeting -&gt; monthly</li> <li>• MCU (general and special)</li> <li>• Emergency response preparedness</li> <li>• OHS inspection for contractor</li> <li>• OHS Internal Audit</li> <li>• Report of OHS committee (P2K3) -&gt; three monthly basis</li> <li>• Review on OHS management system</li> </ul> <p>The safety committee (P2K3) regular meeting has been performed monthly, discussing regarding OHS plan achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) available dated 4 Nov 2022, among others discussed as follows:</p> <ul style="list-style-type: none"> <li>• Preparation for external audit,</li> <li>• Personal Protective Equipment (PPE),</li> <li>• Safety notes,</li> <li>• Inspection of non-compliance at each department.</li> </ul> <p>The actions implemented were monitored and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, internal audit result and incident investigation.</p> <p>Emergency Response and Preparedness drill has been implemented as per document "<i>Simulasi Tanggap Darurat 2022</i>", conducted on 6 Aug</p>	
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		<p>2022 in Belian POM, attended 16 participants. Dated 21 Jul 2022 conducted by Belian and Tengawang Estate, attended by 49 participants consist of operator, security, supervisor and worker. Attendance list, photograph, scenario and evaluation report were available.</p> <p>On 24 - 26 Jun 2022 conducted training in corporation with PT Karya Prima Cipta, PT Persada Graha Mandiri and stakeholders (surrounding communities) called "<i>Pelatihan Masyarakat Siaga Api Program Desa Makmur Peduli Api</i>", located at BLNE Club House. Stakeholders are coming from Villages of Lemedak, Tua Abang, Na Seberuang, Sekadau and Marseda, Semitau District; villages of Mantan, Manapar, Na Suhaid, Tanjung Harapan, Suhaid District; villages of Sentabai, Perigi, Baru, Penai, Silat Hilir District. On 24 Jun 2022 attended by 49 participants; on 25 Jun 2022 attended by 48 participants; on 26 Jun 2022 attended by 77 participants.</p>	
<p><b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p><b>(C)</b> 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&amp;C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has demonstrated a documented programme that provides training, which covers applicable aspects of RSPO Principles &amp; Criteria. Available training records such as "<i>Matriks Identifikasi Kebutuhan Training 2022</i>" and "<i>Program Pelatihan Tahun 2022</i>". Training program is accessible to all staff, workers and scheme smallholders based on request. Subject of training program identified covers:</p> <ul style="list-style-type: none"> <li>○ Hyperkes for paramedic (Sep 2022)</li> <li>○ Operator (Jun 2022)</li> <li>○ First Aid (Aug 2022)</li> <li>○ HIRADC, ERP, Firefighting simulation, MSDS (Jul 2022)</li> <li>○ Handling of Hazardous and toxic material and waste (Oct 2022)</li> <li>○ Harvesting (Sep 2022)</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>○ Spraying and Fertilizing (Jul 2022)</li> <li>○ Maintenance of Vehicle and heavy equipment (Jun 2022)</li> <li>○ Maintenance of infrastructure (Apr 2022).</li> </ul>	
<p>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Records of training are maintained, both in general basis and individual basis, as examples:</p> <ul style="list-style-type: none"> <li>• Training of Hyperkes, dated 19 – 23 Sep 2022, attended by 6 paramedics. Training was delivered by Bina Okupasi Indonesia. Records verified: Attendance list, photograph and training material.</li> <li>• Dissemination of GAR Social Environment Policy (GSEP) to employees of Belian Estate (BLNE), dated 1 and 8 Apr 2022, attended by 91 workers. Record verified: Attendance list, photograph and training material.</li> <li>• Training and dissemination of work instruction, HIRADC, MSDS and PPE to spraying and fertilizing workers of BLNE, dated 27 Jul 2022, located at Div. 2 BLNE, attended by 17 participants.</li> <li>• Record of training/drill/simulation emergency response and preparedness as per document of "Simulasi Tanggap Darurat 2022", was conducted on 21 Jul 2022, attended 56 participants. Available attendance list, photograph, scenario and evaluation report.</li> <li>• Record of first aid training dated 5 – 12 Oct 2021, attended by 37 participants including from PT Karya Prima Cipta, PT Persada Graha Mandiri.</li> </ul> <p>Records of training for each employee are properly maintained in Training History for each employee. For example: employee named Siti Muawana, Mariana Dewi Karlinda and Ipawati have been participated and completed training on company policies (GSEP) and industrial relationship policy (KHI) on 10 Sep 2022; company vision and mission, ethical code of business and OHS Act on 12 Jul 2022; collective working</p>	<p>Complied</p>



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		agreements on 10 Sep 2022; Work Instruction of pesticide spraying, MSDS and HIRADC on 27 Jul 2022.	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	The training of SCCS has been conducted for SCCS-related workers on 20 May 2022. Based on interview to the workers involved in SCCS operations, such as security (for FFB receiving verification), weighbridge operator (for deviding amount of certified and uncertified sourced), and Administration Head (for recording and monitoring the MB data), known that the workers have understood the SCCS mechanism, and the MB record has conducted and monitored well.	Complied
<p><b>Criteria 3.8:</b> Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as <b>Critical Indicators</b>. 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&amp;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 FFB without physically separating them, then only Mass Balance Module is applicable.</p>	The Mill does not implement IP Module, but MB module.	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can</p>	The Mill physically will receive and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is Mass Balance. Certified FFB will be coming from Belian Estate and Tengawang Estate, while non-certified FFB will be coming from plasma or third-party supplier.	Complied

	claim only the volume of oil palm products produced from processing of the certified FFB as MB.		
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 Mill is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Belian Estate, Tengawang Estate and Non-certified FFB from third party supplier, Extraction rates, Processing capacity, CPO & PK production.  The 12 months estimate of products as follows: <ul style="list-style-type: none"> <li>- FFB 132,696 MT</li> <li>- CPO 31,847 MT</li> <li>- PK 7,962 MT.</li> </ul> The actual tonnage produced will be verified on surveillance assessment.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Belian Mill – PT Paramitra Internusa Pratama is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000003782.	Complied
3.8.5	Documented procedures 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: 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	The company has the SOP of Certified Product Supply Chain – Mass Balance Model (No. PT.PIP-BLNM/SOP/RANTAIPASOK-MB/02 dated 03 August 2020). The procedures established and covering all elements of the supply chain model requirements in the P&C of 2018 such as the announcement in RSPO Palmtrace not later than 3 months after dispatch, receiving and recording that identify the traceability of RSPO certified and uncertified source and products (mass balance record), FFB processing, key persons and job descriptions, internal audit, training, etc.  Moreover, the Mill has procedure related every station operation, including: <ul style="list-style-type: none"> <li>- Grading</li> </ul>	Complied

	<p>to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>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>	<ul style="list-style-type: none"> <li>- Loading Ramp</li> <li>- Weighing Bridge</li> <li>- Sterilization Station</li> <li>- Threshing Station</li> <li>- Pressing Station</li> <li>- Clarification Station</li> <li>- Recycling CPO</li> <li>- Nut and Kernel</li> <li>- Engine Room</li> <li>- Boiler</li> <li>- Water Treatment</li> <li>- Final Effluent</li> <li>- Laboratories, etc.</li> </ul> <p>The persons that have key role in supply chain has been identified in the procedure, including their rules, that are: security, weighbridge clerk, grading supervisor, dispatch operator, lab analyst, production clerk, Mill’s Assistant, Head of Administration Officer as the Traceability Officer, Mill Manager, Production Controller.</p> <p>The initial training of the procedures has been conducted on 20 May 2022.</p> <p>Based on field observation, obtained information that key persons for supply chain implementation (such as weighbridge operators, security, and Head of Administration) have understood the supply chain implementation. The Mill has a system to differentiate FFB from certified and uncertified sources.</p>	
3.8.6	Internal Audit	The company has established, maintained and implemented the documented procedures to conduct annual internal audit as per	Complied

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	<ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;               <ul style="list-style-type: none"> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b) Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>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.</li> </ul>	<p>procedure No. SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the mill conforms to the requirements in the RSPO supply chain standard and RSPO Market Communications and Claims.</p> <p>The recent internal audit of supply chain was conducted on 20 – 25 June 2022 integrated with RSPO internal audit against RSPO P&amp;C. There was one nonconformity related to supply chain during the audit.</p> <p>The outcomes of the internal audits and all actions taken to correct non-conformities subject to annual management review. Latest management review conducted on 25 August 2022. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>The Mill has a mechanism to record goods in such as in the form of FFB Delivery Note and Mass Balance form, that will identify amount and sources of FFB certified and uncertified that received, as well as the certified products (CSPO and CSPK).</p> <p>The implementation of this system will be applied after certified and verified on Surveillance audit.</p> <p>Related for handling non-conforming oil palm products, it has been set in the SOP of Complaints and Grievance Handling (SOP/SMART/SUST/IV/003, Rev.03, dated on 8 March 2022). This procedure is generally applied to all complaints aspects, including complaints and non-conforming products from customers/buyers.</p>	<p>Complied</p>
<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</p>	<p>The Mill has documentation system for sales and goods out such as in the form of contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documents cover information of delivery date, description of product</p>	<p>Complied</p>

	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>and supply chain model, product quantity, identification number (unique code), certificate number, sender name and address of the seller.</p> <p>The implementation of this system will be applied after certified and verified on Surveillance audit.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>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.</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>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.</li> </ul> </li> </ul>	<p>The Mill will outsource its products transportation to the third parties and has contractual agreements.</p> <p>CSPO transporter handled by PT Ponti Sarana Utama (Agreement No. 002/PIP/BLNM/08/2022-PK dated 1 August 2022, valid thru 31 July 2025), while CSPK transportation handled by PT BSA Logistic Indonesia (Agreement No. 001/PIP/BLNM/06/2022-PK dated 21 June 2022, valid thru 20 June 2024).</p> <p>To ensure the contractors complies with the RSPO Supply Chain, there were Pact of Integrity dated 7 October 2022 for these contractors, which include clauses of obligations of the contractor to comply with the supply chain rules. For instance, the responsibility to ensure the purity of certified product delivered during the distribution, as well as the willingness to be observed by Certification Body to verify the compliance. Other than that, the Mill has SOP of Contractor Control</p>	<p>Complied</p>

	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	(No. SOP/SMART/UMUM/SADV/I/006 dated 1 July 2014) to monitor the compliance of contractors.	
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>The Mill has the record of details of the contractors, covers the contractor's company profile, address, contact person, email and phone number, contract agreement and period, and list of vehicles.</p> <p>For instance the contractor of PT Ponti Sarana Utama:</p> <ul style="list-style-type: none"> <li>- Contact person: Andy Setiawan Tai</li> <li>- Address: Jln. Tanjungpura No. 247, Pontianak, West Kalimantan, Indonesia.</li> </ul> <p>PT BSA Logistic Indonesia:</p> <ul style="list-style-type: none"> <li>- Contact person: Thomas Wenas</li> <li>- Address: East Jakarta, Indonesia</li> </ul>	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	This audit is initial certification. The additional contractor (if any) will be verified on surveillance audit.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	The Mill has record keeping system to maintain accurate, complete, and up to date records related RSPO Supply Chain implementation that will be kept at least 2 years in accordance to the Mill's procedure. The records variable cover FFB received from certified and uncertified sources, production of CPO and PK (certified, noncertified, total), products dispatch (as RSPO certified, sold in another certified scheme, sold as noncertified, total products sold), as well as balance/stock of	Complied

	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>certified products. The Mill will balance the certified products and dispatch on a three-monthly basis.</p> <p>The implementation of this system will be applied after certified and verified on Surveillance audit.</p>	
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The conversion rate of production of CSPO (OER) and CSPK (KER) are defined based on previous actual production data. Then the management will update the budget rate for the next license period. The current extraction to defined estimate are:</p> <ul style="list-style-type: none"> <li>- OER 24 %</li> <li>- KER 5 %</li> </ul>	<p>Complied</p>
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Report. It will be updated daily.</p>	<p>Complied</p>

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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>	Not Applicable. The Mill will use Mass Balance Module.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	The company has the SOP of Certified Product Supply Chain – Mass Balance Model (No. PT.PIP-BLNM/SOP/RANTAIPASOK-MB/02 dated 3 August 2020). The procedure covers mechanism for the announcement in RSPO Palmtrace not later than 3 months after dispatch.	Complied
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>	The procedure for claims is stated in SOP of Certified Product Supply Chain – Mass Balance Model (No. PT.PIP-BLNM/SOP/RANTAIPASOK-MB/02 dated 03 August 2020). The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. The Mill will claim it's products with Mass Balance Module.	Complied
<b>General corporate communications</b>			
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>	The company did not conduct corporate communication. Corporate communication is conducted by Golden Agri-Resources (GAR) as RSPO member with membership No. 1-0096- 11-000-00, member since 30 January 2005 on website: <a href="https://goldenagri.com.sg">https://goldenagri.com.sg</a>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>Display its RSPO membership status</li> </ul>	In corporate communication, GAR has display its RSPO membership status, display a link to the RSPO web address, stated that GAR support	Complied



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	<ul style="list-style-type: none"> <li>• Display the RSPO web address (www.rspo.org)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member’s history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <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>	the work of the RSPO and stated GAR’s history with regard to the RSPO. GAR did not use RSPO trademark in the website.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	On the website, GAR did not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	On the website, GAR ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	On the website, GAR does not use the RSPO corporate logo.	Complied
<b>Business to business communications</b>			
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.	The company will make Business to Business communication by stated in sales documents/form, e.g. Sales Contract and Delivery Note that the product will be sold in RSPO Certified CPO or PK model MB.	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.	Supply chain model and RSPO certificate number will be stated on the delivery document, e.g. Delivery Note and weighbridge ticket.	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:	The Mill is not a distributor or wholesaler.	Complied

	<p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
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>The Mill is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Not Applicable
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied

	requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.		
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>• In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>	The mill sold it's product in bulk, there is no product labelling.	Not Applicable
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> </ul>	The mill sold it's product in bulk, there is no product labelling.	Not Applicable

	<ul style="list-style-type: none"> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b>          Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Unit of Certification has corporate policy set on 12 December 2019 in Jakarta which ratified by the Head of Policy and Compliance Division (Mr. Haskarlianus Pasang). The policy relating to human rights, there are 11 statements related to the human right.</p> <p>Particularly related to Human Right Defender (HRD) is describe clearly on point 9, stating that: <i>"Perusahaan menghormati dan melindungi hak-hak pelapor pelanggaran dan pembela hak asasi manusia."</i></p> <p>The company's policy is also published using posters at strategic locations in the plantations (Belian Estate, Tengkawang Estate and Belian Mill). Corporate policy has been socialized/dissemination to all levels of PT PIP employees on 3-4 December 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 5-6 December 2021 which was attended by 18 stakeholders.</p> <p>According to interview with sample of workers during audit, it is declared that policy always disseminated during muster morning. For</p>	<p>Complied</p>

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		stakeholders, dissemination of the policy through email and notice board at village office.	
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. - Minor compliance -	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. This can be proven during stakeholder consultation and sample of workers interviewed.	Complied
<b>Criteria 4.2:</b> 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	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Unit of Certification established procedure “ <i>SOP Penanganan Keluhan dan Ketidakpuasan (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated 11 April 2017)</i> ”. Scope of the procedure covering complaints and dissatisfaction records, classification, communication, planning, resolution, monitoring and reporting of complaint and dissatisfaction handling, including form of any sexual harassment to workers nor children sourced from internal and external parties. This procedure is used for handling of any complaints and dissatisfaction to all affected parties. Within the procedure stated: - Any complaints (direct or indirectly) receives and record in Form F/SMART/GIMS-SCMD/USDV/I/001/001 by social officer or administration head. - Entire data and complaint information can be publicly available or classify to affected parties upon approval by reporter. Unit of certification ensure anonymity of complainants and whistle-blower with aims to reducing retaliation risks. - Complaints and disputes can be delivered by mailbox to Head Office, or by phone through hotline and app or email. - Response shall be made within 14 working days after complaints or disputes receives.	Complied

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		- If complaints and dissatisfaction are submitted verbally (the complainant cannot read or write) or by telephone, the recipient of the report must assist in writing/recording the complaint.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Procedure “ <i>SOP Penanganan Keluhan dan Ketidakpuasan (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated 11 April 2017)</i> ” is in place and accommodate inclusivity for illiterate parties. The procedure describes that the process of delivering and handling complaints and grievances internally and externally. In the SOP also mentioned that the company guarantees the anonymity of the whistle-blower. Head clerk is responsible for record all complaints and grievances that exist both orally and in writing from the external. Responses to the complaint and dissatisfaction is given as soon as possible and not later than 14 working days after the issue received. Based on interviews with management, if there is no solution in the complaint mechanism, can be brought to the RSPO Complaint System.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and dissatisfaction document number: F/SMART/SIGSCSRD/SADV/003/001. According to interviews with sample of workers and communities there are no complaints or dissatisfaction with the company.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The company has set the system to handle complaints and grievances in the SOP of Complaints and Grievance Handling No. SOP/SMART/SUST/IV/003, dated 8 March 2022. The SOP has set that the complaint resolution is address in deliberation in advance. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel. During interview with stakeholders, there was no complaints occurs for the last five years.	Complied
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			

<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>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama gathered the social issue from the local communities through the consultation and reflected on CSR plan period 2021. There are several programs for developing local communities Corporate Social Responsibilities period 2021 in each aspect as follows:</p> <ul style="list-style-type: none"> <li>• Education               <ol style="list-style-type: none"> <li>1. Scholarship for university level. Until this assessment, there are 36 scholarship grantees from local communities and employees' children.</li> <li>2. Apprentice opportunities for junior high school/vocational high school level.</li> <li>3. Involving students in CSR activities when they are on holiday from college.</li> <li>4. Capacity building with the scholarship grantees and their families.</li> <li>5. Supporting surrounding school infrastructure.</li> </ol> </li> <li>• Health               <ol style="list-style-type: none"> <li>1. Conducting integrated healthcare centre for babies and young mother in company's or surrounding clinic.</li> <li>2. Socialization of healthy lifestyles to the surrounding communities.</li> <li>3. Collaborate with Buddha Tzu Chi conducted the cataracts, hernias and cleft lips surgery for employees and surrounding communities.</li> </ol> </li> <li>• Infrastructure               <p>Road maintenance to support communities access for economy, education, health and social issues.</p> </li> <li>• Economy</li> </ul>	<p>Complied</p>
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		<p>Assistance in best management practices for vegetable and horticultural farmers.</p> <ul style="list-style-type: none"> <li>• Social             <ol style="list-style-type: none"> <li>1. Basic community bazaar</li> <li>2. Donation for religious festival</li> <li>3. Donation for diesel oil for electricity and knapsack sprayer for farmers.</li> </ol> </li> <li>• Environment             <ol style="list-style-type: none"> <li>1. Socialization of the Impact of Land Burning on Agricultural Systems and the Environment.</li> <li>2. Integrated Ecological Agricultural Field School</li> <li>3. Integrated Ecological Agriculture Learning Park</li> <li>4. Replication of horticulture and lowland rice cultivation programs</li> </ol> </li> </ul> <p>During this audit, auditor team has verified the record of CSR that was completed during period January – December 2021. For example:</p> <ul style="list-style-type: none"> <li>• Education             <p>Scholarship funds for the new grantees on 31 December 2021.</p> </li> <li>• Health             <p>Integrated healthcare centre for babies and young mother in company's clinic on 31 December 2021.</p> </li> <li>• Infrastructure             <ol style="list-style-type: none"> <li>1. Road maintenance from Nanga Lemedang to highway of Kapuas Hulu on 31 December 2021.</li> <li>2. Donation of material for bridge maintenance in Nanga Seberuang on 31 August 2021.</li> </ol> </li> <li>• Economy</li> </ul>	
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		<ol style="list-style-type: none"> <li>1. Land clearing 5.8 Area for replication of horticulture to increasing community income on 20 January 2021.</li> <li>2. Field training best management practices for horticultural farmers on 25 June 2021 in Tua' Abang Village.</li> <li>3. Field training best management practices for paddy farmers (integrated with vegetables) on 26 June 2021 in Nanga Lemedak Village.</li> </ol> <ul style="list-style-type: none"> <li>• Social             <ol style="list-style-type: none"> <li>1. Basic community bazaar in Nanga Lemedak Village on 6 November 2021, Nanga Seberuang on 6 November 2021 and 12 November 2021.</li> <li>2. Donation for customary festival on 31 December 2021.</li> <li>3. Donation for Independence Day festival Sub District of Semitau on 16 August 2021.</li> </ol> </li> <li>• Environment             <ol style="list-style-type: none"> <li>1. Cleaning hyacinth in Jentu River on 31 December 2021.</li> <li>2. Handover of firefighting jet pump for Nanga Lemedak and Nanga Seberuang Village on 27 August 2021.</li> </ol> </li> </ul>	
<p><b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama demonstrates legal ownership of the land through Hak Guna Usaha/HGU. The HGU comprised of 8 certificates land titles and 3 certificates building rights permit. All equipped with map of "Peta Ganti Rugi PT Paramitra Internusa Pratama periode 2007-2019", Scale 1:100,000. Noreg: RPMNP/22/12/214/055.</p> <p>- Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8)</p>	<p>Complied</p>

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		<p>parcels of land title with total area is <b>13,173.93 Ha</b>. Land title certificate as below:</p> <ol style="list-style-type: none"> <li>1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate)</li> <li>2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate)</li> <li>3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate)</li> <li>4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate)</li> <li>5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate)</li> <li>6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate)</li> <li>7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate)</li> <li>8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate)</li> </ol> <p>- Building Rights (HGB) for Belian POM, covering area <b>15.14 Ha</b> refer to legal documents as below:</p> <ol style="list-style-type: none"> <li>1. Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m<sup>2</sup> (2.44 Ha), land use for POME pond.</li> <li>2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m<sup>2</sup> (6.62 Ha), land use for Mill.</li> </ol>	
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		<p>3. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m<sup>2</sup> (6.08 Ha), land use for Reservoir.</p>	
<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <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>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha in period 2007 - 2019. There was no more compensation process afterward.</p> <p>FPIC procedure od PT. Paramitra Internusa Pratama refers to "SOP Penanganan Pengaduan dan Konflik (SOP/SMART/SUST/IV/003" Rev.3 dated 8 Mar 2022.</p> <p>Scope of the procedure: record of grievance and conflict, levelling, communication, planning, handling, monitoring, and reporting grievance and conflict handling sources from internal and external parties. This procedure is included for sexual harassment handling and violence occurs in unit of certification/company.</p> <p>Receiving of complaint/grievance and conflict handling through suggestion box, telephone/sms, public media, CB, NGO's, email: <a href="mailto:gievance@sinarmas-agri.com">gievance@sinarmas-agri.com</a> and mailing address.</p> <p>Stages:</p> <ul style="list-style-type: none"> <li>- Receiving and Record of Complaint and Conflict (verbal or written, includes illiterate parties and disabilities, protection of anonymity and whistle-blower, HRD).</li> <li>- Levelling of complaint/grievance and conflict. Low: no restriction; High: potential restriction.</li> <li>- Authority and approval of complaint/grievance and conflict management plan. Low: authority is EM/MM, approval is RC/PC; High: authority is RC/PC, approval is COO/VPA/VPM/Deputy CEO/CEO/MDOps/HoU.</li> <li>- Conflict and Grievance Handling. Respond of conflict is max. 14 days, if more than 14 days EM/MM shall provide initial notification.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Monthly report shall made by SPO assistant and filled in Grievance Handling as form No. F/SMART/SUST/IV/003/003.</li> </ul> <p>Unit of certification has demonstrated evidence of land compensation, based on agreement, e.g.:</p> <ul style="list-style-type: none"> <li>- Minutes of handover of land belonging to Riki Darmawan Surya for 1.77 hectares of land located in Tua' Abang Village, Semitau District on 19 December 2014. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>- Minutes of handover of land belonging to Kudim for 3.02 hectares of land located in Tua' Abang Village, Semitau District on 3 August 2017. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>- Minutes of handover of land belonging to Florensus Lilik for 3.78 hectares of land located in Sekedau Village, Semitau District on 11 November 2019. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> </ul>	
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		<p>The land compensation process (<i>Simpak Beliung</i>) is carried out on the basis of a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</p> <p>Unit of certification was able show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> <li>- Are there any plans for you to develop the land that will be handed over to meet food needs?</li> <li>- Do you have enough land to meet your food needs?</li> <li>- Is your land needed for hunting areas, building houses, religious/customary rituals, etc.</li> <li>- Do you feel forced or is someone forcing you to hand over the land?</li> <li>- Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes.</li> </ul>	
	<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>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p>	

		<p>Based on review to land compensation document, verified that hamlet head, traditional leaders, village head are involved in compensation process. This proves that the unit of certification has respected communities to give or withhold their consent to the plantation operations.</p> <p>The land compensation process (<i>Simpak Beliung</i>) is carried out on the basis of a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</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>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>Unit of certification was able to show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> <li>- Are there any plans for you to develop the land that will be handed over to meet food needs?</li> <li>- Do you have enough land to meet your food needs?</li> <li>- Is your land needed for hunting areas, building houses, religious/customary rituals, etc.</li> </ul>	

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		<ul style="list-style-type: none"> <li>- Do you feel forced or is someone forcing you to hand over the land?</li> <li>- Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes.</li> </ul>	
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>PT Paramitra Internusa Pratama obtained the HGU and can demonstrate map of legal ownership of the land through HGU maps:</p> <ul style="list-style-type: none"> <li>- Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8) parcels of land title with total area is <b>13,173.93 Ha</b>. Land title certificate as below:</li> </ul> <ol style="list-style-type: none"> <li>1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate)</li> <li>2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate)</li> <li>3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate)</li> <li>4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate)</li> <li>5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate)</li> <li>6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate)</li> </ol>	<p>Complied</p>

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		<p>7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate)</p> <p>8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate)</p> <p>- Building Rights (HGB) for Belian POM, covering area <b>15.14 Ha</b> refer to legal documents as below:</p> <ol style="list-style-type: none"> <li>1. Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m<sup>2</sup> (2.44 Ha), land use for POME pond.</li> <li>2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m<sup>2</sup> (6.62 Ha), land use for Mill.</li> <li>3. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m<sup>2</sup> (6.08 Ha), land use for Reservoir.</li> </ol>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>All relevant information is available in Bahasa Indonesia, such as minutes of handover, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, and location map.</p> <p>FPIC process is implemented by unit of certification prior developed the plantations.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p>	Complied



		<p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p>	
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>The land compensation process (Simpak Beliung) is carried out on the basis of a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land. Available minutes of the meeting between management and community representatives from Nanga Seberuang Village, Temenggung Semitau, Patih Nanga Seberuang, Patih Lemedak, Patih Tua' Abang, Patih Sekedau on 28 April 2022, discussed regarding CSR program for the communities.</p>	Complied

**Criteria 4.5:** No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

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<p>4.5.1</p>	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.          - Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>PT Paramitra Internusa Pratama obtained the HGU and can demonstrate map of legal ownership of the land through HGU maps:</p> <ul style="list-style-type: none"> <li>- Land Title (HGU): "Keputusan Menteri Agraria dan Tata Ruang/BPN Nomor: 35/HGU/KEM-ATR/BPN/2015", dated 7 May 2015 regarding Land Title of PT Paramitra Internusa Pratama. There are eight (8) parcels of land title with total area is <b>13,173.93 Ha</b>. Land title certificate as below:</li> </ul> <ol style="list-style-type: none"> <li>1. Land certificate No. 00039, issued 26 June 2015, validity 7 May 2050. Hectarage: 362.26 Ha (Tengkawang Estate)</li> <li>2. Land certificate No. 00040, issued 26 June 2015, validity 7 May 2050. Hectarage: 222.46 Ha (Tengkawang Estate)</li> <li>3. Land certificate No. 00041, issued 26 June 2015, validity 7 May 2050. Hectarage: 3,192.09 Ha (Tengkawang Estate and Belian Estate)</li> <li>4. Land certificate No. 00042, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,289.74 Ha (Tengkawang Estate and Belian Estate)</li> <li>5. Land certificate No. 00043, issued 26 June 2015, validity 7 May 2050. Hectarage: 2.54 Ha (Tengkawang Estate)</li> <li>6. Land certificate No. 00044, issued 26 June 2015, validity 7 May 2050. Hectarage: 1.50 Ha (Tengkawang Estate)</li> <li>7. Land certificate No. 00045, issued 26 June 2015, validity 7 May 2050. Hectarage: 4,995.26 Ha (Tengkawang Estate and Belian Estate)</li> <li>8. Land certificate No. 00046, issued 26 June 2015, validity 7 May 2050. Hectarage: 2,108.08 Ha (Tengkawang Estate)</li> </ol>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>- Building Rights (HGB) for Belian POM, covering area <b>15.14 Ha</b> refer to legal documents as below:             <ol style="list-style-type: none"> <li>1. Certificate HGB No. 00002, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 24,406 m<sup>2</sup> (2.44 Ha), land use for POME pond.</li> <li>2. Certificate HGB No. 00003, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 66,189 m<sup>2</sup> (6.62 Ha), land use for Mill.</li> <li>3. Certificate HGB No. 00004, issued 9 Jun 2015. Expiry date: 27 May 2045. Area: 60,845 m<sup>2</sup> (6.08 Ha), land use for Reservoir.</li> </ol> </li> </ul> <p>Available pre-inventory report, measurement report, and location map as evidence that assessment was conducted to identify the legal, customary and user rights prior to land compensation process.</p>	
4.5.2	<p><b>(C)</b> 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> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themself or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>FPIC process is implemented by unit of certification prior developed the plantations.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p>	Complied

	<p>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.</p> <p>- Minor compliance -</p>	<p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>FPIC process is implemented by unit of certification prior developed the plantations.</p> <p>Unit of certification was able show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> <li>- Are there any plans for you to develop the land that will be handed over to meet food needs?</li> <li>- Do you have enough land to meet your food needs?</li> <li>- Is your land needed for hunting areas, building houses, religious/customary rituals, etc.</li> <li>- Do you feel forced or is someone forcing you to hand over the land?</li> <li>- Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes.</li> </ul> <p>Verified that landowners have given awareness that they have the right to say 'agree' or 'not agree' to operations planned on their lands.</p>	
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p>	Complied

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		<p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>The company uses questionnaires to ensure local food and water security for the communities. Unit of certification was able to show a questionnaire, signed by each landowner and the company representative. The question asked such as:</p> <ul style="list-style-type: none"> <li>- Are there any plans for you to develop the land that will be handed over to meet food needs?</li> <li>- Do you have enough land to meet your food needs?</li> <li>- Is your land needed for hunting areas, building houses, religious/customary rituals, etc.</li> <li>- Do you feel forced or is someone forcing you to hand over the land?</li> <li>- Landowners have the freedom to give or not give consent to compensation for their land for development purposes or conservation purposes.</li> </ul> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p>	
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p>	Complied

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		<p>Communication and consent record are available in land compensation record, such as minutes of handover, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, and location map. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p>	Complied
4.5.7	<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>- Minor compliance -</p>	<p>Unit of certification is existing since 2015. There is no expansion area for plantations until this assessment conducted. However, some area within plantation is still not develop where that area owned by local communities. Unit of certification does not force to the landowner to release their land. This area is categorized as preserved land.</p>	Complied

		<p>Interview with sampled previous landowner informed that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p> <p>SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.</p>	
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new lands or expansion area within unit of certification. Some area with status reserves area (categorised as inherited land) are isolated from palm crops and not develop by the certificate holder. Communities are lived outside the plantations managed area boundary.</p>	Complied
<p><b>Criteria 4.6:</b> 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	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama is subsidiary of RSPO member Golden Agri Resources (GAR). All procedures are developed by group and applicable to its subsidiaries. Procedure for identifying legal, customary or user rights, identifying entitled to compensation, calculating and distributing fair and gender-equal compensation are covers within "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 Jul 2010)".</p> <p>Procedure for identifying land as follow:</p> <ol style="list-style-type: none"> <li>1. Identifying legal: determined by government in form of permit (location permit).</li> <li>2. Identifying customary or user right: conducted during pre-inventory land (company, village and district team).</li> </ol>	Complied

		<p>3. Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company.</p> <p>The procedure is in place and due to the unit of certification have no expansion area and or land compensation.</p> <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward. Based on document review and interview with previous landowner, land compensation process has followed the "SOP Ganti Rugi Tanah/Lahan" (SOP/NP/SMART/VII/D&amp;L002).</p>	
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Within "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 Jul 2010)", procedure for calculating and distributing fair compensation conducted in participatory way, as follow:</p> <ol style="list-style-type: none"> <li>1. After Location Permit obtained from relevant authority, the Team (representative of company, villages and sub-district) conduct dissemination to communities.</li> <li>2. The Team (representative of company, villages and sub-district) conducting pre-inventory against the land.</li> <li>3. Field verification of land is carried out by landowners, local government, boundary markers, adjacent landowner, sub-district officials and the company team.</li> <li>4. Participatory mapping of ground verification shall be signed by the company and local government official.</li> <li>5. Consultation and coordination to determine price agreements with the village team, sub-district team, regency team (if needed) and company team.</li> </ol>	Complied



		<ol style="list-style-type: none"> <li>6. After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company.</li> <li>7. The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company.</li> <li>8. Application for compensation with complete requirements, submitted to the company. Then verified by the company team.</li> <li>9. If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</li> </ol> <p>PT Paramitra Internusa Pratama has completed the land compensation process of total 6,519.21 Ha (1,496 landowner) in period 2007 - 2019. There was no more compensation process afterward.</p>	
4.6.3	<p>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).</p> <p>- Minor compliance -</p>	<p>Unit of certification start the cultivation process since 2008. The land acquisition/compensation has been held before that time. Based on interview with customary leader and village leader obtain information that all level of community including women involved during land acquisition process.</p> <p>The land compensation process (local name: Simpak Beliung) is carried out based on a collective agreement from village residents, community leaders and traditional leaders after an 80:20 agreement with the company. This means that 20% of the land area handed over by residents will be developed into plasma plantations for the people who own the land.</p>	Complied

<p>4.6.4</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Unit of certification is existing plantations since 2008 where land acquisition process starting from 2006 – 2020.</p> <p>Sample of land acquisition process can be seen below:</p> <ul style="list-style-type: none"> <li>• Minutes of handover of land on behalf of Riki Darmawan Surya for 1.77 hectares of land located in Tua' Abang Village, Semitau District on 19 December 2014. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>• Minutes of Kudim's handover of 3.02 hectares of land located in Tua' Abang Village, Semitau District on 3 August 2017. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>• Minutes of the handover of Paulus Sarman's 1.14 Ha land located in Tua' Abang Village, Semitau District on 9 August 2019. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>• Minutes of the handover of Agus Awi's land area of 13.54 hectares located in Tua' Abang Village, Semitau District on December 19,</li> </ul>	<p>Complied</p>
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		<p>2014. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</p> <ul style="list-style-type: none"> <li>• Minutes of Yanti's handover of 2.26 hectares of land located in Tua' Abang Village, Semitau District on June 20, 2015. The document was signed by the hamlet head, traditional leaders, village head and Semitau subdistrict head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>• Minutes of the handover of Rangga Warsito's 5.18 Ha land located in Nanga Lemedak Village, Semitau District on June 28, 2016. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> <li>• Minutes of the handover of Yohanes Ramai's 5.67 Ha land located in Nanga Lemedak Village, Semitau District on April 18, 2015. The document was signed by the hamlet head, traditional leaders, village head and Semitau subdistrict head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> </ul>	
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		<ul style="list-style-type: none"> <li>Minutes of handover of land on behalf of Kristian Cangan for 5.52 hectares of land located in Nanga Seberuang Village, Semitau District on February 8, 2020. The document was signed by the hamlet head, traditional leaders, village head and Semitau sub-district head. Supporting documents, statement of ownership, statement of no dispute, certificate of domicile and owner of the farm/former farm, statement of release of land control, pre-inventory report, measurement report, payment receipt, location map submitted, relevant ID.</li> </ul>	
<p><b>Criteria 4.7:</b> 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.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.          - Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has had the land acquisition proessedur through the document “<i>SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 July 2010)</i>”, procedure for calculating and distributing fair compensation conducted in participatory way, as follow:</p> <ol style="list-style-type: none"> <li>1. After Location Permit obtained from relevant authority, the Team (representative of company, villages and sub-district) conduct dissemination to communities.</li> <li>2. The team (representative of company, villages and sub-district) conducting pre-inventory against the land.</li> <li>3. Field verification of land is carried out by landowners, local government, boundary markers, adjacent landowner, sub-district officials and the company team.</li> <li>4. Participatory mapping of ground verification shall be signed by the company and local government official.</li> <li>5. Consultation and coordination to determine price agreements with the village team, sub-district team, regency team (if needed) and company team.</li> </ol>	Complied

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		<ol style="list-style-type: none"> <li>6. After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company.</li> <li>7. The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company.</li> <li>8. Application for compensation with complete requirements, submitted to the company. Then verified by the company team.</li> <li>9. If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</li> </ol> <p>Procedure for identifying land as follow:</p> <ol style="list-style-type: none"> <li>1. Identifying legal: determined by government in form of permit (location permit).</li> <li>2. Identifying customary or user right: conducted during pre-inventory land (company, village and district team).</li> <li>3. Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company.</li> </ol> <p>The last compensation was done in 2019. There is no new expansion area and or land compensation after that.</p>	
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>In accordance to "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 July 2010)"</p> <ol style="list-style-type: none"> <li>1. <i>After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company.</i></li> </ol>	Complied

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		<ol style="list-style-type: none"> <li>2. <i>The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company.</i></li> <li>3. <i>Application for compensation with complete requirements, submitted to the company. Then verified by the company team.</i></li> <li>4. <i>If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</i></li> </ol> <p>Based on interview with previous landowner, village representatives and customary leader obtained information that the land acquisition based on collective agreement from whole villagers with agreed price.</p>	
<p>4.7.3</p>	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on interview with previous landowner, village representatives and customary leader obtained information that the land compensation process (Simpak Beliang) was carried out based on the collective agreement with an 80:20 agreement with the company. This means that 20% of the land area handed over by the residents will be developed into a plasma plantation for the community that owns the land.</p> <p>At present, the community has become the owner of the plasma land which is managed under a full managed by the company scheme whereby the development of the plantation is in accordance with the farmer's credit agreement with the bank. The distribution of sharing profit is carried out every month directly to the farmers who own the land after deducting credit, operational costs (maintenance and harvest) and management fees.</p> <p>The communities feel the positive impact of the company's business/operational activities. This is due to better access to</p>	<p>Complied</p>

		transportation, access to employment and business opportunities, access to better education, health and community empowerment.	
<b>Criteria 4.8:</b> 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 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. - Minor compliance -	Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision. SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations. Based on stakeholder interview and document review, there are no disputes regarding land or legal in the area of PT Paramitra Internusa Pratama.	Complied
4.8.2	<b>(C)</b> 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. - Critical (Major) compliance -	Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision. SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations. Based on stakeholder interview and document review, there is no land conflict in the area of PT Paramitra Internusa Pratama.	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).	Interview with sampled previous landowner informed that they could decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are	Complied

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	- Minor compliance -	several landowners whose never release their land parcel and company respect the decision. SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations.	
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). - Minor compliance -	Interview with sampled previous landowner informed that they can decide to do the negotiation themself or be represented. There was no coercive or use of force by company in processing the compensation. Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision. SEIA participation and FPIC process is implemented by unit of certification prior developed the plantations. Based on stakeholder interview and document review, there are no conflict or disputes regarding land in the area of PT Paramitra Internusa Pratama.	Complied
<p><b>Principle 5: Support smallholder inclusion</b>          Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1:</b> 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. - Minor compliance -	FFB Price Mechanism in Kalimantan Barat refer to Provincial Decree "Peraturan Gubernur Kalimantan Barat No. 86 Tahun 2022 tentang Petunjuk Pelaksanaan Penetapan Indeks K dan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun Kalimantan Barat" – Governor regulation on determining FFB purchase price (stipulated on 10 November 2022). Based on that information above and interview with the community leader who also the smallholder’s members, FFB prices that determined by the company to the smallholders cooperative Kopsa Mitra Puyang	Complied



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		<p>Gana. Record of FFB price during January – November 2022 is in place and can be accessed by the smallholders. For example: Year 2022</p> <table border="1" data-bbox="1133 475 1908 1034"> <thead> <tr> <th rowspan="2">Month</th> <th rowspan="2">Oil Palm Age</th> <th colspan="2">FFB price/kg</th> </tr> <tr> <th>1<sup>st</sup> period (0 – 15)</th> <th>2<sup>nd</sup> period (16 – 30/31)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>10-20 years</td> <td>Rp. 3,022.98</td> <td>Rp. 3,304.81</td> </tr> <tr> <td>Feb</td> <td>10-20 years</td> <td>Rp. 3,423.30</td> <td>Rp. 3,450.67</td> </tr> <tr> <td>Mar</td> <td>10-20 years</td> <td>Rp. 3,698.63</td> <td>Rp. 4,041.54</td> </tr> <tr> <td>Apr</td> <td>10-20 years</td> <td>Rp. 3,780.59</td> <td>Rp. 3,825.03</td> </tr> <tr> <td>May</td> <td>10-20 years</td> <td>Rp. 3,628.78</td> <td>Rp. 2,941.02</td> </tr> <tr> <td>Jun</td> <td>10-20 years</td> <td>Rp. 2,733.68</td> <td>Rp. 2,523.82</td> </tr> <tr> <td>Aug</td> <td>10-20 years</td> <td>Rp. 1,782.22</td> <td>Rp. 1,578.47</td> </tr> <tr> <td>Sep</td> <td>10-20 years</td> <td>Rp. 1,841.55</td> <td>Rp. 2,128.52</td> </tr> <tr> <td>Oct</td> <td>10-20 years</td> <td>Rp. 2,357.55</td> <td>Rp. 2,533.14</td> </tr> <tr> <td>Nov</td> <td>10-20 years</td> <td>Rp. 2,517.26</td> <td>Rp. 2,512.64</td> </tr> </tbody> </table>	Month	Oil Palm Age	FFB price/kg		1 <sup>st</sup> period (0 – 15)	2 <sup>nd</sup> period (16 – 30/31)	Jan	10-20 years	Rp. 3,022.98	Rp. 3,304.81	Feb	10-20 years	Rp. 3,423.30	Rp. 3,450.67	Mar	10-20 years	Rp. 3,698.63	Rp. 4,041.54	Apr	10-20 years	Rp. 3,780.59	Rp. 3,825.03	May	10-20 years	Rp. 3,628.78	Rp. 2,941.02	Jun	10-20 years	Rp. 2,733.68	Rp. 2,523.82	Aug	10-20 years	Rp. 1,782.22	Rp. 1,578.47	Sep	10-20 years	Rp. 1,841.55	Rp. 2,128.52	Oct	10-20 years	Rp. 2,357.55	Rp. 2,533.14	Nov	10-20 years	Rp. 2,517.26	Rp. 2,512.64	
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5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -</p>	<p>The FFB prices issued by the Provincial Government through the Plantation Agency on bimonthly bases. 1<sup>st</sup> date period is on date 1 – 15 and 2<sup>nd</sup> date is on 16 – 30/31 every month. Based on interview with the community leader who also the smallholder’s members, auditor team noted that the FFB prices informed by management of PT PIP. However, the FFB price can also accessed by the smallholders through the plantation agency staff directly every week.</p>	Complied																																														
5.1.3	<p><b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p>	<p>FFB Price Mechanism in Kalimantan Barat refer to Provincial Decree “Peraturan Gubernur Kalimantan Barat No. 86 Tahun 2022 tentang</p>	Complied																																														

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	<p>- Critical (Major) compliance -</p>	<p>Petunjuk Pelaksanaan Penetapan Indeks K dan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun Kalimantan Barat” – Governor regulation on determining FFB purchase price (stipulated on 10 November 2022).</p> <p>Based on that information above and interview with the community leader who also the smallholder’s members, FFB prices that determined by the company to the smallholders cooperative Kopsa Mitra Puyang Gana. Record of FFB price during January – November 2022 is in place and can be accessed by the smallholders.</p>	
<p>5.1.4</p>	<p><b>(C)</b> 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 repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>FFB Price Mechanism in Kalimantan Barat refer to Provincial Decree “Peraturan Gubernur Kalimantan Barat No. 86 Tahun 2022 tentang Petunjuk Pelaksanaan Penetapan Indeks K dan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun Kalimantan Barat” – Governor regulation on determining FFB purchase price (stipulated on 10 November 2022).</p> <p>Agreement between Belian Mill and FFB supplier are described in Contractual Agreement. FFB purchasing agreements were established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement document.</p> <p>Based on that information above and interview with the community leader who also the smallholder’s members, FFB prices that determined by the company to the smallholders cooperative Kopsa Mitra Puyang Gana. Record of FFB price during January – November 2022 is in place and can be accessed by the smallholders.</p>	<p>Complied</p>
<p>5.1.5</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama had several contracts with local contractor. For example, sighted contract with Lim Mardy (Work Order No. 053/BLNE/SPKL/12/2021) dated 21 December 2021 for installation</p>	<p>Complied</p>

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		<p>box culvert. The minutes of job inspection dated 10 March 2022 and payment requests on 16 March 2022 has been verified by auditor. Payment evidence has been shown through transfer slip via Bank Sinarmas - Sintang Branch on 12 April 2022.</p> <p>Belian Mill received FFB from scheme smallholders, such as the Cooperative Kopsa Mitra Puyang Gana (Belian Plasma). The smallholder is fully operated by the company. FFB legality, requirement, price and payment method including loans and re-payments through FFB price reductions for land clearing, planting, upkeep, harvesting and others are stated in MoU between the company and the cooperative.</p>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Belian Mill only received FFB from registered smallholder which is Cooperative Kopsa Mitra Puyang Gana (Belian Plasma). Payment evidence can be seen from the data below:</p> <ul style="list-style-type: none"> <li>• Evidence of FFB receiving in period 1 – 31 October 2023 that signed by Chairman of cooperative Kopsa Mitra Puyang Gana on 31 October 2022.</li> <li>• Invoice No. 001/INV/BLNA/20/22 dated 31 October 2022 for FFB payment period of October 2022.</li> <li>• Payment instruction from Estate Manager and Regional Controller on 21 November 2022 referring to Invoice No. 001/INV/BLNA/20/22 dated 31 October 2022 for FFB payment period of October 2022.</li> <li>• Transfers evidence from Bank Sinarmas to bank account of cooperative Kopsa Mitra Puyang Gana on 8 December 2022 refer to payment instruction above.</li> </ul>	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>The Mill's weighbridge has been callibrated annually. The latest calibration conducted on 20 April 2022 by Industrial Agency of Sintang Regency, based on Certificate of Calibration No. 510.3/054/SKHP-MLSTG/04/2022.</p>	Complied

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5.1.8	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama provides information related to RSPO certification to the third party FFB suppliers. PT Paramitra Internusa Pratama prepared Competence identification matrix for FFB suppliers, related to OHS policy, social and environmental policy, RSPO-SCCS-ISPO-ISCC certification, legality – dated 8 January 2020.</p> <p>PT Paramitra Internusa Pratama provided some training for smallholders under member of Kopsa Mitra Puyang Gana. For example, training related to land burning prevention and dissemination of GAR Sustainability Policy to the villager of Tua Abang on 9 November 2021. Attended by 52 participants.</p> <p>Until this audit, Kopsa Mitra Puyang Gana still exclude from the RSPO certification scope. Based on interview with top management at unit, the auditor team noted that certification process for smallholders are still proceed.</p>	Complied
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama refers to "SOP Penanganan Keluhan dan Ketidakpuasan No.SOP/SMART/GIMS-SCMD/USDV/I/001 rev.2" dated 1 July 2017.</p> <p>Based on interview with communities, so far, no complaint or grievance to PT Paramitra Internusa Pratama related to FFB sales.</p>	Complied
<b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama gathered the social issue from the local communities through the consultation and reflected on CSR plan period 2021. There are several programs for developing local communities Corporate Social Responsibilities period 2021 in each aspect as follows:</p> <ul style="list-style-type: none"> <li>• Education             <ol style="list-style-type: none"> <li>1. Scholarship for university level. Until this assessment, there are 36 scholarship grantees from local communities and employees children.</li> </ol> </li> </ul>	Complied

		<ul style="list-style-type: none"> <li>2. Apprentice opportunities for junior high school/vocational high school level.</li> <li>3. Involving students in CSR activities when they are on holiday from college.</li> <li>4. Capacity building with the scholarship grantees and their families.</li> <li>5. Supporting surrounding school infrastructure.</li> <li>• Health             <ul style="list-style-type: none"> <li>1. Conducting integrated healthcare centre for babies and young mother in company's or surrounding clinic.</li> <li>2. Socialization of healthy lifestyles to the surrounding communities.</li> <li>3. Collaborate with Buddha Tzu Chi conducted the cataracts, hernias and cleft lips surgery for employees and surrounding communities.</li> </ul> </li> <li>• Infrastructure             <ul style="list-style-type: none"> <li>Road maintenance to support communities access for economy, education, health and social issues.</li> </ul> </li> <li>• Economy             <ul style="list-style-type: none"> <li>Assistance in best management practices for vegetable and horticultural farmers.</li> </ul> </li> <li>• Social             <ul style="list-style-type: none"> <li>1. Basic community bazaar</li> <li>2. Donation for religious festival</li> <li>3. Donation for diesel oil for electricity and knapsack sprayer for farmers.</li> </ul> </li> <li>• Environment</li> </ul>	
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		<ol style="list-style-type: none"> <li>1. Socialization of the Impact of Land Burning on Agricultural Systems and the Environment.</li> <li>2. Integrated Ecological Agricultural Field School</li> <li>3. Integrated Ecological Agriculture Learning Park</li> <li>4. Replication of horticulture and lowland rice cultivation programs</li> </ol> <p>During this audit, auditor team has verified the record of CSR that has been done during period January – December 2021. For example:</p> <ul style="list-style-type: none"> <li>• Education Scholarship funds for the new grantees on 31 December 2021.</li> <li>• Health Integrated healthcare centre for babies and young mother in company's clinic on 31 December 2021.</li> <li>• Infrastructure             <ol style="list-style-type: none"> <li>1. Road maintenance from Nanga Lemedang to highway of Kapuas Hulu on 31 December 2021.</li> <li>2. Donation of material for bridge maintenance in Nanga Seberuang on 31 August 2021.</li> </ol> </li> <li>• Economy             <ol style="list-style-type: none"> <li>1. Land clearing 5.8 Area for replication of horticulture to increasing community income on 20 January 2021.</li> <li>2. Field training best management practices for horticultural farmers on 25 June 2021 in Tua' Abang Village.</li> <li>3. Field training best management practices for paddy farmers (integrated with vegetables) on 26 June 2021 in Nanga Lemedak Village.</li> </ol> </li> <li>• Social</li> </ul>	
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		<ol style="list-style-type: none"> <li>1. Basic community bazaar in Nanga Lemedak Village on 6 November 2021, Nanga Seberuang on 6 November 2021 and 12 November 2021.</li> <li>2. Donation for customary festival on 31 December 2021.</li> <li>3. Donation for Independence Day festival Sub District of Semitau on 16 August 2021.</li> </ol> <ul style="list-style-type: none"> <li>• Environment             <ol style="list-style-type: none"> <li>1. Cleaning hyacinth in Jentu River on 31 December 2021.</li> <li>2. Handover of firefighting jet pump for Nanga Lemedak and Nanga Seberuang Village on 27 August 2021.</li> </ol> </li> </ul>	
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>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama fully managed the smallholders block under single management namely Belian Plasma. The smallholders only managed the financial aspect where the company has responsibility to manage operational activity starting from land clearing, upkeep until harvesting. However, the company also provided best management practices training (specifically on pesticide handling) and financial management to the board of cooperative Kopsa Mitra Puyang Gana. Sighted the record of training on 3 August 2022 that attended by 17 participants.</p>	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>All smallholders block under Belian Plasma who fully managed by the company has the land title from the government c.q National Land Department since 2008. It means, all FFB comes from the smallholders are legal.</p>	Complied
5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama implementing full managed in scheme smallholder, all operation activities are conducted by the company. However, the company provide training of GSEP (GAR Social and Environment Policy) to the surrounding communities including scheme smallholder, e.g. on 15 Feb 2022 located at Pancasila Building of</p>	Complied

		Semtau District, attended by 37 participants. Subject of pesticide handling are including in environment management.							
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Available report of smallholder development progress of PT Paramitra Internusa Pratama period July to September 2022 No.029/PIP-PTK/DL7/X/2022 dated 7 Oct 2022, reported to Food and Agriculture Services of Kapuas Hulu Regency. Smallholder development progress reported mature area is 1,685.16 Ha and immature area is 112.97 Ha.	Complied						
<p><b>Principle 6: respect workers' rights and conditions</b>          Protect workers' rights and ensure safe and decent working conditions.</p>									
<p><b>Criteria 6.1:</b> Any form of discrimination is prohibited.</p>									
6.1.1	<p><b>(C)</b> 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. - Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has established the policies on non-discrimination and equal opportunity as per document "<i>Kebijakan Hubungan Industrial – Perlindungan Pekerja /Buruh dari Diskriminasi</i>" (KHI-SMART/011-00), means Industrial Relations Policy – Protection of Workers/Labour from Discrimination". The policy explained that the company is implementing harmonious industrial relations, dynamic and fair.</p> <p>Dissemination of company policies to all related workers, example on 23 May 2022 – located at each Division of Bukit Perak Estate, e.g. at Division 1 attended by 48 workers, at Division 2 attended by 47 workers and at Division 3 and 6 attended by 43 workers.</p> <p>Available employee list updated June 2022 demonstrated that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin or gender:</p> <p>For example, below is summary of 654 employee list of Tengkwang Estate:</p> <table border="1" data-bbox="1131 1340 1769 1372"> <thead> <tr> <th>No</th> <th>Origin/ethnic</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Origin/ethnic	Amount				Complied
No	Origin/ethnic	Amount							



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1	Bugis	1
2	Banten	55
3	Batak	1
4	Dayak	281
5	Flores	26
6	Jawa	249
7	Lampung	4
8	Melayu	15
9	Sunda	19
10	Sumbawa	1
11	Lombok	2
<b>No Local / Non-local Amount</b>		
1	Local	296
2	Non-local	358
<b>No Gender Amount</b>		
1	Male	376
2	Female	278
<b>No Religion Amount</b>		
1	Islam	358
2	Christian	268
3	Catholic	28

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<p>6.1.2</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The employee’s demography in PT Paramitra Internusa Pratama proven the nondiscrimination as evidence that all workers came from different backgrounds (race, ethnic, origin, religion, gender). For example, the demography of Tengkawang Estate as below:</p> <table border="1" data-bbox="1137 507 1771 874"> <thead> <tr> <th>No</th> <th>Origin/ethnic</th> <th>Amount</th> </tr> </thead> <tbody> <tr><td>1</td><td>Bugis</td><td>1</td></tr> <tr><td>2</td><td>Banten</td><td>55</td></tr> <tr><td>3</td><td>Batak</td><td>1</td></tr> <tr><td>4</td><td>Dayak</td><td>281</td></tr> <tr><td>5</td><td>Flores</td><td>26</td></tr> <tr><td>6</td><td>Jawa</td><td>249</td></tr> <tr><td>7</td><td>Lampung</td><td>4</td></tr> <tr><td>8</td><td>Melayu</td><td>15</td></tr> <tr><td>9</td><td>Sunda</td><td>19</td></tr> <tr><td>10</td><td>Sumbawa</td><td>1</td></tr> <tr><td>11</td><td>Lombok</td><td>2</td></tr> </tbody> </table> <table border="1" data-bbox="1137 906 1771 995"> <thead> <tr> <th>No</th> <th>Local / Non-local</th> <th>Amount</th> </tr> </thead> <tbody> <tr><td>1</td><td>Local</td><td>296</td></tr> <tr><td>2</td><td>Non-local</td><td>358</td></tr> </tbody> </table> <table border="1" data-bbox="1137 1027 1771 1117"> <thead> <tr> <th>No</th> <th>Gender</th> <th>Amount</th> </tr> </thead> <tbody> <tr><td>1</td><td>Male</td><td>376</td></tr> <tr><td>2</td><td>Female</td><td>278</td></tr> </tbody> </table> <table border="1" data-bbox="1137 1149 1771 1270"> <thead> <tr> <th>No</th> <th>Religion</th> <th>Amount</th> </tr> </thead> <tbody> <tr><td>1</td><td>Islam</td><td>358</td></tr> <tr><td>2</td><td>Christian</td><td>268</td></tr> <tr><td>3</td><td>Catholic</td><td>28</td></tr> </tbody> </table>	No	Origin/ethnic	Amount	1	Bugis	1	2	Banten	55	3	Batak	1	4	Dayak	281	5	Flores	26	6	Jawa	249	7	Lampung	4	8	Melayu	15	9	Sunda	19	10	Sumbawa	1	11	Lombok	2	No	Local / Non-local	Amount	1	Local	296	2	Non-local	358	No	Gender	Amount	1	Male	376	2	Female	278	No	Religion	Amount	1	Islam	358	2	Christian	268	3	Catholic	28	<p>Complied</p>
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<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>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has defined the procedure related to new employment recruitment.</p> <ul style="list-style-type: none"> <li>- Recruitment: according to "<i>SOP Rekrutmen dan Seleksi Karyawan</i>" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications.</li> <li>- Promotion: according to "<i>SOP Promosi dan Mutasi</i>" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade.</li> <li>- Retirement and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination.</li> </ul> <p>Implementation records on employment procedures are available during this initial certification audit, such as:</p> <ul style="list-style-type: none"> <li>• Recruitment: <ul style="list-style-type: none"> <li>○ Man power request by company doctor to Estate Manager Tengkawang Estate No.009/BLNE-Klinik/VI/2022 dated 10 Jun 2022, position: midwife.</li> <li>○ Application letter of Ms. Hety Karmila (midwife), dated 16 Apr 2022. Attachment: ID card, medical test result, Curriculum vitae, SKCK, midwife registration, certificate, transcript, and other related document.</li> <li>○ Record of test and interview dated 17 Apr 2022. Result: Good.</li> <li>○ Letter from EM Tengkawang Estate to RC Semitau No.065/TNKE/PT/07/2022, dated 1 Jul 2022, regarding approval request of employee PT 2 (permanent employee), for Hety Karmila.</li> </ul> </li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>○ Employment Letter No.033/SK-PT2/TNKE/VII/2022, dated 1 Jul 2022, for permanent worker on behalf Hety Karmila, with three months of probation (1 Jul 200 to 30 Sep 2022).</li> </ul> <p>Available job vacancy information of Tengkwang Estate dated 8 May 2021 for 4 harvester, 1 grader operator and 1 tractor operator. Job requirements are fair, no discrimination identified. Available letter from Estate Manager of Tengkwang Estate dated 21 Jul 2021 regarding notification to Sakedau Village residents for harvester labor vacancies.</p> <p>Based on interview to the mill and estate workers including boiler and engine operators, harvester, spraying and fertilizer applicator, confirmed that recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. No payment is made by the candidate during recruitment. No discrimination performed by the unit of certification during recruitment and employment.</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>- Minor compliance -</p>	<p>Pregnancy test is only conducted to check whether female worker, especially spraying and manuring worker, pregnant or not. It is not conducted as discriminatory measure. Pregnant workers can still work in alternative type of work that does not contain chemical material or jobs that require heavy loads. In case of female worker's pregnancy test is positive, then she will be rotated to other types of work for temporary. During 2022 there is no spraying or fertilizing employees who was pregnant, then no work transfer implemented due to pregnancy.</p> <p>Pregnancy monitoring is performed using monitoring of H1 (menstruation) leave, if no H1 leave requested by workers then test pack will be implemented by company clinic.</p> <p>Based on interview with spraying and manuring workers in Belian Estate and Tengkwang Estate, confirmed that there is no pregnant or breastfeeding worker who works as spraying or fertilizer applicator.</p>	Complied

6.1.5	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Unit of certification has formed Gender Committee. Each estate and mill have appointed representative for gender committee, specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committee consider matters such as: dissemination on women’s rights, child-care facilities to be provided by the organization, female workers to be allowed to breastfeed up to nine months before resuming chemical spraying or manuring, and to be given specific break times to enable effective breastfeeding. Organization has also set several signboards about breastfeed up to nine months before resuming chemical spraying or manuring.</p> <p>Based on interview with workers and stakeholders during this initial certification audit, they all understood that sexual and all other form of harassment and violence is prohibited. Verified that female worker already understood who to report if there is any harassment or if there are issues related to reproductive rights.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on verification of salary documents for period October and November 2022 at Belian Estate, Tengkwang Estate and Belian Mill, shows that workers at the same level and year of work, get same basic salary, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree.</p>	Complied
<p><b>Criteria 6.2:</b> 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	<p><b>(C)</b> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established work agreement for permanent employees through Collective Labor Agreement (<i>PKB-Perjanjian Kerja Bersama</i>) valid for 2 years (13/10/2021 – 13/10/2023). The Collective Labor Agreement (PKB) period 2021 – 2023 has been registered in</p>	Complied

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		<p>Manpower Department of Kapuas Hulu Regency Nomor: 44/DTK/TAHUN 2021, dated 13 October 2021.</p> <p>According to PKB, Monthly basic wages which agreed for the lowest worker grade is IDR 2,692,000 and for the highest worker grade is IDR 3,114,500 per month. PKB is a time-limited agreement, the wage structure will change according to government regulations.</p> <p>PT Paramitra Internusa Pratama has set employment provisions in accordance with the regulation and legal requirement. The PKB describes work relations, such as:</p> <ul style="list-style-type: none"> <li>• in Chapter III, Chapter IV related to working days and working hours, exemption from the obligation to work (leave);</li> <li>• in Chapter V, wage systems;</li> <li>• in Chapter VI, care, and medication as well as work safety and health.</li> </ul> <p>The PKB has described employment contract on Chapter IV, article 11-12 related to works days and hours, the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) including over time.</p> <p>Regulation related minimum wage for year 2022 is based on "Upah Minimum Kabupaten Kapuas Hulu Year 2022". The minimum wage is referred to Regent of Kapuas Hulu Decree No: 1465/DISNAKERTRANS/2021 regard "UMK Kapuas Hulu Tahun 2022", dated 29 Nov 2021, IDR 2,486,796.40 per month.</p> <p>Pay and working conditions in PKB and the specific-time work agreement (PKWT) were presented in Bahasa Indonesia, so all employees can understand it.</p>	
6.2.2	<b>(C)</b> 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	Unit of certification has set employment provisions in accordance with regulation and legal requirement. It stated in employment contract off temporary worker (PKWT) in Article 1 about the types of work, working	Complied

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	<p>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>- Critical (Major) compliance -</p>	<p>hours (maximum 40 hours per week and working from Monday to Saturday). Salary was provided based on minimum wage regulation from Regent Decree of Kapuas Hulu 1465/DISNAKERTRANS/2021 regard "UMK Kapuas Hulu Tahun 2022", dated 29 Nov 2021, IDR 2,486,796.40 per month.</p> <p>Determination of salary (including regular and other benefit), working hours (including overtime) and working days have been regulated in the Collective Labor Agreement (PKB) period 2021 – 2023, Chapter VI, Article 18-19; regarding wages, which explains:</p> <ul style="list-style-type: none"> <li>a) Permanent workers are given salary, determined by the employer that it is not lower than government regulations.</li> <li>b) Certain permanent workers are given wages (Basic Salary and Rice allowance) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations.</li> <li>c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions.</li> </ul> <p>Provisions of holidays and leave (including maternity leave and menstruation leave) have been regulated in Chapter IV, Article 11-12 regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Payroll documents give accurate information on compensation for all work performed, sample verified – payslip document 2022:</p> <table border="1" data-bbox="1137 1203 1966 1367"> <tr> <td> <p>Month October 2022</p> <p>Name: Mr A***** (employee number: **03)</p> <p>Basic salary: IDR 2,486,797</p> <p>BPJS allowance: IDR 213,524</p> </td> </tr> </table>	<p>Month October 2022</p> <p>Name: Mr A***** (employee number: **03)</p> <p>Basic salary: IDR 2,486,797</p> <p>BPJS allowance: IDR 213,524</p>	
<p>Month October 2022</p> <p>Name: Mr A***** (employee number: **03)</p> <p>Basic salary: IDR 2,486,797</p> <p>BPJS allowance: IDR 213,524</p>				

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		<p>Deduction for BPJS: IDR 311,471          Social donation: IDR 10,000          Take home pay is IDR 2,156,937</p> <hr/> <p>Month November 2022          Name: Mr S***** (employee number: **048)          Basic salary: IDR 2, 486,797          Overtime: IDR 1,081,280          Premi: IDR 62,307          BPJS allowance (TK): IDR 237,491          BPJS allowance (Kes): IDR 137,875          PPH21: IDR 2,459          Deduction for BPJS (TK): IDR 340,898          Deduction for BPJS (Kes): IDR 172,344          Social donation: IDR 4,000          Take home pay is IDR 3,588,691</p> <hr/> <p>Month November 2022          Name: Mr S***** (employee number: **260)          Basic salary: IDR 2, 486,797          BPJS allowance (TK): IDR 223,727          BPJS allowance (Kes): IDR 136,835          Family allowance: IDR 276,000          Deduction for BPJS (TK): IDR 326,354          Deduction for BPJS (Kes): IDR 171,044          Social donation: IDR 2,000          Take home pay is IDR 2,760,797</p>	
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<p>6.2.3</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The implementation of regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labor requirements have been complied to the regulations and legal requirement.</p> <p>Working hours is set for maximum 40 hours per week and working from Monday to Saturday, salary provided referring to Regent Decree of Kapuas Hulu 1465/DISNAKERTRANS/2021 regard "UMK Kapuas Hulu Tahun 2022", dated 29 Nov 2021, IDR 2,486,796.40 per month. Permanent workers are given salary, determined by the employer that it is not lower than government regulations. Certain permanent workers are given wages (Basic Salary and Rice allowance) in accordance with the status of the group/level which value is determined by the employer with provisions not lower than government regulations.</p> <p>Rice allowance for employee is given include in basic salary, for spouse is 9 kg, and for children (maximum 3 children) is 7.5 kg per month. Rice allowance is given monthly in form of money.</p> <p>Based on interview with worker representatives, they all admit have received monthly salary including allowance, annual leave, menstruation and maternity leave for female worker, adequate housing, electricity, clean water, access for food and education for children, and there are free to resign from the company with one month notice. There is no document in hold, debt bondage or withholding of wages. There is no complaint from the employees regarding employments.</p>	<p>Complied</p>
<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has provided adequate housing. Public facilities were provided by the organization and covered residential facilities, day care, kindergarten, building for prayers, sports facility e.g. volley ball, badminton, football, etc. Housing for workers and medical facilities (clinics) were provided by the organization with basic facilities.</p> <p>The uses of water for employees' daily needs of are met by utilizing rainwater catchment ponds. In the event of not enough water in the</p>	<p>Complied</p>

		<p>ponds, then it can use water from the mill. Clean water provided for employees housing sourced from palm oil mill water treatment. Water analysis/testing have been done based on the laboratory analysis report of clean water.</p> <p>Electricity provided to employees through provision of electricity generator and PLN (National Electricity Company).</p> <p>Based on interview with worker representatives, they all admit have received adequate housing, electricity, clean water, access for food and education for children. There is no complaint from the employees regarding facilities.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The unit of certification has allowed the employee to open several stores around employee housing, that provide daily basic necessary.</p> <p>Markets located in Semitau District with the range of +/- 2 Km, every payday trader will come to estate location to trade basic needs of employees. Access to the market is always maintained using graders and compactors regularly, therefore it can be passed at all season.</p>	Complied
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>- Minor compliance -</p>	<p>The unit of certification has calculated the in-kind benefits for year 2022 given to all workers according to regulations including workers who work on a piece / quota basis, whose wage calculation is based on a quota that can be reached during regular working hours.</p> <p>The unit of certification calculates in-kind benefits year 2022 using the benefit approach that the company has provided to workers, including working tools, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health), etc, with the following calculations:</p> <p>Monthly payments for workers were determined according to daily attendance. Daily attendance for workers were recorded and managed by Assistant through manual records and fingerprint system for mill and estate office. Whilst attendance for field employee in estate such as</p>	Complied

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		<p>harvesters and upkeep workers were recorded manually by each foreman using attendance form. It was evident that the wage was paid according working hours and daily attendance. According to pay list of employee and interview result with worker, it was indicated that wage received by the workers was complied with the determined regulations.</p> <p>Unit of certification calculates in-kind benefits for year 2022 using the benefit approach that company provided to workers, including working allowance, rice allowances, facilities (such as schools-including school transportation, housing, clean water, clinics (health), etc., with the following consideration:</p> <ul style="list-style-type: none"> <li>• Basic salary</li> <li>• THR allowance per month</li> <li>• Rice allowance</li> <li>• Electrical allowance</li> <li>• Housing facilities</li> <li>• Water facilities</li> <li>• School</li> <li>• Medical facilities (Clinic)</li> <li>• Kindergarten</li> </ul> <p>Based on the calculation, in-kind benefits paid by the company to employees was IDR 2,659,186 (Free Labour/Casual Worker) and highest is IDR 4,339,766 (Permanent Employee/Monthly Employee).</p> <p>Unit of certification applied employment wages refer to Regency Minimum Wage of Kapuas Hulu or "Upah Minimum Kabupaten Kapuas Hulu Year 2022". The minimum wage is referred to Regent of Kapuas</p>	
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		<p>Hulu Decree No: 1465/DISNAKERTRANS/2021 regard "UMK Kapuas Hulu Tahun 2022", dated 29 Nov 2021, IDR 2,486,796.40.</p> <p>SK No. 020/PSM7/II/2022, dated 22 Feb 2022 regard Upah Pekerja Tetap PT PIP di Wilayah Kab. Kapuas Hulu. Determined IDR 2,692,000 for permanent employee.</p>	
<p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> <li>1. Payment of minimum wages in accordance with applicable regulations</li> <li>2. Assessment of wages paid (prevailing wages) and in-kind benefits.</li> </ol> <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>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> <p>- Minor compliance -</p>	<p>Based on verification during onsite visit, Certificate Holder using permanent worker for all core work and specified contracted worker (PKWT) for maintenance work.</p> <p>Unit of certification has established policies and mechanisms related to Work Agreements/Contracts (Work Environment and Industrial Relations) Policy No. KHI-smart/002-00 dated 1 August 2017, this policy describes:</p> <ul style="list-style-type: none"> <li>• An employment agreement or contract</li> <li>• Position or type of work</li> <li>• Workplace</li> <li>• Amount wages and the method of payment</li> <li>• Conditions of work that contain the rights and obligations of entrepreneurs and workers / laborers</li> <li>• Starting and validity period of the work agreement. Furthermore,</li> </ul>	Complied

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		<p>there was also explained a Specific Time Work Agreement (PKWT) based on a certain period can be differentiated for a maximum of 2 (two) years and can only be extended once for a maximum period of 1 (one) year.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>o Temporary Work Agreement (PKWT), No: 068/BLNM/PKWT-A2/11/2022, namely Mrs R**** (Administration staff for Personalia), dated 1 Nov 2022 valid until 31 Oct 2023.</li> </ul>	
<p><b>Criteria 6.3:</b> 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>			
<p>6.3.1</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Unit of certification has established policy regarding freedom of association and right to collective bargaining in national languages as per "<i>Kebijakan Hubungan Industrial – Kebebasan Berserikat</i>", nomor: KHI-SMART/018-00.</p> <p>During this audit, unit of certification has shown the renewal of registration process of collective labor agreement to the Labor Agency of Kapuas Hulu Regency dated 09 October 2021.</p> <p>Based on interview with labor union representatives obtained information that the collective labor agreement has been disseminated to all labor union members.</p>	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>Based on the information from the chairman, worker union meeting conducted in accordance with the requirements of temporary and existing issues. Records of meeting with workers union were available in form of attendance list and minutes of meeting. Latest meeting conducted on 12 March 2022.</p> <p>Periodic meeting was also held to discuss any issues as necessary and recorded in minutes of meeting. Several issues discussed at meetings were not limited to labor issues. Meetings also discussed cleanliness,</p>	<p>Complied</p>

		<p>safety of housing areas and work equipment. All employees are represented by unions have agreed on a cooperation agreement on the document of PKB, the agreement renewed every two years.</p> <p>Based on data verification and interviews with several employees during this assessment – November 2022, the unit of certification has facilitated space/rooms for workers union to carry out their activities and conduct monthly meetings.</p>	
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on data verification and interviews with several employees and Chairman of Serikat Pekerja Mandiri PT Paramitra Internusa Pratam during this assessment – November 2022, unit of certification has facilitated space/rooms for workers union to carry out their activities and conduct monthly meetings. 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. Other than that, there is no discrimination or unfair treatment to the board of labor union.</p>	Complied
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Unit of certification has policy for minimum age for worker and mentioned in "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00). The policy stated that the company prohibit the use of child labor and take measure to prevent the use of such labor in connection with their activities; the company will employ remedial action in case that the child labour is uncovered to ensure appropriate follow up on and assistance for protection of the child's welfare; the company ensure to access to education for all children whose parents/guardians work on plantations. The policy is publicly available, and stakeholder can access it upon request.</p> <p>Dissemination of GAR Social Environment Policy (GSEP) to all related workers have been implemented routinely in morning briefing, this is confirmed during interview with workers. It was also available records</p>	Complied

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		<p>of dissemination to employees of Belian Estate, dated 1 and 8 Apr 2022, attended by 91 workers. Record verified: Attendance list, photograph and training material.</p> <p>Based on field visit and interview, there are no child labor existed in Belian Mill, Belian Estate and Tengawang Estate. Based on interview with workers, they said that children were prohibited from entering the work site.</p> <p>For children under 5 years, the company has provided child-care (Balai Penitipan Anak - BPA) which located at each Emplacement. Based on field observation to child-care unit at Belian Estate and Tengawang Estate on 9 Dec 2022, the facility and children were in good condition.</p> <p>In the cooperation contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... ”.</p> <p>Article 7: The second party (Contractor) is obliged to comply with the applicable labour regulations, especially with regard to the payment of wages and the age of workers, which have to be 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labour and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>Based on interview with the contractors, there are no child labor in their operation.</p>	
6.4.2	<p><b>(C)</b> 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>Unit of certification has policy for minimum age of worker and mentioned in "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00). The policy stated that the company prohibit the use of child labor and take measure to prevent the use of such labor in</p>	Complied

	- Critical (Major) compliance -	<p>connection with their activities; the company will employ remedial action in case that the child labour is uncovered to ensure appropriate follow up on and assistance for protection of the child's welfare; the company ensure to access to education for all children whose parents/guardians work on plantations. The policy is publicly available, and stakeholder can access it upon request.</p> <p>Minimum age for worker is 18 years old. Based on list of employees and interview with workers, verified that there is no worker under 18 years old at Belian POM, Belian Estate and Tengawang Estate during this initial assessment.</p> <p>Based on review to employee's personal document, there are no workers under 18 years old during recruitment. Verified Employment Letter No.033/SK-PT2/TNKE/VII/2022, dated 1 Jul 2022, for permanent worker on behalf Hety Karmila, born in 1997, recruited as midwife with three months of probation (1 Jul 200 to 30 Sep 2022). All recruitment documents have copy of identity card, to verified how old the candidate is at the time of recruitment.</p>	
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification straight to the policy that minimum age for worker is 18 years old. Based on list of employees and interview with workers, verified that there is no worker under 18 years old at Belian POM, Belian Estate and Tengawang Estate during this initial assessment. Based on review to employee's personal document, there are no workers under 18 years old during recruitment. Based on interview with workers, they said that children were prohibited from entering the work site.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The GSEP (GAR Social Environment Policy) and policy "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00). The policy stated that the company prohibit the use of child labor and take measure to prevent the use of such labor in connection with their activities; the company will employ remedial action in case that the child labour is uncovered to ensure appropriate follow up on and assistance</p>	Complied



		<p>for protection of the child's welfare; the company ensure to access to education for all children whose parents/guardians work on plantations. The policy is publicly available, and stakeholder can access it upon request.</p> <p>Dissemination of this company policy to all related workers have been implemented routinely in morning briefing, this is confirmed during interview with workers. It was also available records of dissemination to employees of Belian Estate, dated 1 and 8 Apr 2022, attended by 91 workers. Record verified: Attendance list, photograph and training material.</p> <p>Based on list of employees and interview with workers, verified that there is no worker under 18 years old at Belian POM, Belian Estate and Tengawang Estate during this initial assessment. Based on review to employee's personal document, there are no workers under 18 years old during recruitment. Based on interview with workers, they said that children were prohibited from entering the work site.</p> <p>The unit of certification has provided dissemination of GSEP (GAR Social and Environment Policy) that include "no child labour" policy and the negative effects of child labour to the surrounding communities including scheme smallholder and contractors, e.g. on 15 Feb 2022 located at Pancasila Building of Semitau District, attended by 37 participants. Based on interview with the contractors, there are no child labor in their operation.</p>	
<b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><b>(C)</b> 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> <p>- Critical (Major) compliance -</p>	<p>Policy to prevent sexual and all other form of harassment and violence was determined at "<i>Kebijakan Hubungan Industrial – Pelecehan Seksual</i>" (KHI-SMART/016-00). This policy is publicly available, and stakeholder can access it upon request.</p> <p>Dissemination of this company policy to all related workers have been implemented routinely in morning briefing, this is confirmed during</p>	Complied

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		<p>interview with workers. It was also available records of dissemination to employees of Belian Estate, dated 1 and 8 Apr 2022, attended by 91 workers. Record verified: Attendance list, photograph and training material.</p> <p>The company established Gender Committee. Each estate and mill have appointed representative for gender committee. The committee consider matters such as: dissemination on women’s rights, child-care facilities to be provided by the organization, female workers to be allowed to breastfeed up to nine months before resuming chemical spraying or manuring, and to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about breastfeed up to nine months before resuming chemical spraying or manuring. It was observed that it has been installed on main access road and prime locations such as: division office and housing area.</p> <p>Based on interview with workers and stakeholders during this initial assessment, they all understood that sexual and all other form of harassment and violence are prohibited. Verified that there was no sexual and all other form harassment and violence occur within the unit of certification.</p>	
6.5.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>A policy to protect the reproductive rights of all, especially of women, is documented under "<i>Kebijakan Hubungan Industrial – Pekerja Perempuan</i>" (KHI-SMART/005-00). In point 2.5, mentioned that menstruation leave is given to female worker for 2 days-off without any salary deduction. The company allowed female workers to breastfeed their children up to nine months before resuming chemical spraying or manuring, and they are given specific break times to enable effective breastfeeding.</p> <p>Dissemination of this company policy to all related workers have been implemented routinely in morning briefing, this is confirmed during interview with workers. It was also available records of dissemination to</p>	Complied

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		<p>employees of Belian Estate, dated 1 and 8 Apr 2022, attended by 91 workers. Record verified: Attendance list, photograph and training material.</p> <p>The company established Gender Committee. Each estate and mill have appointed representative for gender committee. The committee consider matters such as: dissemination on women’s rights, child-care facilities to be provided by the organization, female workers to be allowed to breastfeed up to nine months before resuming chemical spraying or manuring, and to be given specific break times to enable effective breastfeeding. The organization has also set several signboards about breastfeeding for up to nine months before resuming chemical spraying or manuring. It was observed that it has been installed on main access road and prime locations such as: division office and housing area.</p> <p>Pregnancy test is only conducted to check whether female worker, especially spraying and manuring worker, pregnant or not. It is not conducted as discriminatory measure. Pregnant workers can still work in alternative types of work that does not contain chemical material or jobs that require heavy loads. In case of female worker’s pregnancy test is positive, then she will be rotated to other types of work for temporary. During 2022 there is no spraying or fertilizing employees who was pregnant, then no work transfer implemented due to pregnancy.</p> <p>Pregnancy monitoring is performed using monitoring of H1 (menstruation) leave, if no H1 leave requested by workers then test pack will be implemented by company clinic.</p> <p>Based on interview with spraying and manuring workers in Belian Estate and Tengkawang Estate, confirmed that there is no pregnant or breastfeeding worker who works as spraying or fertilizer applicator.</p>	
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<p>6.5.3</p>	<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>- Minor compliance -</p>	<p>The company has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs in accordance with applicable regulations in Indonesia. The company and workers union has agreed on breastfeeding time, as stipulated in Collective Labour Agreement (PKB) – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p>Consultation conducted via questionnaire “<i>Formulir Interview dengan Ibu Baru Bersalin/Menyusui</i>”. The questionnaire are cover status of work; presence of children needing breastfeeding; exclusive breastfeeding; breastfeeding frequency; 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> <p>The company has provided lactation room and time allocation for breastfeeding. For children under 5 years, the company has provided child-care (<i>Balai Penitipan Anak - BPA</i>) which located at each Emplacement. Based on field observation to child-care unit at Belian Estate and Tengkawang Estate on 9 Dec 2022, the facility and children were in good condition.</p> <p><b>Opportunity for Improvement:</b></p> <p>PT Paramitra Internusa Pratama has conducted assessment of the needs of new mothers and has implemented the results, among others, by providing lactation rooms for breastfeeding mothers and providing time/opportunity to breastfeed their children. Equal understanding is needed regarding the needs of new mothers.</p>	<p>OFI</p>
<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with</p>	<p>Unit of certification has defined A grievance mechanism, which respects anonymity and protects complainants, where requested as per</p>	<p>Complied</p>

	<p>adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>"Kebijakan Hubungan Industrial – Penanganan Keluhan" (KHI-SMART/019-000). All complaints can be issued verbal and or written and informed whether to Gender Committee or Estate / Mill Manger.</p> <p>Based on review the document of "Pencatatan Keluhan dan Ketidak Puasan 2022" – complaints logbook as well as interview with workers representatives, there was no grievance reported up to November 2022 in each unit of Belian Mill, Belian Estate and Tengkwang Estate.</p>	
<p><b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker’s consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• 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</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The company has established and documented policy called GSEP (GAR Social and Environmental Policy) dated 1 Oct 2015. On chapter 3 (Work Environment and Industrial Relations) stated the company is recognize, respect and strengthen the right of all workers including contract, temporary, casual and migrant workers of all genders, inline with international best practices where legal frameworks are not yet in place, e.g. the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.</p> <p>The GSEP (GAR Social and Environmental Policy) stated Responsible employment, that covers:</p> <ul style="list-style-type: none"> <li>- Practice ethical recruitment including prohibiting the charging of recruitment fees to workers and retention of identity documents;</li> <li>- Prohibit the use of child labour;</li> <li>- Ensure access to education for all children;</li> <li>- Prohibit the use of forced or bonded labour;</li> <li>- Provide employment contracts to all workers in a language they understand;</li> <li>- Ensure wage administration including distribution, schedules and language used are direct, timely and clear;</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Ensure all workers are paid a wage equal to or exceeding the legal minimum wage;</li> <li>- Ensure working hours meet legal requirements;</li> <li>- Ensure all overtime is voluntary and compensated at a premium rate consistent with national law or Collective Labour Agreement (CLA).</li> </ul> <p>Based on document review and interview with worker representatives during this initial certification assessment, verified that all works are voluntary, there are no practices of identity document or passport retention; contract substitution without worker’s consent; involuntary overtime. There was no fees during recruitment process. Workers are free to resign, there is no penalty for termination, debt bondage or withholding of wages.</p>	
6.6.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Temporary workers using Specified-Time Work Agreement (PKWT) are used for probation time of recruitment process. If appraisal of candidates are good (in terms of presence and productivity) then she/he will be promoted to permanent worker. Available program related to PKWT workers that has been appointed as Permanent Worker (PT) since 2018.</p> <p>Unit of certification has established policies and mechanisms related to Work Agreements/Contracts as per Work Environment and Industrial Relations Policy (KHI-SMART/002-00 dated 1 August 2017, this policy describes:</p> <ul style="list-style-type: none"> <li>• An employment agreement or contract;</li> <li>• Position or type of work;</li> <li>• Workplace;</li> <li>• Amount of wages and the method of payment;</li> <li>• Conditions of work that contain the rights and obligations of the company and workers;</li> </ul>	Complied

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		<p>Starting and validity period of the work agreement. Furthermore, there was also explained a Specific Time Work Agreement (PKWT) based on a certain period can be differentiated for a maximum of 2 (two) years and can only be extended 1 (one) time for a maximum period of 1 (one) year.</p> <p>Verified sample of PKWT (Specified Time Work Agreement):</p> <ul style="list-style-type: none"> <li>- Perjanjian Kerja Waktu Tertentu-Satuan Hasil (PKWT-SH), of employee name VHD, No.002/Unit Kerja/PKWT-SH/BLNE/10/2022 dated 15 Oct 2022.</li> <li>- Perjanjian Kerja Waktu Tertentu-Satuan Hasil (PKWT-SH), of employee name KI, No.003/Unit Kerja/PKWT-SH/BLNE/10/2022 dated 15 Oct 2022.</li> </ul>	
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;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>- Critical (Major) compliance -</p>	<p>Unit of certification has appointed responsible person for Health and Safety as per P2K3 (Safety Committee). P2K3 has been validated by Manpower Office of Kepulauan Bangka Belitung Province.</p> <p><u>Belian POM:</u></p> <ul style="list-style-type: none"> <li>• OHS Committee (P2K3) approved based on decree letter from Head of Kalimantan Barat Province's Manpower Office No.239/NT.WASKER.1/2021 regarding "<i>Pengesahan Perubahan Susunan Keanggotaan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3)</i>" - Approval of Occupational Safety and Health Committee Team (P2K3) and the Emergency Response Team of PT Paramitra Internusa Pratama – Belian Mill" issued 4 May 2021. OHS Committee is led by Ervan Kurniawan (Mill Manager) and Arista Romadhon as the secretary concurrently as OHS expert.</li> <li>• OHS Expert Certificate on behalf Arista Romadhon is available No.5/438/AS.02.04/VII/2019 dated 24 Jul 2019; Decree Letter of OHS Expert from Ministry of Manpower - "<i>Keputusan Menteri</i></li> </ul>	Complied

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		<p><i>Ketenagakerjaan RI</i>" No.5/1412/AS.02.04/VII/2019 regarding "Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum" - Appointment of General OHS Expert dated 24 Jul 2019. OHS Expert certificate is under process for extension in Ministry of Manpower based on letter from PT Ketel Uap Indonesia No. 88/KUI-SMART/P.OPB/V/2022 dated 6 May 2022.</p> <p><u>Belian Estate:</u></p> <ul style="list-style-type: none"> <li>• OHS Committee (P2K3) approval based on decree letter from Head of Kalimantan Barat Province's Manpower Office No.1456/NT.WASKER-2/2021 regarding "<i>Pembentukan Struktur Organisasi Kepengurusan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Paramitra Internusa Pratama – Belian Estate</i>" - Approval of the Occupational Safety and Health Committee Team (P2K3) of PT Paramitra Internusa Pratama – Belian Estate" issued 2 Sep 2021. OHS Committee is led by Markus Sutrianto (Estate Manager) and Suprianus Tri Putra as the secretary concurrently as OHS expert.</li> <li>• OHS Expert Certificate on behalf Suprianus Tri Putra is available No.5/439/AS.02.04/VII/2019 dated 24 Jul 2019; Decree Letter of OHS Expert from Ministry of Manpower - "<i>Keputusan Menteri Ketenagakerjaan RI</i>" No.5/1413/AS.02.04/VII/2019 regarding "Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum" - Appointment of General OHS Expert dated 24 Jul 2019 valid until 3 years. License No. Reg.71582/PK3/AJ/31/2019/P0 dated 24 Jul 2019. OHS Expert certificate is under process for extension in Ministry of Manpower based on letter from PT Ketel Uap Indonesia No. 089/KUI-SMART/P.OPB/XI/2022 dated 7 Nov 2022.</li> </ul> <p><u>Tengkawang Estate:</u></p> <ul style="list-style-type: none"> <li>• OHS Committee (P2K3) approval based on decree letter from Head</li> </ul>	
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		<p>of Kalimantan Barat Province’s Manpower Office No.1455/NT.WASKER.2/2021 regarding “<i>Pembentukan Struktur Organisasi Kepengurusan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3)</i>” - Approval of Occupational Safety and Health Committee Team (P2K3) and the Emergency Response Team of PT Paramitra Internusa Pratama – Tengkawang Estate &amp; Belian Kemitraan” issued 2 Sep 2021. OHS Committee is led by Rianto Alfadillah (Estate Manager) and Agustinus Nainggolan as the secretary concurrently as OHS expert.</p> <ul style="list-style-type: none"> <li>• OHS Expert Certificate on behalf of Agustinus Nainggolan is available No.5/440/AS.02.04/VII/2019 dated 24 Jul 2019; Decree Letter of OHS Expert from Ministry of Manpower - “<i>Keputusan Menteri Ketenagakerjaan RI</i>” No.5/1414/AS.02.04/VII/2019 regarding “<i>Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum</i>” - Appointment of General OHS Expert dated 24 Jul 2019 valid until 3 years. License No. Reg. 71583/PK3/AJ/31/2019/P0 dated 24 Jul 2019. OHS Expert certificate is under process for extension in Ministry of Manpower based on letter from PT Ketel Uap Indonesia No. 090/KUI-SMART/P.OPB/XI/2022 dated 7 Nov 2022.</li> </ul> <p>The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident. Sample reports reviewed were for meeting during January – November 2022. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed during the meeting such as: review of accident, PPE Checklist update, result of internal audit and incident investigation.</p>	
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<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Unit of certification has defined the procedure for emergency response preparedness under "<i>SOP Kesiapsiagaan Tanggap Darurat</i>" (SOP/SMART/UMUMSADV/I/2005) dated 30 May 2014, and also procedure on occupational accidents and disease under "<i>SOP Penanganan Kecelakaan dan Penyakit Akibat Kerja</i>" No.SOP/SMART/HESS-EHSD/SADV/I/2005" dated 1 July 2014.</p> <p>The procedure described the roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health center. Emergency contact number of each internal emergency team and external related parties were evident. Evacuation route and muster point are available and made known to the employee.</p> <p>Accident and investigation reports described accident chronology, cause and impacts of the accident, analyzing root causes of the accident and determine correction and corrective action. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> <p>Belian Mil has assigned the first aider as per Mill Manager decree letter dated 9 Oct 2021. The appointed person have certificate and license of first aider:</p> <ul style="list-style-type: none"> <li>• Dwi Widiyanto, Certificate No. 5/5436/AS.02.00/XII/2021 dated 8 Dec 2021; license number No. 560/194/NT.WASKER/2022 dated 1 Feb 2022 valid until Jan 2024.</li> <li>• Mariyadi, Certificate No. 5/5466/AS.02.00/XII/2021 dated 8 Dec 2021; license number No. 560/198/NT.WASKER/2022 dated 1 Feb 2022 valid until Jan 2024.</li> <li>• Based on field observation to harvesting, spraying and upkeep activities in estates and to FFB processing activities at mill as well, first aid equipment are available and sufficient. At field, first aid kit brought by the Mandor (supervisor), whilst at mill, first aid kit located at office and processing station.</li> </ul>	<p>Complied</p>
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		<p>Training and emergency drill records:</p> <ul style="list-style-type: none"> <li>Record of refreshment training for first aider, dated 2 Aug 2022, attended by 26 participants from PT PIP, PT PGM and PT KPC. Training was delivered by Company Doctor. Attendance list, photograph and training material were available.</li> <li>Record of training/drill/simulation emergency response and preparedness as per document of "<i>Simulasi Tanggap Darurat 2022</i>", was conducted on 21 Jul 2022, attended 56 participants. Available attendance list, photograph, scenario and evaluation report.</li> </ul> <p>Accident reports are available as per "<i>Laporan Kecelakaan Kerja</i>". Reported in Belian Mill, Belian Estate and Tengawang Estate period January – October 2022 there was no accident occurred. Lost Time Accident (LTA) calculation is 0 FR and 0 SR. Total working hour is 654,333 hours.</p>	
<p>6.7.3</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama – Belian Mill, Belian Estate and Tengawang Estate has demonstrated that workers use appropriate Personal Protective Equipment (PPE) which is provided free of charge to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities called "<i>Rumah Bilas</i>" for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.</p> <p>Document verified:</p> <ul style="list-style-type: none"> <li>First Aid monitoring – "<i>Monitoring isi kotak P3K</i>" dated 30 Nov 2022, located at Central Warehouse, Workshop, R&amp;D office, hazardous waste warehouse, Regional office, Division 1, 2 &amp; 3 office and child care facility.</li> <li>PPE monitoring – "<i>Berita Acara Stock Opname APD Gudang Central BLNE</i>" dated 25 Nov 2022, located at central warehouse of Belian Estate; reported that there were safety glasses, leather apron,</li> </ul>	<p>Complied</p>

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		<p>insulating hand gloves are zero stock. Follow up has been made by issued purchase order.</p> <ul style="list-style-type: none"> <li>- Handover of PPE – "Berita Acara Serah Terima APD", dated 12 Jun 2022, for heavy equipment operator. PPE consisted of helmet, mask and hand gloves.</li> <li>- Handover of PPE – "Berita Acara Serah Terima APD", dated 4 May 2022, for harvesters of Belian Estate. PPE consisted of helmet, sickle cover and rubber boots.</li> </ul>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>All workers in mill and estates have been covered by Medical and Social Insurance (BPJS), as required by applicable regulation. Records of insurance payment available in:</p> <ul style="list-style-type: none"> <li>• BPJS registration number</li> <li>• Monthly BPJS insurance payment.</li> </ul> <p>The records of monthly payment for national incident insurance (BPJS) with percentage 0.54 % from the wages are evident. The reports of monthly payment were evident or period January – October 2022.</p> <p>Unit of certification has prepared Medical Check Up program as presented in "Formulir Program Pemeriksaan Kesehatan" (F/SMART/HESS-EHSD/SADV/012/001) dated 3 January 2022, consist of:</p> <ul style="list-style-type: none"> <li>• Physical examination for all workers (blood pressure, heart rate, respiration, height and general physical examination), has been done on 3 Jun 2022, all workers checked are in normal health condition, consist 345 workers of Belian Estates, 484 workers of Tengawang Estate, and 148 workers of Belian Mill. MCU performed by Company doctor.</li> <li>• Cholinesterase check conducted for sprayers (twice a year), warehouse and manuring workers (annually). Latest check has been done on 7 Jul 2022 to 17 workers – carried out by Company Doctor (dr. Daniel R.H.), most of workers checked indicated in normal health</li> </ul>	Complied

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		<p>condition - with choline content 33.0 – 49.4 µgHb (normal), except 2 workers on behalf M (spraying worker) and HM (central warehouse keepers). There was letter from EM of BLNE dated 19 Jul 2022 regarding re-assign M to work without chemical, and HM to administration work.</p> <ul style="list-style-type: none"> <li>• Normally, spirometry checked conducted for sprayer workers (twice a year), warehouse workers, manuring workers, grader operator and welder (annually). Due to pandemic COVID-19 situation, spirometry test are still not yet conducted as per Company Doctor Letter, No.001/BLNE-KLINIK/I/2021 dated 2 Feb 2022 – referring Decree Letter by Ministry of Manpower of Republic Indonesia, No.5/151/AS.02/XI/2020 regarding "Pedoman Keselamatan dan Kesehatan Kerja (K3) Pelaksanaan Pemeriksaan Kesehatan Tenaga Kerja pada Masa Pandemi COVID-19" - "OHS Guidelines for Occupational Health Checks during COVID-19 Pandemic".</li> <li>• Audiometry checked for genset operator and mechanic, has been done on 26 Jul 2022 for 5 workers. All workers checked indicated normal condition.</li> </ul> <p>Payment record of Medical and Accident Insurance (<i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>):</p> <ul style="list-style-type: none"> <li>• Billing statement; Belian Estate period October 2022; amount due to payment IDR **,013,348. Number of employees is 384 workers, number of dependent 310. Status PAID on 8 Nov 2022. (<i>BPJS Kesehatan</i>).</li> <li>• Payment slip number: 40000 0014 3371, total due to payment is IDR ***,806,449. Status: PAID on 19 Oct 2022 (<i>BPJS Ketenagakerjaan</i>).</li> </ul>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Occupational injuries are recorded using Lost Time Accident (LTA) and documented in " <i>Laporan Kecelakaan Kerja</i> ". Accident and investigation reports described accident chronology, cause and impacts of the accident, analyzing root causes of the accident and determine correction	Complied

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		<p>and corrective action. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> <p>Reported in Belian Mill, Belian Estate and Tengawang Estate period January – October 2022 there was no accident occurred. Lost Time Accident (LTA) calculation is 0 FR and 0 SR. Total working hour is 654,333 hours.</p>	
<p><b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b></p>			
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The company has plans to implement Integrated Pest Management (IPM) activities stated in IPM procedures as follows:</p> <ul style="list-style-type: none"> <li>• No. SOP/SMART/MCAR/VIII/TS-PGM dated 15 July 2020 about weeds control which covers weeds control in the nursery, immature and immature areas, equipment used for weeds control, safety procedures of control, guideline of agrochemicals uses (include paraquat) and monitoring.</li> <li>• No. SOP/SMART/MCAR/VII/TA-HPT dated 15 July 2020 about Pests and Diseases (P&amp;D) Control Management which covers early warning system, census, P&amp;D attack threshold limits, evaluation and decision of pest and disease control, recommendation from SMARTRI (Research Department), P&amp;D handling, recommendation of P&amp;D control and evaluation.</li> </ul> <p>The details of P&amp;D control have presented in several work instruction (WI), for example as follows:</p> <ul style="list-style-type: none"> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/01 about leaf eating caterpillar detection.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/02 about leaf eating caterpillar census.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- WI No. IK No. IK/SMART/MCAR/VII/TA-HPT/03 about leaf eating caterpillar control.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/04 about census and management of <i>Oryctes rhinoceros</i>.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/05 about census and management of termites.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/07 about census and management of rats.</li> </ul> <p>Based on document verification, estates have had IPM program for 2022 - 2023 as follows:</p> <ul style="list-style-type: none"> <li>• Pest and disease census: programmed monthly.</li> <li>• Planting and upkeep beneficial plant: programmed monthly.</li> <li>• Animal infestation census: programmed every two months.</li> <li>• Barn owl box census: programmed monthly.</li> </ul> <p>Evident of monitoring and control are available under document pest and disease census, planting and upkeep beneficial plant, census of animal attack and <i>Tyto alba</i> reproduction monitoring.</p> <p>Rat detection is conducted in 3 monthly bases, while leaf eater caterpillar detection is conducted in 2 monthly bases.</p> <p>Based on field observation in barn owl box in Block E52 Belian Estate, it is known that there was owl occupation in the box. Based on field verification and document review of leaf eater caterpillar census in period of January – October 2022 in both Estates, there is no pest infestation exceeding the economic threshold.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Based on document review and field observation, the company implement some biological control practices to suppress pest and diseases infestation such as white buttercup flower (<i>Turnera subulata</i>)</p>	Complied

		and barn owl ( <i>Tyto alba</i> ). Verification result on website of cabi.org known that those species stated as not invasive in Indonesia.													
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. - Minor compliance -	Based on field visit and document review, there is no use of fire for pest control in all operational area.	Complied												
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.															
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	<p>The unit of certification implemented procedures for Pest and Disease Control (SOP/SMART/MCAR/VII/TA-HPT) and Weed Control (SOP/SMART/MCAR/VIII/TA-PGM) that mentioned the use of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species and measures to avoid the development of resistance has been applied. The company only used pesticides that registered in "Komisi Pestisida Kementerian Pertanian Republik Indonesia".</p> <p>The unit of certification has policy on safe use of chemical including pesticides which stated in GAR Social and Environment Policy, dated 8 September 2015. The organisation has also established Memorandum No: 032/PD/VIII/2016 dated 13 August 2015 signed by President Director Mr. Daud Darsono, that there will be no use of paraquat for weed control.</p> <p>The company has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1" data-bbox="1131 1220 1982 1380"> <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>Rolifos 150 SL</td> <td>Glufosinate Ammonium 150 SL</td> <td>II</td> <td>Grasses weed</td> <td>RI.01030120103683</td> <td>31/01/2025</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Rolifos 150 SL	Glufosinate Ammonium 150 SL	II	Grasses weed	RI.01030120103683	31/01/2025	Complied
Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date										
Rolifos 150 SL	Glufosinate Ammonium 150 SL	II	Grasses weed	RI.01030120103683	31/01/2025										



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		Erkafuron 20 WG	Metil metsulfuron 20%	U	Ferns, Broad Leaf, Sedges	RI.01030120134861	31/01/2025	
		Garlon 670 EC	Triklopir	II	Wood, bamboo, broad leaf	RI.0103011984695	16/04/2023	
		Garlon Mix 333/17 EW	Triklopir butoksi etil ester 333 g/l; Aminopropali d potassium 17 g/l	II	<i>Tetracera indica, Melastoma malabatricum, Clidemia hirta, Lantana camara</i>	RI.0103012015148	31/01/2025	
		Roll Up 480 SL	Isopropilamina glifosat 480 g/l	III	Grasses weed	RI.01030120042133	03/12/2023	
		Starane 290 EC	Fluroksipir 1 – MHE 288 g/l	U	Broad leaf	RI.0103011988854	12/11/2023	
		Starane 480 EC	Fluroksipir 1 – MHE 480 g/l	U	Broad leaf	RI.01030120083155	02/02/2023	
7.2.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The routine pesticides application was for weed control in circle and path every four months if necessary, such as Roll Up 480 SL (a.i Isopropilamina gyphosate).</p> <p>The usage is documented in the form of Pesticide Toxicity, that record includes products name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, hectare application and active ingredients per ha application.</p> <p>For instance for to date 2022, the toxicity calculation of Roll Up 480 SL in Tengawang Estate:</p> <ul style="list-style-type: none"> <li>- active ingredients usage 214 litre.</li> <li>- FFB production 26,943 mt</li> </ul>						Complied

		- Pesticide unit (toxicity) 0.00000158	
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>In line with the explanation of Criteria 7.1 that IPM has been carried out quite effectively, therefore, there was no chemical use for pest control, except for routine weed control. Pesticides were used regularly for weed control in the circle and harvesting path with interval every 4 months if necessary.</p> <p>The usage of pesticides has been monitored in monthly and yearly basis. The UoC does not use pesticides prophylactically. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method was not a preventive application, but rather selective for weedy locations that considered exceed the economic threshold.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The UoC did not use pesticides prophylactically. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method is not a preventive application, but rather selective for locations that have weeds.</p> <p>In pest control, pesticide only used to reduce/eliminate existing pest, which has exceeded the economic threshold.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam 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:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2015. The Group has a policy on safe use of chemical including pesticides which sated in GAR Social and Environment Policy, dated September 8<sup>th</sup>, 2015. The company has also established memorandum that the use of paraquat is prohibited under Memorandum of President Director No.032/PD/VIII/2015 dated 13 August 2015.</p> <p>Based on visit in field operation and agrochemical storage in both Estates, there was no paraquat found or used. Based on report of</p>	Complied

		pesticide use in 2020 to 2022 – there were no paraquat noted in the report.	
	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 CH.	
	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 CH.	
	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 CH.	
	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 CH.	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>The annual internal training related general best practice of pesticide handling and spraying technique has been given to the spraying workers (see criterion 3.7). Based on field observation and interview with the spraying workers, it is known that the pesticides application has been conducted by methods that has minimum risk and negative impacts to workers or environmental. The workers can demonstrate safe working practices in accordance with the existing procedures, such as spraying in the direction of the wind, or prohibition of spraying on riparian, and understanding emergency response in the event of an accident. The spraying activity conducted in selective manner by knapsack sprayer or CDA, that the nozzles regularly calibrated. After work, knapsack sprayer/CDA and PPE were stored in a special storehouse at the Estate. Based on document review, field observation, as well as stakeholder</p>	Complied

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		<p>consultation, also known that the company never been applied pesticides aerially. Knapsack sprayers were in good condition, personal protective equipment has been provided and used properly according to MSDS and HIRAC such as boots, apron, rubber gloves, mask, safety goggles.</p> <p>Moreover, pesticide solutions were mixed in pesticide warehouses and transported by special vehicles. Work equipment and PPE were stored in special warehouses, including for mixing pesticides, and washing after work. The rinse solutions were stored in a special place and will be used again as a mixing agent in the next day's activities.</p>	
7.2.7	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.          - Critical (Major) compliance -</p>	<p>Unit of certification has demonstrated that the storage of all pesticides are in accordance with recognized best practices and environment management. Based on site visit to chemical warehouse of Belian Estate and Tengawang Estate on 9 Dec 2022, there was found that:</p> <ul style="list-style-type: none"> <li>- Pesticides are stored in the determined area separated from fertilizer and other chemicals.</li> <li>- Pesticide storage is provided in Divisions as well as in central storage.</li> <li>- Agrochemical storage is locked areas with limited access. The storage is ventilated.</li> <li>- MSDS and hazard symbol label are provided nearby of pesticides.</li> <li>- Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling.</li> <li>- PPE for handling of pesticides was provided including boots, apron, safety glass, respiratory mask, and hand gloves.</li> <li>- The possible spill is managed.</li> <li>- Secondary containment is provided around the pesticide storage area.</li> </ul>	Complied

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		<p>- Spill kit is also provided in the area.</p> <p>All the workers encountered have used the personal protective equipment meet with the safety rules and work instruction such as: Aprons, safety goggles, chemical mask, hand gloves (2 type: cotton inside and rubber outside) and safety shoes. All precautions attached to the products properly observed, applied, and understood by workers. All applications of agrochemicals were in accordance with the product label and storage instruction. MSDS of all products were understood by workers.</p>	
<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>Unit of certification has Waste Management Procedure (SOP/SMART/LEMS-ESHD/SADV/I/002) and Work Instruction No. IK/SPO/SMART/LH-09/01 regarding used pesticide containers handling (washing and cleaning). The procedure explained that all empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>Available permit of hazardous waste temporary storage (TPS LB3) from Regent of Kapuas Hulu dated 30 Jun 2020 by OSS System. Letter of Recommendation by Environmental Office of Kapuas Hulu Regency was available No. 660.34/312/DLH/P2LH-A dated 30 Jun 2020.</p> <p>Available record of hazardous waste handling based on “<i>Neraca Limbah B3</i>” dated 5 Oct 2022 for period Jul – Sep 2022, handed over to licensed transporter, consisted of:</p> <p>Belian Mill:</p> <ul style="list-style-type: none"> <li>• Used oil (2.1000 tons)</li> <li>• Used oil filter (0.069 tons)</li> <li>• Used battery (0.1400 tons)</li> <li>• Ex-container (0.0155 tons)</li> <li>• Contaminated rags (0.0773 tons)</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Used tube lamp (0.0070 tons)</li> </ul> <p>Belian Estate:</p> <ul style="list-style-type: none"> <li>• Used oil (0.600 tons)</li> <li>• Used oil filter (0.068 tons)</li> <li>• Ex-container (0.064 tons)</li> <li>• Contaminated rags (0.016 tons)</li> <li>• Medical waste (0.0029 tons)</li> </ul> <p>Tengkawang Estate:</p> <ul style="list-style-type: none"> <li>• Used oil (0.4000 tons)</li> <li>• Used battery (0.0480 tons)</li> <li>• Ex-container (0.1084 tons)</li> <li>• Contaminated rigs (0.0122 tons)</li> </ul> <p>Sample record of used pesticides container disposals, e.g. Manifest of hazardous waste No.KLHK-1662060368 for Chemical (pesticides) empty container (0.1879 tons), dated 27 Jul 2022, vehicle: B 9073 JXR, delivered to PT Primanru Jaya, the licensed transporter and processor of hazardous and toxic waste. Available agreement No.071/EPMD/SPK-Pengelolaan LB3/PIP-PJ/2022 dated 21 Mar 2022, between PT Paramitra Internusa Pratama and PT Primanru Jaya as the transporter and processor of hazardous and toxic waste including ex-pesticides container.</p> <p>Report of hazardous waste management and monitoring has regularly reported to Environmental Agency in Kapuas Hulu Regency. Last report was sent for period July – September 2022. Report received on 25 Oct 2022.</p>	
7.2.9	<p><b>(C)</b> 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</p>	<p>Based on document verification and interview with Estate Manager and field workers, obtain information that there is no aerial spraying of pesticides in Belian Estate and Tengkawang Estate.</p>	Complied

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	<p>provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>		
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The company has prepared annual medical surveillance program for pesticide operators, both for general and specific medical surveillance, as presented in "<i>Formulir Program Pemeriksaan Kesehatan</i>" (F/SMART/HESS-EHSD/SADV/012/001) updated on 3 January 2022, the program consists of:</p> <ul style="list-style-type: none"> <li>• Physical examination for all workers (blood pressure, heart rate, respiration, height and general physical examination), has been done on 3 Jun 2022, all workers checked are in normal health condition, consist of 345 workers of Belian Estates, 484 workers of Tengawang Estate, and 148 workers of Belian Mill. MCU performed by Company doctor.</li> <li>• Cholinesterase check conducted for pesticide sprayers (twice a year), warehouse and manuring workers (annually). Latest check has been done on 7 Jul 2022 to 17 workers – carried out by Company Doctor (dr. Daniel R.H.), most of workers checked indicated in normal health condition - with choline content 33.0 – 49.4 µ/gHb (normal), except 2 workers on behalf M (spraying worker) and HM (central warehouse keepers). There was letter from EM of BLNE dated 19 Jul 2022 regarding re-assign M to work without chemical, and HM to administration work.</li> <li>• Normally, spirometry checked conducted for sprayer workers (twice a year), warehouse workers, manuring workers, grader operator and welder (annually). Due to pandemic COVID-19 situation, spirometry test is still not yet conducted as per Company Doctor Letter, No.001/BLNE-KLINIK/I/2021 dated 2 Feb 2022 – referring Decree Letter by Ministry of Manpower of Republic Indonesia, No.5/151/AS.02/XI/2020 regarding "<i>Pedoman Keselamatan dan</i></li> </ul>	Complied

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		<p><i>Kesehatan Kerja (K3) Pelaksanaan Pemeriksaan Kesehatan Tenaga Kerja pada Masa Pandemi COVID-19” - “OHS Guidelines for Occupational Health Checks during COVID-19 Pandemic”.</i></p> <p>All workers in mill and estates have been covered by Medical and Social Insurance (BPJS), as required by applicable regulation. Records of insurance payment available in:</p> <ul style="list-style-type: none"> <li>• BPJS registration number</li> <li>• Monthly BPJS insurance payment.</li> </ul> <p>The records of monthly payment for national incident insurance (BPJS) with percentage 0.54 % from the wages are evident. The reports of monthly payment were evident or period January – October 2022.</p> <p>Payment record of Medical and Accident Insurance (<i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>):</p> <ul style="list-style-type: none"> <li>• Billing statement; Belian Estate period October 2022; amount due to payment IDR **,013,348. Number of employees is 384 workers, number of dependent 310. Status PAID on 8 Nov 2022. (<i>BPJS Kesehatan</i>).</li> <li>• Payment slips number: 40000 0014 3371, total due to payment is IDR ***,806,449. Status: PAID on 19 Oct 2022 (<i>BPJS Ketenagakerjaan</i>).</li> </ul>	
7.2.11	<p><b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established policy to prohibit pregnant and breastfeeding worker to work as a sprayer worker, fertilizer workers and other working related to agrochemical. This is according to a policy KHI-SMART/005-000 dated 1 August 2017 regarding female workers. The Policy has been disseminated to all related workers, example on 1 and 8 Apr 2022, attended by 91 workers – located at Belian Estate. Record verified: Attendance list, photograph and training material.</p> <p>Pregnancy monitoring to female spraying workers and fertilizer workers has been conducted monthly by company midwife. Pregnancy</p>	Complied



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		<p>monitoring is performed using monitoring of H1 (menstruation) leave, if no H1 leave requested by workers then test pack will be implemented by company clinic. If there is indication that female workers were positive pregnant, then the worker will be transferred to another work that not contain chemical.</p> <p>Based on interview with spraying and manuring workers in Belian Estate and Tengawang Estate, confirmed that there is no pregnant or breastfeeding worker who work as spraying or manuring applicator.</p>	
<p><b>Note For 7.2.11</b>          Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p><b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has Waste Management Procedure (SOP/SMART/LEMS-ESHD/SADV/I/002), and work instruction for used pesticide containers handling (IK/SPO/SMART/LH- 09/01).</p> <p>Hazardous and medical waste are disposed to the licensed collector, whilst domestic waste disposed to the landfill. Available agreement No.071/EPMD/SPK-Pengelolaan LB3/PIP-PJ/2022 dated 21 Mar 2022, between PT Paramitra Internusa Pratama and PT Primanru Jaya as the transporter and processor of hazardous and toxic waste including medical waste.</p> <p>Organic and inorganic waste is separated in line site. Organic wastes are composted then used as fertilizer for housing plants. Inorganic wastes are sent to the landfill and some of it collected for re-cycle. Landfill location is far enough from the employee housing, around ± 2 km distance. Audit team has visited landfill of Belian Estate which located at Block H57, landfill condition is good and maintained.</p>	<p>Complied</p>

		<p>Toxic and hazardous waste are handled according to applicable regulation. Permit of hazardous waste temporary storage (TPS LB3) from Regent of Kapuas Hulu dated 30 Jun 2020 by OSS System. Letter of Recommendation by Environmental Office of Kapuas Hulu Regency was available No. 660.34/312/DLH/P2LH-A dated 30 Jun 2020.</p> <p>Available record of hazardous waste handling based on “<i>Neraca Limbah B3</i>” dated 5 Oct 2022 for period Jul – Sep 2022, handed over to licensed transporter, consisted of:</p> <p>Belian Mill:</p> <ul style="list-style-type: none"> <li>• Used oil (2.1000 tons)</li> <li>• Used oil filter (0.069 tons)</li> <li>• Used battery (0.1400 tons)</li> <li>• Ex-container (0.0155 tons)</li> <li>• Contaminated rags (0.0773 tons)</li> <li>• Used tube lamp (0.0070 tons)</li> </ul> <p>Belian Estate:</p> <ul style="list-style-type: none"> <li>• Used oil (0.600 tons)</li> <li>• Used oil filter (0.068 tons)</li> <li>• Ex-container (0.064 tons)</li> <li>• Contaminated rags (0.016 tons)</li> <li>• Medical waste (0.0029 tons)</li> </ul> <p>Tengkawang Estate:</p> <ul style="list-style-type: none"> <li>• Used oil (0.4000 tons)</li> <li>• Used battery (0.0480 tons)</li> <li>• Ex-container (0.1084 tons)</li> <li>• Contaminated rigs (0.0122 tons)</li> </ul>	
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		<p>Sample record of hazardous and toxic waste disposal to the licensed institution, e.g. Manifest of hazardous waste No.KLHK-1662060368 for Chemical (pesticides) empty container (0.1879 tons), dated 27 Jul 2022, vehicle: B 9073 JXR, delivered to PT Primanru Jaya. Available agreement No.071/EPMD/SPK-Pengelolaan LB3/PIP-PJ/2022 dated 21 Mar 2022, between PT Paramitra Internusa Pratama and PT Primanru Jaya as the transporter and processor of hazardous and toxic waste including pesticides container.</p> <p>Report of hazardous waste management and monitoring has regularly reported to Environmental Agency in Kapuas Hulu Regency. Last report was sent for period July – September 2022. Report received on 25 Oct 2022.</p> <p>Sample of reuse and recycle in estates are reusing the fertilizer sack for loose fruit base, which triple rinsed prior to use in the field. Other sample is recycled of 20 L used pesticides container, which triple rinsed, label removed and painted red, used to carry chemical solutions in the field in pesticide application work. Reducing waste and recycling by Belian Palm Oil Mill are performed by reusing by product, such as fiber and shell as fuel of the boiler. Detail of Shell and Fiber usage are described in indicator 7.9.1.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview with workers and managers, demonstrated that they are understood proper disposal of waste material, according to procedures. Hazardous and medical waste are disposed to the licensed collector, whilst domestic waste disposed to the landfill. Organic and inorganic waste is separated in line site. Organic wastes are composted then used as fertilizer for housing plants. Inorganic wastes are sent to the landfill and some of it collected for recycle.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview with workers and stakeholders, there are no use of open fire for waste disposal.</p>	Complied

<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<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/SMART/MCAR/IX/TA-PPK (Fertilizing). Fertilizer is applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis.</p> <p>Those procedures set bunch of strategy to maintain and improve long term fertility, by combining efficient and measurable in-organic fertilization, take into account the oil palm age and soil nutrient properties by conducting leaf and soil sampling.</p> <p>The efficient and non excessive in-organic fertilization are critical to maintain soil structur and texture, combined with manuring by POME land application and EFB mulching application. The manuring conducted especially in land with low nurient properties, to improve soil structure and texture, microbiological properties, as well as to minimise in-organic fertilization if possible.</p> <p>The is no replanting activity yet, however the procedure set that the biomass in replanting will have returned to the soil for nutrient cycling strategy.</p>	Complied
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>- Minor compliance -</p>	<p>The Soil Sampling Unit (SSU) and Leaf Sampling Unit (LSU) are conducted regularly. The last SSU conducted based on report on 31 August 2021, meanwhile the last LSU conducted based on report on 06 May 2022.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The company implement efficient and non excessive in-organic fertilization to maintain soil structur and texture, combined with manuring by POME land application and EFB mulching application. The manuring conducted especially in land with low nurient properties, to improve soil structure and texture, as well as to minimise in-organic</p>	Complied

		<p>fertilization if possible.</p> <p>The is no replanting activity yet, however the procedure set that the biomass in replanting will have returned to the soil for nutrient cycling strategy.</p> <p>Based on document review and field observation, it was known that EFB mulching application has been implemented in all Estate, especially on sandy area in dose 60 tons/ha/round, expected two round per year if possible. Whereas POME land application was only conducted in Belian Estate in expected dose 250 ton/ha/round, three round a year.</p>	
7.4.4	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The records of fertilizer input has been well documented in every Estate for each block.</p> <p>In 2022, the fertilizer including Urea, RP, TSP, MOP, Dolomite, Borate. Overall, total recommendation is 783 MT, while the application is only 139 MT. The company has justified that the lack of fertilization is due to efficiency, while still maintaining good production and alongside to prevent chemical input.</p>	Complied
<p><b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>			

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7.5.1	<p><b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The company has conducted Semi-detail Soil Survey Assessment in 2015, to identify soil type, solum depth, slope, topography and land suitability class.</p> <p>Based on the document and Soil Map, the marginal soil identified is peat soil. There some peat areas have been managed and planted in the period of 2008 – 2014, where the other is managed as conservation area. There are some sandy areas but not dominant.</p> <p>The hectarage of peat area as follows:</p> <table border="1" data-bbox="1133 651 1962 948"> <thead> <tr> <th rowspan="2">Estate</th> <th rowspan="2">Peat</th> <th colspan="2">Planted Peat</th> <th colspan="2">Not Planted Peat</th> </tr> <tr> <th>ha</th> <th>%</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Belian Estate</td> <td>1,000.44</td> <td>763.03</td> <td>76.27</td> <td>237.41</td> <td>23.73</td> </tr> <tr> <td>Tengkawang Estate</td> <td>141.12</td> <td>117.35</td> <td>83.16</td> <td>23.77</td> <td>16.84</td> </tr> <tr> <td>Total</td> <td>1,141.56</td> <td>880.38</td> <td>77.12</td> <td>261.18</td> <td>22.88</td> </tr> </tbody> </table>	Estate	Peat	Planted Peat		Not Planted Peat		ha	%	ha	%	Belian Estate	1,000.44	763.03	76.27	237.41	23.73	Tengkawang Estate	141.12	117.35	83.16	23.77	16.84	Total	1,141.56	880.38	77.12	261.18	22.88	Complied
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7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on the Area Statement has known that the year of planting were in the period of 2008 – 2014 (14 years oldest). Therefore, the replanting will not be conducted for the next five years. However, according to the company's procedure, the replanting will not be conducted in steep area more than 40%.</p>	Complied																												
7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>No planting in steep area more than 40%.</p>	Complied																												
<p><b>Criteria 7.6:</b> 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>																															

<p>7.6.1</p>	<p><b>(C)</b> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.          - Critical (Major) compliance -</p>	<p>The company has conducted Semi-detail Soil Survey Assessment in 2015, to identify soil type, solum depth, slope, topography and land suitability class.          Based on the document and Soil Map, the marginal soil identified is peat soil. There some peat areas have been managed and planted in the period of 2008 – 2014, where the other is managed as conservation area. There are some sandy areas but not dominant.          The hectarage of peat area as follows:</p> <table border="1" data-bbox="1137 655 1966 951"> <thead> <tr> <th rowspan="2">Estate</th> <th rowspan="2">Peat</th> <th colspan="2">Planted Peat</th> <th colspan="2">Not Planted Peat</th> </tr> <tr> <th>ha</th> <th>%</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Belian Estate</td> <td>1,000.44</td> <td>763.03</td> <td>76.27</td> <td>237.41</td> <td>23.73</td> </tr> <tr> <td>Tengkawang Estate</td> <td>141.12</td> <td>117.35</td> <td>83.16</td> <td>23.77</td> <td>16.84</td> </tr> <tr> <td>Total</td> <td>1,141.56</td> <td>880.38</td> <td>77.12</td> <td>261.18</td> <td>22.88</td> </tr> </tbody> </table>	Estate	Peat	Planted Peat		Not Planted Peat		ha	%	ha	%	Belian Estate	1,000.44	763.03	76.27	237.41	23.73	Tengkawang Estate	141.12	117.35	83.16	23.77	16.84	Total	1,141.56	880.38	77.12	261.18	22.88	<p>Complied</p>
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<p>7.6.2</p>	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.          - Minor compliance -</p>	<p>The soil survey assessment has been conducted as a part of plant in plantation development. For peat as marginal area, some have been managed and the other that cannot be planted have been managed as conservation area.          The hectarage of peat area as follows:</p> <table border="1" data-bbox="1137 1158 1966 1327"> <thead> <tr> <th rowspan="2">Estate</th> <th rowspan="2">Peat</th> <th colspan="2">Planted Peat</th> <th colspan="2">Not Planted Peat</th> </tr> <tr> <th>ha</th> <th>%</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Belian Estate</td> <td>1,000.44</td> <td>763.03</td> <td>76.27</td> <td>237.41</td> <td>23.73</td> </tr> </tbody> </table>	Estate	Peat	Planted Peat		Not Planted Peat		ha	%	ha	%	Belian Estate	1,000.44	763.03	76.27	237.41	23.73	<p>Complied</p>												
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7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The company has conducted Semi-detail Soil Survey Assessment in 2015, to identify soil type, solum depth, slope, topography and land suitability class. The Topography Map has been produced based on the result of soil survey assessment, used for management plan such as to make drainage and irrigation systems, roads and other infrastructure.</p>	Complied																											
<p><b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>																														
7.7.1	<p><b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the Semi-detail Soil Survey Assessment and Soil Map, there is peat in the unit of certification area. Total peat in Belian and Tengkawang Estate is 1,141.56 ha, of which 880.38 ha of it has been planted during year of 2008 – 2014. The rest are kept as non-planted area and managed as conservation area. The planting on peat was covered in the NPP published on the RSPO website.</p> <p>Detailed year of planting on peat are as follow:</p> <table border="1"> <thead> <tr> <th>Year of planting</th> <th>Belian Estate (Ha)</th> <th>Tengkawang Estate (Ha)</th> </tr> </thead> <tbody> <tr> <td>2008</td> <td>179.01</td> <td>50.85</td> </tr> <tr> <td>2009</td> <td>348.17</td> <td>-</td> </tr> <tr> <td>2010</td> <td>3.21</td> <td>65.87</td> </tr> <tr> <td>2011</td> <td>42.51</td> <td>-</td> </tr> <tr> <td>2012</td> <td>28.32</td> <td>0.63</td> </tr> <tr> <td>2013</td> <td>9.71</td> <td>-</td> </tr> <tr> <td>2014</td> <td>152.09</td> <td>-</td> </tr> <tr> <td><b>Total</b></td> <td><b>763.02</b></td> <td><b>117.35</b></td> </tr> </tbody> </table>	Year of planting	Belian Estate (Ha)	Tengkawang Estate (Ha)	2008	179.01	50.85	2009	348.17	-	2010	3.21	65.87	2011	42.51	-	2012	28.32	0.63	2013	9.71	-	2014	152.09	-	<b>Total</b>	<b>763.02</b>	<b>117.35</b>	Complied
Year of planting	Belian Estate (Ha)	Tengkawang Estate (Ha)																												
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7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	Peat area within Belian and Tengkawang Estate has been managed, inventoried, documented and reported to the RSPO Secretariat firstly in November 2015, then second submission conducted on 5 November 2023.	Complied
<b>PROCEDURAL NOTE:</b> Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Peat land subsidence in the operational area has been monitored by installing peat subsidence stakes, then monitored and documented. The measurement of subsident in peat soil carried out every month. According to the national regulation, it is said that peat soil was said to be damaged if the cumulative decrease in peat surface was >35 cm / 5 years. Field observation has been conducted to verify the peat subsidence and the comprehension of the PIC. Based on records of peat subsidence, it is shown that the overall annual subsidence that amount about 2 cm/year, that still below the regulation.	Complied
7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	The system in water management and land cover has been set in the SOP of Peat Management which describes the measurement and monitoring of water level, silt pit, implementation, and flood mitigation strategies. Field observation has been conducted to verify the implementation such as weirs, water level meter in drains, and piezometer to measure water table. The company has 22 ground water level meter, which 2 of them are automatic (Data Logger). Based on the summary of monitoring data, it is known that the water level in the rage 30 – 40 cm. The land cover management program has been managed in the SOP of Spraying and Company's Policy in reducing pesticide, by conducting selective weeding and spraying.	Complied

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7.7.5	<p><b>(C)</b> 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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the Area Statement has known that the year of planting were in the period of 2008 – 2014 (14 years oldest). The replanting will not be conducted for the next five years. Therefore, the drainability assessment has not been conducted yet.</p>	Complied
<p><b>PROCEDURAL NOTE:</b> For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p><b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review and field observation, can be concluded that the existing peatland has been managed according to applicable national regulations and RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands, such as by water and ground cover management, and peat subsidence monitoring.</p>	Complied

<p>7.7.7</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The soil survey assessment has been conducted as a part of plant in plantation development. For peat as marginal area, some have been managed and the other that cannot be planted have been managed as conservation area.</p> <p>The hectare of peat area as follows:</p> <table border="1" data-bbox="1137 549 1966 842"> <thead> <tr> <th rowspan="2">Estate</th> <th rowspan="2">Peat</th> <th colspan="2">Planted Peat</th> <th colspan="2">Not Planted Peat</th> </tr> <tr> <th>ha</th> <th>%</th> <th>ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Belian Estate</td> <td>1,000.44</td> <td>763.03</td> <td>76.27</td> <td>237.41</td> <td>23.73</td> </tr> <tr> <td>Tengkawang Estate</td> <td>141.12</td> <td>117.35</td> <td>83.16</td> <td>23.77</td> <td>16.84</td> </tr> <tr> <td>Total</td> <td>1,141.56</td> <td>880.38</td> <td>77.12</td> <td>261.18</td> <td>22.88</td> </tr> </tbody> </table>	Estate	Peat	Planted Peat		Not Planted Peat		ha	%	ha	%	Belian Estate	1,000.44	763.03	76.27	237.41	23.73	Tengkawang Estate	141.12	117.35	83.16	23.77	16.84	Total	1,141.56	880.38	77.12	261.18	22.88	<p>Complied</p>
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<p><b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>																															
<p>7.8.1</p>	<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:</p> <p>- Minor compliance -</p> <p>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>Unit of Certification establish water management plan in form of "Program Efisiensi Penggunaan Air PT Paramitra Internusa Pratama Tahun 2022". The program for Estate unit consists of:</p> <ol style="list-style-type: none"> <li>1. Saving water from optimizing the use of pesticides. Description: reuse of rinsed water used for pesticide packaging for spraying activities. Timeline: routine (during the spray activity). Objective: Save water usage for spraying.</li> <li>2. Water savings in housing and public facilities. Description: using water used for ablution to flush roads and plants. Timeline: routine. Objective: employees and residents of housing.</li> <li>3. Socialization of water use savings for domestic needs. Description: socializing water use savings to all employees, placing warnings. Timeline: as needed. Objective: improvement of water-saving behavior.</li> </ol>	<p>Complied</p>																												

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		<p>4. Monitoring water use. Description: water use monitoring (m3). Timeline: routine (recap every month). Objective: actual use of water as needed.</p> <p>Water management program for Mill, consists of:</p> <ol style="list-style-type: none"> <li>1. Recycle. Program: reuse of air condensate sterilizer for dilution 10% to FFB.</li> <li>2. Recycle. Program: reuse of turbine cooling water to Raw Water for use as washing water. Evaluation: used turbine water is reused as washing water to minimize domestic water use.</li> </ol>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Based on visit to employees housing complex at Division 2 Belian Estate and Division 1 Tengkwang Estate, water source for bathing and washing are using ground water. Clean water for drinking and cooking provided by the company to housing complex from Mill's water treatment or water treatment located in Estate's housing complex. Based on interview with Labor Union and housing resident, it is said that there is no issue related clean water facility.</p>	
<p>7.8.2</p>	<p><b>(C)</b> 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).          - Critical (Major) compliance -</p>	<p>Watercourses which available in unit of certification is stream and reservoir for Mill. Maintaining riparian areas is by planting with local woody species. Maintaining progress are documented within "<i>Rencana dan Rehabilitasi KBKT</i>".</p> <p>Auditor team conducting onsite visit to buffer zones at Sungai Penyengat. Actual condition of buffer zones is covered by natural vegetations and young forest/shrubs.</p> <p>The management of riparian areas which implemented by unit of certification is already following RSPO Manual on BMPs for the management and rehabilitation of riparian reserves (April 2017).</p>	<p>Complied</p>
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Permit of POME (Palm Oil Mill Effluent) Application is based on Kapuas Hulu Regent Decree No. 587 Tahun 2018 dated 24 Sep 2018, regarding "<i>Izin Pemanfaatan Air Limbah ke Tanah untuk Aplikasi pada Tanah di</i></p>	<p>Complied</p>

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<p>- Minor compliance -</p>	<p>- Minor compliance -</p>	<p><i>Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama Kecamatan Semitau Kabupaten Kapuas Hulu</i>. Permit valid for 5 years. Term and conditions are BOD cannot exceed 5000 mg/ltr and pH ranged at 6-9. Application area covers 832 Ha.</p> <p>POME from Belian Mill was processed through a series of waste-water treatment ponds: four anaerobic ponds. POME is monitored monthly as required by permit. The results of POME monitoring were reviewed including measurement of BOD, COD, pH, N Total, TSS, oil and fat for period January – October 2022.</p> <p>The Environment Ministry Decree No. 28/2003 requires that BOD of POME is less than 5,000 mg/liter, pH 6 – 9. The result of POME quality during this period was under 5,000 mg/liter (average 2,650 mg/L) for BOD and pH average 7.7. Quality of wastewater effluent is monitored monthly by third party, Environmental Laboratories of Environmental Agency of Kalimantan Barat Province.</p> <p>Quality monitoring of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) conducted by independent lab Sucofindo. Quality standard for BOD is maximum 5,000 mg/liter, period Feb – Oct 2022, are as follows:</p> <table border="1" data-bbox="1133 1010 1774 1367"> <thead> <tr> <th>Month</th> <th>BOD (mg/liter)</th> <th>pH</th> </tr> </thead> <tbody> <tr> <td>Feb-22</td> <td>717</td> <td>7.15</td> </tr> <tr> <td>Mar-22</td> <td>1,695</td> <td>7.35</td> </tr> <tr> <td>Apr-22</td> <td>823</td> <td>7.30</td> </tr> <tr> <td>May-22</td> <td>823</td> <td>7.30</td> </tr> <tr> <td>Jun-22</td> <td>1,327</td> <td>7.50</td> </tr> <tr> <td>Jul-22</td> <td>1,032</td> <td>7.77</td> </tr> <tr> <td>Aug-22</td> <td>1,172</td> <td>7.90</td> </tr> <tr> <td>Sep-22</td> <td>1,354</td> <td>7.95</td> </tr> <tr> <td>Oct-22</td> <td>1,072</td> <td>7.75</td> </tr> </tbody> </table>	Month	BOD (mg/liter)	pH	Feb-22	717	7.15	Mar-22	1,695	7.35	Apr-22	823	7.30	May-22	823	7.30	Jun-22	1,327	7.50	Jul-22	1,032	7.77	Aug-22	1,172	7.90	Sep-22	1,354	7.95	Oct-22	1,072	7.75	
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		<p>Based on above monitoring result table, BOD and pH value has been complied with the regulation.</p>																																																					
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>Raw water was utilized for mill operations (include boilers, processes, and domestics usage) that through the water treatment plant (using physicals and chemicals method) and for estate operations (include housing, pesticides mixings and office operations).</p> <p>Flow meters were installed to monitor water usage for mill process per ton FFB. The monitoring of water volume utilization was conducted in document "<i>Rekapitulasi Pemakaian dan Distribusi Air tahun 2022</i>" while budget of water consumption sighted in document namely Water Supply Running Account 2022. Budget for mill water use per tons of FFB in 2022 has been set as 1.31 m<sup>3</sup>/ton FFB.</p> <p>According to the record of water consumption for period January to December 2022 the actual water consumption is still under the budget, as follows:</p> <table border="1" data-bbox="1133 895 1966 1398"> <thead> <tr> <th>Month</th> <th>FFB Processed (ton)</th> <th>Water usage (m<sup>3</sup>)</th> <th>Mill water use per tonne of FFB (m<sup>3</sup>/ton FFB)</th> </tr> </thead> <tbody> <tr><td>Jan-22</td><td>27,196.15</td><td>31,403.30</td><td>1.15</td></tr> <tr><td>Feb-22</td><td>23,878.63</td><td>25,430.90</td><td>1.07</td></tr> <tr><td>Mar-22</td><td>28,546.07</td><td>29,934.10</td><td>1.05</td></tr> <tr><td>Apr-22</td><td>22,723.46</td><td>23,350.30</td><td>1.03</td></tr> <tr><td>May-22</td><td>25,226.04</td><td>27,625.00</td><td>1.10</td></tr> <tr><td>Jun-22</td><td>28,240.95</td><td>28,830.00</td><td>1.02</td></tr> <tr><td>Jul-22</td><td>29,004.88</td><td>28,769.30</td><td>0.99</td></tr> <tr><td>Aug-22</td><td>33,537.11</td><td>30,213.80</td><td>0.90</td></tr> <tr><td>Sep-22</td><td>30,321.69</td><td>28,371.40</td><td>0.94</td></tr> <tr><td>Oct-22</td><td>26,496.83</td><td>26,340.00</td><td>0.99</td></tr> <tr><td>Nov-22</td><td>27,321.54</td><td>28,020.60</td><td>1.03</td></tr> <tr><td><b>Total</b></td><td><b>302,493.35</b></td><td><b>308,288.70</b></td><td><b>1.02</b></td></tr> </tbody> </table>	Month	FFB Processed (ton)	Water usage (m <sup>3</sup> )	Mill water use per tonne of FFB (m <sup>3</sup> /ton FFB)	Jan-22	27,196.15	31,403.30	1.15	Feb-22	23,878.63	25,430.90	1.07	Mar-22	28,546.07	29,934.10	1.05	Apr-22	22,723.46	23,350.30	1.03	May-22	25,226.04	27,625.00	1.10	Jun-22	28,240.95	28,830.00	1.02	Jul-22	29,004.88	28,769.30	0.99	Aug-22	33,537.11	30,213.80	0.90	Sep-22	30,321.69	28,371.40	0.94	Oct-22	26,496.83	26,340.00	0.99	Nov-22	27,321.54	28,020.60	1.03	<b>Total</b>	<b>302,493.35</b>	<b>308,288.70</b>	<b>1.02</b>	<p>Complied</p>
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7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Unit of certification has prepared program for improving efficiency of fossil fuels uses and to optimize renewable energy. Fossil fuel records and trends are maintained and available during audit. Energy use are recorded include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Below are records of fossil fuel usage for Diesel Genset 1 and 2 for October 2022:</p> <table border="1" data-bbox="1133 727 1980 863"> <thead> <tr> <th>Month</th> <th>Genset</th> <th>Kwh</th> <th>Liter of fossil fuel usage</th> <th>CPO (ton)</th> <th>Liter/Ton CPO</th> <th>Ratio KWh/Ton fuel</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Oct-22</td> <td>1</td> <td>7,696</td> <td>12,603</td> <td>79,034</td> <td>0.159</td> <td>0.611</td> </tr> <tr> <td>2</td> <td>2,348</td> <td>29,235</td> <td>79,034</td> <td>0.370</td> <td>0.080</td> </tr> <tr> <td colspan="4">Average</td> <td>0.265</td> <td>0.345</td> </tr> </tbody> </table> <p>Below is Shell and Fiber usage for efficiency of fossil fuel usage per ton of CPO produce period October 2022:</p> <table border="1" data-bbox="1133 986 1966 1174"> <thead> <tr> <th>Month</th> <th>Turbine</th> <th>Kwh</th> <th>Fibre &amp; Shell uses (Ton)</th> <th>CPO (ton)</th> <th>Liter/Ton CPO</th> <th>Ratio KWh/Ton fibre &amp; shell</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Oct-22</td> <td>1</td> <td>2,421</td> <td rowspan="4">37,528.07</td> <td rowspan="4">79,034</td> <td rowspan="4">0.47</td> <td rowspan="4">0.30</td> </tr> <tr> <td>2</td> <td>6,010</td> </tr> <tr> <td>3</td> <td>3,003</td> </tr> <tr> <td>Total</td> <td>11,434</td> </tr> </tbody> </table> <p>Based on the records, actual efficiency of fossil fuel usage per ton CPO are accordance to the plan.</p>				Month	Genset	Kwh	Liter of fossil fuel usage	CPO (ton)	Liter/Ton CPO	Ratio KWh/Ton fuel	Oct-22	1	7,696	12,603	79,034	0.159	0.611	2	2,348	29,235	79,034	0.370	0.080	Average				0.265	0.345	Month	Turbine	Kwh	Fibre & Shell uses (Ton)	CPO (ton)	Liter/Ton CPO	Ratio KWh/Ton fibre & shell	Oct-22	1	2,421	37,528.07	79,034	0.47	0.30	2	6,010	3	3,003	Total	11,434	Complied
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	Total	11,434																																																		
<b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.																																																				

<p>7.10.1</p>	<p><b>(C)</b> 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> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>The source of greenhouse gas emission has been identified on Environmental aspect and impact identification, updated on 24 January 2022 for mill and estates, as listed below:</p> <ul style="list-style-type: none"> <li>- Boiler stack emission including particulate and soot.</li> <li>- Diesel electric generator emission</li> <li>- POME methane emission</li> <li>- Use of fertiliser</li> <li>- Vehicle and heave equipment emission</li> </ul> <p>Several efforts to reduce GHG emissions are prepared as follows:</p> <ul style="list-style-type: none"> <li>- Substitution of fossil fuel with renewable energy (fibre &amp; shell)</li> <li>- Conducted monitoring of diesel uses for operational activity of estate and mill</li> <li>- Dissemination regarding turn off engine of truck during queue entering the mill</li> <li>- Monitoring KWh per tons product coming from renewable and non-renewable energy, trend summarized for 3 months period</li> <li>- Conducted water saving in mill operation, estate and domestic uses</li> <li>- Conducted water use monitoring</li> <li>- Conducted electricity saving in mill operation, estate and domestic uses</li> <li>- Uses energy saving lamp.</li> </ul> <p>The source of pollution, type of pollution and its control are documented in list of environmental aspect and impact evaluation. Implementation records of each programme were sighted. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p>	<p>Complied</p>
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		<p>Belian Mill wastewater was processed through a series of waste water treatment ponds four anaerobic ponds and also used as biogas plant. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements of Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters. Quality of wastewater effluent is monitored monthly by third party, Sucofindo Laboratory.</p> <p>POME Application based on Kapuas Hulu Regent Decree No. 587 Tahun 2018 dated 24 Sep 2018, regarding "Izin Pemanfaatan Air Limbah ke Tanah untuk Aplikasi pada Tanah di Perkebunan Kelapa Sawit PT Paramitra Internusa Pratama Kecamatan Semitau Kabupaten Kapuas Hulu". Permit valid for 5 years. Term and conditions is BOD cannot exceed 5000 mg/ltr and pH ranged at 6-9. Application area covers 832 Ha.</p> <p>PT Paramitra Internusa Pratama has submitted GHG emissions through the RSPO PalmGHG calculator <a href="https://ghg.rspo.org/dashboard/mills/889/assessments/2579">https://ghg.rspo.org/dashboard/mills/889/assessments/2579</a>.</p>	
7.10.2	<p><b>(C)</b> 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).</p> <p>- Critical (Major) compliance -</p>	<p>Based on field observation and review of Area Statement, there is no new planting after 2014 in PT Paramitra Internusa Pratama – Belian Estate and Tengawang Estate. Planting after 2014 are conducted in Scheme Smallholder (KKPA) area. It has been covered in the NPP published in 2014.</p>	Complied
7.10.3	<p><b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Paramitra Internusa Pratama has identified other significant pollutants such as emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. Monitoring of air emissions and ambient quality conducted every semester. Emissions test conducted by Accreditation</p>	Complied

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		<p>Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency of Kapuas Hulu Regency every six months, e.g: result of analysis for air emission and Ambient in Belian Estate and Tengkawang Estate.</p> <p>Management efforts to reduce or minimize those pollutant is such as implementation of zero burning, planting trees at the riparian, utilization EFB, reducing the use of fossil fuel with the use of fibres and shells for boiler fuel, emissions test, routine engine maintenance and GHG calculation. Sample of management efforts to reduce pollutants are observed during audit, such as there is no burning activities, there are peat conservation area in Belian Estate and Tengkawang Estate, and the uses fibres and shell as fuel in Belian POM.</p>	
<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.            - Critical (Major) compliance -</p>	<p>Based on field observation and review of Area Statement, planting year of PT Paramitra Internusa Pratama – Belian Estate and Tengkawang Estate are ranged from 2008 to 2014. New planting after 2014 is done in other estate/smallholder, such as Belian KKPA (PT Paramitra Internusa Pratama), Kapuas Hulu KKPA (PT Persada Graha Mandiri) and Muara Tawang KKPA (PT Kartika prima Cipta). Refer to the oldest oil palm planting in Belian Estate and Tengkawang Estate, replanting estimated to be started in 2033.</p> <p>Based on interview to the workers and stakeholders, there were no land preparation performed by burning. Land preparations were conducted by mechanical methods using heavy equipment.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.            - Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has established fire prevention and control measures for land such as provides Firefighting team and its equipment, developed fire watch tower, conduct monitoring for hotspots and forming fire protection program by involving surrounding local communities namely “<i>Masyarakat Siaga Api</i>”.</p>	Complied

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		<p>All the control measures are reported to relevant authority periodically, in example: "<i>Laporan Triwulan Peristiwa Kebakaran Dalam Areal Perkebunan Sawit</i>" - Quarterly Report on Fire Incidents in Oil Palm Plantation Areas period July – September 2022. This report submitted to "<i>Badan Penanggulangan Bencana Daerah (BPBD)</i>" and "<i>Dinas Pertanian dan Pangan</i>" of Kapuas Hulu Regency on 9 Oct 2022. Reported that there was no fire within PT Paramitra Internusa Pratama's plantation area, but there was a fire incident community land of Dusun Jentu, Sentabai Village on 21 May 2022, burned area of 2 Ha, soil type – mineral, vegetation type – Jenger wood and former rubber fields.</p> <p>Available report of system and infrastructure preparedness for land fire ("<i>Laporan Kesiapsiagaan Sistem, Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan</i>") period July – September 2022. Report covers Plantation fire control task force; human resources for plantation land fire control; plantation land fire control operations; and infrastructure for plantation land fire control.</p>	
<p>7.11.3</p>	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>PT Paramitra Internusa Pratama has engages stakeholders in adjacent locations for fire prevention and control measures, evident on 24 - 26 Jun 2022 conducted training in corporation with PT KPC, PT PGM and stakeholders (surrounding communities) called "<i>Pelatihan Masyarakat Siaga Api Program Desa Makmur Peduli Api</i>", located at BLNE Club House. Stakeholders are coming from Villages of Lemedak, Tua Abang, Na Seberuang, Sekadau and Marseda, Semitau District; villages of Mantan, Manapar, Na Suhaid, Tanjung Harapan, Suhaid District; villages of Sentabai, Perigi, Baru, Penai, Silat Hilir District. On 24 Jun 2022 attended by 49 participants; on 25 Jun 2022 attended by 48 participants; on 26 Jun 2022 attended by 77 participants.</p>	<p>Complied</p>
<p><b>Criteria 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p><b>PROCEDURAL NOTE for 7.12:</b></p>			

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The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.

The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.

High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.

Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

7.12.1	<p><b>(C)</b> 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> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation since 2008. HCV assessment conducted in 2011 and verification assessment in 2014 by internal team which has been registered as RSPO-approved assessor. Unit of Certification completed the NPP notification in 2014.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out by unit of certification as below:</p> <ul style="list-style-type: none"> <li>- 29/8/2014: GAR submit liability data and zero liability disclosure to RSPO for all subsidiaries, including PT Paramitra Internusa Pratama.</li> <li>- 15/12/2015: Submission of Land Use Change Analysis (LUCA) for GAR concessions. There are 12 companies were submitted, including PT Paramitra Internusa Pratama.</li> <li>- 19/04/2022: RSPO send LUCA status of PT Paramitra Internusa Pratama, where the LUCA status is Pass with Final Conservation Liability is 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha.</li> </ul> <p>Unit of certification has submit LUCA in accordance with the RSPO LUCA Guidance document.</p>	Complied
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7.12.2	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Unit of certification is an existing plantation since 2008. HCV assessment conducted in 2011 and verification assessment in 2014 by internal team which has been registered as RSPO-approved assessor.</p> <p>Then, the existing HCV assessments remains valid.</p>	Complied
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>There is no new acquisition or expansion area or new planting after 15 November 2018 within this unit of certification. All planted areas were the original area stated in the NPP notifications.</p>	
7.12.3	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>This indicator is not relevant to Indonesia.</p>	Not Applicable
<p><b>PROCEDURAL NOTE for 7.12.3:</b> Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p><b>(C)</b> 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</p>	<p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Paramitra Internusa Pratama, 2012". HCV Assessment was conducted internally using HCV Toolkit Indonesia 2008, where the assessor is registered as RSPO HCV approved assessor. Total HCV area which identified is 2,179.98 Ha consist of 83 points.</p> <p>In 2014, PT Paratmitra Internusa Pratama conduct HCV verification assessment in December 2014. Based on report of "Laporan Verifikasi Kawasan Bernilai Konservasi Tinggi PT Paramitra Internusa Pratama,</p>	Complied

	<p>directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Kabupaten Kapuas Hulu, Kalimantan Barat February 2015, HCV area determined as covers 3,874.79 Ha (increase area from previous HCV report 2012).</p> <p>Based on the verification assessment report, type HCV identified is HCV1, HCV2, HCV4, HCV 5 and HCV6.</p> <p>An integrated management plans to protect and/or enhance HCV and other conservation areas are developed, implemented and adapted by unit of certification. The activities plan is documented in "Laporan Pelaksanaan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi, Tahun 2021". The activities consist of:</p> <ol style="list-style-type: none"> <li>1. HCV boundary marking.</li> <li>2. Socialization (direct and indirect) to affected parties.</li> <li>3. Frequent Communication and Consultation to affected stakeholders.</li> <li>4. Conserving Water Sources.</li> <li>5. Reclamation or Reforestation of HCV area.</li> <li>6. Controlling of Invasive Species.</li> <li>7. HCV Management Agreement of Community Based</li> </ol>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Unit of certification is an existing plantation since 2008. There is no expansion area for plantations. Entire land compensation is accomplished since 2019.</p> <p>Land status of certificate holder prior to developed is State Land and have obtaining Location Permit from relevant authority. Community land which located within location permit already compensated for its crops only and not for its land, due to as national land status is State Land.</p> <p>As a reciprocal, the company hires villagers/local communities as workers. This is form of benefit given by the plantation to surrounding communities.</p>	Complied

		<p>This information is obtained from direct interview with sample of previous landowner during stakeholder consultation.</p> <p>HCV assessment has been conducted since 2011 and verification assessment conducted since 2014.</p> <p>There are no rights of local communities have been identified in HCV area, also no peatland or other conservation area within the unit of certification.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Unit of certification has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through muster morning in each division by field assistant. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p> <p>Based on HCV Identification Assessment 2011 and Verification Assessment in 2014, there are RTE species were identified and current protection status by IUCN as below:</p> <ol style="list-style-type: none"> <li>1. Mammals: Helarctos malayanus (VU), Hylobates muelleri (EN), Manis javanica (EN), Neofelis nebulosa (VU), Nycticebus coucang (VU), Pardofelis marmorata (VU), Cervus unicolor (VU), Aonyx cinerea (VU), Sus barbatus (VU).</li> <li>2. Birds/Aves: Spizaetus nanus (VU), Lophura erythrophthaima (VU).</li> <li>3. Reptile: Tomistoma schlegelii (EN).</li> </ol> <p>Flora: Nepenthes bellii (EN), Shorea palembanica (CR), Shorea seminis v. Slooten (CR), Aquilaria malaccensis (VU), Combretocarpus rotundatus</p>	Complied

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		(VU), <i>Cotylelobium lanceolatum</i> Craib. (VU), <i>Dryobalanops aromatica</i> (CR), <i>Hopea mengarawan</i> (CR), <i>Shorea belangeran</i> (CR), <i>Shorea fosworthyi</i> (CR), <i>Shorea peltate</i> (CR), <i>Shorea platycarpa</i> (CR), <i>Shorea smithiana</i> (CR).	
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. - Minor compliance -	Based on "Laporan Pelaksanaan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi Tahun 2021", wildlife species monitored by unit of certification but only two RTE species was sighted/found within HCV in plantation area refer to IUCN, there are <i>Macaca fascicularis</i> and <i>Megalaima rafflesii</i> .  Species and HCV area that was monitored and reported every year will be integrated to the next year HCV management and monitoring plan.	Complied
7.12.8	<b>(C)</b> 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. - Critical (Major) compliance -	Unit of certification PT Paramitra Internusa Pratama as subsidiary of Golden Agri Resources (GAR) has demonstrate the updated evidence of Remediation and Compensation Procedures (RaCP) processes.  <b>Critical Non-conformity:</b>  According to the Area Statement, there are some areas which cleared prior to HCV Assessment 2011. However, the unit of certification cannot provide evidence to demonstrate that the HCV compensation project plan against Final Conservation Liability and Environmental Remediation Plan has been developed and accepted by the RSPO Compensation Panel.  Objective evidence:  Unit of certification, PT Paramitra Internusa Pratama, as subsidiary of Golden Agri Resources (GAR) has demonstrated the updated evidence of Remediation and Compensation Procedures (RaCP) processes as below:  - 29/8/2014: GAR submitted liability data and zero liability disclosure to RSPO for all subsidiaries, including PT Paramitra Internusa Pratama.	Non-compliance (2284908-202212-M1)



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		<ul style="list-style-type: none"> <li>- 15/12/2015: Submission of Land Use Change Analysis (LUCA) for GAR concessions. There are 12 companies were submitted, including PT Paramitra Internusa Pratama.</li> <li>- 19/04/2022: RSPO send LUCA status of PT Paramitra Internusa Pratama, where the LUCA status is Pass with Final Conservation Liability is 1,974.83 Ha and Environmental Remediation Area is 92.5 Ha.</li> <li>- 29/07/2022: Submission of Concept Note Batch 2.</li> <li>- 08/11/2022: Respond from RSPO against submission of the concept note by GAR Batch 2.</li> <li>- 14/11/2022: Reply from GAR to RSPO against result of concept note review.</li> <li>- 07/12/2022: GAR asking for update of Concept Note review.</li> </ul>	
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**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2022 for PT Paramitra Internusa Pratama – Belian Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2022 for PT Paramitra Internusa Pratama – Belian Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.21
PKO	1.21

Extraction	%
OER	24.16
KER	6.10

Production	t/yr
FFB Process	335,254.69
CPO Produced	81,009.55
PKO Produced	0.00

Land Use	Ha
OP Planted Area	15,254.30
OP Planted on peat	1,056.91
Conservation (forested)	6,262.73
Conservation (non-forested)	854.35
<b>Total</b>	<b>23,428.29</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	101,721.80	0.91	111,937.43	0.50	0.00	0.00	213,659.23	1.41
CO <sub>2</sub> Emission from fertilizer	6,634.84	0.06	13,825.80	0.06	0.00	0.00	20,460.63	0.12
NO <sub>2</sub> Emission from peat	7,468.69	0.07	378.85	0.00	0.00	0.00	7,847.55	0.07
NO <sub>2</sub> Emission from fertilizer	5,261.66	0.05	11,879.52	0.05	0.00	0.00	17,141.18	0.10
Fuel Consumption	1,122.60	0.01	2,743.02	0.01	0.00	0.00	3,865.62	0.02
Peat Oxidation	54,475.52	0.48	2,763.29	0.01	0.00	0.00	57,238.81	0.49
<b>Sink</b>								
Crop Sequestration	-47,236.21	-0.42	-105,465.00	-0.47	0.00	0.00	-152,701.21	-0.89
Conservation Sequestration	-20,628.37	-0.18	-36,800.86	-0.17	0.00	0.00	-57,429.23	-0.35
<b>Total</b>	<b>108,820.53</b>	<b>0.97</b>	<b>1,262.05</b>	<b>0.01</b>	<b>0.00</b>	<b>0.00</b>	<b>110,082.58</b>	<b>0.98</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	12,420.25	0.04
Fuel Consumption	710.19	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>13,130.44</b>	<b>0.04</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

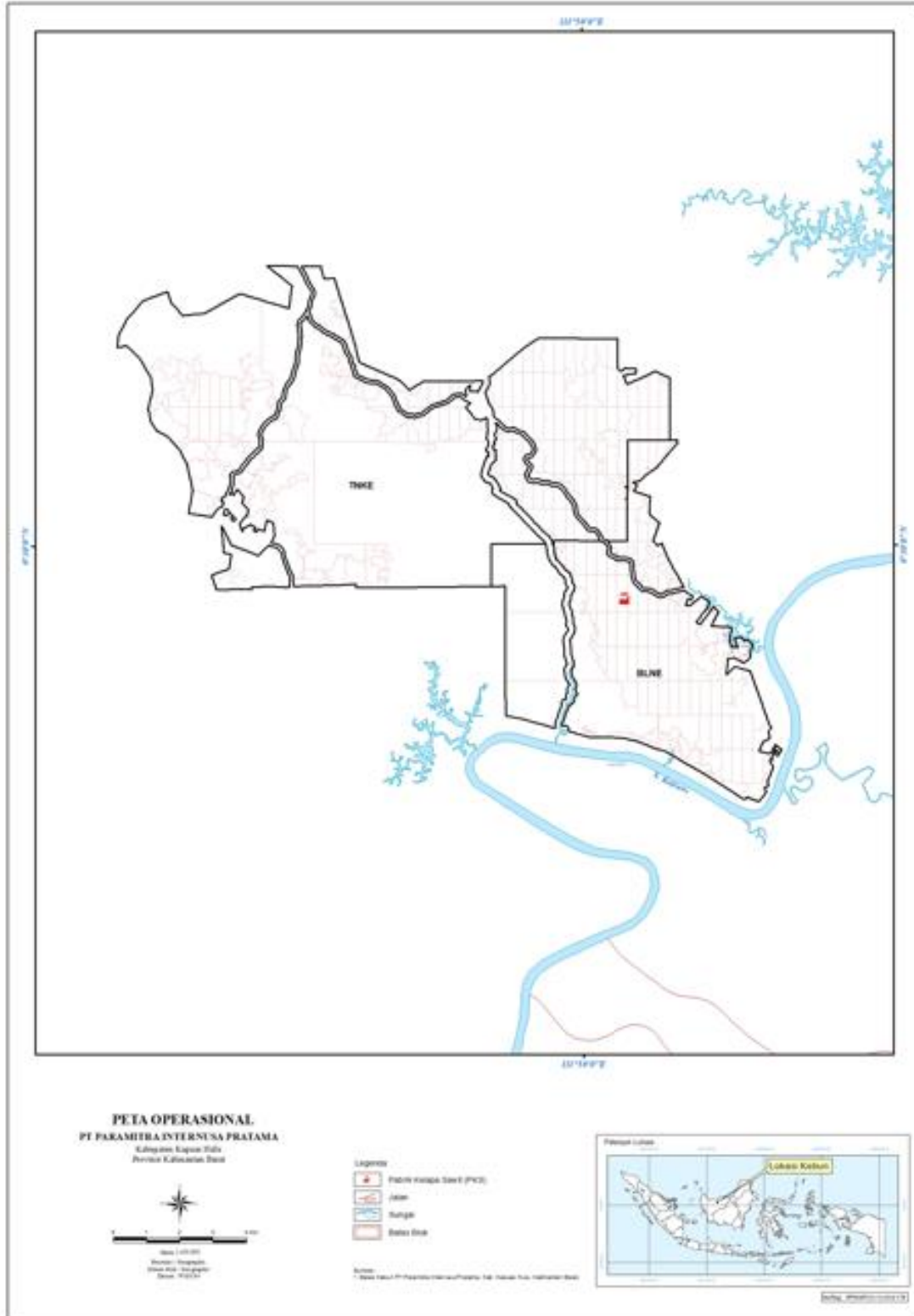
\*This mill has no kernel crusher operation.

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

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



**Appendix D: Estate Field Map**



**Appendix E: List of Smallholder Registered and/or sampled**

Not applicable.

## Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PIP	Paramitra Internusa Pratama
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