

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_1)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company name (Parent Company) PT. Inti Indosawit Subur
Client company Address: Head Office: Jl Palembang Kav 35-37, Jakarta 10230, Indonesia
Certification Unit: PT Saudara Sejati Luhur - Gunung Melayu I Palm Oil Mill Location of Certification Unit: Batu Anam Village, Rahuning District, Asahan Regency, North Sumatra Province, Indonesia
Date of Final Report: 29/06/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 February 2006
Address	Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Saudara Sejati Luhur - Gunung Melayu I Mill		
Location / Address	Batu Anam Village, Rahuning District, Asahan Regency, North Sumatra Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr Ivan Novrizaldie	E-mail	Ivan_novrizaldie@asianagri.com
Telephone	021 2301119	Facsimile	021 2301120

2. Certification Information			
Certificate Number	RSPO 620755	Certificate Start Date	21/03/2022
Date of First Certification	07/09/2015	Certificate Expiry Date	20/03/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT FFB/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<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
ID05/65250	ISO 14001:2015	SGS	10 June 2023
ISCC	EU-ISCC-Cert-DE100-03726122	SGS	01 Dec 2023
ISPO	BSI-ISPO 619194	BSI	18 July 2026

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

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

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pulau Maria Estate	22	0	2,041	0	2,041	22
Total (ha)	22	0	2,041	0	2,041	22
Note: Only Mature area is considered as production area						

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2022 – Feb 2023)	Actual (August 2021 – Nov 2022)*		Forecast (Mar 2023 – Feb 2024)
		Previous license period (Aug 2021 – Feb 2022)	Current license period (Mar 2022 – Nov 2022)	
Pulau Maria Estate	44,478	0	15,106	34,512
Total	44,478	15,106		34,512

Note: The Estimated Last Year Period and Forecast Period is realigned according to the PalmTrace Period which is 21 March 2022 – 20 April 2023.
* Reporting period for Actual Production is more than 12 months to close the reporting period gap caused by previous year audit delay due to COVID-19.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2022 – Feb 2023)	Actual (August 2021 – Nov 2022)*		Forecast (Mar 2023 – Feb 2024)
		Previous license period (Aug 2021 – Feb 2022)	Current license period (Mar 2022 – Nov 2022)	
-		0	0	
Total		0		

Note: The Estimated Last Year Period and Forecast Period is realigned according to the PalmTrace Period which is 21 March 2022 – 20 April 2023.
* Reporting period for Actual Production is more than 12 months to close the reporting period gap caused by previous year audit delay due to COVID-19.

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Mar 2022 – Feb 2023)	Actual (August 2021 – Nov 2022)*		Forecast (Mar 2023 – Feb 2024)
		Previous license period (Aug 2021 – Feb 2022)	Current license period (Mar 2022 – Nov 2022)	
3 rd Party	220,000	119,521	167,816	240,000
Total	220,000	287,328		240,000

Note: The Estimated Last Year Period and Forecast Period is realigned according to the PalmTrace Period which is 21 March 2022 – 20 April 2023.
* Reporting period for Actual Production is more than 12 months to close the reporting period gap caused by previous year audit delay due to COVID-19.

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9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	August 2021	0	19,741	19,741
2	September 2021	0	19,831	19,831
3	October 2021	0	20,030	20,030
4	November 2021	0	18,997	18,997
5	December 2021	0	16,656	16,656
6	January 2022	0	11,605	11,605
7	February 2022	0	12,662	12,662
8	March 2022	0	19,735	19,735
9	April 2022	264	16,392	16,655
10	May 2022	1,932	13,243	15,176
11	June 2022	1,553	20,193	21,745
12	July 2022	3,857	17,653	21,510
13	Aug 2022	4,111	23,954	28,065
14	Sept 2022	2,885	21,921	24,806
15	Oct 2022	354	19,991	20,345
16	Nov 2022	150	14,734	14,884
TOTAL		15,106	287,338	302,442

Note: there were no certified FFBs supplied to GM1 POM during the period of August 2021 – March 2022, the FFBs were supplied to GM 2 POM – PT Gunung Melayu (RSPO Certified) PT. Inti Indosawit Subur Group.

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Mar 2022 – Feb 2023)	Actual (August 2021 – Nov 2022)		Forecast (Mar 2023 – Feb 2024)
	Previous license period (Aug 2021 – Feb 2022)	Current license period (Mar 2022 – Nov 2022)	
FFB	FFB		FFB
44,478 mt	0	15,106 mt	34,512 mt
	TOTAL	15,106 mt	
CPO (OER: 22%)	CPO (OER: 22.42%)		CPO (OER: 23.20%)
11,120 mt	0	3,387 mt	8,007 mt
	TOTAL	3,387 mt	
PK (KER: 5.49%)	PK (KER: 5.12%)		PK (KER: 5.00%)
2,384 mt	0	774 mt	1,726 mt

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	TOTAL	774 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	August 2021	0	0
2	September 2021	0	0
3	October 2021	0	0
4	November 2021	0	0
5	December 2021	0	0
6	January 2022	0	0
7	February 2022	0	0
8	March 2022	0	0
9	April 2022	65	14
10	May 2022	438	90
11	June 2022	339	80
12	July 2022	861	197
13	Aug 2022	881	214
14	Sept 2022	684	153
15	Oct 2022	84	18
16	Nov 2022	35	8
	TOTAL	3,387	774

Note: there were no certified FFBs supplied to GM1 POM during the period of August 2021 – March 2022, the FFBs were supplied to GM 2 POM – PT Gunung Melayu (RSPO Certified) PT. Inti Indosawit Subur Group.

11. Summary of Actual Volume sold					
Current License period (Mar 2022 – Nov 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	3,235	0	0	3,235
PK (MT)	766	0	0	0	766
Credits	0	0	0	0	0
Previous License period (Aug 2021 – Feb 2022)					
CPO (MT)	0	0	0	0	0
PK (MT)	0	0	0	0	0

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Credits	0	0	0	0	0
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT. Saudara Sejati Luhur, KCP Gunung Melayu		-	766
TOTAL			-	766
Note:				

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	PT. SDS	ISCC	3,235	-
TOTAL			3,235	-
Note:				

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

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	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	NA	NA	NA	NA	NA	NA	NA	NA	NA
IS-CSPO	NA	NA	NA	NA	NA	NA	NA	NA	NA
IS-CSPKO	NA	NA	NA	NA	NA	NA	NA	NA	NA
IS-CSPKE	NA	NA	NA	NA	NA	NA	NA	NA	NA
CSPK	NA	NA	NA	NA	NA	NA	NA	NA	NA

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)
NA	NA	NA	NA	NA	NA	NA
TOTAL		NA	NA	NA	NA	NA

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not applicable)							
Credits	NA	NA	NA	NA	NA	NA	NA
Physical	NA	NA	NA	NA	NA	NA	NA
Previous License period (Not applicable)							
Credits	NA	NA	NA	NA	NA	NA	NA
Physical	NA	NA	NA	NA	NA	NA	NA

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)
NA	NA	NA	NA	NA	NA	NA	NA
TOTAL			NA	NA	NA	NA	NA

Note:

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 19 – 21 December 2022. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on 20 March 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.

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.

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

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

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

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

Tentative Date of Next Visit: December 11, 2023 – December 13, 2023

Total Number of Mandays: 9

2.2 BSI Assessment Team

Name	Role	Competency
Arif Faisal Simatupang	Team Leader	<p>Education: Holds a Bachelor Degree in Agriculture, Majoring Agronomy, Gadjah Mada University</p> <p>Work Experience: 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&C and ISPO.</p> <p>Training attended: Completed ISO9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training, SA8000 Auditor training, Endorse RSPO Refresher Courses and ISH Auditor Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Occupation Health Safety requirement, HIRARC, Environment responsibility, Training.</p>
Yudwi Wisnu Rahmanto	Team Member	<p>Education: Holds a Bachelor of Forestry with Silviculture, Faculty of Forestry, University of Gadjah Mada</p> <p>Work Experience: 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK),</p>

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		<p>Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training Course, Endorsed RSPO Supply Chain Lead Auditor Training Course, ISH Auditor Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Environment impact assessment and management plan, Waste management, GHG, natural and biodiversity conservation, HCV.</p>
<p>Andi Pratama Pasaribu (AP)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree, majoring Social Economy</p> <p>Work Experience: He has more than 5 years experience in the oil palm plantation as agronomy and sustainability officer from 2008 – 2013 and has more than 8 years of RSPO and sustainable palm oil auditing experience.</p> <p>Training attended: Attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, High Conservation Value and GIS Awareness training, ISH Auditor Training and Endorsed RSPO Refresher Courses</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Legal Requirements, land & Legal issue, social requirements, workers’ welfare, human rights, Policy and commitment</p>
<p>Eko Purwanto (EP)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, Endorsed RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, Endorsed RSPO P&C Lead Auditor Refresher Course, Endorsed RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&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&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 ISH Auditor Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p>

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		Aspect covered in this audit: Economic management plan, mill and estate best practices, training, Supply Chain, General Custody of Chain, Rules on Market Communications & Claims.
Nanang Mualib	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 4 years working experience with Forestry Department, 2 years working experience with WWF for sustainable forest management and 17 years working experience as RSPO auditor.</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, Technical Training of HCV Assessment; ISPO Lead Auditor endorsed Course, Endorsed RSPO P&C Lead auditor course, SMETA Requirements training, ISH Auditor Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he audited Social requirements, Stakeholder Consultation, smallholder welfare, contract agreement.</p>

Accompanying Persons:

Name	Role
-	-

2.3 Assessment Plan

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

Date	Time	Subjects	EP	AP	AF	YW	NM
Monday, 19/12/2022	07.05-09.30	Flight Jakarta – Kualanamu	√	√	√	√	√
	09.30-13.00	Traveling Kualanamu – PT. Saudara Sejati Luhur	√	√	√	√	√
	14.00-14.30	<p>Opening Meeting</p> <ul style="list-style-type: none"> - Presentation by Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan 	√	√	√	√	√
	14.30-17.00	<p>Document Review</p> <ul style="list-style-type: none"> - Review of Basic Information Data, Time bound plan, partial certification verification - Verification of Supply Chain Data - Data verification of RSPO P&C (Estate & Mill Best management practices, OHS, EMS, Social and Labour) 					
Tuesday, 20/12/2022	08.00-12.00	<p>Field visit to Pulau Maria Estate</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, 	√	√	√	√	√

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Date	Time	Subjects	EP	AP	AF	YW	NM
		<p>worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc.</p> <ul style="list-style-type: none"> - Visit to worker housing: house condition, water supplies sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 					
	12.00-14.00	Break	√	√	√	√	√
	14.00-16.30	<p>Field Visit to Gunung Melayu I Palm Oil Mill:</p> <ul style="list-style-type: none"> - 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 Mill 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. 	√	√	√	√	-
		<p>Stakeholder consultation</p> <ul style="list-style-type: none"> - Village Head, - Community leader, - Contractor (FFB Transporter, Land Clearing, etc). - Worker union, Gender committee - Local NGO - Previous Landowner (if any) 	-	-	-	-	√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√	√
Wednesday, 21/12/2022	08.00-12.00	<p>Document and records verification</p> <p>Data verification of RSPO P&C (Estate & Mill Best management practices, OHS, EMS, Social and Labour)</p>	√	√	√	√	-
		<p>Stakeholder consultation</p> <ul style="list-style-type: none"> - Stakeholder consultation to relevant agencies of Asahan Regency - Stakeholder consultation with NGO 	-	-	-	-	√
	12.00-14.00	Break	√	√	√	√	√
	14.00-16.30	Morning Agenda continued	√	√	√	√	√

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Date	Time	Subjects	EP	AP	AF	YW	NM
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√	√
Friday, 23/12/2022	08.00-12.00	Document and records verification Data verification of RSPO P&C (Estate & Mill Best management practices, OHS, EMS, Social and Labour)	√	√	√	√	√
	12.00-14.00	Break	√	√	√	√	√
	14.00-16.00	Report Preparation and Auditor Discussion	√	√	√	√	√
	16.00-17.00	Closing Meeting (Carried out together with RSPO P&C ASA1.1 PT. Gunung Melayu-Gunung Melayu II POM)	√	√	√	√	√

NCR Close Out Assessment Plan

Date	Time	Subjects	YW
Monday, 20/03/2023	07.05-09.30	Flight Jakarta – Kualanamu	√
	09.30-13.00	Traveling Kualanamu – PT. Saudara Sejati Luhur	√
	14.00-14.30	Opening Meeting - Presentation by Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan	√
	14.30-17.00	Field Observation and Document Review - Review NC Critical 1 & 2	√
	17.00-17.30	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	There are remaining mill and estate that has not certified yet, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP.	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.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP conducted re-audit in 2022. Latest timebound plan revision submitted to RSPO Secretariat on March 2023 and RSPO approved 19 April 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 time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP conducted re-audit in 2022. Latest timebound plan revision submitted to RSPO Secretariat on March 2023 and RSPO approved 19 April 2023.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	The isolated lapses are justified and latest timebound plan revision was approved by RSPO Secretariat 19 April 2023.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	There is no fundamental failure. Unit management can show the evidence of certification progress such as correspondency of RaCP with RSPO Secretariat. The status as follows: <ul style="list-style-type: none"> PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has 	Complied

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	<p>been received the 2nd clarification data of LUCA review.</p> <ul style="list-style-type: none"> • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has been “Pass” and moving forward to preparing and submitted the remediation plan. • Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO. 	
Un-Certified Units or Holdings		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Latest progress of RaCP for Bahilang Estate and Teluk Panjie Estate: Concept Note still on progress submit to RaCP team Q2 2023. The company is to address the concerns in the revised concept note.</p>	Complied
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest.</p> <p>Another progress related to uncertified unit (PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate) related to progress of RaCP actively communicated with RSPO secretariat. The detail of process as follows:</p> <ul style="list-style-type: none"> • PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review. • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has been “Pass” and moving forward to preparing and submitted the remediation plan. • Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO. 	Complied

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	Unit management actively demonstrates its commitment to the RaCP process.	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p> <p><i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker), PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU’s with potential liabilities: 4 unit • LUCA Submitted: 4 units • LUCA review Completed: 3 unit • Concept Note Required: 3 units • Concept Note Submitted: 2 units • Concept Note Approved: - • Compensation Plan Submitted: - • Compensation Plan Endorsed: - • Remediation Plan Required: 4 units • Remediation Plan Submitted: - • Remediation Plan Approved: - <p>Based on the latest correspondence between the unit management and RSPO Secretariat on 17 February 2022 related to Concept Note submission, The RSPO Secretariat stated <i>"The concept note is close to an endorsement. However, the company should address the recommendations on the long-lasting and timeline section in the revised concept note"</i>.</p>	Complied
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>According to internal audit result on August 2022, there is no land conflict occur in all uncertified unit PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	Complied
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	Complied
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8</p>	<p>According to internal audit result there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung</p>	Complied

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<p>and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. Last internal audit for Teluk Panjie Estate Q1 2023; last internal audit for Topaz Estate at Q1 2023; last internal audit for Bahilang Estate at Q1 2023; last internal audit for Sentral Estate August 2022. Report of internal audit are available. Positive assurance: PT Inti Indosawit Subur committed to fulfil all the requirement related to RSPO certification process. PT Inti Indosawit Subur has detailed the correction and corrective action plan and any unresolved issues has been on the right path towards the certification process.</p>	
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates. Based on internal audit, LUCA PASS and on process RaCP for Sentral Estate and Bahilang Estate.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Stakeholder consultation for Bahilang in October 2022; Stakeholder consultation for Sentral Estate on August 2022; Stakeholder consultation for Topaz Estate carried out February 2022. No complaint noted for the uncertified management units abovementioned.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

<p>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</p>		
<p>Requirement</p>	<p>Remarks</p>	<p>Compliance</p>
<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>No smallholders within scope of Gunung Melayu I POM.</p>	<p>Complied</p>

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Approved Time Bound Plan

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

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

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Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015
		Bahilang Estate* (PT Nusa Pusaka Kencana)	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatra	2024	Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. Changes in Timebound plan approved by RSPO 19 April 2023.
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2026	HGU is still in Process. Changes in Timebound plan approved by RSPO 19 April 2023.
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015
		Peranap (Plasma)		2016	Certified on 18 August 2016
		Bungo Tebo Estate		2015	Certified on 3 December 2015

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Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015
		Sentral Estate		2024	Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. Changes in Timebound plan approved by RSPO 19 April 2023.
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified on 2018
		Aek Kuo (501 Ha)		2018	

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Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill
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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 two (2) Critical; one (1) Minor nonconformities and nil (0) of OFI Opportunity For Improvement raised. The **PT Saudara Sejati Luhur – Gunung Melayu I POM** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2292547-202212-M1	Issued Date	23 December 2022
Due Date	22 March 2023	Closure Date	20 March 2023
Clause & Category (Critical / Minor)	7.3.2 Minor escalated to Major		
Statement of Nonconformity:	Lack of evidence that disposal of waste material is demonstrated properly		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Based on a field visit at Pondok Coklat Housing, Pulau Maria Estate, it was found that domestic waste was not disposed of at the landfill that had been provided, but disposed of not properly behind the Pondok Coklat housing.		
Corrections:	Conduct special inspection and cleaning of the houses that do not throw domestic waste in the available bin every 2 months.		
Root Cause Analysis:	There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management.		
Corrective Actions:	Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used; Make a plan for a routine schedule of employee housing inspections signed by all staff and managers.		
Assessment Conclusion:	The audit team verified impact from the installation of signboard and based on inspection record, employee in Pulau Maria Estate does not disposed of waste behind their houses. The audit team made field visit and found the behind of employee house is clean, no waste disposal. Audit team has verified the correction and corrective action plan being implemented. NC Major closed out.		

Non-conformity			
NCR Ref #	2292547-202212-M2	Issued Date	23 December 2022
Due Date	22 March 2023	Closure Date	20 March 2023
Clause & Category (Critical / Minor)	7.3.3 Minor escalated to Major		
Statement of Nonconformity:	The CH cannot demonstrate the proper domestic waste disposal (without open fire/burning)		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Based on a field visit at Pondok Coklat Housing, Pulau Maria Estate, it was found that domestic waste was disposed using open burning/fire.		
Corrections:	Conduct special inspection and cleaning of the houses that do not throw domestic waste and burning domestic waste in the available bin, every 2 months.		
Root Cause Analysis:	There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management, including the use of fire.		
Corrective Actions:	<p>Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used;</p> <p>Make a plan for a routine schedule of employee housing inspections signed by all staff and managers.</p>		
Assessment Conclusion:	<p>The audit team verified impact from the installation of signboard and based on inspection record, employee in Pulau Maria Estate does not dispose of waste behind their houses and not burning domestic waste.</p> <p>The audit team made field visit and found the behind of employee house is clean, no waste being burned, no trace of waste burning.</p> <p>Audit team has verified the correction and corrective action plan being implemented. NC Major closed out.</p>		

Non-conformity			
NCR Ref #	2292547-202212-N1	Issued Date	23 December 2022
Due Date	ASA1-2	Closure Date	Open
Clause & Category (Critical / Minor)	2.1.2 Minor		
Statement of Nonconformity:	Documented system related evaluation of track changes to the law with relevant regulation was not implemented appropriately.		
Requirement Reference:	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.		

Objective Evidence:	<ul style="list-style-type: none"> - <i>Peraturan Pemerintah No. 22 Tahun 2021 tentang Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup</i> was not listed and evaluated. This is related to Hazardous Waste license which has been expired since 22 November 2022 and should follow the requirement refer to Article 295 and 296 within this regulation. - <i>Peraturan Pemerintah No. 36 Tahun 2021 tentang Pengupahan</i> was not listed. This is related document of "Perjanjian Kerja Bersama" where not been approved by relevant government department. The context of "Perjanjian Kerja Bersama" should be considered to follow the requirements of this regulation.
Corrections:	The management unit coordinates with SSL Officer in Head Office Medan to revise and completing the legal list "Evaluasi Kepatuhan Hukum" and inform the possible changes/new activity to be done in compliance with changes in relevant regulation. To put more detail on new activity and/or license to fulfilled in order to review the impact and provide feedback to the said document.
Root Cause Analysis:	PIC for legal evaluation is not proactive in task related to identify changes, update the document, evaluate impact and provide feedback to the legal list document.
Corrective Actions:	Reiterate and emphasize PIC for public relations in form of memorandum from top management at site. The memorandum including information on seek information and evaluate changes in relevant laws/regulation in each management unit.
Assessment Conclusion:	Will be verified during next surveillance.

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	-

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1933967-202007-M1	Issued Date	15 July 2020
Due Date	13 October 2020	Closure Date	21 September 2020
Clause & Category (Critical / Minor)	6.2.2 Critical		
Statement of Nonconformity:	Certificate holder has not been able to demonstrate in detail related to employment procedures specifically for Specified Time Work Agreement/PKWT employees.		
Requirement Reference:	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.		

	in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.
Objective Evidence:	<p>Certificate holder has had employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009. However, the procedure has not yet been specified in detail related to employment procedures, especially for PKWT employees.</p> <p>Based on document verification on latest employee data documents in May 2020 and estate/mill staff explanation obtained information each unit had some PKWT's workers.</p>
Corrections:	Revised procedures related to HR regarding the implementation of the 2019 RSPO INA NI P&C, especially the mechanism for the recruitment and recruitment of PHL and PKWT workers.
Root Cause Analysis:	Lack of coordination between the Sustainability Department and the HR Department has resulted in procedures related to HR regarding the implementation of the 2019 RSPO INA NI P&C, especially the mechanism for the Acceptance and Appointment of PHL and PKWT workers not yet updated.
Corrective Actions:	Update HR procedures if there are changes to the management system, both RSPO and other management systems.
Assessment Conclusion:	<p>Based on NCR Close Out verification, certificate holder has shown the CAP's evidence as follows:</p> <ol style="list-style-type: none"> 1. Memorandum No. 30/GM/INT/07/2020 dated 23 July 2020. Those memorandum described the recruitment process of Specified Time Work Agreement Worker/Temporary Worker. Effective since the memorandum released. Those memorandum attached with recruitment flow chart. 2. Certificate holder has shown the minutes of meeting with workers representatives on 3 August 2020, attended by 97 workers. 3. Certificate holder has shown the workers evaluation schedule year 2020. Sighted the amount of 43 people on 2020 and 23 people on 2023. <p>Based on that evidence, this Major NC's has been closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Verification at ASA 1.1</p> <p>Unit of certification submit the progress report to Manpower Department in regard promotion of PKWT workers PT Gunung Melayu and PT Saudara Sejati Luhur as per letter No: 342/GM-SSL AA/Ext/IX/2022, dated 5 September 2022.</p> <p>The data of PKWT promoted period Jan-Jun 2022 as below:</p> <ol style="list-style-type: none"> 1. Batu Anam Estate: 23 workers promoted. 2. Aek Tarum Estate: 22 workers promoted. 3. Gunung Melayu 2 POM: 4 workers promoted. 4. Pulau Maria Estate: 15 workers promoted. 5. Gunung Melayu 1 POM: 6 workers promoted. <p>According to the verification during ASA-1.1, the corrective action which implement by unit of certification is effective.</p>

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

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	<p>d. Decreased understanding, awareness and discipline from supervisor and workers regarding the dangers and safety of their work and there is no sanctions for violating these rules.</p>
<p>Corrective Actions:</p>	<p>a. Provide socialization regarding the important of the use of PPE and OHS to all workers. Conduct periodic monitoring and maintenance by workshop supervisor. Effectively check the readiness and conformity with the physical installations required before changing the shifts during the briefing.</p> <p>b. The Management Unit (Pulau Maria Estate) made an agreement with the TUS supervisor and TUS workers in the form of a Statement Letter that the workers were willing to be subject to the agreed sanctions if there were still matters related to the suitability of PPE users.</p> <p>c. Provide apron at workshop and 1 unit in the warehouse as stock if the apron is lot and damaged.</p> <p>d. The Management Unit (Pulau Maria Estate) made an agreement with the TUS supervisor and TUS workers in the form of a Statement Letter that the workers were willing to be subject to the agreed sanctions if there were still matters related to the suitability of PPE users.</p>
<p>Assessment Conclusion:</p>	<p>Based on NCR Close Out Verification, certificate holder has shown the CAP's evidence as follows:</p> <p>a. Certificate holder has shown the minute of meeting with workers on 23 September 2021, attended by 26 workers at Gunung Melayu I POM. The socialization has also conducted through media OHS bulletin regarding topic "Advice to self-cleaning after working with chemical", OHS bulletin has distributed via WhatsApp.</p> <p>Periodic monitoring and maintenance by workshop supervisor has shown during verifications. The document evidence is for September and October 2021.</p> <p>Field verification has conducted at Gunung Melayu I POM, based on field verification has shown that all rotating machine has equipped by safety cover.</p> <p>b. Certificate holder has shown the minute of meeting with TUS workers (Pulau Maria Estate) in September 2021, attended by 15 workers.</p> <p>Certificate holders has shown the agreement letter regarding willing to be subject to the agreed sanction if there are still matters related to the suitability of PPE users.</p> <p>Field verification has conducted at TUS room, it was shown that the CH has provide the employee locker to store clean PPE, further a clothesline is also provided.</p> <p>Based on interview with the TUS workers during NCR Close Out visit at Pulau Maria Estate Block I02a Afd I revealed that all TUS workers have understood regarding the importance of using PPE.</p> <p>c. Certificate holders has shown the evidence regarding the Purchase Order for Welding Apron as mentioned on the Good Receive Notes (GRN) No. 113200597 dated 7 September 2021, qty 2 pcs.</p>

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	<p>Field verification has conducted at workshop and warehouse, apron has already available.</p> <p>d. Certificate holder has shown the minute of meeting with TUS workers (Pulau Maria Estate) in September 2021, attended by 15 workers.</p> <p>Certificate holders has shown the agreement letter regarding willing to be subject to the agreed sanction if there are still matters related to the suitability of PPE users.</p> <p>Field verification has conducted at TUS room, it was shown that the CH has provide the employee locker to store clean PPE, further a clothesline is also provided.</p> <p>Based on interview with the TUS workers during NCR Close Out visit at Pulau Maria Estate Block I02a Afd I revealed that all TUS workers have understood regarding the importance of using PPE</p> <p>Based on that evidence, this Major NC's has been closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Verification at ASA 1.1</p> <p>During field observation in mill and estate found:</p> <ul style="list-style-type: none"> • All rotate machine in mill has been covered. • All pesticide applicator has been equipped with appropriate PPE such as uniform, mask, hand glove, safety boot and apron. All PPE stored in agrochemical store after working hour. <p>Other than that, auditor team has observed the documentation of rotate machine monitoring and handover PPE to the mill worker period 2022.</p> <p>According to the verification during ASA-1.1, the corrective action which implement by unit of certification is effective.</p>

Non-conformity			
NCR Ref #	2097225-202108-N1	Issued Date	21 August 2021
Due Date	ASA1-1	Closure Date	15 November 2021
Clause & Category (Critical / Minor)	3.2.2 Minor		
Statement of Nonconformity:	PT. Saudara Sejati Luhur – Gunung Melayu I POM and its supply base cannot provide filled up/completed RSPO metrics template.		
Requirement Reference:	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.		
Objective Evidence:	PT. Saudara Sejati Luhur – Gunung Melayu I POM and its supply base cannot provide filled up/completed RSPO metrics template.		
Corrections:	Re-Inventory and re-identify the required data in the templates in the units (estate and mill), so that the data can be completed.		
Root Cause Analysis:	There is no coordination between the Sustainability Dept and units (estate and Mill), so there has not been an update as per new indicator regarding the		

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	implementation of the RSPO PC INANI 2020 especially the mechanism of RSPO Metric Template.
Corrective Actions:	Create a standard mechanism and format for the timeline progress for the implementation of data collection related to the RSPO Metric Template, so that the required data is available and complete before the next audit.
Assessment Conclusion:	Unit of certification has sent the RSPO Metric Template and verified by auditor during the NCR Close Out Visit. based on that, this non-compliance is closed .
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable

Non-conformity			
NCR Ref #	2097225-202108-N2	Issued Date	21 August 2021
Due Date	ASA1-1	Closure Date	23 December 2022
Clause & Category (Critical / Minor)	6.7.2 Minor		
Statement of Nonconformity:	Based on field visit sampled, first aid equipment was not complete available at worksites as required in PERMENAKER No:15/MEN/VIII/2008		
Requirement Reference:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Corrections:	Complete first aid kit for the mandor, at warehouse and workshop.		
Root Cause Analysis:	There is no mechanism and PIC that has special task for the completeness of first aid kit or medicine according to the applicable requirements		
Corrective Actions:	The manager issues a Memorandum of Affirmation for special officers on the completeness of the first aid kit, to ensure that the reference for the types of drugs used in the garden are materials that comply with the Permenaker 15/2008 and make a list format for the type of drugs and equipment as a reference routine monitoring that must be documented by PIC t the RSPO Clerk		
Assessment Conclusion:	During this audit observed that the first aid box has been completed in accordance with national regulation in mill and estate. The record of first aid kit completion is in place. Furthermore, the field supervisor who act as first aider can demonstrated the first aid usage. Based on information above, this non-conformance is closed.		
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable		

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Non-conformity			
NCR Ref #	2097225-202108-N3	Issued Date	21 August 2021
Due Date	ASA 1-1	Closure Date	20 March 2023
Clause & Category (Critical / Minor)	7.3.2 Minor raised to Major		
Statement of Nonconformity:	Lack of evidence that disposal of waste material is demonstrated properly		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Based on field visit at Housing Division I - Pulau Maria Estate, it was found that domestic waste has not been managed properly, domestic waste is seen pilling up behind the housing areas, furthermore it also was found 2 (two) cans of used oil behind the housing areas, this is not in accordance with SOP AA-KL-05-EFP rev.2 dated 1 February 2008 "Penanganan Sampah Industri Non-B3" and SOP AA-KL-06-EFP rev.8 dated 1 June 2021 "Penanganan Limbah B3".		
Corrections:	Conduct special inspection and cleaning of the houses that do not throw domestic waste in the available bin every 2 months.		
Root Cause Analysis:	There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management.		
Corrective Actions:	<ul style="list-style-type: none"> • Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used, • Make a plan for a routine schedule of employee housing inspections signed by all staff and managers. 		
Assessment Conclusion:	<p>Verification during ASA 1.1 audit:</p> <p>Based on a field visit at Pondok Coklat Housing, Pulau Maria Estate, it was found that domestic waste was not disposed of at the landfill that had been provided but disposed of not properly behind the Pondok Coklat housing.</p> <p>This NC has not been closed yet. The status is raised from Minor to Major category. See NC 2292547-202212-M1.</p>		
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable		

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Non-conformity			
NCR Ref #	2097225-202108-N4	Issued Date	21 August 2021
Due Date	ASA1-1	Closure Date	Escalated to Critical
Clause & Category (Critical / Minor)	7.3.3 Minor raised to Critical		
Statement of Nonconformity:	Based on field visit at Housing Division 1 - Pulau Maria Estate, it was found that domestic waste has not been managed properly, during the visit it was observed that there were traces of burning waste behind the housing areas.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Based on field visit at Housing Division 1 - Pulau Maria Estate, it was found that domestic waste has not been managed properly, during the visit it was observed that there were traces of burning waste behind the housing areas.		
Corrections:	Conduct special inspection and cleaning of the houses that do not throw domestic waste in the available bin every 2 months.		
Root Cause Analysis:	There is no sudden inspections and visits by management (all staff and security) in the last 2 years due to the COVID 19 pandemic, thereby reducing the awareness of residents of housing, causing indiscipline in waste management.		
Corrective Actions:	<ul style="list-style-type: none"> • Making sign board regarding the disposal of domestic waste and including hazardous waste which is often used, • Make a plan for a routine schedule of employee housing inspections signed by all staff and managers. 		
Assessment Conclusion:	<p>Verification during ASA 1-1 audit:</p> <p>Based on a field visit at Pondok Coklat Housing, Pulau Maria Estate, it was found that domestic waste was disposed using open burning.</p> <p>This NC has not been closed yet. The status is raised from Minor to Major category. See NC 2292547-202212-M1.</p>		
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable		

Non-conformity			
NCR Ref #	2097225-202108-N5	Issued Date	21 August 2021
Due Date	ASA1-1	Closure Date	Escalated to Critical
Clause & Category (Critical / Minor)	7.12.7 Minor raised to Critical		
Statement of Nonconformity:	PT. Saudara Sejati Luhur has not put management and monitoring plan from HCV assessment document and monitoring report as feedback to HCV management and monitoring plan/conservation management plan. And the conservation management plan has no plan for monitoring of disturbance to HCV identified.		

Requirement Reference:	7.12.7 The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.
Objective Evidence:	PT. Saudara Sejati Luhur has not put management and monitoring plan from HCV assessment document and monitoring report as feedback to HCV management and monitoring plan/conservation management plan. And the conservation management plan has no plan for monitoring of disturbance to HCV identified.
Corrections:	Coordinate with the HCV Officer HO by providing guidance and direction in the revision and evaluation of the document CMP related to the management and monitoring of further HCVs, especially the plan for monitoring the level of disturbance to the HCVs that have been identified.
Root Cause Analysis:	Lack of understanding in the unit to complete the results of the analysis of monitoring and identifications of biodiversity concludes regarding the description of species conditions in detail, and the reciprocal impacts given in the CMP document.
Corrective Actions:	Provide socialization and training in the preparation of special CMP reports to the PIC by the HCV Officer HO, so that they understand in completing the conclusions from the results of the analysis of monitoring and identification of biodiversity related to the description of species conditions in detail, and the reciprocal impacts given in the CMP document.
Assessment Conclusion:	PT. Saudara Sejati Luhur has put management and monitoring plan from HCV assessment document and monitoring report as feedback to HCV management and monitoring plan/conservation management plan. The conservation management plan has included the monitoring of disturbance to HCV identified. This non-conformance is closed.
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable

Opportunity for Improvement	
OFI#	Description
OFI 1	-

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Recertification Assessment (Remote Audit)				
1933967-202007-M1	Critical	6.2.2	15/07/2020	Closed on 21/09/2020
Recertification Assessment (Onsite Audit)				
2097225-202108-M1	Critical	6.7.3	21/08/2021	Closed on 15/11/2021
2097225-202108-N1	Minor	3.2.2	21/08/2021	Closed on 15/11/2021

2097225-202108-N2	Minor	6.7.2	21/08/2021	Closed on 23/12/2022
2097225-202108-N3	Minor	7.3.2	21/08/2021	Open, Escalated to Major
2097225-202108-N4	Minor	7.3.3	21/08/2021	Open, Escalated to Major
2097225-202108-N5	Minor	7.12.7	21/08/2021	Closed on 23/12/2022
ASA 1.1				
2292547-202212-M1	Minor escalated to Major	7.3.2	23/12/2022	Closed on 20/03/2023
2292547-202212-M2	Minor escalated to Major	7.3.3	23/12/2022	Closed on 20/03/2023
2292547-202212-N1	Minor	2.1.2	23/12/2022	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss **PT Saudara Sejati Luhur – Gunung Melayu I** 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)
Internal	Gender Committee	Face to face
Union	Worker Union	Face to face
Contractor	FFB contractor	Face to face
Governmental Department	Asahan Regency Manpower Office Asahan Regency Lands Office Asahan Regency Agriculture and Plantation Office Asahan Regency Environmental Office	Face to face
Communities	Sidomulyo Village Batu Anam Village Gonting Malaha Village	Face to face

Stakeholders comment	
1	<p>Feedbacks: Asahan Regency Manpower Office</p> <ul style="list-style-type: none"> - PT. Saudara Sejati Luhur has meet minimum wage for Asahan Regency. - PT. Saudara Sejati Luhur has register all the workers with BPJS Kesehatan and Ketenagakerjaan, including for the "Pekerja Harian Lepas"/contract worker. - Company has reported the mandatory workforce report "Wajib Lapor Ketenagakerjaan" and submitted to the Manpower Office. - There was no report on use of child worker and/or use of female worker for night-time work. - Company has safety committee and has been acknowledge by Asahan Regency Manpower Office. The company also reporting their OHS performance on regularly. - Company has provided PPE for the worker, for all type of work activities. Discipline in using PPE can be improved. - Company has recommendation to use hazardous material from Asahan Regency Manpower Office. - Company handled work related incident in good manner, including reporting to Manpower Office and claiming process to BPJS Ketenagakerjaan. - Company carried out regular medical checkup priority for worker on high risk including sprayer, fertilizer and mill worker. - Company has valid permit for lift-carry tools, pressure vessel, etc. including performing regular inspection; and operators have been registered with operator license. - Company and worker has established bipartite committee to resolve any industrial dispute and acknowledge by Manpower Office. In year 2022, there was a case on industrial dispute, but Manpower Office has mediated, and the case resolved. - Company has Collective Work Agreement. - Company has provided infrastructure for worker welfare: worker housing, electricity, clean water, clinic, school, etc. <p>Audit Team verification and response: Audit team has verified with indicator related to worker welfare, occupational health and safety and found align. This recorded as positive comment.</p>
2	<p>Feedbacks: Asahan Regency Lands Office</p> <ul style="list-style-type: none"> - Company has consistently reported the use of land title/HGU. - The land title/HGU is still valid. <p>Audit Team verification and response: Audit team verified against the indicator related to legal compliance, support to smallholder, community development and found in compliance.</p>
3	<p>Feedbacks: Asahan Regency Agriculture and Plantation Office</p> <ul style="list-style-type: none"> - The land title/HGU for PT. Saudara Sejati Luhur has meet the designation as per spatial planning in Asahan Regency as "Kawasan Budidaya Tanaman Perkebunan"; furthermore the plantation area as per land title/HGU was not categorized as forest area. - Company has submitted mandatory report on plantation business progress, in statistical format.

	<ul style="list-style-type: none"> - FFB price from company was based on market price, and not binding to FFB price determined by Sumatera Utara government. Based on community inputs, the FFB price sets by PT. Saudara Sejati Luhur has better FFB structure compared to other company in the region.
	<p>Audit Team verification and response: Audit team verified against the indicator related to legal compliance, support to smallholder, community development and found in compliance. This comment recorded as positive comment.</p>
<p>4</p>	<p>Feedbacks: Asahan Regency Environmental Office</p> <ul style="list-style-type: none"> - Asahan Regency’s Environmental Office conduct meeting every 3 months in review environmental management and monitoring performance. - Company has environmental permit, environmental impact assessment, environmental management and monitoring document; and reporting the implementation to Environmental Office. - Company has managed the hazardous waste and holds valid temporary hazardous waste store in line with regulation. - There is no report on environmental pollution from mill and estate operation. - Fertilizer inner bag categorized as hazardous waste and shall be treated/kept in permitted temporary hazardous waste storage. - Input from Environmental Office to meet latest environmental regulation: <ol style="list-style-type: none"> a. Company to submit technical consideration for land application “Pertimbangan Teknis Pemanfaatan Limbah Cair untuk Land Aplikasi”; b. Company to submit technical consideration for domestic wastewater “Pertimbangan Teknis Pengelolaan Limbah Domestik Cair”; c. Company to submit technical specification for hazardous waste storage “Rincian Teknis Fasilitas TPS Limbah B3”. <p>Audit Team verification and response: Audit team verified against the indicator related to legal compliance, environmental management system, water quality and found in compliance. This comment recorded as positive comment.</p>
<p>5</p>	<p>Feedbacks: Village communities Sidomulyo Village, Batu Anam Village, Gonting Malaha Village</p> <ul style="list-style-type: none"> - In general, the communication between village community and company is good. - Company has always responded to issues conveyed by community or village authorities. - Company has realized CSR program to surrounding community and ask community participation during CSR program preparation. - Surrounding community feels the positive benefit from company program: road maintenance, road material provision, housing renovation, mosque renovation, provision of bore well for clean water, package for Eid al Fitr and Christmas. - So far, no land conflict reported. - Company gave training and awareness on HCV area, no fire use for planting oil palm, firefighting, prohibit hunting/poaching poisoning fish. - Currently company has CSV program to develop community economic by aiding surrounding oil palm plantation for partnership and guiding for independent smallholder. Company assisting smallholder to be independent smallholder. - Surrounding community understand company prohibit underage/child worker, prohibit force labour, respect human rights.

	<ul style="list-style-type: none"> - Company absorbs local community as worker.
	<p>Audit Team verification and response: Audit team verified against the indicator related to transparency, legal compliance, support to smallholder, community development and found in compliance. This comment recorded as positive comment.</p>
6	<p>Feedbacks: Gender Committee</p> <ul style="list-style-type: none"> - Gender committee has annual working program: meeting, socialization on female worker rights to female workers, training on manpower regulation. - So far, no complaint on sexual harassment, domestic violence to female worker, and/or violation of female reproductive rights. - Gender committee meeting carried out 3 months. Coordinating the gender committee activity for PT. Saudara Sejati Luhur and PT. Gunung Melayu. - Company has demonstrated effort to protect female worker rights: period (menstruation) leave, maternal leave, specific medical checkup for female worker in high-risk area, pregnancy test for sprayer and fertilizer. - Gender committee understand the mechanism to convey complaint, including protection of anonymity. <p>Audit Team verification and response: Audit team verified against the indicator related to worker welfare, no discrimination, occupational health and safety, protection on female worker rights, complaint handling and found in compliance.</p>
7	<p>Feedbacks: Worker Union</p> <ul style="list-style-type: none"> - Company has implemented the normative rights such as worker payment meets government minimum wage, paying benefit for religious festivities, register worker to BPJS Ketenagakerjaan and Kesehatan – until contract worker level. - From legal point of view, SPSI member composed of permanent worker, starting from worker to staff; however, the worker union also put attention to contract worker. - Each contract worker has work agreement. - Performance evaluation carried out once per year as management consideration for evaluation, promotion, mutation, etc. - No indication company discriminate the workers, all treated equally. - Company has provided working tools and PPE for the workers. - Company provides facility for the worker: worker housing, clean water, water closet, electricity, sanitation, school bus, clinic, mosque. - No indication company violates human rights, violate policy on forced labor, violate female worker reproductive rights. - There was a case of industrial relation dispute, but then said worker and company mediated by Manpower Office and agreement achieved/resolved. <p>Audit Team verification and response: Audit team verified against the indicator related to worker welfare, no discrimination, occupational health and safety, protection on female worker rights, complaint handling and found in compliance.</p>
8	<p>Feedbacks: FFB Contractor</p> <ul style="list-style-type: none"> - FFB payment done in timely manner, the price paid as per agreement.

	<ul style="list-style-type: none"> - The FFB price updated every time there's a change. - FFB that does not meet quality requirement returned to the FFB supplier (not processed). - PT. Saudara Sejati Luhur asked FFB supplier/contractor to demonstrate data related to land legality, oil palm plantation GPS coordinate.
	<p>Audit Team verification and response: Audit team verified against the indicator related to contractor compliance, health and safety implementation, community development, complaint handling and found in compliance.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A	-	-	-	-	-
PT Saudara Sejati Luhur – Gunung Melayu I POM has been established since 1975. Currently the palm oil has been replanted since 2008.					



Previous land owner / user comment	
	<p>Feedbacks: N/A</p>
	<p>Audit Team verification and response:-</p>

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that **PT Saudara Sejati Luhur – Gunung Melayu I POM** has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that **PT Saudara Sejati Luhur – Gunung Melayu I POM** is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Arif Faisal Simatupang	Name: Putu Grhyate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT Saudara Sejati Luhur – Gunung Melayu I POM
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 20/03/2023	Date: 24/03/2023

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -</p>	<p>There is no change compared to the previous assessment. The Certificate Holder has shown the list of information that can be accessed by relevant stakeholders under document "<i>Daftar Dokumen Yang dapat diakses oleh Stakeholders</i>, Memorandum No. 12/GM-GME/Int/V/2021", updated on 17 May 2021, that covered:</p> <ol style="list-style-type: none"> 1. Legal Documents - a copy of SK HGU (Land Title) - a copy of AMDAL (Social and Environmental Impact Assessment) - a copy of Operational Permit (IUP/SPUP). 2. Environment Documents - Hazardous waste storage permit - Waste management plans - Report of wastewater - Report of water management - Report of river water quality - Report of air quality. - Report of RKL (Environmental Management Plan) – RPL (Environmental Monitoring Plan). - Report of Hazardous Waste - HCV Assessment 3. Social Activity Documents (<i>Rencana dan Realisasi Program CSR</i>). 4. Employment Documents. - <i>Jamsostek</i> and also <i>BPJS Kesehatan</i> - HSE management programs. 	<p>Complied</p>
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -</p>	<p>The provision of publicly available document segregates based on stakeholder category. Based on review of documents mentioned above, the information is provided in Indonesian language (Bahasa Indonesia).</p>	<p>Complied</p>

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<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>The Certificate Holder has developed a communication procedure under SOP of Information Request from Stakeholder No. SOP; AA-GL-5008.1-R1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will be responded according to respective authorities, starts from Humas (Public Relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respond information request on 14 working days.</p> <p>Recording information requests can be seen in Logbook of incoming and outgoing mail. From the Logbook review, there was no request for information from the stakeholders, therefore there was no response.</p> <p>However, the company has submitted regular mandatory reports to government agencies such as Report on Environment Management and monitoring (RKL-RPL), OHS Committee reports, CSR Reports, Plantation Development Report (LPUP), etc.</p>	<p>Complied</p>
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -</p>	<p>The Certificate Holder has developed a communication procedure under SOP of Information Request from Stakeholder (No. SOP; AA-GL-5008.1-R1) dated 22 August 2011, SOP Grievance Handling (internal) No. SOP AA-HR-308.5-R1, dated 1 December 2019, and SOP Grievance Handling from External (SOP AA-GL-510.1-R0, dated 1 Jan 2013. SOP also explains the company responses against all information requested sent by stakeholders including response time of 14 working days after information request accepted.</p> <p>The company has nominated Public Affair Staff as per "Memorandum Regional Head Plantation-1 No.071/HR-RO1/MEMO/02/17" dated 25 February 2017 as Personnel in Charge related to consultation and communication with local communities and other stakeholders.</p> <p>Based on public stakeholder consultation with local contractor, NGO and public official, it was revealed that company has disseminated the</p>	<p>Complied</p>

		procedure. However, they has not yet request for certain information to the management.	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	The list of stakeholder list updated annually by Public Relation. Last update performed in July 2022, consist of 27 stakeholders which related to company operations, as follows: <ul style="list-style-type: none"> - Government institutions consist of surrounding Villages, District Head, and related Agency of Asahan Regency (Dinas Lingkungan Hidup, Dinas Pertanian and Perkebunan, Dinas Tenaga Kerja, BPN, BPPPM and BAKORTIBA). - Informal Institution around the company, e.g. DPC F-SP.PP SPSI Asahan, Public Figure, Worker Union and Gender Committee. - NGO around the company i.e.: Icon RI, etc. 	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	There is no change compared to the previous assessment. The company has a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director. The company's policy confirms the Code of Conduct behaviour inbusiness at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources. In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (Perjanjian Kerja Harian Lepas), which is stated in the appendix to corporate policies and behaviors that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in article 16 related of the behavior of the business ethics in the company.	Complied

		The company's policy is also published to use posters at any strategic places in all Estates and POM. In the contractual agreements with third party contractors, these clauses also have been mentioned.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	System to monitor compliance and implementation of its policy applied through poster which distribute in all units. Poster with title " <i>Bantu Perusahaan Kita Tetap Bersih/Keep Our Company Clean</i> " is publicly accessible. If there is any violation or illegal action within the company, is available through hotline (call) and email to whistleblow@rgei.com . Other ways to monitor the compliance are conducted by RSPO internal audit, operation internal audit, and financial audit. Based on interview with workers, obtained information that there is no violation in terms of code of conduct during recruitment or promotion process.	Complied
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -	PT Saudara Sejati Luhur as Unit of Certification has procedure of identification and evaluation of legal requirements " <i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i> " (SOP AA-GL-5001.1-R0), dated 5 December 2009. Person in charge to identify and evaluate is legal staff in coordinate with unit head. Evaluation period conducted in two period which is January – June and July to December. Legal requirements for PT SSL consist of: Organisation legal standing - Company Deed: 1. No. 62 dated 20 March 1971, registered as PT. Saudara Sejati	Complied

		<p>Luhur.</p> <ol style="list-style-type: none"> 2. No. J.A.5/28/18 dated 15 February 1972, registered by Ministry of Justice. 3. Amended Company Deed (based on Extraordinary Shareholders Meeting): Deed No.10 dated 5 February 2020. Notary: Esther P.E. Jovina, SH, MKn. Approval Ministry of Laws and Human Right: AHU-001461.AH.01.02.TAHUN 2020, dated 10 February 2020. <p>- Company Tax Registration Number (NPWP): 01.139.030.9-073.000.</p> <p>Land Tenure and Land-Use Rights HGU Certificate Number: 1, dated 29 April 2004. Ministry of Land Decree 154/HGU/BPN/2004, dated 11 November 2004. Valid until 31 December 2030. Area: 2,301.88 Ha.</p> <p>Plantation Permit Surat Pendaftaran Usaha Perkebunan Nomor: HK. HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Plantation area permitted: 2,319 Ha; Mill capacity: 30 MT FFB/hr.</p> <p>Premises License Ijin Tempat Usaha No. 503/SITU/BPP/06781/XII/ 2007 dated 27 December 2007.</p> <p>All the legal permit listed in the document "Evaluasi Kepatuhan Hukum PT Saudara Sejati Luhur". Updated regularly by the document control. The last updated in July 2022. All the documents are valid.</p>	
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<p>2.1.2</p>	<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>A documented system for ensuring legal compliance, Unit of Certification implement updating law and regulations periodically. An updating law and regulations was documented within "Evaluasi Kepatuhan Peraturan PT. Saudara Sejati Luhur", dated 3 July 2022. There are 25 updated national regulation that were identified in 2022. Person in charge for updating this document is Administration Head with supported by Sustainability Team and Legal Department as evaluation team. For example: <i>Undang – Undang Cipta Kerja No. 11/2020</i> and its clauses, <i>Permentan 38/2020</i> related to Indonesian Sustainable Palm Oil (ISPO), Minimum Wage of 2022 based on Governor Sumatera Utara Decree No. 188.44/781/KPTS/2021 dated 19 November 2021. All the document mentioned before has been updated in the "Daftar Update Peraturan 2022".</p> <p>Non-compliance raised:</p> <p>PT SSL's regulatory change tracking system and its evaluation have not been fully implemented, for example</p> <ul style="list-style-type: none"> - Government Regulation No. 22 of 2021 concerning the Implementation of Environmental Protection and Management is not available in the Legal Compliance Evaluation. Where, TPS LB3 has expired, has not shown the detailed technical documents as stipulated in the PP articles 295-296. - Government Regulation No. 36 of 2021 concerning Wages is not available in the Legal Compliance Evaluation. This is related to the Collective Labor Agreement currently in force which has not been ratified, in which the CBA contains the parameters contained in the Government Regulation. <p>The legal department also conducted the evaluation of legal compliance of third parties engaged. Especially the fulfilment of working agreement.</p>	<p>Non-compliance</p>
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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 which verified onsite by auditor based on sample visited as below:</p> <table border="1" data-bbox="1131 443 1977 853"> <thead> <tr> <th>Poles #</th> <th>GPS coordinates monitoring on 2 December 2022.</th> <th>GPS coordinates verified by auditor</th> </tr> </thead> <tbody> <tr> <td>SSL 21</td> <td>2° 47' 12.36" N 99° 36' 32.04" E</td> <td>2° 47' 12.60" N 99° 36' 32.31" E</td> </tr> <tr> <td>SSL 27</td> <td>2° 46' 34.61" N 99° 36' 10.26" E</td> <td>2° 46' 34.59" N 99° 36' 10.34" E</td> </tr> <tr> <td>SSL 28</td> <td>2° 46' 41.84" N 99° 36' 10.66" E</td> <td>2° 46' 42.04" N 99° 36' 10.60" E</td> </tr> <tr> <td>SSL 38</td> <td>2° 45' 51.59" N 99° 35' 17.27" E</td> <td>2° 45' 51.35" N 99° 35' 17.56" E</td> </tr> </tbody> </table> <p>Based on verification onsite, there is no planting beyond these legal or authorized boundaries by unit of certification.</p> <p>Legal boundaries monitoring is recorded in "Laporan monitoring pemeriksaan dan perawatan patok HGU PT Saudara Sejati Luhur – Kebun Pulau Maria", dated 2 Dec 2022.</p>	Poles #	GPS coordinates monitoring on 2 December 2022.	GPS coordinates verified by auditor	SSL 21	2° 47' 12.36" N 99° 36' 32.04" E	2° 47' 12.60" N 99° 36' 32.31" E	SSL 27	2° 46' 34.61" N 99° 36' 10.26" E	2° 46' 34.59" N 99° 36' 10.34" E	SSL 28	2° 46' 41.84" N 99° 36' 10.66" E	2° 46' 42.04" N 99° 36' 10.60" E	SSL 38	2° 45' 51.59" N 99° 35' 17.27" E	2° 45' 51.35" N 99° 35' 17.56" E	Complied
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																		
2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>List of contracted parties made available in "Daftar Stakeholder PT Saudara Sejati Luhur" updated in January 2022. The list of contracted parties is general contractor, CPO/PK transporter, replanting contractor – land clearing/felling and chipping and FFB contractor.</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 of contracts verified: Contract agreement "Kontrak Jual Beli PT Sawit Trading Sejahtera" Nomor: 001/TBS/GM/2020, dated 1 May 2020 (valid until the contract is terminated with one of party).</p>	Complied															

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		<p>Specific clause on meeting relevant legal requirements already covers within "Catatan":</p> <ul style="list-style-type: none"> - <i>TBS yang dipasok kepada Pembeli berasal dari lahan yang telah dimiliki/dikuasai/diusahakan sesuai peraturan perundangan khususnya di bidang pertanahan, perkebunan seta peraturan terkait lainnya yang berlaku</i> – FFB supplied to the mill sourced from land managed/controlled in accordance to relevant laws and regulations on land legality, plantation and other applicable regulation. 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Sample of contracts verified:</p> <p>Contract agreement "Kontrak Jual Beli PT Sawit Trading Sejahtera" Nomor: 001/TBS/GM/2020, dated 1 May 2020 (valid until the contract is terminated with one of party).</p> <p>Specific clause on meeting relevant legal requirements already covers within "Catatan":</p> <ul style="list-style-type: none"> - <i>"Penjual melarang pekerja dibawah umur, kerja paksa dan perdagangan manusia di arealnya"</i> – FFB supplier prohibit use of child labor, forced labor and human trafficking in his/her operational area. 	Complied
<p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Certificate holder has the traceability procedure for FFB Purchased. This procedure stated on Procedure Traceability – FFB Purchase (AA-SOP-MM-506.4-R1 dated 1 September 2017. The procedure stated that all FFB supplier shall make guarantee statement that FFB delivered are legal, not coming from protected forest, conservation forest or production forest; No deforestation; zero burning; and not employed underage worker. The company cooperates with the surrounding community in terms of purchasing FFB and recorded in "Pernyataan dan Jaminan" - Statement and Guarantee as a supplier of FFB. The document stated that:</p>	Complied

		<ol style="list-style-type: none"> 1. FFB that supplied to Gunung Melayu I POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation. 2. FFB supplied does not originate from unauthorized areas, such as: <ol style="list-style-type: none"> a. Protected Forest Area b. Industrial Forest Area c. Production Forest Area d. Conservation Area <p>Based on the record of mill's supplier as follows:</p> <ul style="list-style-type: none"> • PT Tinggi Raja (Plantation Company) • Hasan BP (Private Ownership) • Herman Wijaya (Private Ownership) • Keb. Aman (Private Ownership) • Sihotang CO (Private Ownership) • Sinar Bakti I (Private Ownership) • Sipanjang (FFB collector and trader) • Abdul Gani (FFB collector and trader) • BD Siregar (FFB collector and trader) • DE & SK & ST & LU (FFB collector and trader) • PT Sawit Trading Sejahtera (FFB collector and trader) • PT Sawit Trading Sejahtera A (FFB collector and trader) • PT Sawit Trading Sejahtera L (FFB collector and trader) • PT Sawit Trading Sejahtera AK (FFB collector and trader) • Win Win (FFB collector and trader) • CV Abadi Tetap Jaya (FFB collector and trader) 	
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		<p>In accordance with interview and document verification with Create Share Value (CSV) and FFB Purchasing staff, obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Copy of bank account <p>All supplier is an independent supplier. Which mean they can sell their FFB to the different mill with the best price. In Gunung Melayu I POM, the price in refer to the Procedure Traceability – FFB Purchase (AA-SOP-MM-506.4-R1 dated 1 September 2017.</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>According to the information above, FFB purchasing department has defined the type of supplier including the collection centres, agents and intermediaries. Each supplier has verified their supply base including the geolocation which has verified by FFB Purchasing staff.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			

<p>3.1.1</p>	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -</p>	<p>There is no change compared to the previous assessment. The company has provided long-term management plan in document <i>Rencana Jangka Panjang periode 2020 – 2025</i>. This document described the five year business projection of the company.</p> <p>The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) <p>Through the document, the production of Gunung Melayu I POM is projected to increased.</p> <p>Based on interview with head clerk and sustainability staff, PT Saudara Sejati Luhur has started to engage with independent smallholder named Create Share Value (CSV) near the Saudara Sejati Luhur's concession since a couple year ago and renewed annually.</p>	<p>Complied</p>
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>Based review of area statement, the oldest plant is 20 years old. Therefore, replanting program were not applicable for this unit.</p> <p>Based on document Long Term Management Program <i>2020 – 2025</i> obtain information that there is no replanting plan until 2025.</p>	<p>Complied</p>
<p>3.1.3</p>	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -</p>	<p>The management review is conducted after internal audit. For instance, the latest internal audit is conducted on 22 – 27 August 2022. The result will be used as an input for monthly management review/meeting. Input of management review consist of:</p> <ul style="list-style-type: none"> • Internal audit result 	<p>Complied</p>

		<ul style="list-style-type: none"> • Customer feedback • Proses performance and product conformity • Status of Corrective and Preventive Action • Follow up previous management review • Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> • Recommendation for improvement • Resources needed. <p>Based on interview with estate and mill manager obtained information that they have been conducting monthly management review to follow up the internal audit/visit and reported the correction to the agronomy/mill advisor.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continues improvement were developed by Unit of Certification is by following up the non-conformities of the internal audit and certification audit. Also, they have annual Continuous Improvement (CI) Report to create improvements in their Mill and Estate. Continuous report verified. Based on the report and observation, the continuous improvement observed among others:</p> <ul style="list-style-type: none"> - Improvement to reduce harvester turn over. - The usage of mini tractor for harvesting transport. - reducing recondition time for screw press from 20 hours to 14 hours. - Improvement of EFB application in flat area. The issue related to uneven EFB per palm. - Improvement of harvesting FFB with PalmPro mechanism. 	<p>Complied</p>

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3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template. - Minor compliance -	The unit of certification has sent the RSPO Metric Template. All variables of Estates and Mill have been filled appropriately. The company has made a timeline and PIC for arranging the annual RSPO Metric Template.	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	PT Saudara Sejati Luhur – Pulau Maria Estate has demonstrated procedures for estate operation, starts from land preparation including replanting up to harvesting, such as: 1. SOP AA-APM-OP-1100.01-R4, dated 5 Sep 2016: <i>Pembibitan</i> (Nursery). 2. SOP AA-APM-OP-1100.02-R3, dated 10 Jun 2015: <i>Penanaman Areal Baru</i> (New Area Planting). 3. SOP AA-APM-OP-1100.03-R2, dated 24 Jul 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (road and bridge construction and maintenance). 4. SOP AA-APM-OP-1100.04-R3, dated 7 Dec 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (culvert/drainage construction and maintenance). 5. SOP AA-APM-OP-1100.05-R3, dated 23 Nov 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). 6. SOP AA-APM-OP-1100.06-R6, dated 16 Feb 2017: <i>Menanam Kacangan</i> (Planting cover crops). 7. SOP AA-APM-OP-1100.07-R6, dated 16 Feb 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palm). 8. SOP AA-APM-OP-1100.08-R6, dated 11 May 2016: <i>Pengendalian Gulma</i> (Weed control). 9. SOP AA-APM-OP-1100.09-R5, dated 5 Sep 2016: <i>Pemupukan</i> (Fertilizer application).	Complied

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		<p>10. SOP AA-APM-OP-1100.10-R6, dated 23 Nov 2016: <i>Pengendalian Hama dan Penyakit</i> (Pest & Disease Control).</p> <p>11. SOP AA-APM-OP-1100.11-R1, dated 01 Feb 2009: <i>Pestisida dan Pengendaliannya</i> (pesticide handling).</p> <p>12. SOP AA-APM-OP-1100.12-R3, dated 23 Nov 2016: <i>Kastrasi</i> (Castration - cutting all generative product e.g., male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</p> <p>13. SOP AA-APM-OP-1100.13-R3, dated 04 Mar 2016: <i>Tunas Pokok</i> (pruning).</p> <p>14. SOP AA-APM-OP-1100.14-R3, dated 16 Feb 2017: <i>Sensus dan Identifikasi Pokok</i> (census and palm identification).</p> <p>15. SOP AA-APM-OP-1100.15-R2, dated 01 Oct 2010: <i>Sensus Produksi</i> (production census).</p> <p>16. SOP AA-APM-OP-1100.16-R1, dated 01 Feb 2009: <i>Konsolidasi Pohon Tumbang</i> (provision of support to fallen palm).</p> <p>17. SOP AA-APM-OP-1100.17-R1, dated 23 Oct 2014: <i>Pengelolaan Air</i> (water management).</p> <p>18. SOP AA-APM-OP-1100.18-R3, dated 20 Apr 2015: <i>Potong Buah</i> (harvesting).</p> <p>19. SOP AA-APM-OP-1100.19-R1, dated 01 Feb 2009: <i>Pengelolaan Transport</i> (FFB Transport).</p> <p>20. SOP AA-APM-OP-1100.20-R6, dated 16 Feb 2017: Replanting.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill has established procedures to process the FFB to become CPO and PK starts from reception of FFB to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02-R2: <i>Stasiun Penerimaan</i> (FFB receiving station). 	
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		<ol style="list-style-type: none"> 2. SOP AA-MPM-OP-1400.03-R1: <i>Stasiun Rebusan</i> (Sterilizer station). 3. SOP AA-MPM-OP-1400.04-R1: <i>Stasiun Pemisahan Berondolan</i> (Threshing station). 4. SOP AA-MPM-OP-1400.05-R1: <i>Stasiun pengadukan dan pengempaan</i> (Pressing station). 5. SOP AA-MPM-OP-1400.06-R1: <i>Stasiun pemurnian</i> (Clarification station). 6. SOP AA-MPM-OP-1400.07-R1: <i>Stasiun pemisahan nut dan fiber</i> (Depericarper station). 7. SOP AA-MPM-OP-1400.08-R1: <i>Stasiun kernel</i> (Kernel station). 8. SOP AA-MPM-OP-1400.09-R1: <i>Stasiun boiler</i> (Boiler station). 9. SOP AA-MPM-OP-1400.10-R1: <i>Stasiun engine room</i> (Engine room station). 10. SOP AA-MPM-OP-1400.11-R1: <i>Stasiun water treatment</i> (Water treatment station). 11. SOP AA-MPM-OP-1400.12-R1: <i>Laboratorium</i> (Laboratory station). 12. SOP AA-MPM-OP-1400.13-R1: <i>Stasiun pengelolaan limbah</i> (Palm oil mill effluent treatment). 13. SOP AA-MPM-OP-1400.14-R2: <i>Stasiun penimbunan dan pengiriman CPO dan kernel</i> (CPO and PK bulking and dispatch operation). 14. SOP AA-MPM-OP-1400.15-R1: <i>Perawatan</i> (Preventive maintenance). 15. SOP AA-MPM-OP-1400.19-R2: <i>Manajemen dan Metode Menghitung Emisi Gas rumah kaca</i> (GHG management and mitigation). 16. SOP AA-MPM-OP-1400.18-R4: <i>Book Keeping</i>. 17. AA-MPM-OP-1400.17-R6: <i>Traceability</i>. <p>The mill operational procedures explains the flow process, specification of material and process, machinery and tools required, step-by-step process,</p>	
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		control, monitoring and measurement and health and safety requirements.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor compliance -	<p>The unit of certification has a mechanism to check consistent implementation of procedures, which is documented under Standard Operating Procedures AA-SOP-ES-6001-R1 dated 1 Mar 2013. The procedure stated that internal audit conducted minimum once a year. Upon finding, management unit shall prepare review on audit finding and prepare root cause analysis, prepare corrective action – with person in charge and completion target. The latest internal audit in Gunung Melayu I POM and Pulau Maria Estate has been conducted on 22 to 27 Aug 2022.</p> <p>To check and monitor the operations procedures, unit of certification conducted other internal audit and visit both in estate and mill. During this ASA1_1, auditor team verified the report of internal audit/visit, as follows:</p> <ul style="list-style-type: none"> - Visit Agronomy Pulau Maria Estate: Report No. VA-KPM-OCT-FULL-01-2022 date of visit 3 – 7 Oct 2022 by Simon Sihotang. Some agronomy issues were quality of weeding, fertilizer application, pest & disease, pruning, drainage, road and harvesting. - Visit Engineering Gunung Melayu I POM: Report No. VE-PGS-APR-FULL-01-2022-Full Report, date of visit 8 to 12 April 2022 by Sahat Sibuea. There were several issues found during visit engineering, e.g. Oil power pack in Sterilizer door has been changed color to white because of contamination with water. <p>Based on interview with estate and mill manager obtained information that they have been conducted monthly management review to follow up the internal audit/visit and reported the correction to the agronomy/mill advisor.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	Records of monitoring and any follow up actions can be demonstrated	Complied

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	<p>- Minor compliance -</p>	<p>during audit, such as:</p> <ul style="list-style-type: none"> - RSPO internal audit report, completed on 22 to 27 Aug 2022 in Pulau Maria Estate and Gunung Melayu I POM. Audit conducted by Hendrik K. Simanjuntak, Ridho Illahi, Wahyu Mulya Atmaja and Yohanes Simanjuntak. Audit result findings can be demonstrated, and corrective action has been implemented to address issue found during audit. - Visit Agronomy Pulau Maria Estate: Report No. VA-KPM-OCT-FULL-01-2022 date of visit 3 – 7 Oct 2022 by Simon Sihotang. Some agronomy issues were quality of weeding, fertilizer application, pest & disease, pruning, drainage, road and harvesting. <ul style="list-style-type: none"> • Issues: Quality of circle weeding is bad; found damaged barn-owl boxes; Found conditions of clogged ditches and bushes. • Action Plan: Field Assistant consistently calibrates the nozzle every morning before spraying and consistently conducts spraying technical simulations; The harvesting Mandor who has barn-owl boxes in His area is responsible for reporting on the condition of the barn-owl boxes and must be spot checked by the Field Assistant and Mandor 1, and repaired immediately the next day; Identify the number, location, and condition of clogged ditch, make a program and its completion deadline. - Production Performance Report: explained the FFB production performance and evaluation as well as determined production target for next year. Evaluation FFB production each block can be demonstrated. - Mandor logbook; contain information of daily work monitoring covering: harvesting, spraying, fertilizing, pest and disease census, road and infrastructure maintenance, and others. Mandore logbooks can be used to improve the efficiency and productivity of an estate 	
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		<p>by helping Field Assistant to track their progress and make informed decisions about their work.</p> <ul style="list-style-type: none"> - Visit Engineering Gunung Melayu I POM: Report No. VE-PGS-APR-FULL-01-2022-Full Report, date of visit 8 to 12 April 2022 by Sahat Sibuea. There were several issues found during visit engineering, e.g. Oil power pack in Sterilizer door has been changed color to white because of contamination with water. Action Plan: weekly cleaning shall be done and whole sterilizer maintenance shall be done. - Mill Daily Report of Gunung Melayu I POM; contain information covering FFB receiving, FFB process: gross and net FFB processed, FFB stock, shift hour, process hour, press hour, press capacity, sterilizer process, Utility factor commercial and capacity, CPO and PK production, CPO and PK extraction rate, CPO and PK quality. Process performance evaluated everyday by mill manager and some corrective action determined to address issues identified. <p>It is a routine that the estate and mill management prepare monthly reports (<i>Laporan Unit Kebun</i> and <i>Laporan Unit Pabrik</i>) and send to the company's head office for monitoring purpose as well. Monthly Report Document has recorded all field inspection results.</p>	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Saudara Sejati Luhur has approved environmental impact assessment in form of "Dokumen Studi Evaluasi Lingkungan (SEL) Perkebunan dan Pabrik Kelapa Sawit PT Gunung Melayu, PT Saudara Sejati Luhur dan PT Sumber Sawit Makmur di Kabupaten Asahan – Sumatera Utara", prepare by CV Andalen Persada Konsultan in 1994. The assessment team for AMDAL has meet the requirements at the time, comprise of:</p>	Complied

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		<ul style="list-style-type: none"> • Team Leader: Dr. Hemat R. Bramana, MSc • Coordinator: Ir. Juliarto Barus, MS (AMDAL A/B) • Agronomy/Soil science: Ir. Bahtera Purba and Ir. Jansen Sinulingga • Water and air quality: Drs. Ahmad Darwin, MSc (AMDAL A) and Drs. Satriana • Social, economy, culture: Abdul Rahman SH, MH, and Drs. Johannes Karo-Karo • Production technology: Dr. R. Kamrol D, MSc and Renalson • Water biology: Dra. Retno Widhiastuti and Drs. Mimpin Ginting, MS • Machinery technic: Ir. Rejeki Maha and Juna B • Programmer: Drs. Sehat Sembiring and Roshermida <p>The said environmental impact assessment document was approved through "Surat Komisi Pusat AMDAL, Departemen Pertanian No.220/687/B/IV/1994" dated 18 April 1994. The document has described the positive and negative impact from oil palm plantation and palm oil mill construction and development from pre-operation phase until operational, in Gunung Melayu.</p> <p>PT. Saudara Sejati Luhur has demonstrated environmental document for capacity upgrade "Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL) Pekebunan Kelapa Sawit, Peningkatan Kapasitas Produksi Pabrik CPO 60 Ton TBS/Jam dan Pembangunan Pabrik KCP 200 Ton/Hari dan Biogas Plant". The environmental permit approved through "Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara No.660.1/0779/LH/2015 tentang Izin Lingkungan PT. Saudara Sejati Luhur", dated 17 June 2015.</p>	
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		<p>PT. Saudara Sejati Luhur –Gunung Melayu I POM has identified/evaluate the environmental aspect and impact as documented under “Evaluasi Aspek dan Dampak Lingkungan”, latest review 7 January 2020 in each operating unit, plantation and mill.</p> <p>Social impact assessment for PT. Saudara Sejati Luhur explained under “Laporan Identifikasi dan Upaya Kelola Sosial” including the impact assessment, prepared in 2017. Company has also issued a report on social management effectiveness, prepared by Tim Corporate Social Responsibility in year 2017, titled “Laporan Efektivitas Upaya Pengelolaan Sosial PT. Sejati Saudara Luhur – PKS Gunung Melayu I, Kabupaten Asahan, Provinsi Sumatera Utara”.</p> <p>The social impact assessment describing the condition: social interaction, organization, community structure, local community livelihood, economic impact, health condition, education, presence of worker union, presence of gender committee. During the preparation of document, management and assessment team involving community through interview and meetings with village peoples, smallholders, village authorities, regency authorities, etc. Record of meeting with impacted stakeholders available and demonstrated. Social impact assessment carried out 25-29 April 2017.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM carried out meeting with stakeholders, surrounding communities and they filled up questionnaire on May 2018. Record sighted: 4 questionnaires filled up “Kuesioner Pendapat Masyarakat Sekitar Kegiatan Usaha” dated 14 May 2018 to villagers of Dusun VIII Batu Anam village, Dusun VI Sidomulyo village, Dusun III Gonting Malaha village, from Bandar Pulau district. The questionnaire discussing social relation between company and community, basic needs, information transparency, job vacancy and/or opportunity for business/economic development, input/comments,</p>	
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		<p>grievance handling satisfaction, environmental impact, community perception.</p> <p>On 4 March 2019, PT. Saudara Sejati Luhur - Gunung Melayu I POM carried out consultation meeting to review social impact management program with Batu Anam village, Gonting Malaha village, Sidomulyo village. Document under "Berita Acara Review Efektivitas Penilaian Dampak Sosial PT Saudara Sejati Luhur – POM Gunung Melayu I", dated 4 February 2019. The meeting attended by 19 villagers. Photograph evidence provided.</p> <p>In year 2022, company carried out consultation on final document Social Impact Assessment with NGO Lingkar Komunitas Sawit/LINKS, after field verification 5-24 August 2022.</p>	
<p>3.4.2</p>	<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>PT. Saudara Sejati Luhur-Gunung Melayu I POM assigned the mill manager and estate manager as PIC for environmental management and monitoring. Company consistently prepares environmental management and monitoring performance and submitted to Environmental Office. Sighted the report for period 2021 and Semester I year 2022:</p> <ul style="list-style-type: none"> - "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) disampaikan kepada Dinas Lingkungan Hidup dan Kehutanan Provinsi Sumatera Utara, Periode July-December 2021". The report sent 5 March 2022. - "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) disampaikan kepada Dinas Lingkungan Hidup dan Kehutanan Provinsi Sumatera Utara, Periode Januari – Juni 2022". The report sent 16 September 2022. <p>The report has explained the effectiveness evaluation of the environmental management and monitoring plan.</p>	<p>Complied</p>

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		<p>In year 2022, company carried out consultation on final document Social Impact Assessment with NGO Lingkar Komunitas Sawit/LINKS, after field verification with communities 5-24 August 2022.</p> <p>The Social Impact Assessment document prepared into social impact management plan, the arrangement assisted by LINKS with inputs from stakeholders: village communities, authorities, and regency authorities.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way. - Critical (Major) compliance -</p>	<p>The document for SEIA monitoring plan, implementation report and correction plan (if findings raised) included in the environmental report which prepared and submitted to Environmental Office.</p> <p>The impacted parties can convey their view through representative or their spoke person - freely chosen during impact identification, review finding and mitigation plan. The social impact assessment carried out through focus group discussion, in-depth interview, structured interview and field observation.</p> <p>The social impact assessor and management has involved community participation from preparation stage: with village communities, village authorities and regency authorities.</p> <p>The stakeholder consultation process was carried out with assistance from SIA consultant named LINKS. LINKS made field verification to review SIA plan through interview, FGD, meeting with surrounding village date 5-24 August 2022.</p>	<p>Complied</p>
<p>Criteria 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<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. - Minor compliance -</p>	<p>There are no changes on employment procedures for recruitment, selection, hiring, promotion, retirement and termination.</p> <p>According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to workers.</p>	<p>Complied</p>

		<p>3 steps in employee recruitment such as:</p> <ol style="list-style-type: none"> 1. Request recruitment of estate employee <ol style="list-style-type: none"> a. Letter of application for recruitment from Site Management devoted to management via the General Section b. Letter of approval for recruitment from management (Head Office) 2. The selection process: <ol style="list-style-type: none"> a. The collection of application file b. Selection of administration c. Announcement of the selection schedule d. Test questions and physical tests e. Summary of selection results f. Announcement of selection results 3. Provision of a cover letter MCU to candidates who pass the selection Implementation of medical check-up (MCU). <p>The procedure is available in Bahasa Indonesia Language and has been communicated to all workers. The procedure and its content already comply with applicable laws and regulation in Indonesia related workforce/employment. This procedure were communicated to all employees in the workplace and stakeholders. Last socialization conducted in 9 August 2022 at Pulau Maria Estate and Gunung Melayu 1 Mill.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained. - Minor compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has conducted regular evaluation against all employees, as one aspect considered for promotion and conducted talent test prior to promotion.</p> <p>In 2022, there was no new recruitment process for new employees. Only 12 PKWT workers are promoted to permanent workers.</p>	Complied

		According to SOP: AA-HR-305.2-R0 dated 1 February 2009 related to Recruitment and Selection of Employee, the company will accept new employee based on their capabilities and qualifications.	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>In accordance with OHS policy that was issued and signed by the Managing Director on 1 December 2014. Under Point 3. Stated <i>"Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation"</i>.</p> <p>Unit of certification conducted the OHS risk assessment review annually. The OHS risk assessment procedure refer to "SOP Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" Number AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control has considered on planning of risk control.</p> <p>The last risk assessment review was conducted on 10 January 2022 covering for all activities both in Gunung Melayu I POM and Pulau Maria Estate. Such as: mill (boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank) and estate (chemical mixing, fertilizer warehouse, herbicide and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance).</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared and documented the OHS Plan as in "Program Management K3 Tahun 2022", such as:</p> <ul style="list-style-type: none"> • Training on emergency response and preparedness • Training on implementation OHS management system (SMK3) • Implementation of risk assessment • Zero Accident and consistent on using of PPE 	Complied

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		<ul style="list-style-type: none"> • Review of accident report • Medical checkup for workers and provision of first aid kit • Safety committee meeting • OHS inspection 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>In order to evaluate to evaluate effectiveness of H&S plan, unit of certification has demonstrated the record on monitoring effectiveness of the H&S plan to address health and safety risks.</p> <p>Unit of certification has prepared the program of OHS program 2022 - 2023 such as:</p> <ul style="list-style-type: none"> • OHS meeting (in a monthly basis) • Report of OHS performance to Manpower Agency (threes month base) • General Medical Check Up (annually) and Special Medical Check Up (per threes month base) • Socialization of healthy life (every month) • Routine inspection of OHS facilities (fire extinguisher and first aid box) • Integrated fire drill (annually) • Training for first aider (annually) • Training on hazardous waste both of handing and documentation • Review of risk assessment (annually) <p>Person who has responsibility to monitored the H&S implementation is safety officer/OHS expert, Muhammad Rizki Darmawansyah Hasibuan (OHS Expert registration valid until 29 November 2024). Sample of monitoring document seen:</p> <ul style="list-style-type: none"> • OHS Refreshment training dated November 2022 to all of field supervisors in mill and estate. 	Complied

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		<ul style="list-style-type: none"> • Training on pesticides application (has implemented in May 2022) • PPE distribution for harvester. Sample seen; distribution of 56 pairs of rubber boot for harvester on 22 November 2022. • OHS safety meeting dated 26 November 2022 (attended by 14 participants) -> record of OHS meeting provided. • Report of monthly OHS inspection on 24 October 2022 in in Gunung Melayu I POM was reported OK. • Refreshment training for first aider, dated 26 November 2022. <p>Based on field visit to the harvesting activity in estate concluded that all the harvester has equipped with appropriate PPE such as safety boot (rubber), helm and google. Other than that, they also used the chisel cover to avoid accident during moving to another harvesting plot.</p>	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>During this audit, unit of certification has demonstrated the document of training program (Annually).</p> <p>The training related to applicable aspects of P&C RSPO.</p> <p>Document verified: Program Training Year 2022 – 2023, consisted of:</p> <ul style="list-style-type: none"> • OHS Refreshment training dated November 2022 to all of field supervisors in mill and estate. • Training on pesticides application (has implemented in May 2022) • Training on Pest and Diseases (has implemented in April 2022 and October 2022) • Training on handling of hazardous waste management (has implemented in September 2022). • Refreshment training on harvesting procedure and quality of FFB (has implemented in October 2022) • Refreshment training for first aider, dated 26 November 2022. 	<p>Complied</p>

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		<ul style="list-style-type: none"> Refreshment training on RSPO supply chain in November 2022. <p>Sample the record of training realization during 2022:</p> <ul style="list-style-type: none"> OHS Refreshment training dated 26 November 2022 to all of field supervisors in mill and estate. Attended by 22 participants. Training on pesticides application (has implemented in May 2022). Attended by 16 pesticide applicator and 5 field supervisor. Training on Pest and Diseases (has implemented in April 2022 and October 2022). Attended by 9 participants. Training on handling of hazardous waste management (has implemented in September 2022). Attended by 5 participants. Refreshment training on harvesting procedure and quality of FFB (has implemented in October 2022). Attended by 18 participants. Refreshment training for first aider, dated 26 November 2022. Attended by 22 participants. Refreshment training on RSPO supply chain in November 2022. Attended by 12 participants on 30 November 2022. <p>Based on interview with workers sample during the audit, they have demonstrated on understand of related operational procedures.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Unit of certification has documented the training record on an individual bases. For example:</p> <ol style="list-style-type: none"> Muhammad Rizki Darmawansyah Hasibuan has attended the OHS expert training in 2019. The OHS Expert license valid until 29 November 2024. He also attended the refreshment training on RSPO supply chain in November 2022. Attended by 12 participants on 30 November 2022. 	Complied

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		<p>2. Hafiz Hazalin Sinaga has attended fire expert training 13 – 17 December 2021. The fire expert license valid until 31 December 2024.</p> <p>3. Tri Dayanto has attended welder training 10 June 2016. Sighted certificate of attendance.</p> <p>Edi Supiandi has attended steam operator training level 1 on 19 – 24 April 2010. Renewal license certificate valid until 21 May 2023.</p>	
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>	<p>As explained in previous indicator, refreshment training on RSPO supply chain in November 2022. Attended by 12 participants on 30 November 2022. Person who attended the training on behalf of mill manager, first clerk, field assistant, weighbridge operator and security team.</p>	Complied
<p>Criteria 3.8: Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p><i>No change in the supply chain module since last assessment.</i></p> <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM holds current RSPO P&C Certificate No. RSPO 620755, first certification started 7 September 2015 and expired on 20 March 2027. In the current certificate, PT. Saudara Sejati Luhur - Gunung Melayu I POM use Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate: Pulau Maria Estate. Not applicable.</p>	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</p>	<p><i>No change in the supply chain module since last assessment.</i></p> <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM holds current RSPO P&C Certificate No. RSPO 620755, first certification started 7 September</p>	Complied

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	taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	2015 and expired on 20 March 2027. In the current certificate, PT. Saudara Sejati Luhur - Gunung Melayu I POM use Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate: Pulau Maria Estate.	
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 estimated tonnage of CPO and PK has been recorded in BSI's summary report and registered in palmtrace. Production estimated as follows: FFB: 44,478 MT CPO: 11,120 MT PK: 2,384 MT The actual CPO and PK produced verified during each subsequent visit to ensure that certified mill only deliver the allowed tonnage for the year.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT. Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill is a subsidiary of PT. Inti Indosawit Subur, which is a member of RSPO with membership number 1-0022-06-000-00, since 6 February 2006. PT. Saudara Sejati Luhur – Gunung Melayu I Palm Oil Mill has been registered in RSPO IT Platform with ID number RSPO_PO1000002609, sub license ID CB90877.	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).	PT. Saudara Sejati Luhur – Gunung Melayu I POM can demonstrate procedures as follow: <ul style="list-style-type: none"> Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, from the proportion of certified FFB receiving from company-owned estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. 	Complied

	<p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</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"> • Standard Operating Procedure – Bookkeeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The bookkeeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; 	
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		<ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>During the audit, personnel in charge in mill (mill manager, KTU and weighbridge officer) able to demonstrate their competency in RSPO supply chain implementation started from FFB receive until CPO/PK dispatch.</p> <p>In accordance with Procedure of Traceability (AA-MPM-OP-1400.17-R7), PT. Saudara Sejati Luhur – Gunung Melayu I POM has appointed the mill manager as the person having overall responsibility for and authority over the implementation of RSPO SCCS requirements and compliance with all applicable requirements. In accordance with Group Manager Memorandum No. 308/SSL-GM/MEMO/12/2022 dated 1 December 2022 that appointed Maruli Tua Munthe as Supply Chain Personnel in Charge for Gunung Melayu I POM.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <ul style="list-style-type: none"> a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions</p>	<p>In accordance with Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>The last internal audit conducted on 22 – 27 August 2022. There are no findings against supply chain indicator. Report of internal audit documented in Integrated Internal Audit Sustainability 2022 prepared by Internal Audit Department.</p>	Complied

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	<p>taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Unit of certification conducted management review annually. The last management review conducted on 24 October 2022. Input of management review consist of:</p> <ul style="list-style-type: none"> • Internal audit result. • Customer feedback. • Proses performance and product conformity. • Status of Corrective and Preventive Action. • Follow up previous management review. • Change that could effect to the management system 	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>During field visit in Gunung Melayu I POM, auditor has verified the sampling record incoming FFB and dispatch CPO and PK. Based on document verification, there are no over projection of FFB, CPO and PK. It is mean, certificate holder no need to propose additional quota of certified product.</p> <p>The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate Pulau Maria Estate. The proportion of non-certified FFB comes from third-party supplier:</p> <ul style="list-style-type: none"> • PT Tinggi Raja (Plantation Company) • Hasan BP (Private Ownership) • Herman Wijaya (Private Ownership) • Keb. Aman (Private Ownership) 	<p>Complied</p>

		<ul style="list-style-type: none"> • Sihotang CO (Private Ownership) • Sinar Bakti I (Private Ownership) • Sipanjang (FFB collector and trader) • Abdul Gani (FFB collector and trader) • BD Siregar (FFB collector and trader) • DE & SK & ST & LU (FFB collector and trader) • PT Sawit Trading Sejahtera (FFB collector and trader) • PT Sawit Trading Sejahtera A (FFB collector and trader) • PT Sawit Trading Sejahtera L (FFB collector and trader) • PT Sawit Trading Sejahtera AK (FFB collector and trader) • Win Win (FFB collector and trader) • CV Abadi Tetap Jaya (FFB collector and trader) <p>During this audit, there is no request for extension volume to CB. Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Kebun Pulau Maria No. 1/12/VII/KPM/22" from Division 3 block K10H dated 30 July 2022 – total 215 bunches. Vehicle BK9268VN; destination Gunung Melayu I POM. - Weighbridge Ticket No. PGSA12026070 dated 30 July 2022, commodity: certified FFB; source: Pulau Maria Estate Division 3 to Gunung Melayu I POM; net weight: 5,780 kg; amount: 215 bunches; Block: K10H; RSPO Cert: RSPO620707; Transporter: Internal; Vehicle: BK9268VN; 	
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3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Sample seen of delivery form CSPK from Gunung Melayu I POM to Gunung Melayu I KCP, because under same entity, no contract or delivery order. The unit of certification using Mass Balance Sheet and daily production report to record CSPK Delivery:</p> <ul style="list-style-type: none"> • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated May 2022. Total Sustainable PK Production 142.83 MT; Total Sustainable PK Delivery 20.85 MT; Total Announce PK RSPO 81.53 MT; • Shipping Announcement No. TR-9f160c7c-fa89 for 81.53 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 31 May 2022; date of confirmation 31 May 2022. • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated July 2022. Total Sustainable PK Production 131.29 MT; Total Sustainable PK Delivery 171.20 MT; Total Announce PK RSPO 215.82 MT; • Shipping Announcement No. TR-caf93eda-d9f8 for 215.82 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 31 July 2022; date of confirmation 31 October 2022. • Daily Production Report "Laporan Harian Pabrik PT. Saudara Sejati Luhur-PMKS Gunung Melayu I" dated October 2022. Total Sustainable PK Production 44.459 MT; Total Sustainable PK Delivery 31.19 MT; Total Announce PK RSPO 468.87 MT; • Shipping Announcement No. TR-227bf27e-c761 for 468.47 MT CSPK from PT. Saudara Sejati Luhur-Gunung Melayu I POM to PT. Saudara Sejati Luhur-Gunung Melayu I KCP, dated of shipping 31 October 2022; date of confirmation 31 October 2022. 	Complied
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		<p>The information contain in the document are complete and can be presented either on a single document or across a range of documents.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM did not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV. Pengangkutan Jaya who is the same transporter every year.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM having legal ownership of material being transported by appointed outsourced companies: CV. Pengangkutan Jaya.</p> <p>PT. Saudara Sejati Luhur – Gunung Melayu I POM have a contract agreement with transporter as below:</p> <p>“Perjanjian Pengangkutan Nomor: 12/X/JSA-GM/2022” dated 12 September 2022 between PT. Saudara Sejati Luhur and CV Pengangkutan Jaya. Contract transport for CPO & PK.</p> <p>PT. Saudara Sejati Luhur controls the CPO transporter by “Surat Perintah Kerja (SPK)” and “Daftar Periksa Kesiapan Kerja Pengiriman”.</p> <p>SPK covered information as explain in indicator 5.5.2 b. while “Daftar Periksa Kerja” is the tool to control the transporter:</p> <ul style="list-style-type: none"> • Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out); • After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition); <p>The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>During field audit and document verification can be demonstrated that the transporter is under control of Marketing Asian Agri Medan and PT. Saudara Sejati Luhur.</p>	<p>Complied</p>

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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The site kept the contract of CPO and PK transporter which include name and contact detail of the contractors/transporter.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>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>PT. Saudara Sejati Luhur – Gunung Melayu I POM maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weighbridge ticket for FFB receiving CPO delivery - Daily Production Report for PK transfer to Gunung Melayu I KCP - Delivery Order - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Gunung Melayu I POM" period 2022: January – March, April – June, July – September, October – December and period 2021: January – March, April – June.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p>	Complied

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		<p>According to Mass balance Report, Gunung Melayu I POM only deliver Mass Balance sales from a positive stock.</p> <p>PT. Saudara Sejati Luhur - Gunung Melayu I POM cannot demonstrate sales contract with customer.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2023, the estimated extraction rate from FFB into CPO is 23.00%, whilst from FFB to PK is 5.00%. Based on Daily Production Figure as per 30 November 2022, actual extraction rate ratios from FFB into CPO is 18.20% (year to date 2022), whilst from FFB to PK is 5.30% (year to date 2022).</p>	Complied
3.8.14	<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 Figure. Unit of certification is able to demonstrate the work instruction for analysis of oil content. Sampled Daily Production Report to check the OER and KER. Sample seen:</p> <p>"Laporan Harian Pabrik" dated 31 December 2021; FFB from previous day 506.25 MT; FFB Sustainable Received 165.56 MT; FFB Non-sustainable Received 609.71 MT; FFB Received Total 1,281.52 MT; FFB Sustainable Processed 140.60 MT; FFB Non-sustainable Processed 565.83 MT; FFB Processed Total 706.43 MT; CPO Sustainable Production 27.50 MT; CPO Non-sustainable Production 102.69 MT; CPO Production Total 130.19 MT; OER CPO Sustainable 19.56 %; OER CPO Non-sustainable 18.15 %; PK Sustainable Production 7.03 MT; PK Non-sustainable Production 28.29 MT; PK Production Total 35.32 MT; KER PK Sustainable 5.00%; KER PK Non-sustainable 5.00%;</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil</p>	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM implement Mass Balance Module.</p> <p>This indicator is not applicable.</p>	Not Applicable

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	<p>palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>																																		
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT. Saudara Sejati Luhur - Gunung Melayu I POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002609. Unit of certification has made shipping announcement inside PalmTrace transaction, sample seen for period December 2019 – December 2022:</p> <table border="1" data-bbox="1133 715 1989 1321"> <tr> <td>Transaction ID</td> <td>TR-227bf27e-c761</td> <td>TR-caf93eda-d9f8</td> <td>TR-9f160c7c-fa89</td> </tr> <tr> <td>Seller</td> <td>PT Saudara Sejati Luhur - Gunung Melayu I Mill</td> <td>PT Saudara Sejati Luhur - Gunung Melayu I Mill</td> <td>PT Saudara Sejati Luhur - Gunung Melayu I Mill</td> </tr> <tr> <td>Buyer</td> <td>PT Saudara Sejati Luhur - Gunung Melayu I KCP</td> <td>PT Saudara Sejati Luhur - Gunung Melayu I KCP</td> <td>PT Saudara Sejati Luhur - Gunung Melayu I KCP</td> </tr> <tr> <td>Product</td> <td>CSPK</td> <td>CSPK</td> <td>CSPK</td> </tr> <tr> <td>Supply Chain Model</td> <td>Mass Balance</td> <td>Mass Balance</td> <td>Mass Balance</td> </tr> <tr> <td>Volume*</td> <td>468.47</td> <td>215.82</td> <td>81.53</td> </tr> <tr> <td>Transaction Type</td> <td>Shipping</td> <td>Shipping</td> <td>Shipping</td> </tr> <tr> <td>Status</td> <td>Confirmed</td> <td>Confirmed</td> <td>Confirmed</td> </tr> </table> <p>Remove:</p>	Transaction ID	TR-227bf27e-c761	TR-caf93eda-d9f8	TR-9f160c7c-fa89	Seller	PT Saudara Sejati Luhur - Gunung Melayu I Mill	PT Saudara Sejati Luhur - Gunung Melayu I Mill	PT Saudara Sejati Luhur - Gunung Melayu I Mill	Buyer	PT Saudara Sejati Luhur - Gunung Melayu I KCP	PT Saudara Sejati Luhur - Gunung Melayu I KCP	PT Saudara Sejati Luhur - Gunung Melayu I KCP	Product	CSPK	CSPK	CSPK	Supply Chain Model	Mass Balance	Mass Balance	Mass Balance	Volume*	468.47	215.82	81.53	Transaction Type	Shipping	Shipping	Shipping	Status	Confirmed	Confirmed	Confirmed	<p>Complied</p>
Transaction ID	TR-227bf27e-c761	TR-caf93eda-d9f8	TR-9f160c7c-fa89																																
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Transaction Type	Shipping	Shipping	Shipping																																
Status	Confirmed	Confirmed	Confirmed																																

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		Unit of certification has removed the CSPO with total volume 3,235.31 MT under stock transaction ID ST-TR-53c50f5a-3cdf dated 16 December 2022. Reason for removal: sold as ISCC.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Saudara Sejati Luhur - Gunung Melayu I POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.</p> <p>RSPO Rules on Market Communications and Claims audited during internal audit.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>PT. Saudara Sejati Luhur - Gunung Melayu I POM with the parent company PT. Inti Indosawit Subur and its brand Asian Agri, in its website:</p> <p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010."</p> <p>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of</p>	Complied

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

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

	of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	The MB volume that can be sold is the certified CSPO and CSPK volume produced by PT. Saudara Sejati Luhur - Gunung Melayu I POM. Hence the CSPO and CSPK volume sold under MB model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	The MB volume that can be sold is the certified CSPO and CSPK volume produced by PT. Saudara Sejati Luhur - Gunung Melayu I POM. Hence the CSPO and CSPK volume sold under MB model is considered 100% content.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the 	There is no labelling and trademarking used by PT. Saudara Sejati Luhur - Gunung Melayu I POM on their products. Not applicable.	Not Applicable

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> 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 & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>There is no labelling and trademarking used by PT. Saudara Sejati Luhur - Gunung Melayu I POM on their products. Not applicable.</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented in corporate policy in	Complied

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	<p>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>point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age</i>".</p> <p>The policy is also published to use posters at any strategic places Pulau Maria Estate and Gunung Melayu I POM.</p> <p>Corporate policy has been socialized/disseminated to all levels of PT Saudara Sejati Luhur employees and stakeholders (including local contractors)</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also a policy related a Human Rights Defender (HRD), which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "<i>Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment</i>".</p> <p>The socialization of this policy has been done to all employees in Pulau Maria Estate dated 8 March 2022.</p>	
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>The unit of certification is an existing plantation since 1970's and most of employee origin from surrounding villages and felt that the company does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>Complied</p>
<p>Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
<p>4.2.1</p>	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure on handling</p>	<p>Complied</p>

		<p>complaints and grievances, the company keeps confidential complainant and whistle blower.</p> <p>Based on document verification and interview with internal stakeholders (labour union, gender committee) informed that the Human rights policy that has been published No.298/ES-KTS/Memo/08/14 dated 26th August 2014 which also covering ethics in business that stated that "ethical behavior, Prohibition of all forms of corruption, bribery in the conduct or transaction business practices and fraudulent use of funds".</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM committed to protect Human Rights Defender in their operational area. Each violation against the policy can be reported to HRD Department, Internal Audit Department, or line manager.</p> <p>There is no record of Human Rights violation found. Based on interview with stakeholders; no indication company violates human rights.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>These mechanisms have communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on 12 February 2021.</p> <p>Through this communication, PT Saudara Sejati Luhur – Gunung Melayu I POM explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion),</p> <p>The procedure on handling complaints and grievances, the company keeps confidential complainer and whistleblower. Complaints and</p>	<p>Complied</p>

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		<p>grievances were recorded in LogBook and in “<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>”.</p> <p>Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head and previous landowners) all policy/procedures are in place and understood by all stakeholders. In addition, there is no illiterate parties found until this audit.</p> <p>Through the public consultation with village head obtained information that all the villagers acknowledge the grievance procedure. They can submit their complaint or grievance by their self or by village head/elders.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>“Mekanisme Penanganan Keluhan” – complaint handling mechanism (No. SOP-AA-GL-5005-R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (No. SOP-AAHR-3008-R0 05). Refer to the “<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>”, all incoming letter such as requested information or grievance should be responded within 14 working days.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also prepared “Mekanisme Jaminan Pelapor dan Pengungkapan Kasus” prepared by Public Relation officer. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested. These mechanisms have been communicated to external parties and disseminated to all employees. Based on interviews with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p>	Complied

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		<p>PT Saudara Sejati Luhur – Gunung Melayu I POM is recording each complaint and response provided in the Logbook of “<i>Buku Keluhan Karyawan</i>”, where from complaint from external is documented in “<i>Buku Agenda Komplair</i>”.</p> <p>Mostly the employee’s complaints are complaints about improvements in infrastructure and public facilities.</p>	
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>In each conflict resolution process, community representatives/other parties are free to appoint their representatives in any negotiation or advocacy process or third-party mediator.</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Company demonstrated CSR Program period 2021 and 2022 under “Budget Program CSR tahun 2021 dan 2022”. For Budget year 2022 comprise of 6 aspects and 15 activities such as Aid for “Usaha PKK Desa Gonting Malaha”, Donation for Musholla renovation in “SMP Negeri Satu Atap Desa Batu Anam”, Donation for mosque construction in Pulau Maria village, etc.</p> <p>Based on interview with village community Sidomulayo, Batu Anam and Gonting Malahan stated the CSR program has been in coordination with surrounding village head through SIA report and monitoring.</p> <p>Program CSR 2022 for example:</p> <ol style="list-style-type: none"> 1. Social aspect: <ol style="list-style-type: none"> a. Donation package for the poor in surrounding community Batu Anam, Gonting Malaha and Sidomulyo village. b. Blood donor in Batu Anam village. 2. Economic aspect: <ol style="list-style-type: none"> a. Computer unit aid for Rahuning District Office; 	Complied

		<ul style="list-style-type: none"> b. Aid for duck egg development in Sidomulyo village; c. Micro and Small Enterprise development aid in PKK Gonting Malaha and Batu Anam village; d. Aid for surrounding community impacted by COVID-19 in Batu Anam, Gonting Malaha and Sidomulyo village. <p>3. Education aspect:</p> <ul style="list-style-type: none"> a. Donation for Musholla construction in "SMP 1 Atap" – Batu Anam village; <p>4. Health aspect:</p> <ul style="list-style-type: none"> a. Aid in form of medical devices for "Posyandu" Gonting Malaha village. b. Aid for "Bank Sampah" in Bandar Pulau Pekan village. <p>5. Infrastructure aspect:</p> <ul style="list-style-type: none"> a. Material donation for mushola construction in Sidomulyo and Batu Anam village; b. Material donation for church in Gonting Malaha village. <p>Semester I year 2022, company reported CSR program implementation:</p> <ul style="list-style-type: none"> – Provision of cooking oil package "Paket Pasar Murah Minyak Goreng" of 3,000 litres 11 – 13 January 2022 in Sidomulyo, Gonting Malaha and Batu Anam village worth Rp. 42,000,000. – Aid in form of "Speaker Sound System Complete" 2 Sets for Bandar Pulau District office dated 28 March 2022 worth Rp. 5,100,000. – Aid in form of home industry tools "PKK Kampung Masundung", Batu Anam village dated 19 April 2022 worth Rp. 2,245,000. – Aid in form of medical devices for "Posyandu" Gonting Malaha village worth Rp.2,557,000. 	
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		<ul style="list-style-type: none"> - Donation package for the poor of 260 sets in surrounding community Batu Anam, Gonting Malaha and Sidomulyo village during Ramadhan 2022 worth Rp. 20,306,000. - Donation package of 156 sets for fire victim in Sei Apung, Tanjung Balai dated 30 May 2022 worth Rp. 12,183,000. <p>Semester I year 2022, company maintain the social activity to support independent smallholder under program Created Share Value/CSV in surrounding village such as:</p> <ol style="list-style-type: none"> a. Material aid for road maintenance in Batu Anam, Sidomulyo and Gonting Malaha village dated 4 March 2022 total Rp. 54,000,000. b. Material aid for road hardening in Batu Anam, Sidomulyo and Gonting Malaha village dated 30 May 2022 total Rp. 27,200,000. c. Provision of 5 units barn owl boxes to partner smallholder in Gonting Malaha, Batu Anam and Sido Mulyo village total Rp. 6,500,000. 	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. During the audit the unit of certification able to show legal ownership documents as below:</p> <ul style="list-style-type: none"> • Land Use Title (HGU) Certificate of HGU issued by Kantor Pertanahan Asahan Regency no. 1 of 2004 dated April 29, 2004, in accordance with the Measure Letter no. 01/Rahuning/2004 dated April 27, 2004 with an area of 2,301.883 Ha and valid until December 31, 2030. Equipped with HGU Map Appendix with a scale of 1: 10,000. • Plantation Permit (IUP) 	<p>Complied</p>

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		<p>Surat Pendaftaran Usaha Perkebunan (SPUP) issued from Ministry of Agriculture No.HK.350/539/Dj.Bun.5/VII/2001, dated 12 July 2001. Permitted area is 2,319 Ha.</p> <p>Palm crops in Pulau Maria Estate as supply base to Gunung Melayu 1 POM started to 2nd cycle/generation due to Ganoderma disease. First step replanting is commenced at 2008 (585 Ha) and second step replanting already started in January 2023 for area 252 Ha. Therefore, no land compensation and FPIC process occurs.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>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 is Not Applicable for replanting period.</p>	Complied
	<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>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>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 making is Not Applicable for replanting period.</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</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no</p>	

	legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. 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 has been describe in SEIA document or AMDAL.	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. PT. Saudara Sejati Luhur has legal ownership as Land Use Title or Hak Guna Usaha, completed with map "Peta Bidang Tanah" scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder "Risalah Panitia Tanah-B".</p> <p>There is no land expansion of PT Saudara Sejati Luhur.</p>	Complied
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>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. All relevant information is available in appropriate forms and in Bahasa Indonesia language, including assessment of impact or AMDAL and RKL-RPL.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p>	Complied

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		FPIC is not necessarily needed for replanting period. 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 is Not Applicable for replanting period.	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. FPIC is not necessarily needed for replanting period. 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 is Not Applicable for replanting period.	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.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.	Complied

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	<p>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>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	
<p>4.5.3</p>	<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 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>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	<p>Complied</p>
<p>4.5.4</p>	<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>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. The communities</p>	<p>Complied</p>

		can access food through nearby market; as for clean water for drinking they used gallon water.	
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Complied
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. Based on stakeholder consultation show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.	Complied

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	- Minor compliance -	According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. There were no expansions after November 2018.	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that the surrounding area is developed rural area, no communities lived in voluntary isolation.</p>	Complied
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken</p>	Complied

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		into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p>	Complied
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 is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period.</p>	Complied

		Based on stakeholder consultation show that the surrounding communities feels company provide job vacancy to absorb manpower from surrounding village.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them. - Minor compliance -	According to the earlier land title document, PT Saudara Sejati Luhur has been established since 1975. Since 2002 - 2008, the company started replanting in the second planting cycle. There were no new expansions during the replanting period. There was no compensation made.	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no	Complied

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		expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. Based on stakeholder consultation show that the surrounding communities feels company provide job vacancy to absorb manpower from surrounding village. In addition, company developed CSV program to assist oil palm planter to organized and strive for independent smallholder organization.	
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed 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 -	Unit of certification is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. However, where there are land disputes occurs, unit of certification have mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has considered FPIC Guide for RSPO Member, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). Based on communication with affected stakeholders, including surrounding villages, land disputes/conflict in PT Saudara Sejati Luhur managed area.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification	Based on communication with affected stakeholders, including surrounding villages, land conflict is not present in the area of the unit of certification.	Complied

	addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Where land conflict exists, acceptable conflict resolution processes is following their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015.	
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). - Minor compliance -	Based on communication with affected stakeholders, including surrounding villages, no customary land or other legal rights within the certified area.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on communication with affected stakeholders, including surrounding villages, land conflict is not present in the unit of certification.	Complied
Principle 5: Support smallholder inclusion			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	PT. Saudara Sejati Luhur – Gunung Melayu I POM has procedure for communicating and evaluating the FFB from third party source (non-certified) under "SOP Pengawasan Sumber Pembelian TBS Luar No.AA-MM-506.2-R0", dated 1 January 2014. Company also prepared procedure for traceability "SOP Traceability-FFB Purchase No.AA-SOP-MM-506.3-R0", dated 1 January 2015. Actual FFB price informed to FFB contract holder or cooperative committee. The FFB price also displayed at mill gate. The FFB price for period 25 – 30 November 2022 at Rp 2,355/kg. As for FFB price awarded for independent supplier will follow CPO price dynamics. Based on interview with FFB supplier (Mr. DSS) found that	Complied

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		FFB price update when there's change. FFB payment max. 3 days after POM received the FFB. So far no complaint on FFB payment process.	
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM has procedure for communicating and evaluating the FFB from third party source (non-certified) under "SOP Pengawasan Sumber Pembelian TBS Luar No.AA-MM-506.2-R0", dated 1 January 2014. Company also prepared procedure for traceability "SOP Traceability-FFB Purchase No.AA-SOP-MM-506.3-R0", dated 1 January 2015.</p> <p>Actual FFB price informed to FFB contract holder or cooperative committee through phone call or Whatsapp. The FFB price also displayed at mill gate. The FFB price for period 25 – 30 November 2022 at Rp 2,355/kg.</p>	Complied
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Saudara Sejati Luhur – Gunung Melayu I POM determines the FFB price. Actual FFB price informed to FFB contract holder or cooperative committee through phone call or Whatsapp. The FFB price also displayed at mill gate. The FFB price for period 25 – 30 November 2022 at Rp 2,355/kg.</p>	Complied
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>As for FFB price awarded for independent supplier will follow CPO price dynamics. Based on interview with FFB supplier (Mr. DSS) and verification to FFB supply agreement stated mill will inform the price and refer to CPO price dynamics and FFB price update accordingly. The agreement have been signed by both parties. In the agreement FFB payment max. 3 days after POM received the FFB.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Company demonstrated agreement with third party FFB Suppliers. For example the verified document: "Kontrak Jual Beli TBS No. 001/TBS/GM/2020" dated 1 May 2020. Company demonstrated the evidence of code of ethical conduct to FFB supplier: PT. Saudara Sejati Luhur and PT. Sawit Trading Sejahtera signed "Kode Etik Pengadaan"</p>	Complied

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		dated 3 February 2020; PT. Saudara Sejati Luhur and Hasan BP signed "Kode Etik Pengadaan" dated 3 February 2020. The contract stipulates the term and timeframe.	
5.1.6	<p>(C) 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>	Based on verification upon payment evidence and interview with FFB supplier, shows the payment for FFB suppliers made on time, in line with FFB purchase agreement. No complaint on the payment made from FFB supplier interviewed.	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>Gunung Melayu I POM made calibration for the weighbridge:</p> <ul style="list-style-type: none"> - Weighbridge calibration certificate "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Dinkopdag Kabupaten Asahan No.059/SKHP-MT/ASH.59/2022" dated 25 May 2022. Brand: Presica Type PSC-7801 Serial P5M220262; Test dated 24 May 2022. - Weighbridge calibration certificate "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Dinkopdag Kabupaten Asahan No.103/SKHP-MT/ASH.59/2022" dated 1 August 2022. Brand: Avery Weight Tronix Type E-1205 Serial 142750249; Test dated 29 July 2022. 	Complied
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>CH does not have direct control to the development on smallholder. However, through program Create Share Value (CSV) the CH demonstrate commitment to assist surrounding oil palm planter to be organized and establish independent smallholder organization. Verified commitment in form of Memorandum of Understanding:</p> <ol style="list-style-type: none"> 1. Memorandum of Understanding/MoU with "Kelompok Sejahtera Sidomulyo Makmur" year 2017 with 28 smallholder members, total area 150 Ha in Sido Mulyo village; 2. Memorandum of Understanding /MoU with "Kelompok Petani Mekar Jaya" year 2017 with 30 smallholder members, total area 43 Ha in SIdo Mulyo village; 	Complied

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		<p>3. Memorandum of Understanding/MoU with “Kelompok Tani Keluarga Tani” year 2017 with 7 smallholder members, total area 78 Ha in Rahuning village.</p> <p>4. Memorandum of Understanding/MoU with “Kelompok Rezeki Makmur Desa Rahuning” year 2017 with 6 smallholder members, total 30 Ha in Rahuning village.</p> <p>5. Memorandum of Understanding/MoU with “Kelompok Subur Desa Rahuning” year 2018 with 6 smallholder members, total 70 Ha in Rahuning village.</p> <p>6. Memorandum of Understanding/MoU with “Kelompok Tani Sejahtera Desa Rahuning” year 2018 with 17 smallholder members, total 171 Ha in Rahuning village.</p> <p>CH has recorded the smallholder member name, GPS coordinates of the oil palm plantation and the copy of land legality.</p>	
<p>5.1.9</p>	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -</p>	<p>CH does not have direct control to the development on smallholder. However, through program Create Share Value (CSV) the CH demonstrate commitment to assist surrounding oil palm planter to be organized and establish independent smallholder organization.</p> <p>Company has a mechanism for complaint handling for smallholder partner, under “SOP Penanganan Komplain No. XX-HR-308.5-R0” dated 11 December 2009.</p> <p>Based on interview with surrounding communities, so far no complaint related to smallholder development, and/or FFB payment.</p>	<p>Complied</p>
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>CH does not have direct control to the development on smallholder. However, through program Create Share Value (CSV) the CH demonstrate commitment to assist surrounding oil palm planter to be organized and establish independent smallholder organization. CSH program target is to develop smallholder to improve the economic</p>	<p>Complied</p>

<p>- Minor compliance -</p>		<p>condition through sustainable development and accepting the FFB in company's mill. Verified commitment in form of Memorandum of Understanding:</p> <ol style="list-style-type: none"> 1. Memorandum of Understanding/MoU with "Kelompok Sejahtera Sidomulyo Makmur" year 2017 with 28 smallholder members, total area 150 Ha in Sido Mulyo village; 2. Memorandum of Understanding /MoU with "Kelompok Petani Mekar Jaya" year 2017 with 30 smallholder members, total area 43 Ha in Sido Mulyo village; 3. Memorandum of Understanding/MoU with "Kelompok Tani Keluarga Tani" year 2017 with 7 smallholder members, total area 78 Ha in Rahuning village. 4. Memorandum of Understanding/MoU with "Kelompok Rezeki Makmur Desa Rahuning" year 2017 with 6 smallholder members, total 30 Ha in Rahuning village. 5. Memorandum of Understanding/MoU with "Kelompok Subur Desa Rahuning" year 2018 with 6 smallholder members, total 70 Ha in Rahuning village. 6. Memorandum of Understanding/MoU with "Kelompok Tani Sejahtera Desa Rahuning" year 2018 with 17 smallholder members, total 171 Ha in Rahuning village. 7. Partnership agreement "Perjanjian Kemitraan No.01/SL/CSV/VII/2020 antara PT Gunung Melayu – PT Saudara Sejati Luhur dengan Kelompok "Soelianto Aminudin" (Desa Gunung Berkat)" dated 20 July 2020, comprise of 1 family head total 100 Ha. 8. Partnership agreement "Perjanjian Kemitraan No.05/SSM/CSV/VIII/2017 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Sejahtera Sidomulyo Makmur, Desa 	
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		<p>Sidomulyo" dated 10 August 2017, member 40 family head total 100 Ha.</p> <p>9. Partnership agreement "Perjanjian Kemitraan No. 10/MJ/CSV/VIII/2017 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Mekar Jaya, Desa Sidomulyo" dated 24 August 2017, member 30 family head, total 43 Ha.</p> <p>10. Partnership agreement "Perjanjian Kemitraan No.08/SM/CSV/VIII/2017 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Suka Maju, Desa Sidomulyo" dated 14 August 2017, member 25 family head total 50 Ha.</p> <p>11. Partnership agreement "Perjanjian Kemitraan No.08/SM/CSV/VIII/2017 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Berumbun Atas Makmur, Desa Teladan" tanggal 14 August 2017, comprise of 11 family head total 75 Ha.</p> <p>12. Partnership agreement "Perjanjian Kemitraan No.63/TS/CSV/VIII/2018 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Tani Sejahtera, Desa Batu Anam" tanggal 28 August 2018, comprise of 17 family head total 37,5 Ha.</p> <p>13. Partnership agreement "Perjanjian Kemitraan No.39/JT/CSV/XI/2017 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Jaya Tani, Desa Buntu Maraja" dated 30 November 2017, comprise of 10 family head total 310 Ha.</p> <p>14. Partnership agreement "Perjanjian Kemitraan No. 16/BTJ/CSV/IX/2017 antara PT Gunung Melayu – PT Saudara Sejati Luhur dan Kelompok Tani Berkat Tani Jaya, Desa Gunung Berkat" tanggal 13 September 2017, comprise of 38 family head total 552 Ha.</p> <p>By the end of year 2022 there has been 21 smallholder group/"kelompok tani" with 780 smallholder members and 3201 Ha area</p>	
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		<p>registered under CSV program PT. Saudara Sejati Luhur and PT. Gunung Melayu.</p> <p>Semester I year 2022, company support independent smallholder under program Created Share Value/CSV in surrounding village such as:</p> <ul style="list-style-type: none"> a. Assisting organizational development in Asosiasi Petani Swadaya Anugerah in Gonting malaha village o grp.3.000.000 for coordination meetings. b. Material aid for road maintenance in Batu Anam, Sidomulyo and Gonting Malaha village dated 4 March 2022 total Rp. 54.000.000. c. Material aid for road hardening in Batu Anam, Sidomulyo and Gonting Malaha village dated 30 May 2022 total Rp. 27.200.000. d. Provision of 5 units barn owl boxes to partner smallholder in Gonting Malaha, Batu Anam and Sido Mulyo village total Rp. 6.500.000. 	
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. Saudara Sejati Luhur developed program titled Create Share Value (CSV) to assist surrounding oil palm planter to be organized and establish independent smallholder organization. CSH program target is to develop smallholder to improve the economic condition, enhance productivity, FFB quality through sustainable development and accepting the FFB in company’s mill.</p> <p>By the end of year 2022 there has been 21 smallholder group/“kelompok tani” with 780 smallholder members and 3201 Ha area registered under CSV program.</p> <p>CH has recorded the smallholder member name, GPS coordinates of the oil palm plantation and the copy of land legality.</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>Based on document verification on FFB processed year 2022 shows Gunung Melayu I POM supplied by company-owned estate and</p>	Complied

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		<p>smallholder group/independent smallholder – as third party FFB supplier.</p> <p>CH has recorded the smallholder member name, GPS coordinates of the oil palm plantation and the copy of land legality.</p> <p>Based on field visit to Gunung Melayu I POM shows at the mill gate stated “tidak menerima TBS dari sumber ilegal (kawasan hutan atau hasil panen curian)” – mill does not receive FFB from illegal source (forest area or from stealing).</p> <p>All third party FFB supplier shall obey the rules. Mill staff stated Purchase Department has set a procedure for supplier:</p> <ul style="list-style-type: none"> - New supplier shall prepare proposal/offer for sales of their FFB including prepare a list of landowner and land legality of potential smallholder/farmer. - Purchase Department verifying the geolocation of potential smallholder, carried out by independent third party. - New supplier shall sign agreement stating no FFB supplied from illegal source, agreement invalid when the condition violated. - FFB transporter also need to sign statement letter saying zero illegal FFB at security gate for every delivery. 	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Integrated Pest Management, including handling pesticide training on 9 July 2019 – attended by 19 person. - Integrated Pest Management, including handling pesticide training for CSV member on 3 March 2022. 	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	<p>By the end of year 2022 there has been 21 smallholder group/“kelompok tani” with 780 smallholder members and 3201 Ha area registered under CSV program. The progress up to year 2021 was reported in the company’s Sustainability Report.</p>	Complied

Principle 6: respect workers’ rights and conditions

Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Non-discrimination and equal opportunity policy is stated in "Kebijakan Perusahaan", dated 1st December 2014 "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>This policy has been informed to all employees and being placed into noticed board in public area and easily accessed.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM also has SOP about the new employment recruitment. According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to the rights of local, migrant, or urban worker.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated</p>	<p>According to the latest employee's data as per December 2022. Those workers come from different gender, religion, originated area (local or outsiders) and tribe/races (Batak, Jawa, Nias, etc). Based on interview</p>	Complied

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	<p>against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>with labour representative (labour union, gender committee) and random workers that interviewed during field visit obtained information that there is no discrimination between them.</p> <p>Since the latest audit – August 2021 up to December 2022, there was no migrant worker hired in estate or mill.</p>	
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</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 result.</p> <p>In 2022, unit of certification is focussed on promoting daily workers to be permanent workers. There is no new recruitment is hire in Estate and Mill.</p> <p>Based on promoting workers as above mentioned, the skills, capabilities, qualities and medical fitness is already tested and qualified to be promoted.</p>	Complied
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>Unit of certification is prohibiting pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>Estate management has kept the record that spraying is not conducted by pregnant or breast-feeding women. Female workers are voluntary to own test for menstrual cycle and informed Polyclinic to be review by nurse and recorded in monthly basis.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>PT Saudara Sejati Luhur has formed a Gender Committee at Gunung Melayu 1 Mill and Pulau Maria Estate. Gender committees play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers.</p> <p>In 2022 Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Improving maternal and child health through Posyandu (integrated 	Complied

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		<p>service post), immunization and vitamin supplement activities.</p> <ul style="list-style-type: none"> - Conduct regular gender committee meetings at least every 4 months - Provision of supplementary food (during Posyandu) - Sports activities for employees - Environmental cleanliness in residential areas - Assessment of healthy housing for employees - Religious activity <p>The regular monthly gender committee meeting was held on 10 September 2022 which discussed the protection of the rights of women workers from the company, the meeting was attended by 8 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit).</p> <p>Based on the records of the routine meeting and interviews with management, that during the January – December 2022 there were no cases related to women workers.</p> <p>Based on interview with sample of female workers and gender committee chairman, awareness related issues of concern and how to address is conducted consistently. Such as: religion meeting in mosque, church or weekly meeting in compound.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Equal Opportunity policy is written in Bahasa Indonesia, so that all employees can understand as stated in "Kebijakan Perusahaan", dated 1st December 2014 "Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>Based on the interview with the female workers (pesticide applicator and IPM census) obtain information there is no difference of the payments between the men or women workers. All are equal. Those information</p>	Complied

		are aligned with the payroll document when the minimum wage are applied to all workers.	
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has stated the documentation of pay and working conditions in accordance with applicable labor laws refer to Decree of North Sumatra Governor SK No. 561/12012/2021, dated 19 November 2021; regarding: "Penetapan Upah Minimum Tahun 2022 dan Penyampaian Data Perekonomian dan Ketenagakerjaan Dalam Penetapan Upah Minimum Tahun 2022" amount of IDR 2,522,609.94.</p> <p>The Department of HRD (Manager HRD RO1) also issued Memorandum 001/HR-RO1/MEMO/05/2022 on 5 May 2022 related wages for year 2022 is IDR 2,522,609.94per month (25 Working Days) or equal to IDR 100,904.40 per day.</p> <p>The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2022 is IDR 9,500/kg.</p> <p>Salary scale structure for the period 2022 for all level of workers has shown during audit, this structure is based on Decree of North Sumatra Governor SK No. 561/12012/2021, dated 19 November 2021.</p> <p>The company has provided a scripts/slip salary to employees, salary slip contains basic salary, allowances, premium, labor health coverage (<i>BPJS Tenaga Kerja and Kesehatan</i>) and deduction.</p> <p>Based on interview with upkeep workers in the field (lowest grade) and payment slip of some workers with lowest grade (Sardi, as upkeep worker, and Nurhamiah; female; as spraying worker), it is known that they received wage amount IDR 3,311,800.</p>	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and	Employment contracts and related documents detailing payments and	Complied

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	<p>conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>conditions of employment described in the Collective Labor Agreement (PKB) and the daily labour contract of the wage was presented in Bahasa Indonesia.</p> <p>Collective Labour Agreement are contain the detail of working condition among others: responsibility each parties, recognition of company and trade union rights, work relationship, workers admission and requirement, job placement and transfer, working days and working hour, overtime, weekly rest and official holidays, annual leave, menstruation leave pregnancy and pregnancy loss, prevention of sexual harassment, permission to leave work of worship and permission of illness, wage component and wage system, wage increase, holiday allowance (THR), care and medication, occupational safety and health, work equipment, education, sports & entertainment facilities, school children's facilities, work rules, etc.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The Collective Labor Agreement (PKB) document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT SSL - Gunung Melayu Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual</p>	<p>Complied</p>

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		<p>leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>Sighted the employment contract that has explained the period of agreement, wages and payment (IDR 100,904.40 per day.in accordance with the Governor's Decree on Wages in 2022), allowances (holidays and others), attachments related to disgraceful acts/actions; which explains related to discrimination, child labor, workers' code of ethics, no sexual harassment and coercion or force labor.</p>							
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>During onsite visit to workers compound at Pulau Maria Estate and Gunung Melayu I POM, all workers facilities was provided by the company free.</p> <p>In Pondok Coklat at Pulau Maria Estate compound, there are 4 houses just repair and re-build. It is clear that unit of certification is aware with employees welfare, particularly houses facilities.</p>	Complied						
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 is located closest to the town (only 3 km to Sei Piring traditional market). Then the workers are accessible to the market for buying affordable food.</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>PT Saudara Sejati Luhur – Gunung Melayu I POM has also demonstrated the slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has calculations the DLW, based on the wages given to employees as costs.</p> <p>Following is DLW Calculation:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">No.</th> <th style="width: 70%;">In Kind Benefits</th> <th style="width: 20%;">Total</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No.	In Kind Benefits	Total				Complied
No.	In Kind Benefits	Total							

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1.	Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months	255,430
2.	Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months	248,717
3.	Education [(Total cost not including teacher and non teacher labour cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months	68,129
4.	Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers	13,027
5.	Healthcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of healthcare workers) ÷ Number of workers	407
6.	Food	54,801
7.	Sport & Recreation Facilities	3,432
Total Cost of In Kind Benefits		643,943
Average Monthly Take Home Salary per Worker		2,693,286
Total Value of Prevailing Wage		3,337,229

		No changes of DLW in 2022.	
<p>PROCEDURAL NOTE:</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"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<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 interviews with 8 promoted harvesters in Pulau Maria Estate, there are 12 PKWT workers has been promoted to be permanent workers, with the target for year 2022 is 30 workers promoted as permanent. All these workers is used for core worked performed.</p>	Complied
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Statement recognizing freedom of association and right to collective bargaining policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1st December 2014 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i>".</p> <p>This policy has been informed to all employees and being placed into public area easily accessed.</p>	Complied
6.3.2	<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>Labour Union has regularly meet with representative of management. Minutes of meeting we available at list of attendance was sighted. The minutes were made readily available to employees upon request, e.g:</p>	Complied

		Minute of Meeting dated 10 December 2022, to discuss related minimum wage 2023.	
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. - Minor compliance -	Based on interview with sample of employees at Mill and Pulau Maria Estate, informed that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers operation of registered labour organizations/unions, or other freely elected representatives for all workers.	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	A formal policy for the protection of children, including prohibition of child labour and remediation is stated in parent company Policy, which was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers as per November 2022, interview with workers and observation during field visit, workers hired with less than 18 years old is not found. Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017). During this surveillance audit, no new recruitment in 2022 as young workers.	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available. - Critical (Major) compliance -	Based on document review of list of workers as per November 2022, interview with workers and observation during field visit, workers hired with less than 18 years old is not found. Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017).	Complied

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		During this surveillance audit, no new recruitment in 2022 as young workers.	
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review of list of workers as per November 2022, interview with workers and observation during field visit, workers hired with less than 18 years old is not found.</p> <p>Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017).</p> <p>During this surveillance audit, no new recruitment in 2022 as young workers.</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>Based on interviews with stakeholders, gender committee and worker union leader, the company has communicated no child labour policy. Interview with surrounding village communities shows the company has communicated that recruitment policy is not for workers under 18 years old.</p> <p>Based on document review of list of workers as per November 2022, interview with workers and observation during field visit, workers hired with less than 18 years old is not found.</p> <p>Sample seen: The youngest workers namely M. Harto Satria (Birth date 26-10-1996; Join date 5-3-2016) and Mr Deni Atmajaya (Birth date 18-12-1998; Join date 1-7-2017).</p> <p>During this surveillance audit, no new recruitment in 2022 as young workers.</p>	Complied
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has implemented policy on prevention of sexual harassment and violence, the policy is prominently displayed on notice boards at the Mill and Estates muster areas.</p>	Complied

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		Based on interviews of female workers and union representatives confirmed that the company implemented the sexual harassment policy. (which is the latest circular letter to complement previous circulars). The policy has disseminated to all employees.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has established the company policy dated 1st December 2015 related to A policy to protect the reproductive rights of all, especially of women. The policy stated that “To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights”.</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	Based on an interview with the female workers from the fertilizer team and spraying team, states that the company gives the questionnaire to fulfill regarding the needs of new mothers. In 2022, there is no female workers have delivered babies or no new mothers existed.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared “Mekanisme Jaminan Pelapor dan Pengungkapan Kasus” prepared by Public Relation officer PT. Gunung Melayu on 01/12/2015. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested.	Complied

	<p>- Minor compliance -</p>	<p>"Mekanisme Penanganan Keluhan" – complaint handling mechanism (No. SOP-AA-GL-5005- R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (No. SOP-AAHR-3008- R0 05).</p> <p>These mechanisms have been communicated to external parties and disseminated to all employees.</p> <p>Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company including anonymity policy.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009. Based on those procedure, there is no specific request to bonding the employee (especially the new employee).</p> <p>Based on interview with sample of 8 workers at Pulau Maria Estate and worker union, stated that the unit of certification does not practice such thing as follows:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	<p>Complied</p>

6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>PT Saudara Sejati Luhur – Gunung Melayu I POM has employee recruitment and selection procedures (SOP-AA-HR-305-2-RO) effective since 1 February 2009 and the Memorandum No. 085/EXT-PGM/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Saudara Sejati Luhur – Gunung Melayu I POM; where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators) are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.</p> <p>Based on document verification on latest employee data documents in November 2022 there are 12 PKWT workers has been promoted to be permanent workers, with the target for year 2022 is 30 workers promoted as permanent.</p>	Complied
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>During this audit, unit of certification has appointed the responsible person(s) for OHS is identified, also for records of regular meetings between the responsible person(s) and workers has demonstrated.</p> <p>Data verified during this audit:</p> <ul style="list-style-type: none"> • OHS Committee (P2K3 – Panitia Pembina Keselamatan dan Kesehatan Kerja) has registered OHS Committee as presented in document of "Surat Keputusan Kepala Dinas Tenaga Kerja Provinsi Sumatera Uatra UP Pengawasan Ketenagakerjaan Wilayan IV Nomor KEP.108/P2K3/DTK/V/2019 tentang Pengesahaan Panitia Pembina Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan dated 13th May 2019. • OHS Expert on behalf of Muhammad Rizki Darmawansyah Hasibuan has attended the OHS expert training in 2019. The OHS Expert license valid until 29 November 2024. 	Complied

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		<ul style="list-style-type: none"> OHS safety meeting dated 26 November 2022 (attended by 14 participants) -> record of OHS meeting provided. Agenda: review the result of previous meeting, discussing the report OHS inspection, review the report of accident (if any), discussing another issue. 	
6.7.2	<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 prepared the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap PT Saudara Sejati Luhur – Gunung Melayu I POM has also prepared the procedure on work accident under “Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0”, revision 0 dated 1st April 2018. <p>Those procedures have socialized and available in notice board in site, during interviewed with workers, it was seen that they understood. Emergency call phone also is available in all site operation. All procedure written in Bahasa Indonesia.</p> <p>During the audit, sighted that all the first aid kit in estate and mill has been comply with the national regulation (21 items and no expired items).</p>	Complied

<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>During the onsite audit, the auditor team notes that the workers in mill and estate has used appropriate PPE refer to the HIRAC in each station. All the PPE distributed are for free. Sample seen:</p> <ul style="list-style-type: none"> • Loading ramp operator provide with safety boot, hand glove and mask. • Sterilizer station operator provide with safety shoes, hand gloves, mask, safety glasses and ear plug. • Boiler operators provide with ear plug, mask, hand gloves, safety shoes and safety glasses. • Engine room operator provide with safety shoes, hand gloves, earmuff and mask. • Welder provides with safety shoes, hand gloves, apron, and safety goggles dedicated for welder. • Harvester in estate provide with helm, safety goggles and safety boots. Along with their harvesting equipment is chisel cover to avoid the accident during moving to another harvesting plot. • Chemical weeding applicator provide with safety boots, mask, hand gloves, safety goggles and apron. They also provided with dedicated uniform for chemical weeding applicator. <p>Unit of certification also provide rinse and wash station namely 'rumah bilas' for chemical applicator (weeding and manuring). As explained by the chemical applicators team and manuring team during field visit, auditor team noted that all chemical workers shall change their clothes with the uniform in 'rumah bilas' before started to work. And after work, all of them, including field supervisor shall back to the 'rumah bilas' to take a shower, changing their clothes and washing their PPE and uniform before back home. Meaning that all workers must be cleaned when they back home to minimize the residual risk of pesticide.</p>	<p>Complied</p>
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<p>6.7.4</p>	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>During this audit, there was no changed related to policy – Company Statement, that all workers are provided medical care and covered by accident insurance. Workers who worked in high-risk station or chemical handler have been included in specific medical test. The last test was conducted on 12 June 2022 for mill and estate workers.</p> <p>Based on interview with sample workers during field visit and consultation with labour union, they were stated all workers are provided with medical care and accident under BPJS Kesehatan and BPJS Ketenagakerjaan.</p> <p>Sample of data verified – period December 2022:</p> <ul style="list-style-type: none"> • Medical Insurance – payment records of health insurance (BPJS Kesehatan) period November 2022. • Pulau Maria Estate - payment record of accidents insurance (BPJS Ketenagakerjaan), month November 2022 (payment code: 20027xxxx, amount paid IDR xx,xxx,270. Covering for all workers. Status: PAID • Gunung Melayu 1 POM - payment record of accidents insurance (BPJS Ketenagakerjaan), month November 2022 (payment code: BB021222), amount paid IDR XX,XXX,374 covering for all workers. Status: PAID. <p>All workers have been registered into health and worker insurance. There is no record or complaint from the workers related to the insurance issue.</p>	<p>Complied</p>
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Unit of certification has shown the record of injuries using lost time accident (LTA) metrics as in “Rekapitulasi Kejadian Kecelakaan Kerja PT Gunung Melayu – LTA” year 2022.</p> <p>All the accidents have followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records.</p>	<p>Complied</p>

		<p>The monitoring carried out on monthly basis and results have discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly by safety officer.</p> <p>In the middle of 2022 - the occupational injuries reported 3 cases. There are no lost time injuries. Near Miss reported 6 cases.</p>	
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Integrated Pest Management (IPM) are implemented according to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 (<i>Pengendalian Hama dan Penyakit</i>) - Pests & Disease Control, the unit of certification has plan to implement integrated pest management that included schedule to regularly monitored pest infestation (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of Ganoderma annually. • Census rat infestation by recap the record of sortation in loading ramp. • Census of Barn Owl Box occupation in three monthly bases. <p>The estate performed pest and disease census, e.g. "<i>Rekap Serangan Hama dan Penyakit</i>", Pest Census Summary form B2 (Ulat Api & Ulat Kantong), "<i>Data Titik Sensus Ulat Api</i>", "<i>Ringkasan Sensus Hama Tikus</i>", "<i>Sensus Kandang Burung Hantu</i>", "<i>Formulir A4 Sensus Burung Hantu</i>".</p> <p>Detection of leaf-eater caterpillar conducted monthly as early warning system. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%. Unit of certification has implemented biological control to minimize or eliminate pest and disease, e.g. by use of barn owl (<i>Tyto alba</i>) and planting beneficial plants such as <i>Casia sp.</i>, <i>Antigonon leptopus</i> and <i>Turnera subulatta</i>.</p>	<p>Complied</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>Up to this ASA 1_1, the unit of certification only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not listed in invasive species according to the information listed on the website www.cabi.org or in global invasive species database http://www.iucngisd.org/gisd/search.php.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on document verification, interview and field observation, verified that up to this ASA 1_1 there is no evidence of use of fire for pest control.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The company has the procedure related to best practice of pesticide usage for chemical weeding and pest control (if needed). The recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed).</p> <p>There was identification and assessment of the pesticides, stated in document of Pesticides Recommendation, covers the pesticides trademark, active ingredients, type (sistemic/contact), LD50, target species, and WHO class.</p> <p>Pesticides used in 2022 were:</p> <ol style="list-style-type: none"> 1. Kenlon 480 EC; Active ingredient – Trychlopyr 480 g/L; LD50 – 5,000; Permit – RI.01030120062433; expiry – 1 Jun 2027. 	Complied

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		<ol style="list-style-type: none"> 2. Solusi; Active ingredient – Amonium Gufosinat; LD50 – n/a; Permit – RI.01030120031931; expiry – 20 Jun 2026. 3. Glufo 150 SL; Active ingredient – 2,4 D Dimetilamina 865 g/L; LD50 – 700; Permit – RI.0103011989867; expiry – 20 Jun 2027. 4. Supremo 480 SL; Active ingredient – Isoprophilamina Glifosat 480 g/L; LD50 – n/a; Permit – RI.01030120021712; expiry – 14 Feb 2027. 5. Metaprima 20 WG; Active ingredient – Methyl Metsulfuron 20%; LD50 – 5,000; Permit – RI.01030120031897; expiry – 20 Aug 2026. <p>According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php.</p> <p>Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p>	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>PT Saudara Sejati Luhur – Pulau Maria Estate has a pesticide application program which is documented in annual work program. Activities using pesticides among others circle and path spraying and selective spraying. Records of pesticides use have been recorded including active ingredient, LD50, area treated, amount applied per ha, use of selective product and rotation number of applications. Several records of pesticide used were sighted, e.g. application schedule, list of pesticide use in oil palm estate, work achievement and pesticide use, stock card of agrochemicals. The records covered date of application, quantity of pesticide use and name of sprayers.</p> <p>Record “Daftar Pemakaian Bahan Pestisida Tahun 2022” described that pesticide used for January to November 2022 are as follows:</p>	Complied

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		<p>6. Supremo 480 SL; Active ingredient – Isoprophilamina Glifosat 480 g/L; LD50 – n/a; Permit – RI.01030120021712; expiry – 14 Feb 2027; volume used – 1,375 L; Active ingredient used – 379.50 kg.</p> <p>7. Biolon 670 EC; Active ingredient – Triklampir 670 EC; LD50 – n/a; Permit – RI.01030120093412; expiry – 21 Sep 2027; volume used – 60.00 L; Active ingredient used – 16.56 kg.</p> <p>8. Glufo 150 SL; Active ingredient – Ammonium Glufosinat 150 g/L; LD50 – n/a; Permit – RI.01030120052266; expiry – 20 Aug 2027; volume used – 1,390.00 L; Active ingredient used – 383.64 kg.</p> <p>9. Metaprima 20 WG; Active ingredient – Methyl Metsulfuron 20%; LD50 – 5,000; Permit – RI.01030120031897; expiry – 20 Aug 2026; volume used – 276.00 Kg; Active ingredient used – 76.17 kg.</p>	
<p>7.2.3</p>	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - 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>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> <p>The usage of pesticides has been monitored in monthly and yearly basis. The certificate holder does not use pesticides prophylactically.</p>	<p>Complied</p>
<p>7.2.4</p>	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -</p>	<p>The company 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>Complied</p>

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		In pest control, pesticide will be used to reduce/eliminate existing pest, which has exceeded the economic threshold.	
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: - Minor compliance - 7.2.5a Judgment of the threat and verify why this is a major threat.	Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.	Complied
	7.2.5b Why there is no other alternative which can be used.	According to IPM procedures, certificate holder always using biological approach in order to monitor pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide. To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).	
	7.2.5d Process to limit the negative impacts of the application.	SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows: <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. 	

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		<ul style="list-style-type: none"> • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. 	
	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Its rotation can be reduced in line with the palm ages.</p>	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>The company has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in the estate to handling chemical weeding activity. The team member originated from own workers (for own estate). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review obtained information that the company has conducted pesticide handling training on 3 August 2022. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask, and hand gloves.</p> <p>PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged.</p>	<p>Complied</p>

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		All precautions attached to the products properly observed, applied, and understood by workers.	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices. - Critical (Major) compliance -	<p>SOP for pesticide storage has been provided in SOP "<i>Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP</i>" dated 1 February 2008. The storage of all pesticide has been in accordance with Indonesian recognized best practices, that was stipulated in Labor Minister Regulation No. 3 of 1986 regarding OHS requirements in pesticides management.</p> <p>Based on field observation of agrochemical storage in the Estate, it was known that agrochemical was stored in specific agrochemical storage that was in accordance with the regulation, such as build in concrete walls and separated from other activities, has OHS sign and MSDS that understood by operator, has PPE, exhaust fan, fire extinguisher, and in clean condition with no spills.</p>	Complied
7.2.8	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. - Minor compliance -	<p>All pesticide containers were properly disposed and handled responsibly in accordance with Indonesian recognized best practices, that was stipulated in Government Law No. 101 of 2014 regarding management of hazardous waste.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "<i>Penanganan Limbah Industri B-3 AA-KL-06-EFP</i>" dated 1 November 2008. The company has temporary hazardous waste storage where all hazardous waste from estate and mill is collected. The storage has obtained the license from Environmental Agency.</p> <p>Based on field observation in hazardous waste storage and housing, as well as interview to the operator in each Estate, it was known that pesticide containers rinsed and stored in temporary hazardous waste storage that build in considering OHS and environmental aspects. The water used for rinsing will be reused as water mixing for chemist activity.</p> <p>The pesticides containers periodically collected by licensed and</p>	Complied

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		registered hazardous waste transporting company, and delivered to licensed and registered hazardous waste management company as well.	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Based on document review, field observation, as well as stakeholder consultation, known that the company never been applied pesticides aerially.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Annual medical surveillance was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer. The last test was conducted on 12 June 2022 for mill and estate workers. The purpose of medical performed on location in at company medical healthcare attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage. The result of MCU has communicated to related workers. Until this audit, all workers stated 'fit to works'.	Complied
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives. - Critical (Major) compliance -	Unit of certification prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test. Unit of certification has also kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month. The last of pregnancy test conducted in July 2022 All the female sprayer in well condition and not being pregnant nor breast feeding.	Complied
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is	A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020. The	Complied

	<p>documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>document covered all operation in mill, estate PT Saudara Sejati Luhur – Gunung Melayu I POM and Pulau Maria Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared a procedure to handle waste:</p> <ul style="list-style-type: none"> - For hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP dated 22 April 2016 explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter. The temporary hazardous waste storage has permit according to “Keputusan Bupati Asahan Nomor 503/LB3/DPMPPTSP/1427/XI/2017 tanggal 22 November 2017 tentang Pemberian Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT Saudara Sejati Luhur”, permit valid for 5 years and PT Saudara Sejati Luhur has permit to store the hazardous waste for 180 days because of producing hazardous waste less than 50 kg/day. At this point, as per stakeholder consultation, company is in process “Rincian Teknis” technical specification document to meet latest regulation. - Procedure for non hazardous waste “SOP Penanganan Sampah Industri Non B3 Dokumen No.AA-KL-05-EFP” dated 1 February 2008. - Procedure for medical waste “SOP Penanganan Limbah Medis Dokumen No. AA-KL-07-EFP” dated 5 April 2017. The procedure stated medical waste treated as hazardous waste. - Procedure for laboratory waste “SOP Penanganan Limbah Laboratorium Dokumen No.AA-KL-11-EFP” dated 15 November 2008. The procedure stated waste from mill laboratory treated as hazardous waste. 	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Company carried out waste management following the procedures.</p>	<p>Non-compliance</p>

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<p>- Minor compliance -</p>	<p>- Fibre and kernel shell used as boiler fuel.</p> <p>- POME used in the land application as organic fertilizer. Gunung Melayu I POM demonstrated record of POME to land application: 20 October 2022 producing POME 412 m³ and flowed to land application 480 m³; 31 October 2022 producing POME 370 m³ and flowed to land application 300 m³.</p> <p>- Hazardous waste has been stored in licensed storage and disposed of using licensed transporter. PT. Saudara Sejati Luhur is using licensed transporter PT. Hazmat Techno Indonesia, permit for transporting hazardous waste "Izin Pengangkutan No.SK.00107/AJ.309/1/DJPD/2018".</p> <p>Record of hazardous waste disposal, in form of manifest:</p> <p>- Manifest for medical waste "Manifes No. KLHK-1639546393; transporter PT Hazmat Techno Indonesia; PT. Saudara Sejati Luhur; 16 November 2021; Limbah Klinis/Infeksius (Kode Limbah B3: A337-1); volume 20.1 Kg; Nomor Kendaraan pengangkut BK 9133 BR".</p> <p>- Manifest for used pesticide container "Manifes No.KLHK-1651915355; transporter PT Hazmat Techno Indonesia; PT. Saudara Sejati Luhur; 9 April 2022; Kemasan bekas pestisida (Kode Limbah B3: B104d); volume 113.4 Kg; Nomor Kendaraan pengangkut BK 8390 CJ".</p> <p>- Manifest for electronic waste "Manifes No.KLHK-1651915525; transporter PT Hazmat Techno Indonesia; from PT. Saudara Sejati Luhur; 9 April 2022; jenis limbah berupa Limbah elektronik termasuk cathode ray tube (CRT), lampu TL, Printer circuit board (PCB), Karet Kawat (Wire rubber) (Kode Limbah B3: B107d); volume 14 Kg; Nomor Kendaraan pengangkut BK 8390 CJ".</p> <p>- Manifest for used oil "Manifes No. KLHK-1651915698; transporter PT Hazmat Techno Indonesia; from PT. Saudara Sejati Luhur; 9 April</p>	
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		<p>2022; jenis limbah berupa minyak pelumas bekas antara lain minyak pelumas bekas hidrolis, mesin, gear, lubrikasi, insulasi, heat transmission, dan/atau campurannya dengan (Kode Limbah B3: B105d); volume 61.2 Kg; Nomor Kendaraan pengangkut BK 8390 CJ”</p> <p>- Manifest for contaminated material “Manifes No. KLHK-1663355365; transporter PT Hazmat Techno Indonesia; from PT. Saudara Sejati Luhur; 28 July 2022; jenis limbah berupa kemasan bekas kimia/pupuk/lainnya dengan (Kode Limbah B3: B104d); volume 30.5 Kg; Nomor Kendaraan pengangkut BK 9133 BR”.</p> <p>However, NC Minor not closed and escalated as Major NC: Lack of evidence that disposal of waste material is demonstrated properly.</p>	
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 visit to Pondok Coklat worker housing compound, audit team still found burning practice for domestic waste. The Minor NC not effective implemented.</p> <p>NC Minor not closed and escalated as Major NC: Based on field visit at Housing Division 1-Pulau Maria Estate, it was found that domestic waste has not been managed properly, during the visit it was observed that there were traces of burning waste behind the housing areas.</p>	Non-compliance
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<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>Unit of Certification has procedure to maintain soil fertility to ensure optimal and sustained yield, e.g. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016 (Konservasi Tanah dan Air explains Soil & Water Conservation); SOP AA-APM-OP-1100.06-R6 dated 16 February 2017 (Menanam kacang related to Planting cover crops); SOP AA-APM-OP-</p>	Complied

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		<p>1100.09.R5 dated 5 September 2016 (Pemupukan related to Fertilizer application).</p> <p>Leaf samplings are taken annually to accurately capture palm nutrient requirement (both macro and micronutrient) and serve as source for fertilizer recommendation – fertilizer application (inorganic, compost, POME application, and empty fruit bunch) follows fertilizer recommendation. Another effort is to plant legume cover crop during replanting to keep soil humidity.</p>	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>Unit of certification has conducted tissue sample and soil analysis in regular basis, which is annually for leaf samples analysis and five-year interval for soil samples analysis. Records of periodical leaf sampling and visual analysis were available. Leaf analysis performed by Asian Agri Research and Development Centre, PT Nusa Pusaka Kencana Analytical & QC Laboratory.</p> <p>Foliar Analysis Report document shows that leaf sampling and analysis in Pulau Maria Estate has been done in April-May 2022, result used for fertilizer recommendation 2023. It was available:</p> <ul style="list-style-type: none"> - Foliar Analysis Report #048/INT/R&D/APR/L/22 dated 20 April 2022; for Division 1 Pulau Maria Estate; number of samples 41. - Foliar Analysis Report #090/INT/R&D/MEI/L/22 dated 17 May 2022; for Division 2 Pulau Maria Estate; number of samples 53. - Foliar Analysis Report #094/INT/R&D/MEI/L/22 dated 24 May 2022; for Division 3 Pulau Maria Estate; number of samples 47. <p>Analysis result consist of Lab Ref number, Block ID, year of planting, Division and Estate; nutrient content consist of Ash, N, P, K, Mg, Ca and B.</p> <p>For soil sample analysis, it was available document of "<i>Laporan Survey Update Analisa Tanah – KPM</i>" under Memorandum from Head Oil Palm R&D No.03/RD/KPM/JAN/2019 dated 23 January 2019. Based on Soil</p>	Complied

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		Analysis Result ref no. 004/RD-INT/S/JAN/19 dated 2 January 2019, number of samples 24. E.g. Lab ref 18S4286, Block Profile P5 KBA; depth 10-36 cm. Particle size: coarse sand 30%; fine sand 22%; silt 24%; clay 24%; N= 0.11%; organic C=0.80%; CEC= 5.21; Ca= 1.68; Mg= 0.38; K=0.18; Na= 0.07; pH H2O= 5.15; KCl= 4.35.												
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). It has been observe in the field that the company has implemented EFB application in estate with dosage 30 – 50 ton/Ha in land with low nurient properties, as well as POME application with dosage 750 m ³ /Ha in Pulau Maria Estate.	Complied											
7.4.4	Records of fertilizer inputs are maintained. - Minor compliance -	Unit of certification aware of the importance of maintaining records of fertilizer inputs in order to accurately track the amount of nutrients that are being applied to the plantation. This can help to ensure that oil palms are receiving the proper amount of nutrients for optimal growth, and can also help to identify any potential nutrient imbalances or deficiencies. Maintaining records can also be useful for budgeting and planning purposes, as it allows to track fertilizer costs and make adjustments as needed. Pulau Maria Estate keep records that include the type of fertilizer used, the application rate, and the date of application. Fertilizer inputs are recorded under "Fertilizer Application and Recommendation" and "Laporan Unit Kebun" (Estate Monthly Report). Record of fertilizer inputs of Pulau Maria Estate in 2022 are as follows:	Complied											
		<table border="1"> <thead> <tr> <th rowspan="2">Type of Fertilizer</th> <th colspan="3">Pulau Maria Estate</th> </tr> <tr> <th>Recommendation (kg)</th> <th>Realization (kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Type of Fertilizer	Pulau Maria Estate			Recommendation (kg)	Realization (kg)	%					
Type of Fertilizer	Pulau Maria Estate													
	Recommendation (kg)	Realization (kg)	%											

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		MOP	258,888	257,061	99.29	
		Urea	334,770	333,751	99.70	
		HGFB	24,504	23,849	97.33	
		Dolomite	613,080	592,846	96.70	
		CuSO ₄	4,029	3,952	98.10	
		Rock Phosphate	393,125	385,746	98.12	
		AC	208,846	207,312	99.27	
Criteria 7.5: Practices minimise and control erosion and degradation of soils.						
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.				Complied
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour.				Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.				Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.						

7.6.1	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p> <p>- Critical (Major) compliance -</p>	<p>As per SOP Soil Analysis No.R&D AA IK Profil Tanah” the semi detailed soil test carried out every 6 years with validity up to 7 years. The latest semi-detailed soil test carried out November 2018.</p> <p>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p> <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.</p> <p>- Minor compliance -</p>	<p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Complied
<p>Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) 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>The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005.</p> <p>Soil type analysis based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic</i></p>	Complied

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		<i>Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.	
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 -	The whole planted area in Pulau Maria Estate, PT Saudara Sejati Luhur are replanting that performed in 2002 to 2008, there is no new planting area or developed area after November 2005. Soil type analysis is based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.	Complied
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Soil type analysis is based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.	Complied
7.7.4	(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	Soil type analysis is based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.	Complied
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before	Soil type analysis is based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i> . Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.	Complied

	<p>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>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Soil type analysis is based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Complied
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	<p>Soil type analysis is based on soil survey by Asian Agri Group Research and Development back in 2012 was available soil map in scale 1:25,000. The predominant soil type consists of <i>Typic Hapludults</i> and <i>Typic Endoaquepts</i>. Based on the report there is no peat and fragile soil identified in Pulau Maria Estate.</p>	Complied
<p>Criteria 7.8: 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> <ul style="list-style-type: none"> - Minor compliance - <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>PT Saudara Sejati Luhur – Gunung Melayu I POM has prepared the document on protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones as in document “Praktek-praktek Mempertahankan Kualitas dan Ketersediaan Air Permukaan dan Air Tanah” – Water Sustainable”.</p> <p>PT Saudara Sejati Luhur – Gunung Melayu I POM has also developed a procedure to maintain soil fertility and water quality as stated in SOP for maintaining riparian zone is under SOP AA-APM-OP-1100.05. R1 “Konservasi Tanah dan Air”, it is stated that at during land clearing area along the river shall be conserved.</p> <p>PT Saudara Sejati Luhur has implement the construction of terrace contour for hilly area, individual platforms, and drainage network to handle rainfall. Audit team has verified document on planting the riparian “Penanaman Sempadan” and visit to block J08f, Division II, buffer to Karmila river and found company has planted enrichment species such as: <i>Terminalia catappa</i>, <i>Vetiver grass</i>, <i>Paraserianthes spp</i>, <i>Bambusa spp</i>. along the riparian.</p> <p>Company also conducts water quality test on each semester. Water quality test performed by accredited laboratory PT. ITEC Solution Indonesia, analysis report verified:</p> <ul style="list-style-type: none"> - Water analysis from clean water sample in worker housing “Pondok Seng Afd I KPM” dated 10 October 2022. Analysis result all parameter meets the clean water regulation (Peraturan Menteri Kesehatan No.492/Menkes/Per/IV/2010). - Water analysis from clean water sample in worker housing “Perumahan Pondok Coklat Afd II KPM” dated 10 October 2022. Analysis result all parameter meets the clean water regulation (Peraturan Menteri Kesehatan No.492/Menkes/Per/IV/2010). - Sample taken for domestic wastewater from worker housing “Perumahan Pondok Seng Afd I KPM” dated 10 October 2022. 	<p>Complied</p>
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		<p>Analysis result all parameter meets the domestic wastewater regulation (Peraturan Menteri Lingkungan Hidup dan Kehutanan No.P.68/Menlhk/Setjen/Kum.1/8/2016).</p> <ul style="list-style-type: none"> - Sample taken for analysis of surface water from Karmila river, Division II Pulau Maria Estate, dated 5 July 2022, Analysis result all parameter meets the surface water regulation (Peraturan Pemerintah No.22 Tahun 2021) <p>PT Saudara Sejati Luhur did not limit the supply of clean water to the worker. Based on stakeholder interview, there was no report or complaint from community on pollution to water body from company operation.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Company conducts water quality test on each semester. Water quality test performed by accredited laboratory PT. ITEC Solution Indonesia, analysis report verified:</p> <ul style="list-style-type: none"> - Water analysis from clean water sample in worker housing "Pondok Seng Afd I KPM" dated 10 October 2022. Analysis result all parameter meets the clean water regulation (Peraturan Menteri Kesehatan No.492/Menkes/Per/IV/2010). - Water analysis from clean water sample in worker housing "Perumahan Pondok Coklat Afd II KPM" dated 10 October 2022. Analysis result all parameter meets the clean water regulation (Peraturan Menteri Kesehatan No.492/Menkes/Per/IV/2010). <p>PT Saudara Sejati Luhur did not limit the supply of clean water to the worker.</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or</p>	<p>PT> Saudara Sejati Luhur has procedure for riparian management No. AA-APM-OP-1100.21-R2 dated 7 December 2015. In the document, the criteria for riparian area, lake, water source and conservation area explained. River riparian area sets at 50 meters both sides for river width</p>	<p>Complied</p>

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	<p>Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p><12 meters; and riparian area sets at 100 meters both sides for river width >12 meters.</p> <p>Based on field visit to Karmila river, no replanting within the buffer zone; no chemical treatment in the buffer zone, riparian area marked with signboard.</p> <p>Audit team has verified document on planting the riparian "Penanaman Sempadan" and visit to block J08f, Division II, buffer to Karmila river and found company has planted enrichment species such as: <i>Terminalia catappa</i>, <i>Vetiver grass</i>, <i>Paraserianthes spp</i>, <i>Bambusa spp</i>. along the riparian.</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>- Minor compliance -</p>	<p>Monitoring on BOD carried out by accredited laboratory PT. ITEC Solution Indonesia. Based on analysis, the parameter measured under threshold as regulated in "Peraturan Menteri Lingkungan Hidup dan Tenaga Kerja No.KEP-51/MENLH/10/1995" of 5.000 mg/liter.</p> <ul style="list-style-type: none"> - Report analysis PT. ITEC Solution Indonesia No.D.03.443/LHU/2022 – period March 2022; BOD 2,095 mg/liter; pH 7.6; - Report analysis PT. ITEC Solution Indonesia No.D.04.667/LHU/2022 – period April 2022; BOD 1,982 mg/liter; pH 7.4; - Report analysis PT. ITEC Solution Indonesia No.D.10.1925/LHU/2022 – period October 2022; BOD 1,125 mg/liter; pH 7.3; - Report analysis PT. ITEC Solution Indonesia No.D.11.2315/LHU/2022 – period November 2022; BOD 1,195 mg/liter; pH 7.5; 	<p>Complied</p>
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Based on Mill Summary Report year 2022 the average water per tonne FFB processed reach 1.04 m³/ton FFB.</p>	<p>Complied</p>
<p>Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			

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7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	Plan for reduce fossil fuel use and optimize renewable energy stipulated under "Rencana Management Lingkungan" 2022. Point 2 stipulates fossil fuel use efficiency improved from monitoring the actual fossil fuel used.	Complied
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly. - Critical (Major) compliance -	PT Saudara Sejati Luhur has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2021-2022". Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB. The assessment of pollution activities was documented in "Mitigasi Gas Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation. Report as per GHG calculator result displayed in annual public summary report.	Complied
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	There is no new development in the supply base of PT. Saudara Sejati Luhur, as replanting completed in 2012. Not applicable.	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Saudara Sejati Luhur has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from	Complied

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	- Critical (Major) compliance -	<p>mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months.</p> <p>For GHG emission, calculated with RSPO Palm GHG. Emission from estate operation and mill calculated and monitored, emission reduction achieved.</p>	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has replanted oil palm since 2008. Replanting procedure in "Prosedur Replanting No.SOP AA-APM-OP-1100.20-R8" dated 1 May 2019. Procedure stated company will implement zero burning through chipping and stacking with bucket-modified excavator.</p> <p>The replanting activities recorded: felling, chipping, cutting palm stomp, Ganoderma mitigation, Legume cover crop planting, holing, planting.</p> <p>In Pulau Maria Estate, replanting never use fire.</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.</p> <p>- Minor compliance -</p>	<p>PT. Saudara Sejati Luhur – Pulau Maria Estate has implemented various step to prevent land and forest fire:</p> <ul style="list-style-type: none"> - Daily patrol to check hotspot and fire as per fire-prone area mapping "Peta Area Rawan Kebakaran PT. Saudara Sejati Luhur-Kebun Pulau Maria". Based on patrol record year 2022 no hotspot or fire incident. - Company implement fire danger rating as early warning system. Based on fire danger rating record year 2019, 2020, 2021, 2022 in general the fire danger rating at low risk. - Company provide basic competence for worker in fire-fighting. Due to COVID-19 not implemented in 2020 and 2021. In 30 March 2022, 	Complied

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		<p>company carried out Basic Fire and Fire Equipment Training by Asian Agri Learning Institute.</p> <ul style="list-style-type: none"> - Fire fighting tools, equipment and infrastructure is in place as per "Daftar Peralatan Pemadam Kebakaran", this includes portable pumps, suction hose, nozzle, water hose, sickle, fire overall, etc. - Company coordinates and report the fire incident to relevant authorities, as reported "Laporan Pencegahan dan atau Kerusakan Lingkungan Hidup yang Berkaitan Kebakaran Lahan" for period July-December 2021 has been reported 5 March 2022; for period January-June 2022 reported 27 August 2022. 	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Latest firefighting training with surrounding communities on 6 December 2019, attended by 25 people.</p> <p>During Create Share Value/CSV program, company is also communicating with surrounding community member/smallholder to raise awareness on risk of land and forest fire.</p>	Complied

Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

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

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<p>countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>		
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in PT. Saudara Sejati Luhur-Pulau Maria Estate after November 2005 and/or November 2018.</p> <p>Complied</p>
<p>7.12.2</p>	<p>(C) 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>CH, PT. Saudara Sejati Luhur has conducted HCV identification by Forestry faculty from "Fakultas Kehutanan Institut Pertanian Bogor" in 2014, reported "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia" dated 12 July 2008.</p> <p>The HCV identification team consist of: Team leader: Dr. Ir. Nyoto Santoso, MS (RSPO HCV Assessor and HCVRNI member); Environmental service expert: Ir. A. Faizal Siregar, Msi (RSPO HCV Assessor and HCVRNI member); Vegetation expert: Eko Adhiyanto, S.Hut (RSPO HCV Assessor and HCVRNI member); Wildlife expert: Sutopo S.Hut. (RSPO HCV Assessor and HCVRNI member); Social-economic-cultural expert: Rae Birumbo (RSPO HCV Assessor and HCVRNI member); GIS: Arif Prasetyo, S.Hut (RSPO HCV Assessor and HCVRNI member).</p> <p>The HCV identification carried out with field assessment and public stakeholder consultation with surrounding communities on 1-7 April and May 2013. The HCV Identification report has been peer reviewed by Mr.</p> <p>Complied</p>

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		<p>Rachmad Darmawan (RSPO HCV Assessor and HCVRN member) on January 2014.</p> <p>In the assessment, The total HCV identified in Pulau Maria Estate was 12.29 Ha, consist of HCV 4.1 (10.79 Ha) and HCV 6 (1.5 Ha). Based on HCV Identification Report, 2014 shows in area of Pulau Maria Estate, found 54 types of mammals, 42 types of bird, 4 types of reptile.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. The company carried out replanting first in 2008.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>HFCL is not applicable for Indonesia.</p> <p>Not applicable.</p>	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3:</p> <p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the</p>	<p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2008.</p> <p>PT. Saudara Sejati Luhur has conducted HCV identification by Forestry faculty from "Fakultas Kehutanan Institut Pertanian Bogor" in 2014, reported "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di</p>	Complied

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	<p>directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia” dated 12 July 2008. This HCV identification mark the base of HCV management plan.</p> <p>Based on soil survey from Asian Agri Group Research and Development year 2012, there was no peat soil in Pulau Maria Estate; no fragile soil in Pulau Maria Estate.</p>	
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>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2018. The company carried out replanting first in 2008. PT. Saudara Sejati Luhur has conducted HCV identification by Forestry faculty from “Fakultas Kehutanan Institut Pertanian Bogor” in 2014, reported “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia” dated 12 July 2008.</p> <p>Based on soil survey from Asian Agri Group Research and Development year 2012, there was no peat soil in Pulau Maria Estate; no fragile soil in Pulau Maria Estate.</p> <p>Based on interview with stakeholders from surrounding communities and government, there was no HCV in local communities land.</p>	Complied
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>Based on HCV identification report, no wildlife identified in management unit categorized as Appendix I and II based on CITES or IUCN Redlist.</p> <p>PT. Saudara Sejati Luhur carried out socialization to worker and surrounding community related to HCV area, wildlife protection and prohibit hunting/poaching/killing of RTE species. Based on stakeholder consultation with surrounding village this was confirmed.</p>	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>PT. Saudara Sejati Luhur has prepared an HCV Management and Monitoring report every 6 months. The report putting recommendation for subsequent HCV Management and Monitoring Plan.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT. Saudara Sejati Luhur after November 2005 and /or November 2018. Company carried out replanting first in 2008.</p> <p>PT. Saudara Sejati Luhur has conducted HCV identification by Forestry faculty from "Fakultas Kehutanan Institut Pertanian Bogor" in 2014, reported "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Saudara Sejati Luhur Kebun Pulau Maria Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia" dated 12 July 2008.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Gunung Melayu I POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Gunung Melayu I POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-0.19
PKO	-0.19

Extraction	%
OER	17.27
KER	5.27

Production	t/yr
FFB Process	1,224
CPO Produced	35,650
PKO Produced	10,888

Land Use	Ha
OP Planted Area	57.69
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0.34
Total	57.69

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	569.78	0.47	0	0	0	0	569.78	0.47
CO ₂ Emission from fertilizer	41.26	0.03	0	0	0	0	41.26	0.03
NO ₂ Emission	0	0.03	0	0	0	0	38.04	0.03
Fuel Consumption	38.04	0.01	0	0	0	0	6.28	0.01
Peat Oxidation	6.28	0.00	0	0	0	0	0	0
Sink								
Crop Sequestration	-540.08	-0.44	0	0	0	0	-540.08	-0.44
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	115.27	0	0	0	18,649.53	0	18,584.80	15.18

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	22,41.25	0.01
Fuel Consumption	306.54	0.00
Grid Electricity Utilization	17.21	0.00
Credit		
Export of Grid Electricity	-0.22	0.00
Sales of PKS	-30,122.40	-0.15
Sales of EFB	0.00	0.00
Total	-27,557.62	-0.14

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-8,361.96
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	-8,461.96

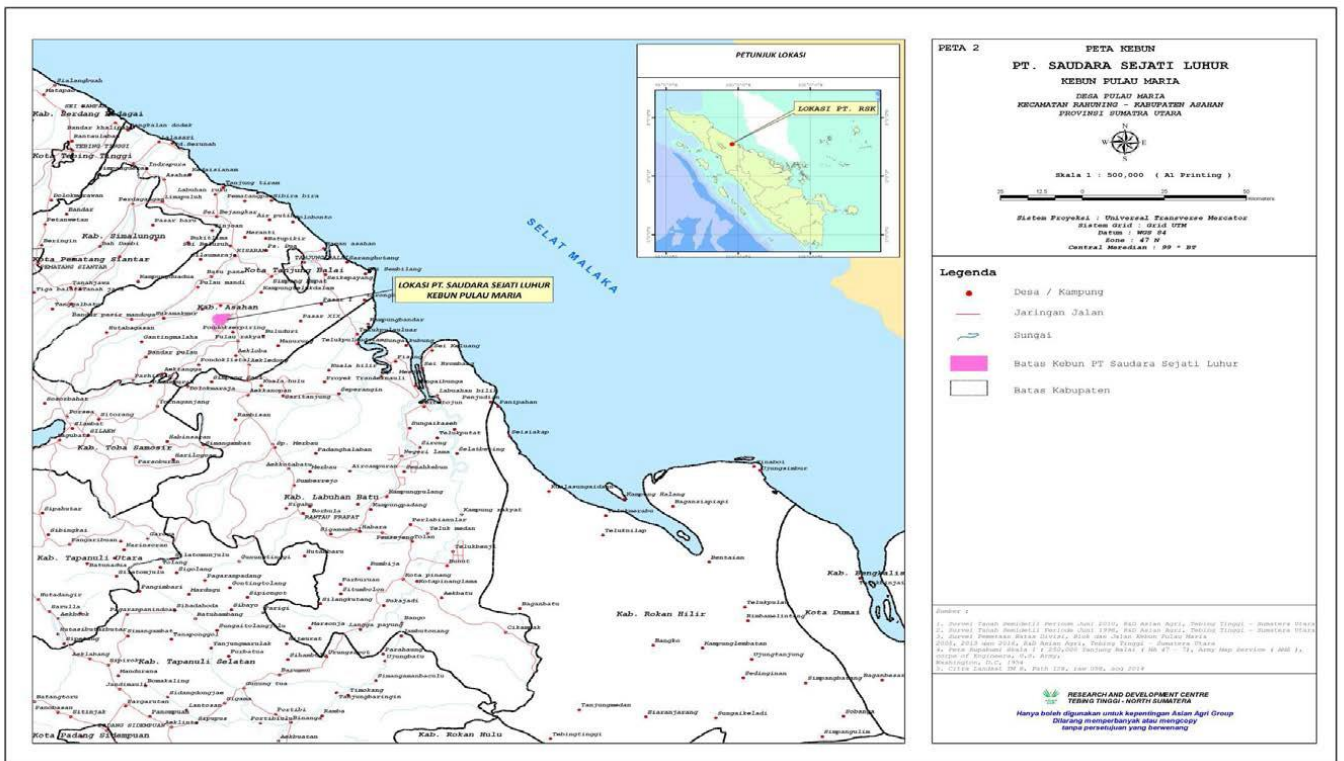
*This mill has no kernel crusher operation.

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

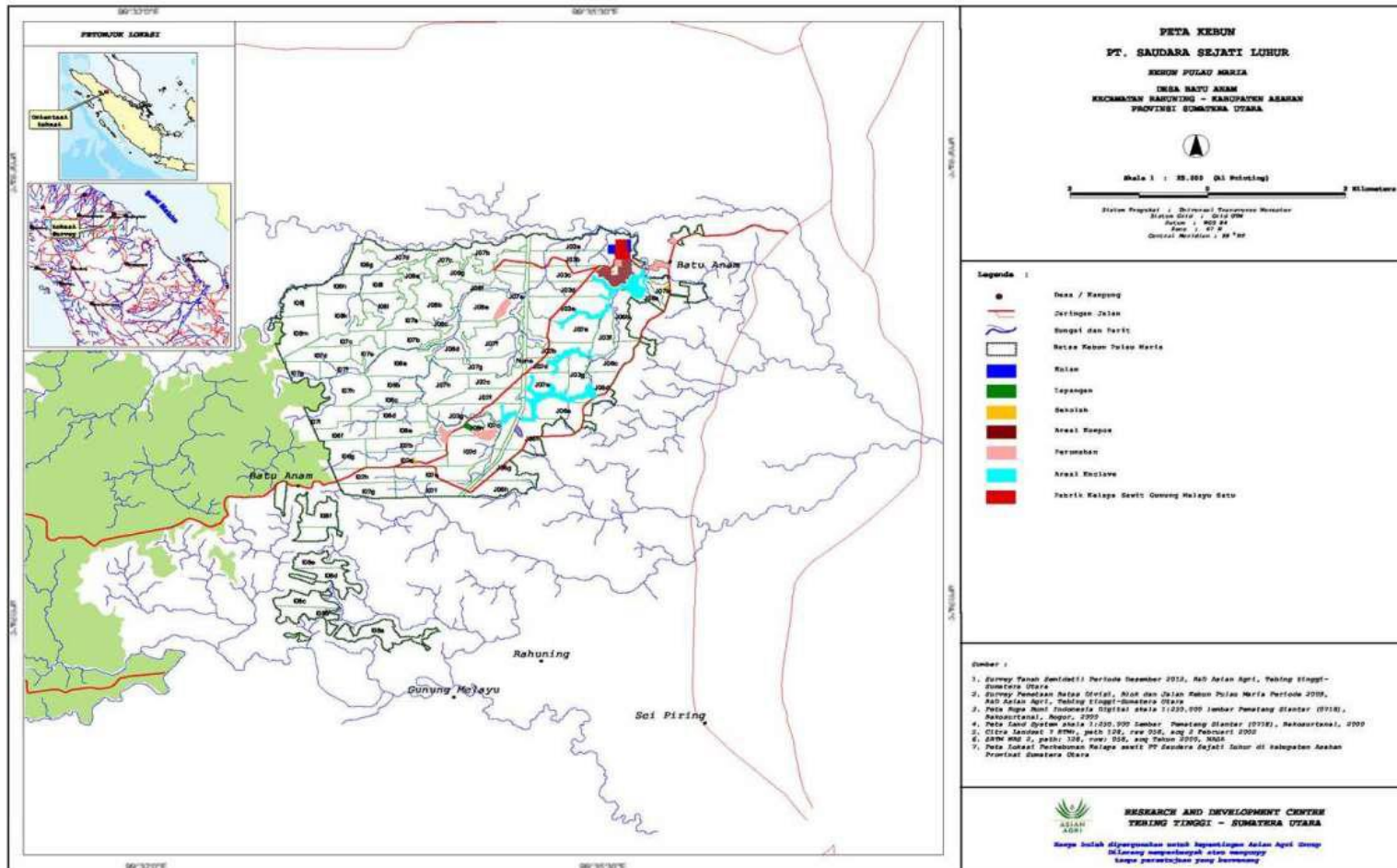
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	100

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Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and sampled

No smallholder scheme within this certification scope. Not applicable

Appendix F: List of Abbreviations

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