

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT** **Initial Assessment** **Annual Surveillance Assessment** (Choose an item.) **Recertification Assessment** (Choose an item.) **Extension of Scope**

Client Company Name / Parent Company: IOI Corporation Berhad
Client Company / Parent Company Address: IOI Corporation Berhad, Level 27, IOI City Tower Two, Lebuhr IRC, IOI Resort City, 62502 Putra Jaya Malaysia
Certification Unit: Sukses Karya Sawit POM - PT. Sukses Karya Sawit Location of Certification Unit: Desa Air Hitam Hulu, Kecamatan Kendawangan, Ketapang Regency, 74117 Kalimantan Barat Province, Indonesia
Date of Final Report: 16/07/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	IOI Corporation Berhad		
RSPO Membership Number	2-0002-04-000-00	Membership Approval Date	17/03/2004
Address	IOI Corporation Berhad, Level 27, IOI City Tower Two, Lebuhr IRC, IOI Resort City, 62502 Putra Jaya Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Sukses Karya Sawit POM -PT. Sukses Karya Sawit		
Location / Address	Air Hitam Village, Kendawangan District, Ketapang Regency, 74117 Kalimantan Barat Province, Indonesia		
Website	www.ioigroup.com.my		
Management Representative	Mrs. Nazlya Syahputri	E-mail	nazlya.syahputri@ioigroup.com
Telephone	+6253224933	Facsimile	+6253224933

2. Certification Information			
Certificate Number	RSPO 715456	Certificate Start Date	16/07/2023
Date of First Certification	16/07/2023	Certificate Expiry Date	15/07/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	The objective of the assessment was to conduct an initial certification assessment to ensure the elements of the proposed scope of registration and the requirements of the RSPO P&C standard and RSPO P&C certification system are effectively addressed by the organisation.		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <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	90 tons 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		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Nil			

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sukses Karya Sawit POM	Air Hitam Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 48' 03.36" S	110° 35' 35.20" E
Berkat Nabati Sejahtera 1 Estate	Air Hitam Besar Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 47' 39.18" S	110° 38' 43.62" E
Berkat Nabati Sejahtera 2 Estate (operates Plasma program of Koperasi Sawit Sejahtera Bersama)*	Air Hitam Besar Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 47' 39.18" S	110° 38' 43.62" E
Berkat Nabati Sejahtera 3 Estate	Air Hitam Besar Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 51' 15.29" S	110° 39' 37.85" E
Berkat Nabati Sejahtera 4 Estate	Air Hitam Besar Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 51' 15.29" S	110° 39' 37.85" E
Sukses Karya Sawit 1 Estate (operates Plasma program of Koperasi Natai Aru Mitra Sejahtera and Koperasi Natai Sipun Mandiri)*	Air Hitam Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 47' 41.75" S	110° 35' 07.01" E
Sukses Karya Sawit 2 Estate	Air Hitam Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 47' 41.75" S	110° 35' 07.01" E
Sukses Karya Sawit 3 Estate	Air Hitam Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 47' 34.66" S	110° 32' 19.60" E
Bumi Sawit Sejahtera 1 Estate	Natai Kuini Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 48' 40.89" S	110° 54' 45.33" E
Bumi Sawit Sejahtera 2 Estate	Natai Kuini Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 52' 37.29" S	110° 49' 37.13" E
Bumi Sawit Sejahtera 3 Estate	Natai Kuini Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 53' 42.06" S	110° 45' 39.57" E
Bumi Sawit Sejahtera 4 Estate (operates Plasma program of Koperasi Citra Niaga Bumi Sawit)*	Natai Kuini Village, Kendawangan District, Kalimantan Barat Province, Indonesia	2° 53' 42.06" S	110° 45' 39.57" E

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Notes: *In SKS 1 Estate, there are 2 cooperatives consist of: Koperasi Natai Aru Mitra Sejahtera consist of 818 members; In Koperasi Natai Sipun Mandiri consist of 590 members.
In BNS 2 Estate there is 1 cooperative: Koperasi Sawit Sejahtera Bersama consist of 1134 members.
In BSS 4 Estate there is 1 cooperative: Koperasi Citra Niaga consist of 298 members.
Please note that all cooperative/Koperasi is fully managed by the Unit of Certification. Therefore, individual cooperative member does not have individual plantation block in each of the estate. Cooperative issued with Hak Guna Usaha/land title.

5. Description of Supply Base						
New Planting Development	<input type="checkbox"/> No (no change in total planted area)		<input checked="" type="checkbox"/> Yes			
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other* (ha)	Total Area (ha)	% of Planted	
Berkat Nabati Sejahtera 1 Estate	1,881.18	5.69	72.18	1,959.05	96.02	
Berkat Nabati Sejahtera 2 Estate – Koperasi Sawit Sejahtera Bersama Plasma	1,471.87	0	35.28	1,507.15	97.65	
Berkat Nabati Sejahtera 3 Estate	1,842.57	0	75.93	1,918.50	96.04	
Berkat Nabati Sejahtera 4 Estate	1,800.54	0	61.00	1,861.54	96.72	
Sukses Karya Sawit 1 Estate – Koperasi Natai Aru Mitra Sejahtera and Koperasi Natai Sipun Mandiri Plasma	1,251.31	0	65.12	1,316.43	95.05	
Sukses Karya Sawit 2 Estate	2,618.47	0	257.10	2,875.57	91.05	
Sukses Karya Sawit 3 Estate	2,403.64	412.25	302.22	3,118.11	77.08	
Bumi Sawit Sejahtera 1 Estate	1,750.52	604.82	591.34	2,946.68	59.40	
Bumi Sawit Sejahtera 2 Estate	1,913.95	0	132.91	2,046.86	93.50	
Bumi Sawit Sejahtera 3 Estate	2,024.24	0	492.31	2,516.55	80.43	
Bumi Sawit Sejahtera 4 Estate – Koperasi Citra Niaga Bumi Sawit Plasma	1,443.85	0	253.54	1,697.39	85.06	
Total	20,402.14	1,022.76	2,338.93	23,763.83	85.85	

Notes: *Infrastructure & Others including Conservation Hectarage

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Berkat Nabati Sejahtera 1 Estate	-	1,881.18	-	-	1,881.18	-
Berkat Nabati Sejahtera 2 Estate – Koperasi Sawit Sejahtera Bersama Plasma	-	1,471.87	-	-	1,471.87	-
Berkat Nabati Sejahtera 3 Estate	-	1,842.57	-	-	1,842.57	-
Berkat Nabati Sejahtera 4 Estate	-	1,800.54	-	-	1,800.54	-
Sukses Karya Sawit 1 Estate – Koperasi Natai Aru Mitra Sejahtera and Koperasi Natai Sipun Mandiri Plasma	-	1,251.31	-	-	1,251.31	-
Sukses Karya Sawit 2 Estate	-	2,618.47	-	-	2,618.47	-
Sukses Karya Sawit 3 Estate	-	2,403.64	-	-	2,403.64	-
Bumi Sawit Sejahtera 1 Estate	-	1,750.52	-	-	1,750.52	-
Bumi Sawit Sejahtera 2 Estate	-	1,913.95	-	-	1,913.95	-
Bumi Sawit Sejahtera 3 Estate	-	2,024.24	-	-	2,024.24	-
Bumi Sawit Sejahtera 4 Estate – Koperasi Citra Niaga Bumi Sawit Plasma	-	1,443.85	-	-	1,443.85	-
Total (ha)	-	20,402.14	-	-	20,402.14	-

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

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Not applicable)	Actual (Not applicable)		Forecast (July 2023-June 2024)
		Previous license period (Not Applicable)	Current license period (Not Applicable)	
Berkat Nabati Sejahtera 1 Estate	N/A	N/A	N/A	46,310
Berkat Nabati Sejahtera 2 Estate – Koperasi Sawit Sejahtera Bersama Plasma	N/A	N/A	N/A	23,000
Berkat Nabati Sejahtera 3 Estate	N/A	N/A	N/A	10,180
Berkat Nabati Sejahtera 4 Estate	N/A	N/A	N/A	8,880
Sukses Karya Sawit 1 Estate – Koperasi Natai Aru Mitra Sejahtera and Koperasi Natai Sipun Mandiri Plasma	N/A	N/A	N/A	25,960
Sukses Karya Sawit 2 Estate	N/A	N/A	N/A	49,250
Sukses Karya Sawit 3 Estate	N/A	N/A	N/A	53,470
Bumi Sawit Sejahtera 1 Estate	N/A	N/A	N/A	32,050
Bumi Sawit Sejahtera 2 Estate	N/A	N/A	N/A	36,370
Bumi Sawit Sejahtera 3 Estate	N/A	N/A	N/A	29,830
Bumi Sawit Sejahtera 4 Estate – Koperasi Citra Niaga Bumi Sawit Plasma	N/A	N/A	N/A	15,620
Total	N/A	N/A	N/A	330,920

Note: This is Initial Assessment

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Not applicable)	Actual (Not applicable)		Forecast (Not applicable)
		Previous license period (Not Applicable)	Current license period (Not Applicable)	
N/A		N/A	N/A	
Total		N/A		

Note: Not applicable as this is Initial Assessment

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Not applicable)	Actual (Not applicable)		Forecast (Not applicable)
		Previous license period (Not Applicable)	Current license period (Not Applicable)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

Note: Not applicable as this is Initial Assessment

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	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A

Note: Not applicable as this is Initial Assessment

10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Not applicable)	Actual (Not applicable)		Forecast (July 2023-June 2024)	
	Previous license period (Not Applicable)	Current license period (Not Applicable)		
FFB	FFB		FFB	
N/A	N/A	N/A	330,920.00 mt	
	TOTAL	N/A		
CPO (OER: N/A %)	CPO (OER: N/A %)		CPO (OER: 22.5 %)	
N/A	N/A	N/A	74,457.00 mt	
	TOTAL	N/A		
PK (KER: N/A %)	PK (KER: N/A %)		PK (KER: 3.0 %)	
N/A	N/A	N/A	9,928.00 mt	
	TOTAL	N/A		

Note: This is Initial Assessment

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

Note: Not applicable as this is Initial Assessment

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

Note: Not applicable as this is Initial Assessment

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)
	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

Note: Not applicable as this is Initial Assessment

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

Note: Not applicable as this is Initial Assessment

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	N/A	N/A	N/A
TOTAL		N/A	N/A

Note: Not applicable as this is Initial Assessment

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
	N/A	N/A	N/A
TOTAL			N/A

Note: Not applicable as this is Initial Assessment

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			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

Note: Only applicable for ISH

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

Note: Only applicable for ISH

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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				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period: (Not applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Note: Only applicable for ISH							

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A
Note: Only applicable for ISH							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **28 November – 3 December 2022**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 27 October 2022.

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 **9-10 May 2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Sukses Karya Sawit POM	X	X	X	X	X
Berkat Nabati Sejahtera 1 Estate	X		X		X
Berkat Nabati Sejahtera 2 Estate – Koperasi Sawit Sejahtera Bersama Plasma	X	X		X	X
Berkat Nabati Sejahtera 3 Estate		X		X	
Berkat Nabati Sejahtera 4 Estate			X		X
Sukses Karya Sawit 1 Estate – Koperasi Natai Aru Mitra Sejahtera & Koperasi Natai Sipun Mandiri Plasma	X	X	X	X	
Sukses Karya Sawit 2 Estate	X		X		
Sukses Karya Sawit 3 Estate	X			X	
Bumi Sawit Sejahtera 1 Estate	X			X	
Bumi Sawit Sejahtera 2 Estate		X			X
Bumi Sawit Sejahtera 3 Estate		X			X
Bumi Sawit Sejahtera 4 Estate – Koperasi Citra Niaga Plasma	X		X		X

Tentative Date of Next Visit: April 2, 2024 - April 10, 2024

Total Number of Mandays: 31

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2.2 BSI Assessment Team

Name	Role	Competency
<p>Pratama Sedayu (PS)</p>	<p>Team Leader</p>	<p>Education: Holds a Bachelor Degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.</p> <p>Work Experience: 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001 and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program.</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISPO Lead Auditor endorsed Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements Training, Endorsed RSPO Refresher Trainings, and Endorsed ISH Auditor Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this assessment, he assessed timebound plan, continuous improvement, supply chain requirements, transparency.</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, ISO 45001:2018 Lead Auditor Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, Endorsed RSPO P&C Lead Auditor Training, Endorsed RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, 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, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System, and Endorsed ISH Auditor Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this assessment, he assessed on Economic management plan, Agriculture Best management practices, Environmental management system.</p>

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<p>Yudwi Wisnu Rahmanto (YW)</p>	<p>Team member</p>	<p>Education: Holds a Bachelor of Forestry with Silviculture background.</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 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), 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, Endorsed RSPO ISH Standard Auditor Training, Endorsed RSPO Supply Chain Lead Auditor Training and Endorsed Refresher Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on legal compliance, FPIC process, HCV and conservation management and monitoring.</p>
<p>Arif Faisal Simatupang (AF)</p>	<p>Team Member</p>	<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, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training, SA8000 Auditor training, Endorsed RSPO Refresher Trainings, and Endorsed ISH Auditor Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed Occupational Health and Safety management system, Social requirements, Stakeholder consultation, interview with previous landowners.</p>
<p>Dr. Suhaili Bin Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong</p>

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		<p>Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health & Safety 3. ISO 14001:2015 Standard 4. RSPO Standards: RSPO P&C 2018 MY-NI 2019 5. MSPO Standards: MS 2530:2013 part 1, 2, 3 and 4 6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7. HACCP MS 1480:2019 8. GAP Standard: Global GAP, Euro GAP 9. ASI Peer Reviewer training
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Accompanying Persons:

Name	Role
Haye Semail	ASI Witness Assessor
Yopi Jaya Kusuma	ASI Witness Assessor

2.3 Assessment Plan

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

Date	Time	Subjects	PS	EP	YW	AF
Sunday, 27/11/2022	06.00 -	Flight Jakarta – Pangkalan Bun 06.00 – 07.00	√	√	√	√
		Travelling Pangkalan Bun – Sukamara – PT. Sawit Nabati Agro	√	√	√	√
Monday, 28/11/2022	08.00 – 08.30	<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. 	√	√	√	√
	08.30 – 12.00	<p>Field visit to Sukses Karya Sawit Estate 2</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. 	√	√	-	-

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		<ul style="list-style-type: none"> - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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 Sukses Karya Sawit HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 				
		<p>Field visit to Sukses Karya Sawit Estate 3</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, 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, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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 HCV area, riparian zone 	-	-	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	Document and records verification	√	√	√	√
	16.30 – 17.00	Wash up meeting and Reporting	√	√	√	√
Tuesday, 29/11/2022	08.00 – 12.00	<p>Field visit to Bumi Sawit Sejahtera Estate 1</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, 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, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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. 	√	√	-	-

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Date	Time	Subjects	PS	EP	YW	AF
		<ul style="list-style-type: none"> - Visit to Bumi Sawit Sejahtera HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 				
		<p>Field visit to Bumi Sawit Sejahtera Estate 4 Plasma</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, 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, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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 Bumi Sawit Sejahtera Plasma HGU boundary poles/SHM boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 	-	-	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	<p>Document and records verification</p> <p>Interview with stakeholders</p> <ul style="list-style-type: none"> - Village/communities - Bumi Sawit Sejahtera Estate 4 Plasma Cooperative and members - Previous Landowners 	√	√	-	-
	16.30 – 17.00	Wash up meeting and Reporting	√	√	√	√
		Stay overnight at Bumi Sawit Sejahtera	√	√	√	√
Wednesday, 30/11/2022	06.00 – 08.00	Travel from Bumi Sawit Sejahtera Estate to Sukses Karya Sawit	√	√	√	√
	08.00 – 12.00	<p>Field visit to Sukses Karya Sawit POM to verify:</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 SKS POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities. 	√	√	√	-

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Date	Time	Subjects	PS	EP	YW	AF
		<ul style="list-style-type: none"> - 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. <p>Interview with workers related to health and safety condition, training provision, worker right and condition, etc.</p>				
		<p>Stakeholder consultation</p> <ul style="list-style-type: none"> - Stakeholder consultation to relevant agencies of Ketapang Regency; - Stakeholder consultation with local community/villagers; - Stakeholder consultation with previous landowners; - Stakeholder consultation with gender committee, worker union. 	-	-	-	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	Document and records verification	√	√	√	-
		Stakeholder consultation continued	-	-	-	√
	16.30 – 17.00	Wash up meeting and Reporting	√	√	√	√
Thursday, 1/12/2022	08.00 – 12.00	<p>Field visit to Sukses Karya Sawit Estate 1 Plasma</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, 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, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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 Sukses Karya Sawit HGU boundary poles/SHM boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 	√	√	-	-
		<p>Field visit to Berkat Nabati Sejahtera Estate 2 Plasma</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope 	-	-	√	√

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Date	Time	Subjects	PS	EP	YW	AF
		<ul style="list-style-type: none"> - 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, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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 Berkat Nabati Sejahtera Plasma HGU boundary poles/SHM boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 				
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	Interview, document and records verification <ul style="list-style-type: none"> - Interview with Village/communities - Interview with Sukses Karya Sawit Estate 4 Plasma Cooperative and members - Interview with Berkat Nabati Sejahtera Estate 2 Plasma Cooperative and members - Interview with previous landowners 	√	√	√	√
	16.30 – 17.00	Wash up meeting and Reporting	√	√	√	√
Friday, 2/12/2022	08.00 – 12.00	Field visit to Berkat Nabati Sejahtera Estate 1 <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, 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, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - 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 Berkat Nabati Sejahtera HGU boundary poles, border with surrounding entities - Visit to HCV area, riparian zone 	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√

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Date	Time	Subjects	PS	EP	YW	AF
	14.00 – 16.30	Interview, document and records verification - Interview with Village/communities - Interview with previous landowners	√	√	√	√
	16.30 – 17.00	Wash up meeting and Reporting	√	√	√	√
Saturday, 3/12/2022	08.00 – 11.00	Document and records verification <i>Document review and discussion if there any outstanding issues</i>	√	√	√	√
	11.00 – 12.00	Report Preparation	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√
	13.00 – 14.00	Closing Meeting (tentative)	√	√	√	√

NCR Close Out Verification

Date	Time	Subjects	PS
Tuesday, 19/05/2023	08.00 – 08.30	Opening Meeting - Presentation by Lead Auditor. - Confirmation audit scope, requirements, document access permission and clarifying audit plan.	√
	08.30 – 12.00	Field visit to Sukses Karya Sawit Visit to review CAP effectiveness on RSPO P&C indicator: - RSPO P&C 3.4.3 SIA update with participatory manner – SKS BNS, BSS - RSPO P&C 3.6.1 HIRADC review; MSDS availability and eligibility in warehouse (correct language) - RSPO P&C 3.8.5 RSPO SCCS Registration of Transaction, Shipping Announcement and Remove in IT Platform – SKS POM - RSPO P&C 3.8.9 RSPO SCCS SOP for outsources processes and control – SKS POM - RSPO P&C 4.2.1 Mutual agreement for SOP Complaint and Grievance – SKS, - RSPO P&C 5.1.6 FFB payment time information agreement – SKS - RSPO P&C 6.7.3 Provision of PPE – SKS, - RSPO P&C & ISH Certification System 5.5.3 Internal audit for uncertified management units. - Visit to plantation operation - Chemical warehouse, mixing bay, fertilizer store	√
	12.00 – 14.00	Break	√
	14.00 – 16.30	Field visit to Berkati Nabati Sawit	√

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Date	Time	Subjects	PS
		Visit to review CAP effectiveness on RSPO P&C indicator: <ul style="list-style-type: none"> - RSPO P&C 3.4.3 SIA update with participatory manner – BNS - RSPO P&C 3.6.1 HIRADC review; MSDS availability and eligibility in warehouse (correct language) – BNS - RSPO P&C 4.2.1 Mutual agreement for SOP Complaint and Grievance – BNS - RSPO P&C 5.1.6 FFB payment time information agreement – BNS - RSPO P&C 6.7.3 Provision of PPE – BNS - Visit to plantation operation - Chemical warehouse, mixing bay, fertilizer store 	
	16.30 – 17.00	Wash up meeting and Reporting	√
Wednesday, 10/05/2023	06.00 – 08.00	Travelling to Bumi Sawit Sejahtera	√
	08.00 – 12.00	Field visit to Bumi Sawit Sejahtera Visit to review CAP effectiveness on RSPO P&C indicator: <ul style="list-style-type: none"> - RSPO P&C 3.4.3 SIA update with participatory manner – BSS - RSPO P&C 3.6.1 HIRADC review; MSDS availability and eligibility in warehouse (correct language) – BSS - RSPO P&C 4.2.1 Mutual agreement for SOP Complaint and Grievance – BSS - RSPO P&C 5.1.6 FFB payment time information agreement –BSS - RSPO P&C 6.7.3 Provision of PPE –BSS - Visit to plantation operation - Chemical warehouse, mixing bay, fertilizer store 	√
	12.00 – 14.00	Break	√
	14.00 – 16.30	Interview, document and records verification <ul style="list-style-type: none"> - Interview with cooperative committee/community - Interview with workers 	√
		Document and records verification <ul style="list-style-type: none"> - Document review and discussion if there any outstanding issues 	√
	16.30 – 17.00	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?	Yes. Refer to IOI Corporation Berhad Time Bound Plan approved by RSPO 4 November 2022.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. Refer to IOI Corporation Berhad Time Bound Plan approved by RSPO 4 November 2022 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. The ACOP Report states that IOI Corporation Berhad plans to achieve 100% RSPO Certification for all estates and mill by 2024. https://www.rspo.org/members/62/IOI-Group RSPO secretariat approval obtained based on email communication dated 4 November 2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition in IOI Corporation Berhad to date.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Deviations are approved by RSPO Secretariat dated 4 November 2022.	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?	This is initial assessment to IOI Corporation Berhad Time Bound Plan in one of their subsidiaries, PT. Sukses Karya Sawit – Sukses Karya Sawit POM and its supply bases.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. Refer to IOI Corporation Berhad’s Time Bound Plan updated and approved by RSPO Secretariat as of 4 November 2022 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There have not been any isolated lapses in implementation of the plan.	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	No. Refer to IOI Corporation Berhad’s Time Bound Plan updated and approved by RSPO Secretariat as of 4 November 2022 and IOI ACOP 2021 under Time Bound Plan section (Section 4.2.1) which was submitted to RSPO. There has not been any isolated lapses in implementation of the plan.	Complied

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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>Updates on the RSPO CP Complaints case tracking was referred to on issues related to this on IOI's uncertified units prior to and during the audit. Verified that incidences of HCV clearance that were reported at the IOI's uncertified unit at Kalimantan, Indonesia namely PT. Bumi Sawit Sejahtera since year 2010 is being resolved as per the RSPO NPP and RSPO CP Complaints processes.</p> <p>Another 1 unit namely PT. KPAM in Kalimantan, had undergone the NPP Public Consultation and approved in April 2018 and HCSA Peer Review Assessment completed in May 2018. Currently, the plantation is under development and pending issuance of Local Government HGU. Reports on the NPP progress made to resolve the issues at the said units were checked and monitored till latest update made available on:</p> <p>https://askrspo.force.com/Complaint/s/case/5009000028Erz8AAC/detail</p> <p>As of this audit, there has been no other incidences of any replacement of primary forest at any other area under the IOI group</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>The concession in Indonesia PT. KPAM had undergone the NPP process prior to any new planting. RSPO has approved PT. KPAM NPP Summary Report and was published in RSPO website for public notification on 13 April 2018.</p> <p>The NPP public notification could be assessed through the link below:</p> <p>https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p>http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility as per the link below:</p> <p>https://askrspo.force.com/Complaint/s/case/50090000028ErzqAAC/detail</p> <p>This is further check in the website:</p> <p>https://www.rspo.org/certification/remediation-and-compensation/racp-tracker.</p>	<p>Complied</p>

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	<p>Only 1 (one) management unit identified with potential liability and require concept note and remediation plan as reported in case tracker.</p> <p>Further information on the current progress is currently available in IOI Corporation Berhad's Website: https://www.ioigroup.com/Content/S/S_Progress</p>	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	There was no labour dispute reported	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There was no legal non-compliance reported.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Sustainability Team Lahad Datu Region performs internal audit for uncertified management units under IOI Corporation Berhad and reported 3 October 2022. The internal audit report for IOI Pelita Plantation Sdn Bhd, Sarawak, Malaysia; and PT. Sukses Karya Sawit, PT. Berkat Nabati Sawit, PT. Bumi Sawit Sejahtera, PT. KPAM, Indonesia dated 3 October 2022 was audited against incorrect RSPO P&C criterion reference.	Major Non-compliance
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?	No non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates	Complied
Have there been any stakeholder (including NGO) consultation conducted?	<p>Stakeholder consultation for uncertified management units performed on annual basis.</p> <p>For Pelita Plantation Sdn Bhd., consultation to reach agreement on plantation excision March 2022.</p> <p>For PT. KPAM, latest consultation carried out period January-March 2023 to "Dinas Pertanian, Peternakan dan Perkebunan Kabupaten Ketapang".</p>	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a</p>	<p>In PT. Sukses Karya Sawit – Sukses Karya Sawit POM and its supply base, all the scheme smallholder is part of the certification scope.</p>	Complied

major NC if this requirement is not met after three years.		
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Approved Time Bound Plan

No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
1.	Pamol (Sabah) POM, Sabah	Meliau, Nangoh, Rungus, Tindakon, Ulu, Sugut & Bayok	May 2008	Certified since 3 February 2009.	Currently has been certified for the 3 rd cycle, ASA2_3 audit in July 2022.	No outstanding issues
2.	Sakilan POM	Sakilan, Linbar 1 and Linbar 2	Nov 2008	Certified since 8 March 2010	Currently has been certified for 3 rd cycle, ASA2_2 audit in November 2022.	No outstanding issues
3.	Pamol Kluang POM	Pamol Timur, Pamol Barat, Mamor, Unijaya, Kahang and Swee Lam	Mar 2009	Certified since 16 March 2010	Currently has been recertified for the 3 rd Cycle, 2 nd Surveillance Audit.	No outstanding issues
4.	Gomali POM	Gomali, Paya Lang, Bahau, Bertam, Bukit Dinding, Kuala Jelai, Tambang, Regent, Sagil, and Jasin Lalang	Aug 2009	Certified since 23 August 2010	Currently has been recertified for 3 rd Cycle, 3 rd Surveillance Audit.	No outstanding issues
5.	Baturong POM	Baturong 1, Baturong 2, Baturong 3 and Cantawan	Sept 2009	Certified since 15 October 2010	Currently has been recertified for the 3 rd cycle, ASA2_2 Audit in 2022.	No outstanding issues
6.	Bukit Leelau POM	Bukit Leelau, Detas, Merchong, Mekassar, Leepang A and Laukin A	Apr 2010	Certified since 19 November 2010	Currently has been recertified for 3 rd Cycle, 2 nd Surveillance Audit	No outstanding issues
7.	Mayvin POM	Mayvin 1, Mayvin 2, Mayvin 5, Mayvin 6 and Tangkulap	Aug 2010	Certified since 22 December 2010.	Currently has been certified for 3 rd cycle, ASA2_2 audit in August 2022.	No outstanding issues

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No	PMU	Supply Bases (Estate Name)	Main Assessment	Certification Status	Status	Updated Information on Minimum Requirements for Multiple Management Units, Clause 4.5.1 RSPO Certification Systems for Principles & Criteria
8.	Pukin POM, Pahang	Pukin, Shahzan 1, Shahzan 2, Segamat and Bukit Serampang	Dec 2010	Certified since 13 June 2012	Currently has been recertified for 3rd Cycle, 2nd Surveillance Audit.	No outstanding issues
9.	Leepang (Sabah) POM	Morisem 5, Leepang 1, Leepang 5, Permodalan 1, Permodalan 2, Permodalan 3, and Permodalan 4	Aug 2012	Certified since 16 December 2013	ASA2_4 surveillance audit September 2022. Will be undergoing 3rd cycle recertification audit on September 2023.	No outstanding issues.
10.	Syarimo POM	Syarimo 1, Syarimo 2, Syarimo 3, Syarimo 4, Syarimo 5, Syarimo 6, Syarimo 7, Syarimo 8 and Syarimo 9	Sept 2012	Certified since 20 March 2013	Currently has undergone 3 rd cycle recertification audit on January 2023.	No outstanding issues
11.	Ladang Sabah POM	Moynod, Luangmanis, Terusan Baru, Sungai Sapi, Laukin, Labuk, Bimbingan 1, and Bimbingan 2	Oct 2012	Certified since 3 April 2013.	Currently has undergone 3rd cycle recertification audit in January 2023.	No outstanding issues
12.	Morisem POM, Sabah	Morisem 1, Morisem 2, Morisem 3, Morisem 4, Leepang 2, Leepang 3, and Leepang 4	Sept 2013	Certified since 18 December 2013	Completed ASA2_4 audit October 2022. Will be undergoing 3rd cycle recertification audit October 2023.	No outstanding issues
13.	Unico POM-1, Sabah	Unico 6, Ladang Asas (Tas & Halusah), 31 (Outgrowers & Smallholders)	Planned - 2018	Certified since 5 July 2018	Currently has undergone 2nd Cycle recertification audit in March 2023.	No outstanding issues Outgrowers and Smallholders are not part of the certified area
14.	Unico Desa POM-2, Sabah	Unico 1, Unico 2, Unico 3, Unico 4, Unico 5 and 17 (Outgrowers & Smallholders)	Dec 2017	Certified since 16 May 2018	Currently has undergone 2nd cycle recertification audit in February 2023.	No outstanding issues Outgrowers and Smallholders are not part of the certified area

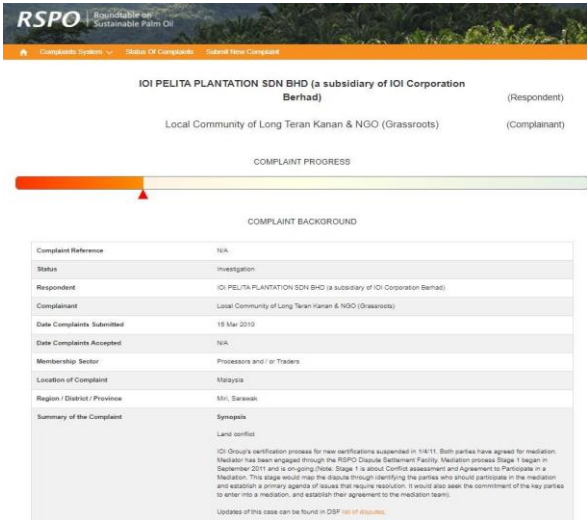
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15.	IOI – Pelita, Sarawak	Sejap and Tegai	Planned – TBC as it is under the resolution process	Uncertified Unit	IOI – Pelita (Sarawak) is in the resolution process (under RSPO CP)	<p><u>Stage 3: Negotiations for Final Settlement</u></p> <p>As soon as the Movement Control Order (MCO) was lifted, IOI Pelita held the second round of negotiations with all eight communities, one at a time, on 23-25 September 2021. Similar to the first round of negotiations, the meetings were observed by RSPO and other relevant stakeholders such as the Sarawak State government representatives. Due to Covid-19 travel restrictions some participants had opted to join the process via Zoom. The meetings were videotaped and recorded.</p> <p>All eight communities provided their response to IOI Pelita's settlement offers.</p> <p>Long Jegan community made two requests for the Sarawak State Government:</p> <ol style="list-style-type: none"> 1) to provide reassurance that the excised land will not be given to anyone else but the 8 community groups participating in the resolution process, and 2) to appointment of facilitator for the process of dividing the excised land among the community groups. <p>The eight community, LTKB, asked IOI Pelita to excise 300 ha of IOI Pelita planted land (the land IOI Pelita keeps) and return it back to LTKB. This, however, is legally impossible. IOI Pelita is a leaseholder and it can only surrender the land to the Sarawak State Government. This fact was explained to the LTKB community but the community stood firmly by its demand.</p> <p>As soon as the 2nd round of negotiations ended on Saturday, September 25th, IOI Pelita, Dr Ramy Bulan, and all government agencies participating in the negotiations recognized the need to address Long Jegan's concerns and came up with a detailed action plan aimed at providing all communities with more clarity and</p>

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						<p>reassurance as to how the Sarawak State Government will handle the question of land titling and which agency will play a facilitation role and help communities divide the excised land among themselves.</p> <p>In October 2021, IOI Pelita held several meetings with the Sarawak State Government representatives to address communities' remaining concerns regarding the status of the 4,615 hectares of land that IOI Pelita agreed to surrender.</p> <p>An inter-governmental meeting held on 2 December 2021 decided that Resident of Miri Office, acting on behalf of the Sarawak State Government, will meet each affected community to:</p> <ol style="list-style-type: none"> 1) inform them that the land surrendered by IOI Pelita will be gazette as communal land under Section 6 of the Land Code, with all 8 communities as trustees, 2) ask for communities' consent to allow a licensed surveyor to conduct a survey of the excised land as it is the necessary step for publishing the gazette, 3) reassure them that the survey will take into account the results of the Community Participatory Mapping conducted by CICOM, explain that it will be entirely up to the communities how they divide the gazette land among themselves. <p><u>Progress on Stage 2: Community Participatory Mapping</u></p> <p>Handing over of the ex-gratia payment ceremony has been conducted on 5th September 2019 in Miri involving members from 4 main communities respectively. Second stage of the Resolution Plan, 3D Community Participatory Mapping, started in August 2019. Technical assistance to the affected communities is being provided by CICOM. By mid-March 2020, six out of nine affected communities had their surveys done. Unfortunately, at that point,</p>

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						<p>the coronavirus outbreak reached Sarawak and the government issued Movement Control Order. The Community Participatory Mapping had to be put on hold.</p>  <p>The screenshot shows the RSPO Complaint System interface. At the top, it says 'RSPO Sustainable and Sustainable Palm Oil'. Below that, there are navigation links: 'Complaint System', 'Status Of Complaints', and 'Submit New Complaint'. The main content area shows the details of a complaint:</p> <ul style="list-style-type: none"> Respondent: IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad) Complainant: Local Community of Long Teran Kanan & NGO (Grassroots) COMPLAINT PROGRESS: A progress bar is shown, with a red triangle indicating the current status. COMPLAINT BACKGROUND: A table provides further details: <table border="1"> <tr><td>Complaint Reference</td><td>N/A</td></tr> <tr><td>Status</td><td>Investigation</td></tr> <tr><td>Respondent</td><td>IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)</td></tr> <tr><td>Complainant</td><td>Local Community of Long Teran Kanan & NGO (Grassroots)</td></tr> <tr><td>Date Complaints Submitted</td><td>18 Mar 2010</td></tr> <tr><td>Date Complaints Accepted</td><td>N/A</td></tr> <tr><td>Membership Sector</td><td>Processors and / or Traders</td></tr> <tr><td>Location of Complaint</td><td>Malaysia</td></tr> <tr><td>Region / District / Province</td><td>Itik, Sarawak</td></tr> <tr><td>Summary of the Complaint</td><td>Land conflict</td></tr> </table> 	Complaint Reference	N/A	Status	Investigation	Respondent	IOI PELITA PLANTATION SDN BHD (a subsidiary of IOI Corporation Berhad)	Complainant	Local Community of Long Teran Kanan & NGO (Grassroots)	Date Complaints Submitted	18 Mar 2010	Date Complaints Accepted	N/A	Membership Sector	Processors and / or Traders	Location of Complaint	Malaysia	Region / District / Province	Itik, Sarawak	Summary of the Complaint	Land conflict
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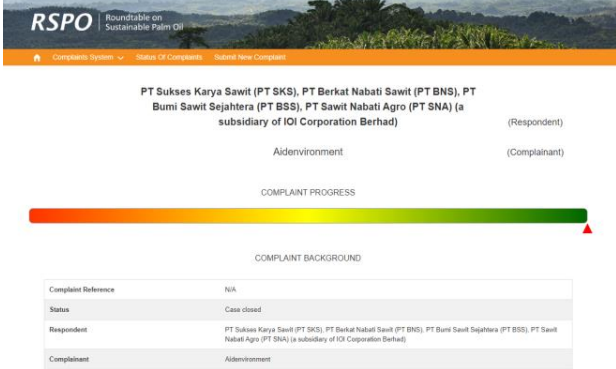
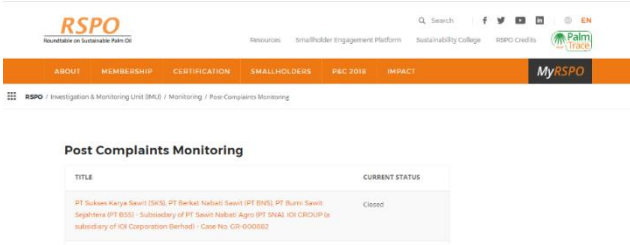
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						<p style="text-align: center;">COMPLAIN UPDATE</p> <table border="1"> <thead> <tr> <th>DATE</th> <th>UPDATE</th> <th>DOCUMENTS</th> </tr> </thead> <tbody> <tr> <td>15 Dec 2021</td> <td>Pending update on negotiations.</td> <td></td> </tr> <tr> <td>29 Sep 2021</td> <td>Pending report from Complaints Desk and deliberation by the CR.</td> <td></td> </tr> <tr> <td>25 Aug 2021</td> <td>Pending report from the Complaints Desk.</td> <td></td> </tr> <tr> <td>28 Jul 2021</td> <td>The Respondent has invited the RSPO Secretariat to participate in the second phase of negotiation and witness the process of the signing of the settlement agreement by the communities.</td> <td></td> </tr> <tr> <td>23 Jun 2021</td> <td>The Complaints Desk had a meeting with representatives of the Respondent. The Respondent have also forwarded to the Complaints Desk some supporting documents. They are currently being reviewed by the Complaints Desk.</td> <td></td> </tr> <tr> <td>25 May 2021</td> <td>The Secretariat's review is underway. The Secretariat to reach out to the Respondent on updates.</td> <td></td> </tr> </tbody> </table> <p>Further and updated progress of this issue could be access through the link below;</p> <ul style="list-style-type: none"> (a) IOI Pelita Land Dispute Resolution Plan (b) Current progress on IOI Pelita Land Dispute Resolution Process (c) https://www.ioigroup.com/Content/MEDIA/M_Media?Category=7 (d) RSPO Case Tracker – IOI Pelita Status of Complaints (e) IOI Pelita & Stakeholders Reaching a Breakthrough <p>Internal audit for Sejap Estate has been completed in October 2022</p>	DATE	UPDATE	DOCUMENTS	15 Dec 2021	Pending update on negotiations.		29 Sep 2021	Pending report from Complaints Desk and deliberation by the CR.		25 Aug 2021	Pending report from the Complaints Desk.		28 Jul 2021	The Respondent has invited the RSPO Secretariat to participate in the second phase of negotiation and witness the process of the signing of the settlement agreement by the communities.		23 Jun 2021	The Complaints Desk had a meeting with representatives of the Respondent. The Respondent have also forwarded to the Complaints Desk some supporting documents. They are currently being reviewed by the Complaints Desk.		25 May 2021	The Secretariat's review is underway. The Secretariat to reach out to the Respondent on updates.	
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16.	PT Sukses Karya Sawit (SKS), Indonesia	SKS 1, SKS 2, and SKS 3	Planned 2022 -	Uncertified Unit	RSPO Stage 2 was conducted in November 2022.	RSPO Complaints Panel (CP) officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and																					

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						<p>Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>

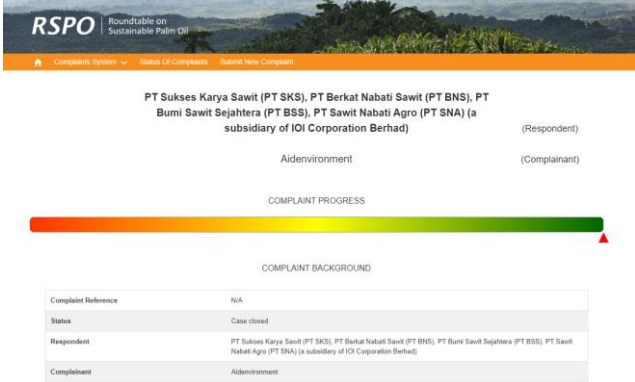
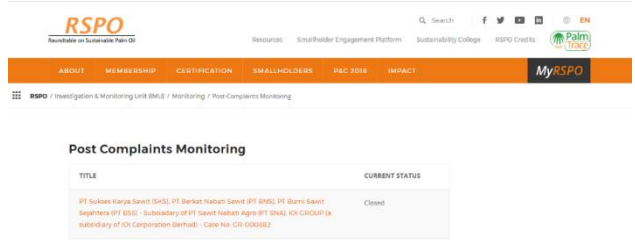
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						communicated and approved by RSPO. In November 2020, PT. SKS internal audit have been conducted. Date of RSPO main assessment audit have been proposed to CB to be conducted in Mid 2022
17.	PT Berkat Nabati Sawit (BNS), Indonesia	BNS 1, BNS 2, BNS 3 and BNS 4	Planned - 2022	Uncertified Unit	RSPO Stage 2 audit was conducted in November 2022	<p>RSPO Complaints Panel (CP) officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>

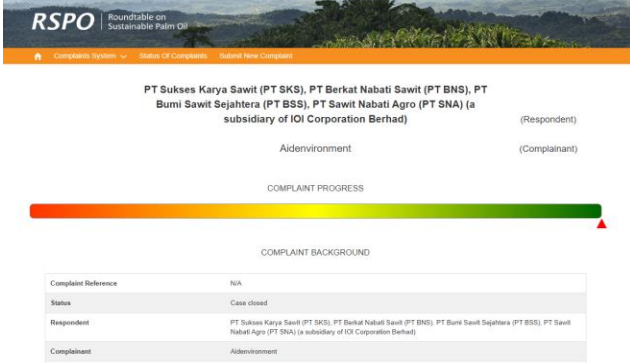
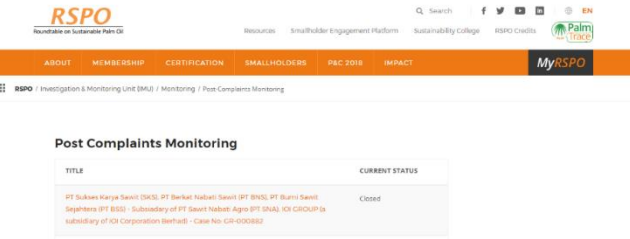
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18.	PT Bumi Sawit Sejahtera (BSS), Indonesia	BSS 1, BSS 2, BSS 3 and BSS 4	Planned - 2022	Uncertified Unit	RSPO Stage 2 was conducted in November 2022	<p>RSPO Complaints Panel (CP) officially closed the complaint case on 12 October 2018. IOI will continue to work with the RSPO Investigate and Monitoring Unit on the implementation of its Action Plans to ensure continuous sustainable development. First and second quarterly update for the action plan on PT. SKS, PT. BNS and PT. BSS was submitted to RSPO Investigate and Monitoring Unit in December 2018 and February 2019 respectively.</p> <p>On 15th April 2019, RSPO's official announced "that the monitoring of the implementation of the Complaints Panel directives for "PT Sukses Karya Sawit (SKS), PT Berkat Nabati Sawit (PT BNS), PT Bumi Sawit Sejahtera (PT BSS) - Subsidiary of PT Sawit Nabati Agro (PT SNA), IOI GROUP (a subsidiary of IOI Corporation Berhad) - Case No: GR-000882 " is now officially closed."</p> <p>IOI received an email from RSPO that "the Investigation & Monitoring Unit (IMU) of the RSPO Secretariat had finalized the internal review of the action plan and progress reports submitted by IOI against the Complaints Panel's directives and the IMU concluded that IOI has successfully met all the requirements set by the Complaints Panel."</p> <p>Further and updated progress of this issue could be access through the link below;</p> <p>(a) RSPO Ketapang Complaint for PT BSS, PT SKS & PT BNS</p> <p>(b) RSPO Case Tracker – PT BSS, PT SKS & PT. BNS Status of Complaints</p>

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						Date of RSPO main assessment audit have been proposed to CB to be conducted in 2022
19.	PT KPAM, Indonesia	Under Development	Planned - 2024	Uncertified Unit	NPP and HCSA was approved in April 2018. Currently under development.	<p>RSPO has approved PT. KPAM NPP Summary Report and was published on the RSPO website for public notification on 13 April 2018. The NPP public notification could be assessed through the link below:</p> <p>https://rspo.org/certification/new-planting-procedure/public-consultations/page/2?</p> <p>HCSA Peer Review Assessment completed on 14 May 2018. The HCSA Peer Review Report and Summary Report could be assessed through the link below:</p> <p>http://highcarbonstock.org/wp-content/uploads/2018/05/PRR-PT.-KPAM.pdf</p>

Notes: Item 16, 17, and 18 is covered in the Audit Report.

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 eight (8) Critical nonconformities; seven (7) Minor nonconformities and five (5) Opportunity For Improvement raised. The PT. Sukses Karya Sawit – Sukses Karya Sawit POM and its supply base 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 #	2278530-202211-M1	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 3.4.3 Critical/Major		
Statement of Nonconformity:	The social impact assessment's evaluation for PT. Sukses Karya Sawit, PT. Berkat Nabati Sejahtera has not updated in participatory manner inviting aspiration/issue from scheme smallholder cooperatives.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.		
Objective Evidence:	Based on stakeholder consultation Cooperative Natai Aru Mandiri Sejahtera and Cooperative Natai Sipun Mandiri comments and issues related to payment timeframe, transparency, plantation condition and infrastructure leads to low productivity blocks. This was not captured in SIA evaluation PT. Sukses Karya Sawit. Cooperative Sawit Sejahtera Bersama raised issues on plantation condition and infrastructure leads to low productivity blocks. This not captured in SIA PT. Berkat Nabati Sejahtera.		
Corrections:	<ul style="list-style-type: none"> - Consolidating documents that the SIA evaluation henceforth will only use the SIA Management Plan. - Revision of the SIA Management Plan by incorporating the results of consultations with the management of the cooperative and other affected stakeholder (e.g. village head, villagers) in the surrounding community then compiling the submitted impact mitigation efforts. <p>Verified evidence:</p> <ul style="list-style-type: none"> • Revision on SIA PT. Sukses Karya Sawit, review 15 November 2022; Revision 20 February 2023; Next Review 15 November 2023. The revision including participation information on consultation with external stakeholders 7 February 2023: 2 contractors, 11 villagers, 2 school teachers, 8 scheme smallholder cooperative. • Revision on SIA PT. Berkat Nabati Sawit, review 15 November 2022; Revision 20 February 2023; Next Review 15 November 2023. The revision including participation information on consultation with external stakeholders 7 February 		

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	<p>2023: 3 villagers, 2 school teachers, 9 scheme smallholder cooperative committee.</p> <ul style="list-style-type: none"> Revision on SIA PT. Bumi Sawit Sejahtera, review 15 November 2022; Revision 20 February 2023; Next Review 15 November 2023. The revision including participation in form consultation meeting with external stakeholders 4 November 2022: 12 contractors, 12 villagers, 6 school teachers.
Root Cause Analysis:	<ul style="list-style-type: none"> Currently there are two documents that discuss social impact evaluation, namely the SIA Review and the SIA Management Plan. Each document has not yet discussed the update on the results of stakeholder consultation with cooperative management. There is no mechanism/checklist available as a guide for implementing the SIA evaluation.
Corrective Actions:	<ul style="list-style-type: none"> Develop guidelines/checklists for preparing the SIA Management plan so that it can be used as a reference for the implementation of the evaluation process for the SIA Management Plan in the future; Monitor the implementation of the guidelines and the process of SIA Management Plan during internal mock audit. <p>Verified evidence:</p> <ul style="list-style-type: none"> PT. Sukses Karya Sawit prepared SOP "Panduan Penyusunan Social Impact Assessment (SIA) Management Plan NO.SOP.SNA.SIA-01 rev.0" dated 15 February 2023. PT. Sukses Karya Sawit prepared internal audit, reported in "Laporan Internal Audit Khusus Hasil Audit Sertifikasi RSPO 2022" dated April 2023. Informing SIA review and SIA management plan combined into SIA Management Plan. Checking SIA revision and inclusion of impact identification: PT. SKS in SIA Management Plan page 47, 48, 62, 63, 64; PT BNS in SIA management Plan page 48, 61, 62; PT. BSS in SIA Management Plan page 47, 61, 62.
Assessment Conclusion:	<p>This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated. Critical NC/Major NC Closed Out.</p>

Non-conformity			
NCR Ref #	2278530-202211-M2	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 3.6.1 Critical/Major		
Statement of Nonconformity:	PT. Sukses Karya Sawit and management units prepared risk assessment document, however a number of activities, information related to risk has not been reviewed in the document.		
Requirement Reference:	All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		

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Objective Evidence:	<ul style="list-style-type: none"> - HIRADC has not identified risk based on activity and review availability of information on risk: - Activity boundary poles (patok HGU) control and monitoring; Activity HCV area patrol; Activity fire patrol in fire tower in BSS 1 Estate; - Activity related to generator maintenance/repair in BSS 1 Estate; - Use of ART tractor to FFB transfer process in BNS I Estate; - Control from risk assessment document for hazardous waste storage and transit hazardous waste store (TPS LB3 Berizin) was inconsistent: In SKS 3 the transit hazardous waste storage was not equipped with symbol and label, eye wash, emergency shower and alarm. - Information such as Material Safety Data Sheet in SKS 3 Estate’s Fertilizer Store was found not complete, and some worker interviewed does not understand MSDS in English and prefer in Bahasa Indonesia. - Information such as Material Safety Data Sheet in BSS 1 Estate’s Oil storage was found not complete and some in English, and the storekeeper interviewed does not understand MSDS in English language. Sprayer mandor does not fully understand the content of MSDS for agrochemical used and has not fully understand emergency response plan for incident related to chemical exposure. - HIRADC has not covered hazard and risk from storage/management of material in spare part warehouse and Fire Fighting Equipment storage, whereby hazardous material (flammable) was kept: oil, lubricant, thinner, paint. - Information such as Material Safety Data Sheet in SKS POM’s laboratory was found not available for material hexane. - Based on information, SKS POM performs FFB processing in nighttime, while control on lighting for SKS POM has not identified in HIRADC.
Corrections:	<ul style="list-style-type: none"> - Review and revise HIRADC all existing activities if needed; - Develop HIRADC for activities that have not been identified; - HIRADC socialization for work where there was no risk analysis before, namely monitoring HGU stakes, HCV patrols, hotspot and fire tower patrols, ART tractor, spare parts warehouse (potential risk flammable); - Replacing all MSDS posted in the field with MSDS in Indonesian and re-socializing them to related officers; <p>Verified Evidences:</p> <ul style="list-style-type: none"> • HIRADC for SKS Estate, BNS Estate, BSS Estate revised No.001/HRDC/R-4/2023 dated 9 January 2023. The latest HIRADC has incorporating activities such as pesticide application in consideration MSDS information; warehouse operation in consideration MSDS information; post pesticide application activities; HGU pole installation, monitoring and maintenance; HCV monitoring; fire patrol and fire-fighting; genset maintenance and operation. • HIRADC for SKS Mill revised No.001/HRDC-Mill/R-4/2023 dated 9 January 2023. Latest HIRADC review night operation at the palm oil mill; maintenance work at palm oil mill include external parties such as contractor. • In BSS 1 Estate Oil Storage, MSDS made available in Bahasa Indonesia for grease Cobra, thinner, grease bearing Kyodo, oil Komatsu EO 15W-40;

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	<ul style="list-style-type: none"> In BSS Fertilizer Storage, MSDS made available in Bahasa Indonesia for MOP, Rock Phosphate, ZA/Ammonium Sulphate; In BSS Chemical Storage, MSDS made available in Bahasa Indonesia for Meta Prima 20 WG - methyl metsulfuron, Prima Furon 20 WG - methyl metsulfuron, Prima Ace 75 WP - Acephate, Kencis 50 EP - Cypermethrin, Starkum 0,005BB - Brodifakum, Centalon 480 - Trycophyr;
Root Cause Analysis:	<ul style="list-style-type: none"> Inconsistency in terms of HIRADC evaluation of new activities. HIRADC is currently only conducted for main activities both in estate and Mill. Several MSDSs from suppliers are provided in English without any translation into Bahasa Indonesia. Administrative provision of MSDS from suppliers who have not been in order because some purchases were not immediately provided with the MSDS.
Corrective Actions:	<ul style="list-style-type: none"> Evaluating the HIRADC drafting mechanism to ensure the process of preparing, monitoring, evaluating including updating if new activities are carried out in the field can be identified properly and comprehensively; Ensuring that all employees are aware of the job risk analysis carried out through periodic training/socialization programs; Regular monitoring of MSDS completeness in the field; <p>Verified Evidences:</p> <ul style="list-style-type: none"> Verified document "Sistem Management Kesehatan dan Keselamatan Kerja IOI Corporation Berhad (Plantation Division) Indonesia Area No.IOI-OSH 3.3.4.2-ID" dated 1 January 2023. Section 4 indicating modification and/or introduction of new work method, new material, new machinery and consultation with worker and safety committee. Verified Masterlist MSDS for all estate in PT. Sukses Karya Sawit, PT. Berkat Nabati Sawit and PT. Bumi Sawit Sejahtera, last update 15 April 2023. Based on interview during NCR close out visit, sprayer mandores and agrochemical storekeeper can explain the content in MSDS in Bahasa Indonesia, including pointing specific first aid treatment in case of exposure.
Assessment Conclusion:	<p>This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated. Critical NC/Major NC Closed Out.</p>

Non-conformity			
NCR Ref #	2278530-202211-M3	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 3.8.5 Critical/Major		
Statement of Nonconformity:	PT. Sukses Karya Sawit – Sukses Karya Sawit POM Standard Operation Procedure has not explains process for registration of transactions, shipping announcement and remove in the RSPO IT Platform.		
Requirement Reference:	Documented procedures		

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	<p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.
Objective Evidence:	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP “Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03” dated 7 October 2022. In the SOP has not indicate process for registration of transactions, shipping announcement and remove in the RSPO IT Platform.</p>
Corrections:	<p>Revised the Supply Chain procedure to complete the provisions related to the process for registration of transactions, shipping announcement and remove in the RSPO IT Platform.</p> <p>Verified Evidences:</p> <ul style="list-style-type: none"> • SOP Supply Chain Certification "Prosedur Penerapan Standar Rantai Pasok Sertifikasi No.SOP.SNA.SRP-01 rev.04/2022" dated 6 February 2023. • The SOP "Prosedur Penerapan Standar Rantai Pasok Sertifikasi No.SOP.SNA.SRP-01 rev.04/2022" Section 6.5 Pendaftaran Transaksi dan Penghapusan Stok pada RSPO IT Platform" explains all RSPO certified product delivery shall be registered to PalmTrace; volume registration in Palmtrace in accordance to sales requirement; Mill Administration Head shall report the delivery and update in mill report and mass balance sheet; Department Logistik PT. SNA Group will review the report and issue shipping announcement. Removal of non-certified product carried out by Department Logistik PT. SNA Group.
Root Cause Analysis:	<p>The implementation of the RSPO SCCS has not been carried out in the SKS POM so it has not been clearly identified who will be responsible for operating the RSPO IT Platform (Palmtrace).</p>
Corrective Actions:	<ul style="list-style-type: none"> - Re-socialize to related parties according to the revisions made. - Monitor the implementation of PalmTrace activities during sustainability monitoring visit. <p>Verified Evidences:</p> <ul style="list-style-type: none"> • CH conduct socialization of SOP Supply Chain Certification Standard/SCCS and Critical Point, dated 3 February 2023. The socialization attended by Mill Assistant Head; Weighbridge Operator; FFB Grading Operator; Securities; Mill Administration Head; Sustainability Manager; Grading Supervisor;

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	<ul style="list-style-type: none"> PT. Sukses Karya Sawit prepared internal audit, reported in "Laporan Internal Audit Khusus Hasil Audit Sertifikasi RSPO 2022" dated April 2023. Informing PalmTrace transaction monitoring done but since no RSPO certified product trading: N/A
Assessment Conclusion:	<p>This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated.</p> <p>Critical NC/Major NC Closed Out.</p>

Non-conformity			
NCR Ref #	2278530-202211-M4	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 3.8.9 Critical/Major		
Statement of Nonconformity:	In the current RSPO SCCS SOP, has not explained the explicit procedures for the outsourced process which is communicated to the relevant contractor.		
Requirement Reference:	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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. ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes. 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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. 		
Objective Evidence:	PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. In the current RSPO SCCS SOP, has not explained the explicit procedures for the outsourced process which is communicated to the relevant contractor.		
Corrections:	<p>Revised RSPO Supply Chain procedures by adding contractor selection and monitoring mechanisms in accordance with RSPO SCCS requirements.</p> <p>Verified Evidences:</p>		

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	<ul style="list-style-type: none"> SOP Supply Chain Certification "Prosedur Penerapan Standar Rantai Pasok Sertifikasi No.SOP.SNA.SRP-01 rev.04/2022" dated 6 February 2023. The SOP "Prosedur Penerapan Standar Rantai Pasok Sertifikasi No.SOP.SNA.SRP-01 rev.04/2022" Section 6.7 "Kegiatan Alih Daya (Outsourcing)" explains the requirement for outsourcing such as the certified mill has legal ownership of the product; the certified mill has contractual agreement to regulate outsourced process; certified mill responsible to ensure internal auditor and external certification body has access to contractor and its operator conducting outsourced process and audit if necessary should informed in advance.
Root Cause Analysis:	SKS POM has not developed a mechanism for outsourcing activities in accordance with the provisions of the RSPO SCCS
Corrective Actions:	<ul style="list-style-type: none"> - Dissemination of updates on outsourcing mechanisms to related PICs including contractors; - Review the suitability of contract so it will comply with the outsourcing provisions in the revised SOP; - Monitor the implementation of SOP regarding outsourcing as well as the awareness of the provision of outsourcing regarding SCCS through the sustainability monitoring visit; <p>Verified evidence:</p> <ul style="list-style-type: none"> • CH provides training for contractor/product transporter on 7 February 2023. The training for contractor attended by CV Candra Buana, CV Sultan Borneo Mandiri. • Review on transporter contract suitability carried out "Berita Acara Review Kontrak Kerjasama Pengangkutan Produk" dated 9 February 2023; whereby the contract accommodated revision in the SOP Supply Chain Certification Standard: in the transport contract Chapter 2 - verse 22 adding clause related to legal ownership of product; Chapter 8 - verse 8.4 adding explanation on provide relevant access for duly accredited CBs to contractor operations when this is announced in advance. • PT. Sukses Karya Sawit prepared internal audit, reported in "Laporan Internal Audit Khusus Hasil Audit Sertifikasi RSPO 2022" dated April 2023. Informing control on outsourcing process done in form of revise transport contract clauses; RSPO certified product transportation done, but since no RSPO certified product delivery: N/A
Assessment Conclusion:	This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated. Critical NC/Major NC Closed Out.

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Non-conformity			
NCR Ref #	2278530-202211-M5	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 4.2.1 Critical/Major		
Statement of Nonconformity:	PT. Sukses Karya Sawit has procedure on complaint and grievance handling but company has not demonstrated the procedure developed in mutual agreement with stakeholders; and further the SOP has not include requirement on ensuring anonymity of complainants, Human Rights Defender, community spokespersons and whistleblowers, where requested.		
Requirement Reference:	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.		
Objective Evidence:	SOP Penanganan Saran dan Keluh Kesah Karyawan dan Stakeholder No.SNA/SOP/HR/PK/003 r1 1 September 2022 has not been demonstrated mutually agreed with stakeholders and further the SOP has not include requirement on ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested.		
Corrections:	<ul style="list-style-type: none"> - Review the SOP for Handling Employee and Stakeholder Suggestions and Complaints No.SNA/SOP/HR/PK/003 and ensure Anonymity; - Training of PICs who are responsible for receiving complaints to ensure the protection of anonymity is maintained; - Information dissemination and consultation on the SOP mechanism for Handling Employee and Stakeholder Advice and Complaints No.SNA/SOP/HR/PK/003 to employees and external stakeholders. <p>Verified Evidence:</p> <ul style="list-style-type: none"> • PT. Sukses Karya Sawit Agro revised the SOP "Prosedur Penanganan Saran dan Keluh Kesah Karyawan dan Stakeholder No.SNA/SOP/HR/PK/003 rev.2" dated 31 January 2023. Section 5.1 "Penyampaian Keluh Kesah dan Saran" indicating no name/anonymity policy. • PT. Sukses Karya Sawit provides training on SOP for Handling Employee and Stakeholder Input and Complaints for internal PIC: for PIC in PT. Sukses Karya Sawit and PT. Berkat Nabati Sawit on 9 February 2023, attended by 9 PICs; in SKS Palm Oil Mill dated 10 April 2023 attended by 17 workers; in PT. Berkat Sawit Sejahtera on 8 March 2023 and attended by 12 PICs. • PT. Sukses Karya Sawit provides dissemination/socialization on SOP for Handling Employee and Stakeholder Input and Complaints for surrounding villagers: to Air Hitam Besar village on 16 February 2023 attended by 3 village authorities; to Air Hitam Hulu village on 10 February 2023 attended 4 village authorities; to Pembedilan village dated 8 February 2023 attended by 7 village authorities. 		
Root Cause Analysis:	<ul style="list-style-type: none"> - SOPs for Handling Employee and Stakeholder Complaints and Suggestions have not been properly consulted with stakeholders (internal – external); 		

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	<ul style="list-style-type: none"> - There is an indication of a violation of the "anonymity" rule because one of the forms in the SOP requests the inclusion of a name;
Corrective Actions:	<ul style="list-style-type: none"> - Verify the implementation of the SOP for Handling Employee and Stakeholder Advice and Complaints through regular monitoring on evidence of complaint submissions and record books; - Ensuring effective implementation of SOP through consultation with external stakeholders during the next SIA evaluation <p>Verified Evidence: PT. Sukses Karya Sawit monitors the incoming grievance/complaint/input in each estate and/or mill. Sighted incoming complaint dated 21 March 2023 in SKS 1 Estate put no name in the input letter, status on progress.</p>
Assessment Conclusion:	<p>This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated. Critical NC/Major NC Closed Out.</p>

Non-conformity			
NCR Ref #	2278530-202211-M6	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 Indicator 5.1.6 Critical/Major		
Statement of Nonconformity:	With regards to FFB payment process from company to scheme smallholder cooperative, there is no documented information on Mechanism for payment administration, and Payment time information that Agreed by both company and cooperative.		
Requirement Reference:	Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.		
Objective Evidence:	<ul style="list-style-type: none"> - Based on stakeholder consultation with the scheme smallholder cooperative; smallholder cooperative stated that they questioning payment lead time of two months, do not receive clear information on how long FFB payment lead time will take. - PT. Sukses Karya Sawit demonstrated document "Date Line Pengajuan Permintaan SHU – Plasma: closing account 8-9; accounting plasma create SHU calculation date 10-11; explanation on cost nucleus estate vs scheme smallholder estate date 10-11; Estate manager signing date 12; signing from Regional Office date 13; Signing from Head of Plantation date 14; invoice submission from cooperative date 14-15; Submit SHU to HQ date 15-16. - There is no documented information on Mechanism for payment administration, and Payment time information Agreed by both company and cooperative. 		
Corrections:	<ul style="list-style-type: none"> - Develop SOP for payment of SHK to farmers; - Conduct outreach and consultation to farmers to reach a common understanding of the mechanism that has been prepared. 		

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	<p>Verified Evidence:</p> <ul style="list-style-type: none"> • PT. Sukses Karya Sawit prepared new SOP for scheme smallholder payment "Prosedur Pembayaran Sisa Hasil Kebun (SHK) Koperasi Plasma No.SOP.SNA.PKT-002 rev.0" dated 11 February 2023. Section 8 explains in detail the process for receiving account up to payment to smallholder organization, completed with timeframe for each step. • PT. Sukses Karya Sawitconsult and disseminates the SOP for scheme smallholder payment to Koperasi Citra Niaga and Natai Kuini village on 21 February 2023; the meeting attended by 4 cooperative committees and village head. • PT. Sukses Karya Sawitconsult and disseminates the SOP for scheme smallholder payment to Koperasi Sawit Sejahtera Bersama and Air Hitam Besar village on 16 February 2023; the meeting attended by 9 cooperative committees. • PT. Sukses Karya Sawitconsult and disseminates the SOP for scheme smallholder payment to Koperasi Natai Aru Mitra Sejahtera and Air Hitam Hulu village on 8 February 2023; the meeting attended by 2 cooperative chairman. • PT. Sukses Karya Sawit consult and disseminates the SOP for scheme smallholder payment to Koperasi Natai Sipun Mandiri and Pembedilan village on 9 March 2023; the meeting attended by 6 cooperative committees.
Root Cause Analysis:	The mechanism at this point does not clearly identify payment steps and has not been communicated to the cooperative
Corrective Actions:	<p>Verify the implementation of the SOP for Farmers SHK Payments at least quarterly to monitor the effectiveness of the SOP implementation.</p> <p>Verified Evidence:</p> <ul style="list-style-type: none"> • PT. Sukses Karya Sawitconduct payment monitoring to the scheme smallholder organization "Monitoring Proses Pembayaran SHK Januari 2023" • Payment voucher for Koperasi Citra Niaga period January 2023; • Payment voucher for Koperasi Natai Aru Mitra Sejahtera period January 2023; • Payment voucher for Koperasi Perkebunan Natai Sipun Mandiri period January 2023; • Payment voucher for Koperasi Perkebunan Sawit Sejahtera Bersama period January 2023;
Assessment Conclusion:	<p>This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated.</p> <p>Critical NC/Major NC Closed Out.</p>

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Non-conformity			
NCR Ref #	2278530-202211-M7	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 6.7.3 Critical/Major		
Statement of Nonconformity:	The PPE provision and usage is not effectively monitored.		
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:	<ul style="list-style-type: none"> - In SKS POM, 2 boiler operators and helper interviewed were using broken safety shoes. Upon asking, they said had inquired for replacement but replied waiting for next quota. In SKS POM, the transit hazardous waste using medical masker, deviation from SOP Environment Health and Safety No.SOP.EHS.APD.01 recommendation for the use of carbon masker. - In SKS 3 Estate, the masker and hand glove for sprayers was not stored in washing bay /storage. In SKS 3 Estate the gumboot for LA attendant was broken, and he purchased safety shoes himself. - In BNS 2 Estate, found PPE for FFB loader in Div.A using gumboot was broken and still used for work. The worker said he has asked for replacement but replied waiting for next quota. 		
Corrections:	<ul style="list-style-type: none"> - Replacing the broken PPE or PPE that does not match the matrix; - Revised the SOP of PPE at the minimum stock point and added details on the flow of PPE replacement before the replacement schedule according to the matrix; - Re-socialization on the implementation of PPE procedures to the workers in accordance with the revised SOP; - Setting up stock of all PPE in the warehouse; - Create a storage area for PPE tools in the form of gloves and masks; - Outreach to the spray team regarding storage of spray PPE; - Re-socialization of the duties and responsibilities of estate/mill assistants and EHS assistants regarding PPE monitoring; <p>Verified Evidences:</p> <ul style="list-style-type: none"> • Verified revised EHS procedure "Standar Operation Procedure (SOP) Environment Health & Safety Alat Pelindung Diri/PPE Np.SOP.EHS.APD-01 rev.04" dated 7 February 2023. Section 6.3 explains the type of PPE provision; Section 7 explains provision of minimum stock in warehouse of 10% -> max. 2 x 24 hours shall order. • Socialization of PPE provision, minimum PPE stock in warehouse, record of PPE replacement to estate managers and assistants on 22-23 February 2023. Attended by all estate managers and assistants from PT. Sukses Karya Sawit, PT. Berkat Nabati Sawit, PT. Bumi Sawit Sejahtera. 		

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	<ul style="list-style-type: none"> • Based on field visit to SKS estate and BSS estate warehouse, PPE such as gumboot, masker and hand glove already in stock. Based on visit to SKS POM warehouse, safety shoes already in stock. • Based on field visit to SKS estate, BNS estate and BSS estate – CH completed the washing room with locker and storage to store the PPE in use. Based on interview with sprayers in SKS estate, BNS Estate and BSS estate, all PPE now stored in the washing room and not taken home. • PPE replacement record sighted for various workers/activities: 8 loader in BNS estate replacing gumboot, safety goggle, fabric glove on 31 March 2023; 12 sprayers and 3 loaders in SKS Estate replacing gumboot on 1 March 2023; Replacement of gumboot for 6 land application attendant on 30 March 2023; • PPE replacement for boiler operator in SKS POM dated 3 April 2023.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> - SOP on Personnel Protective Equipment does not cover the minimum stock of PPE that must be provided in the warehouse; - There was a change in the purchasing officer at the regional office without carrying out work handovers so that several PPE purchase requests were delayed; - Monitoring of PPE has not been carried out according to the SOP due to a lack of understanding of the related PIC - The PPE SOP does not yet include an explanation of the mechanism for replacing damaged PPE before the frequency has been determined according to the PPE matrix. - There is no place to store gloves and masks;
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> - Carry out PPE inspections at least twice a month to ensure that the PPE used is in accordance with the recommendations in the SOP; - Conduct regular outreach to employees regarding the use, storage and replacement of PPE; - Ensuring the availability of adequate PPE stock in the warehouse to avoid stock shortages; - Conduct PPE SOP review periodically as needed; <p>Verified Evidences:</p> <ul style="list-style-type: none"> • Socialization of PPE provision, minimum PPE stock in warehouse, record of PPE replacement to worker – including PPE inspection: BNS estate on 1 March 2023 for 13 harvesters, 9 sprayers; BSS Estate on 2 March 2023 for 31 harvesters and sprayers; BNS Estate on 3 March 2023 for 55 harvesters, fertilizer, nursery and sprayers; • Socialization of PPE provision, minimum PPE stock in warehouse, record of PPE replacement to worker – including PPE inspection in SKS POM on 6 March 2023 attended by 15 workers from Shift B. • Procedure related to PPE reviewed on 27 February 2023, attended by all estate managers and mill manager, Sustainability manager and EHS Manager.
<p>Assessment Conclusion:</p>	<p>This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated. Critical NC/Major NC Closed Out.</p>

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Non-conformity			
NCR Ref #	2278530-202211-M8	Issued Date	3 December 2022
Due Date	2 December 2023	Closure Date	10 May 2023
Indicator & Category (Critical / Minor)	RSPO Certification Systems for Principle & Criteria and RSPO Independent Smallholder Standard November 2020 Section 5.5.3 Critical/Major		
Statement of Nonconformity:	Sustainability Team Lahad Datu Region performs internal audit for uncertified management units under IOI Corporation Berhad, and reported 3 October 2022. The internal audit report for IOI Pelita Plantation Sdn Bhd, Sarawak, Malaysia; and PT. Sukses Karya Sawit, PT. Berkat Nabati Sawit, PT. Bumi Sawit Sejahtera, PT. KPAM, Indonesia dated 3 October 2022 was audited against incorrect RSPO P&C criterion reference.		
Requirement Reference:	Requirements for uncertified management units: <ol style="list-style-type: none"> a. 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. Any new plantings since 1 January 2010 shall comply with the RSPO New Planting Procedure (NPP). For each new planting development, compliance with the NPP shall be verified by an RSPO accredited CB. b. Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. c. Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2. d. Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1. 		
Objective Evidence:	The internal audit report for IOI Pelita Plantation Sdn Bhd, Sarawak, Malaysia; and PT. Sukses Karya Sawit, PT. Berkat Nabati Sawit, PT. Bumi Sawit Sejahtera, PT. KPAM, Indonesia dated 3 October 2022 was using incorrect RSPO P&C reference. The report content: <ul style="list-style-type: none"> - Related to no replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.3 - while in RSPO Certification Systems for Principle & Criteria and RSPO Independent Smallholder Standard November 2020 Section 5.5.3.a stated in accordance with RSPO P&C criterion 7.12. - Related to Land conflicts, assessed in accordance with RSPO P&C criteria 6.4, 7.5, 7.6 - while in RSPO Certification Systems for Principle & Criteria and RSPO Independent Smallholder Standard November 2020 Section 5.5.3.b stated in accordance with RSPO P&C criterion 4.4, 4.5, 4.6, 4.7 and 4.8. - Related to Labour disputes, assessed in accordance with RSPO P&C criterion 6.3 - while RSPO Certification Systems for Principle & Criteria and RSPO Independent Smallholder Standard November 2020 Section 5.5.3.c stated in accordance with RSPO P&C criterion 4.2. - Related to Legal non-compliance, assessed in accordance with RSPO P&C criterion 2.1 and 2.2 - while in RSPO Certification Systems for Principle & 		

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	Criteria and RSPO Independent Smallholder Standard November 2020 Section 5.5.3.b stated in accordance with RSPO P&C criterion 2.1.
Corrections:	Revise the internal audit report using the latest P&C standard. Verified Evidence: PT. Sawit Nabati Agro and the parent company (IOI Group) reviewing the form for "Internal Audit untuk Unit Belum Bersertifikat - PT. SNA Group - sesuai dengan RSPO Certification System P&C and RSPO Independent Smallholder Standard, November 2020 (Requirement 5.5.3 a-d)". Revision on 25 January 2023. In the formalready indicated compliance against RSPO criterion 7.12 on no replacement of primary forest and HCV; 4.4, 4.5, 4.6, 4.7, 4.8 on land conflict; 4.2 on labor dispute;
Root Cause Analysis:	In the internal audit sustainability report, the RSPO P&C used still uses the 2013 P&C
Corrective Actions:	<ul style="list-style-type: none"> - Review the internal audit checklist used, including uncertified units; - Reconsolidating all the sustainability teams. Verified Evidence: <ul style="list-style-type: none"> • PT. Sawit Nabati Agro and the parent company (IOI Group) reviewing the form for "Internal Audit untuk Unit Belum Bersertifikat - PT. SNA Group - sesuai dengan RSPO Certification System P&C and RSPO Independent Smallholder Standard, November 2020 (Requirement 5.5.3 a-d)". Revision on 25 January 2023. In the formalready indicated compliance against RSPO criterion 7.12 on no replacement of primary forest and HCV; 4.4, 4.5, 4.6, 4.7, 4.8 on land conflict; 4.2 on labor dispute; • IOI Group as parent company consolidated the use of revised template for Malaysia and Indonesia operation. Sighted Senior Sustainability Manager, dated 25 January 2023. • IOI Group carried out internal audit for uncertified management unit on 25 January 2023.
Assessment Conclusion:	This is IAV; audit team accepted the root cause identification. CH has implemented corrections and corrective action plan. Effectiveness of corrective actions are demonstrated. Critical NC/Major NC Closed Out.

Non-conformity			
NCR Ref #	2278530-202211-N1	Issued Date	3 December 2022
Due Date	ASA 1	Closure Date	TBC
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 3.5.2 Minor		
Statement of Nonconformity:	Monitoring on employment procedure was found not effective, with regards to the provision of staple food and household utilities for new worker.		

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Requirement Reference:	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.
Objective Evidence:	Employment procedure stipulated the provision of staple food and household utilities however based on worker interview in BSS 1 Estate, new worker such as harvester and fertilizer applicator admitted they did not receive such provision.
Corrections:	<ul style="list-style-type: none"> - Reviewing the effectiveness of the provision of cooking utensils within 7 days adjusted to the actual time required for the procurement of goods. - Provide cooking utensils to new employees. - Re-socialization to estate/mill management regarding the provision of facilities provided to new employees.
Root Cause Analysis:	Monitoring the provision of cooking utensils for new workers who are more than 7 days after joining the company has not been effectively carried out because goods often arrive late due to logistical and distribution constraints
Corrective Actions:	Developing receipt forms for cooking utensils assistance and temporary guarantees for staple food needs given to new employees as a form of monitoring the implementation of recruitment SOPs.
Assessment Conclusion:	CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC. Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.

Non-conformity			
NCR Ref #	2278530-202211-N2	Issued Date	3 December 2022
Due Date	ASA 1	Closure Date	TBC
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 4.2.3 Minor		
Statement of Nonconformity:	Company has not communicated the result of field visit, water quality testing result and decision from Dinas Lingkungan Hidup Kabupaten Ketapang with regards to allocation of POME pollution from PT. Sukses Karya Sawit POM to Air Hitam River.		
Requirement Reference:	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.		
Objective Evidence:	With regards to complaint related to allegation of POME pollution to Air Hitam River. Dinas Lingkungan Hidup Kabupaten Ketapang has made field visit and carried out water quality testing. The visit and analysis report available, however has not communicated this information to wider affected community.		
Corrections:	Communicating and providing information on the results of verification from the Ketapang Regency Environmental Service to Pembedilan and Air Hitam Besar villages.		
Root Cause Analysis:	<ul style="list-style-type: none"> - The results of verification of suspected POME pollution in the Black Air River from the Ketapang Regency Environmental Service have not carried out 		

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	<p>consultations and information with village stakeholders, especially Pembedilan village as the party filing the complaint.</p> <ul style="list-style-type: none"> - The information was given to Air Hitam Hulu because the Mill's location was in Air Hitam Hulu Village and when the DLH visited, the Head of the Air Hitam Hulu Village participated.
Corrective Actions:	<ul style="list-style-type: none"> - Updates on the status of the previous issues/concerns by the stakeholder (e.g. villagers, cooperation, etc.) – if any. - Record complaints and record settlement of river pollution issues in a grievance book. - Revisit the Grievance SOP to ensure the clear mechanism of communication about handling and resolving process to the complainant. - Monitor the implementation of the SOP through Sustainability monitoring visit.
Assessment Conclusion:	<p>CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC.</p> <p>Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.</p>

Non-conformity			
NCR Ref #	2278530-202211-N3	Issued Date	3 December 2022
Due Date	ASA 1	Closure Date	TBC
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 4.4.2 Minor		
Statement of Nonconformity:	PT. Sukses Karya Sawit has not communicated to the previous land owner the copies documents evidencing agreement-making processes and negotiated agreements.		
Requirement Reference:	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>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>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>		
Objective Evidence:	Based on interview with community from Pembedilan Village and Air Hitam Besar they stated company has carried out socialization of plantation development prior to engage community for compensation of growth/land use.		

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	<p>Community stated Copies documents evidencing agreement-making processes and negotiated agreements for "GRTT/Ganti Rugi Tebang Tebas" not available for them.</p> <p>PT. Sukses Karya Sawit has listed the negotiation and compensation procedure as well as the record of compensation as publicly available document.</p>
Corrections:	Dissemination of SOP of Communication and Responses to Requests for Information as well as documents listing information available to the public to GRTT recipients.
Root Cause Analysis:	GRTT recipients have not received socialization related to the Communication Procedure and Response to Requests for Information and the GRTT document as one of the documents available to the public and can be accessed through the procedure for responding to requests for information.
Corrective Actions:	<ul style="list-style-type: none"> - Record all requests for information from GRTT recipients who submit requests for GRTT Copies in the communication book. - Review the effectiveness of the previous landowner satisfactory regarding the implementation of SOP of Communication and Responses to Requests for Information during SIA Management plan process.
Assessment Conclusion:	<p>CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC.</p> <p>Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.</p>

Non-conformity			
NCR Ref #	2278530-202211-N4	Issued Date	3 December 2022
Due Date	ASA 1	Closure Date	TBC
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 5.2.2 Minor		
Statement of Nonconformity:	Company has not implement 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).		
Requirement Reference:	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).		
Objective Evidence:	PT. Sukses Karya Sawit has prepared improvement program for smallholder in "Program Kegiatan Pelatihan Estate Plasma SKS & Petani Mandiri – 2023", however the plan has not implemented.		
Corrections:	Conduct training in accordance with the 2023 Independent Smallholder and Plasma Farmer Improvement Program that has been prepared.		
Root Cause Analysis:	During 2022, the focus of capacity building will be plasma plantation employees. Recording is still mixed with the implementation of training for nucleus plantation employees. For 2023, a training program has been prepared for plasma farmers		

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	and independent smallholders but the implementation has not yet been carried out.
Corrective Actions:	Ensure programs are monitored regularly through sustainability monitoring visit.
Assessment Conclusion:	CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC. Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.

Non-conformity			
NCR Ref #	2278530-202211-N5	Issued Date	3 December 2022
Due Date	ASA 1	Closure Date	TBC
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 6.7.2 Minor		
Statement of Nonconformity:	The management of first aid kit and emergency procedure was not effectively monitored.		
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 fields and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	<ul style="list-style-type: none"> - In SKS 2 Estate, the first aid kit carried out by harvesting team, sprayer team, fertilizer application was not complete. In SKS 2 Estate, spraying team mandor not fully understand the type and how to use medicine in first aid kit. In SKS 2 Estate, the first aid kit in workshop and material store equipped with "Bioplacenton" salve – whereby application/use requires doctor's prescription. - In BSS 1 Estate, the fertilizer application mandor, sprayer mandor and harvesting mandor carried first aid kit whereby the content was not complete. The fertilizer application mandor, sprayer mandor, harvesting mandor and material/chemical storekeeper not fully understand the type and how to use medicine in first aid kit. In BSS 1 Storage, the first aid kit in the chemical store was not complete. - In BSS 1 Estate mixing bay, the emergency shower does not have sufficient pressure/water flow. - In BNS 1 Estate, upkeep/slashing team mandor was not equipped with first aid kit. - In SKS 1 Estate, first aid kit in fertilizer storage found povidone iodine expired since 2020. - In SKS 3 Estate fertilizer storekeeper and spraying mandor not fully understand the type and how to use medicine in first aid kit. - In SKS POM, the audit team witnessed hydrant test. However, based on interview some emergency response team members, they have not been trained with firefighting simulation before. One person stated in the past 3 years Emergency Response Procedure has not been simulated. 		

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Corrections:	<ul style="list-style-type: none"> - Conducting an assessment of the understanding of holders of first aid bags and first aid kits regarding the contents and functions of using first aid bags/boxes. - Refresh first aid training for all holders of first aid bags and first aid kits. - Reviewing first aid box/bag monitoring mechanism as well as emergency response equipment to define duties and responsibilities of related parties. - Refresh training for PIC monitoring first aid boxes/bags and emergency response equipment. - Reviewing the Mill's emergency response structure and creating an emergency response training program for the entire team.
Root Cause Analysis:	<ul style="list-style-type: none"> - Workers in charge of first aid bags and first aid kits do not understand how to use and check them. - BNS 1: the disciplinary foreman did not carry a first aid bag. - BSS 1: monitoring of emergency equipment not optimal. - SKS POM: There is no fire emergency response training program yet. - Mechanisms for monitoring and evaluation of emergency response equipment and first aid kits have not been implemented optimally due to a lack of understanding of the related PIC.
Corrective Actions:	<ul style="list-style-type: none"> - Arrange periodic first aid training programs. - Routine inspection of eyewash shower is ready to use and maintained. - Arrange regular emergency response training programs for emergency response teams. - Conduct simulation to maintain the skill of Emergency Response Team. - Evaluate the planning and implementation training regularly and monitor the progress through sustainability monitoring visit.
Assessment Conclusion:	<p>CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC.</p> <p>Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.</p>

Non-conformity			
NCR Ref #	2278530-202211-N6	Issued Date	3 December 2022
Due Date	ASA 1	Closure Date	TBC
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - RSPO Principles and Criteria: 2018 Minor		
Statement of Nonconformity:	The implementation of waste management plan has not monitored properly.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		

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Objective Evidence:	<ul style="list-style-type: none"> - In BSS 1 Estate’s worker housing, the audit team found an empty oil container stored on the back of worker’s house not treated as hazardous waste and stored in hazardous waste storage. - In SKS POM’s laboratory, found an empty thinner container categorized as hazardous waste, used as desk support. In SKS POM’s transit hazardous waste storage, the building roof was leaking; in addition, cement and grass mower (not categorized as hazardous waste) stored there. In SKS POM, oil trap behind hazardous waste storage was not properly closed and sighted trace of spillage.
Corrections:	<ul style="list-style-type: none"> - Review of K3L SOP for waste management and landfill activities to add a mechanism for managing LB3 from domestic waste as well as monitoring (inspection) mechanisms for managing LB3 waste at work and housing. - Conduct outreach to employees and employees' families in housing regarding the type and management of B3 waste according to the K3L SOP for waste management and landfill. - Dissemination of the implementation of monitoring of waste management to the relevant PIC.
Root Cause Analysis:	<ul style="list-style-type: none"> - Employees do not understand the management of B3 waste category. - Warehouse staff do not understand the function of the B3 Transit waste building. - Oil trap monitoring was not carried out resulting in oil spills/splatters. The oil trap also doesn't have a cover so it will collect rainwater which causes the potential for water overflow mixed with LB3. - Mechanisms for monitoring (inspection) of B3 waste management at the workplace and in housing are not yet available. - The mechanism for managing LB3 domestic waste is not yet available.
Corrective Actions:	<ul style="list-style-type: none"> - Periodic outreach to employees and staff regarding LB3 waste management in housing and workplaces; - Conduct regular inspection for managing LB3 waste at work and housing; - Monitor the implementation of managing LB3 waste at work and housing as well as the inspection through sustainability monitoring visit;
Assessment Conclusion:	<p>CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC.</p> <p>Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.</p>

Non-conformity			
NCR Ref #	2278530-202211-N7	Issued Date	3 December 2022
Due Date	Next ASA	Closure Date	No
Indicator & Category (Critical / Minor)	RSPO Principles and Criteria: 2018 - INA NI 2020 - Indicator 7.3.2 Minor		
Statement of Nonconformity:	Waste management plan is in place, however audit team found food refuse from housing packed using plastic and disposed of into "TPSA Dapur" pit.		

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Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.
Objective Evidence:	In SKS 3 Estate's worker housing the waste disposal practice deviate from the waste management plan: food refuse from housing packed using plastic and disposed of into "TPSA Dapur" pit – mixing organic and inorganic waste.
Corrections:	<ul style="list-style-type: none"> - Re-socialize regarding organic TPSA and urge not to use plastic in collecting and disposing of kitchen waste as well as replacing waste collection bins with other reusable containers such as buckets or basins. - Monitor the implementation of managing waste at work and housing as well as the inspection through sustainability monitoring visit;
Root Cause Analysis:	<ul style="list-style-type: none"> - Mechanisms for monitoring (inspection) of waste management at the workplace and in housing are not yet available; - Employees/families still use plastic to collect kitchen waste because it is considered more practical and do not understand that plastic waste is inorganic waste that should not enter the Kitchen TPSA.
Corrective Actions:	Periodic monitoring of landfill/TPSA based on K3L SOP for waste management and landfill.
Assessment Conclusion:	CH has identified the root cause, prepared correction and corrective action plan. Audit team has review and accept the root cause, correction plan and corrective action plan are appropriate and able to address the NC. Minor NC will be verified effectiveness in the subsequent assessment/surveillance visit.

Opportunity for Improvements	
OFI #	Description
OFI 1	INA NI 2020 - Indicator 2.1.3 Based on field visit to BSS 4 Estate, the sampled boundary pole with BSS notation is in place and visibly maintained. Effective coordination with Badan Pertanahan Nasional for requirement boundary pole with ENC notation for BSS 4 Estate as in HGU map.
OFI 2	INA NI 2020 - Indicator 3.3.1 PT. Sukses Karya Sawit has provided standard operating procedure for BMP, translated from English to Bahasa Indonesia such as SOP Panen No.SOP.SNA.AGR.11.2 r1 May 2019; SOP Evakuasi dan Pengangkutan Tandan Buah Segar No.SOP.SNA.AGR.11.7 r1 May 2019 – with better translation into Bahasa Indonesia.
OFI 3	INA NI 2020 - Indicator 3.5.1 Based on interview with worker union, employment procedure including hiring and promotion communicated. Improved effectiveness on communication of employment procedure on promotion requirement to worker expected.
OFI 4	INA NI 2020 - Indicator 3.6.2 The company has provided sprayer worker with PPE based on risk assessment. Worker washing bay and bathroom available for worker cleaning after work in all estate. Review on the use of overall for sprayer worker for better protection against chemical exposure expected.

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OFI 5	INA NI 2020 - Indicator 3.7.1 A documented training program for SKS POM available, including a training plan for boiler operator. Faster training program implementation for boiler operators expected.
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Positive Findings	
PF #	Description
PF 1	CH demonstrated commitment to improve operational condition in order to comply with RSPO P&C requirements.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			
Effectiveness Closure (for previous audit closed Critical NC):			

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: N/A Verification / Follow-up actions:

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2278530-202211-M1	Critical	INA NI 2020 – indicator 3.4.3	03/12/2022	Closed 10/05/2023
2278530-202211-M2	Critical	INA NI 2020 – indicator 3.6.1	03/12/2022	Closed 10/05/2023
2278530-202211-M3	Critical	INA NI 2020 – indicator 3.8.5	03/12/2022	Closed 10/05/2023
2278530-202211-M4	Critical	INA NI 2020 – indicator 3.8.9	03/12/2022	Closed 10/05/2023
2278530-202211-M5	Critical	INA NI 2020 – indicator 4.2.1	03/12/2022	Closed 10/05/2023
2278530-202211-M6	Critical	INA NI 2020 – indicator 5.1.6	03/12/2022	Closed 10/05/2023
2278530-202211-M7	Critical	INA NI 2020 – indicator 6.7.3	03/12/2022	Closed 10/05/2023
2278530-202211-M8	Critical	RSPO Certification Systems for Principle & Criteria and RSPO Independent Smallholder Standard November 2020 Section 5.5.3	03/12/2022	Closed 10/05/2023
2278530-202211-N1	Minor	INA NI 2020 – indicator 3.5.2	03/12/2022	Open
2278530-202211-N2	Minor	INA NI 2020 – indicator 4.2.3	03/12/2022	Open
2278530-202211-N3	Minor	INA NI 2020 – indicator 4.4.2	03/12/2022	Open
2278530-202211-N4	Minor	INA NI 2020 – indicator 5.2.2	03/12/2022	Open
2278530-202211-N5	Minor	INA NI 2020 – indicator 6.7.2	03/12/2022	Open
2278530-202211-N6	Minor	INA NI 2020 – indicator 7.3.1	03/12/2022	Open
2278530-202211-N7	Minor	INA NI 2020 – indicator 7.3.2	03/12/2022	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. Sukses Karya Sawit-Sukses Karya Sawit POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted

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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)
Governmental Department	<ul style="list-style-type: none"> - Plantation Agency of Ketapang Regency - Manpower Agency of Ketapang Regency - Environmental Agency of Ketapang Regency - Land Agency of Ketapang Regency (no response) - Cooperative Agency of Ketapang Regency (no response) - Body of Conservation and Natural Resources (BKSDA) of Ketapang Regency (no response) - Manggala Agni (firefighting body) of Ketapang Regency (no response) 	Phone interview
Communities	<ul style="list-style-type: none"> - Village Head of Natai Kuini - Village Head of Pembedilan - Village Head of Air Hitam Hulu - Village Head of Air Hitam Besar - Smallholder Cooperative of Natai Aru Mitra Sejati - Smallholder Cooperative of Natai Sipun Mandiri - Smallholder Cooperative of Sawit Sejahtera Bersama 	face to face interview
Internal, Union	<ul style="list-style-type: none"> - Gender Committee - Labor Union of PT. BNS (<i>Serikat Pekerja Perkebunan</i>) - Labor Union of PT. SKS (<i>Serikat Pekerja Seluruh Indonesia/SPSI</i>) 	face to face interview

Stakeholders comment	
1	<p>Feedbacks: Plantation Agency of Ketapang Regency</p> <p>The company has complied the regulation of plantation permit, such as has had a Plantation Business Permit (<i>Izin Usaha Perkebunan / IUP</i>) and has had sufficient fire-fighting equipment. The land preparation did not conduct by land burning. Mandatory reports also have been submitted regularly. Social engagement also has been conducted well, such as by providing CSR program, receiving local workers, and establishing Plasma. There is no negative issue or complaint submitted to agency.</p> <p>Audit Team verification and response:</p> <p>Based on document review, the company has complied regulation in the domain of Plantation Agency such as had had Plantation Business Permit and has regularly submitted Plantation Development Report (LPUP). There is no negative issue mentioned to be followed up.</p>
2	<p>Feedbacks: Manpower Agency of Ketapang Regency</p>

	<p>The company is quite not so long to invest in this area, therefore there are some regular problems of industrial relation between the company and workers. However, the disputes can be resolved bipartitely, and no need intervention of Agency (tripartite resolution).</p> <p>There is no negative issue so far related employment and OHS. The thing is, the company's location is very remote, so far from city or big market, therefore, the price of staple foods there are very high. The company need to think this issued and facilitate the workers with store with affordable price.</p> <p>Audit Team verification and response:</p> <p>The company has established a worker's cooperative and provide stores in SKS 2, where for BNS and BSS are being processed. Based on interview with workers in SKS, the existence of cooperative store has provided affordable staple foods for workers.</p>
<p>3</p>	<p>Feedbacks: Environmental Agency of Ketapang Regency</p> <p>The companies have complied with applicable environmental regulations, among others have had environmental document, license of hazardous temporary warehouse, and license of POME disposal. All mandatory reports related environmental has been reported to agency regularly.</p> <p>There was a complaint from Villagers related to allegation of POME pollution from PT. Sukses Karya Sawit POM to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available and has been sent to company's management.</p> <p>Audit Team verification and response:</p> <p>With regards to complaint related to allegation of POME pollution to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available, however has not communicated this information to wider affected community so that during the audit this issued still mentiond by Village Head of Air Hitam Hulu and Air Hitam Besar. This case is raised as an NC in indicator 4.2.3.</p>
<p>4</p>	<p>Feedbacks: Village Head of Natai Kuini</p> <p>There is no land dispute, environmental pollution, or employment issue. The company has made efforts to develop surrounding community through CSR programs, the use of local labor and local contractors, as well as plasma (scheme smallholder) establishment. The land acquisitions have been made in FPIC manner involving village officials.</p> <p>Audit Team verification and response:</p> <p>There is no negative issued from Cooperative of Sawit Sejahtera Bersama to be followed up.</p>
<p>5</p>	<p>Feedbacks: Smallholder Cooperative of Natai Aru Mitra Sejati</p> <ul style="list-style-type: none"> - The profit of plasma is fluctuated because in the rainy season, 60% of the area flooded. The company has made effort to address this issue such as has made boundary embankment, also water pump to pump the water to outer area. - The road and harvesting bridge are not established well. - The cooperative official did not involve in any kind of SIA assessment. - The payment of profit often late payment. It has been communicated to management, however there is no clear answer and procedure related to the payment. <p>Audit Team verification and response:</p> <p>The company has shown draft of embankment upkeep proposal, including road and harvesting bridge upkeep. The current status is waiting for approval of cooperative official. Related to the complaint of payment, it has been raised an NC in indicator 3.4.3, related to this issue has not been captured in SIA evaluation.</p>
<p>6</p>	<p>Feedbacks: Village Head of Pembedilan</p>

	<ul style="list-style-type: none"> - The company is lack in employing local labors. - The CSR program has not been made in participatory manner, moreover, the program has not been disseminated to village official. - There was a fatality accident in 2021, indicate that the company was lack in OHS management - There was a complaint from Villagers related to allegation of POME pollution from PT. Sukses Karya Sawit POM to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available and has been sent to company's management. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The company has shown evidence of dissemination of job vacancy to village official. - There is an evidence of SIA evaluation involving village officials. The purpose of the meeting among other to ask the village need related CSR program. - The company has shown fatality accident evaluation in late 2021, among others by making speed bump in the roundabout. - With regards to complaint related to allegation of POME pollution to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available, however has not communicated this information to wider affected community so that during the audit this issued still mentioned by Village Head. This case is raised as an NC in indicator 4.2.3.
<p>7</p>	<p>Feedbacks: Smallholder Cooperative of Natai Sipun Mandiri</p> <ul style="list-style-type: none"> - The profit of plasma is fluctuated because in the rainy season, because the area mostly flooded. The company has made effort to address this issue such as has made boundary embankment, also water pump to pump the water to outer area. - The road and harvesting bridge are not established well. - The cooperative official did not involve in any kind of SIA assessment. - The payment of profit often late payment. It has been communicated to management, however there is no clear answer and procedure related to the payment. <p>Audit Team verification and response:</p> <p>The company has shown draft of embankment upkeep proposal, including road and harvesting bridge upkeep. The current status is waiting for approval of cooperative official. Related to the complaint of payment, it has been raised an NC in indicator 3.4.3, related to this issue has not been captured in SIA evaluation.</p>
<p>8</p>	<p>Feedbacks: Village Head of Air Hitam Besar</p> <p>There was a complaint from Villagers related to allegation of POME pollution from PT. Sukses Karya Sawit POM to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available and has been sent to company's management.</p> <p>Audit Team verification and response:</p> <p>With regards to complaint related to allegation of POME pollution to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available, however has not communicated this information to wider affected community so that during the audit this issued still mentioned by Village Head. This case is raised as an NC in indicator 4.2.3.</p>
<p>9</p>	<p>Feedbacks: Smallholder Cooperative of Sawit Sejahtera Bersama</p> <p>There is no significant issue related to flood in rainy season, because fortunately, the farm location is quite far from river/water course. There is no kind of discrimination related establishing and upkeep of plasma farm compared to Estate. The cooperative provided 5 supervisors, therefore, there is no issue related miss communication or misunderstanding in reporting. For payment has been made in timely manner.</p>

	<p>Audit Team verification and response: There is no negative issued from Cooperative of Sawit Sejahtera Bersama to be followed up.</p>
10	<p>Feedbacks: Village Head of Air Hitam Hulu There was a complaint from Villagers related to allegation of POME pollution from PT. Sukses Karya Sawit POM to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available and has been sent to company’s management.</p> <p>Audit Team verification and response: With regards to complaint related to allegation of POME pollution to Air Hitam River. Environmental Agency has made field visit and carried out water quality testing. The visit and analysis report available, however has not communicated this information to wider affected community so that during the audit this issued still mentioned by Village Head. This case is raised as an NC in indicator 4.2.3.</p>
11	<p>Feedbacks: Gender Committee The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. Have implemented regulations related to reproductive rights such as menstruation leave and childbirth, as well as prohibition of pregnant and breastfeeding women to work in chemical area. There is no issue related gender discrimination in the recruitment and promotion opportunities. For new mother, the company has conducted assessment and provide facility such as clinics with paramedic, free consultation in the form of <i>Posyandu</i>, ambulance, time for breastfeeding, daycare, etc.</p> <p>Audit Team verification and response: There is no negative issue to be followed up. The unit of certification has had Sustainability Policy that protect reproduction rights and prevent sexual harassment, also prohibition of pregnant and breastfeeding women to work in chemical area. The company has conducted assessment and provide facility such as clinics with paramedic, free consultation in the form of <i>Posyandu</i>, ambulance, time for breastfeeding, daycare, etc.</p>
12	<p>Feedbacks: Labor Union of PT BNS (<i>Serikat Pekerja Perkebunan</i>) and Labor Union of PT SKS (<i>Serikat Pekerja Seluruh Indonesia/SPSI</i>)</p> <ul style="list-style-type: none"> - There was a fatality accident in late 2021, but the company has conducted accident investigation, and corrective action has been made such as by putting sign and speed bumps. - there were some regular problems of industrial relation between the company and workers. However, the disputes can be resolved bipartitely, and no need intervention of Agency (tripartite resolution). - There is no negative issue so far related employment and OHS. - the company’s location is very remote, so far from city or big market, therefore, the price of staple foods there are very high. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The company has shown fatality accident evaluation in late 2021, among others by making speed bump in the roundabout. - The company has established a worker’s cooperative and provide stores in SKS 2, where for BNS and BSS are being processed. Based on interview with workers in SKS, the existence of cooperative store has provided affordable staple foods for workers.

List of land owner / user contacted

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Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Yuskari (Natai Kuini Village)	2012	5.78	Yes	Yes	Comply
Zulkifli (Natai Kuini Village)	2012	5.78	Yes	Yes	Comply
Mursyd (Natai Kuini Village)	2012	5.78	Yes	Yes	Comply
Mustafa (Natai Kuini Village)	2012	5.78	Yes	Yes	Comply
Nurhan (Air Hitam Hulu Village)	2009	2.50	Yes	Yes	Comply
Ali Ahmat (Air Hitam Hulu Village)	2011	2.09	Yes	Yes	Comply
Aliyas (Air Hitam Hulu Village)	2009	5.43	Yes	Yes	Comply
Nurbani (Air Hitam Hulu Village)	2012	5.14	Yes	Yes	Comply
Saipul (Air Hitam Hulu Village)	2012	4.34	Yes	Yes	Comply
Gapuri (Air Hitam Hulu Village)	2012	2.74	Yes	Yes	Comply
H. Syarif (Air Hitam Hulu Village)	2009	3.31	Yes	Yes	Comply
Dolah (Air Hitam Hulu Village)	2010	1.91	Yes	Yes	Comply
Sapuansyah (Air Hitam Hulu Village)	2012	3.65	Yes	Yes	Comply
Ibin Jukhairi (Air Hitam Hulu Village)	2010	1.46	Yes	Yes	Comply
Syarani (Air Hitam Hulu Village)	2011	6.07	Yes	Yes	Comply
Kamaroh (Air Hitam Besar)	2010	2.75	Yes	Yes	Comply
Bahriansyah (Air Hitam Besar)	2010	3.72	Yes	Yes	Comply
Rusdi Ikram (Air Hitam Besar)	2010	5.27	Yes	Yes	Comply
H. Idham (Air Hitam Besar)	2010	4.28	Yes	Yes	Comply
Mudranmudin (Air Hitam Besar)	2010	4.26	Yes	Yes	Comply
Amat (Air Hitam Besar)	2011	0.38	Yes	Yes	Comply
Sualiansyah (Air Hitam Besar)	2011	0.53	Yes	Yes	Comply
Tarkan (Air Hitam Besar)	2012	3.43	Yes	Yes	Comply
Harun (Air Hitam Besar)	2010	4.28	Yes	Yes	Comply
Darmadi (Air Hitam Besar)	2010	7.01	Yes	Yes	Comply
Oren (Air Hitam Besar)	2010	4.26	Yes	Yes	Comply
Sinah (Air Hitam Besar)	2011	1.2	Yes	Yes	Comply

Previous land owner / user comment	
	Feedbacks:


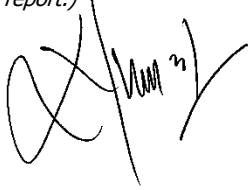
	<p>Previous Land Owner in village area of Natai Kuini, Air Hitam Besar, Air Hitam Hulu</p> <ul style="list-style-type: none"> - The land acquisitions were conducted in FPIC manner, such as by surveying the land to determine the boundaries, to now the boundaries owner, and to verify the ownerships. The survey was witnessed by Village Head and surrounding owners to ensure that the land was not in a problematic condition. - The documentation of land acquisition had been made thoroughly in accordance with Indonesian regulation, made by Village Officials. - So far there is no dispute from other party related to the land acquisition.
	<p>Audit Team verification and response:</p> <p>There is no negative issue to be verified related to GRTT process. Auditor has contacted Village Head of Natai Kuini, Air Hitam Hulu, Air Hitam Besar to observe the land acquisition processes. Audit team has verified the GRTT documents however issued NC Minor on indicator 4.4.2</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. Sukses Karya Sawit-Sukses Karya Sawit POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT. Sukses Karya Sawit-Sukses Karya Sawit POM is certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Nazlya Syahputri
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: PT. Sukses Karya Sawit-Sukses Karya Sawit POM
Title: Lead Assessor	Title: Sustainability Manager PT. SNA Group
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: 22 May 2023	Date: 25 May 2023

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -</p>	<p>PT. Sukses Karya Sawit referring to "Internal Memo No.003/EHS-SPO/SNA/X/2022 Daftar Dokumen untuk Umum" dated 18 July 2012. The list comprise of: certificate legal ownership of the land; OHS plan; SEIA plan; HCV document and HCS document; Pollution prevention and mitigation plan; Detailed information of complaint and grievance; negotiation procedure; Continuous improvement plan; Public summary report of the certification assessment report; Human rights policy.</p>	<p>Complied</p>
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -</p>	<p>All information provided in Bahasa Indonesia. Sample sighted by audit team:</p> <ul style="list-style-type: none"> - "Berita Acara Sosialisasi Kebakaran Hutan dan Lahan", dated 28 September 2021 in Pembedilan Village involving all hamlet under Pembedilan Village. Attended by 21 community member. - Notulen Pertemuan dengan 3 Desa (Air Hitam Besar, Air Hitam Hulu dan Pembedilan), dated 21 October 2021. Requesting: additional incentive for village; Vaccination in Air Hitam Besar, Air Hitam Hulu and Pembedilan village in November 2021; Request from District level and boundary costing IDR 43M; road maintenance Air Hitam Village – Air Hitam Besar Village – Pembedilan Village – Air Hitam Kecil Village; job application if not accepted – please return the application letter; Request explanation on CSR fund; Village request TKD fund paid quarterly; request TKD's HGU to be handed over to 	<p>Complied</p>

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		<p>village; installation of (suar) in Muara Air Hitam and Pembedilan Village to avoid sinking. Meeting attended by Samsidi (Air Hitam Hulu), Nahrowi (Air Hitam Besar), Mahyudi (BPD Chairman), Anang Armadi (Ketua Adat), M Arifin (Pembedilan); Sudirman (BPD Air Hitam Besar).</p> <ul style="list-style-type: none"> - "Notulen Rapat dengan Pemerintah Desa Pembedilan" dated 27 October 2022 in Air Hitam Besar Village and Pembedilan Village. The discussion related to: road construction from Air Hitam Besar to Pembedilan Village; requesting (tanah timbun) on road of 500 meters; installing culvert in main road leads to Pembedilan Village; Village want company check village recommendation prior to management appointing contractor; CSR in form of village office renovation or construction of early age education center. Management responded through CSR and Partnership Manager: The road construction to facilitate Air Hitam Besar village; Technical aspect for road construction taking into consideration field condition and company ability; explaining some contractors work for company is Pembedilan community. Meeting attended by Anang Armadi (Ketua Adat), Muhammad Arifin (Village Head), Husni Thamrin (Karang Taruna), Masrohan (Ketua RT 10), Ali Mursid (Sekdes Pembedilan); Feri Fahriwan (BPD Pembedilan). - "Berita Acara Sosialisasi Kebakaran Hutan dan Lahan", dated 22 October 2022 with Pembedilan Village. Attended by M. Arifin (Village Head), Gapoktan, Karang Taruna, Ali Murod (Sekretaris Desa), and other community member. 	
1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Recorded in "Buku Informasi dan Permintaan Atas Informasi" SOP Komunikasi & Pemberian Informasi No. SOP.SNA.Communication.02" dated 1 November 2022. 6.4.1 stipulated in the case the proposal/request from stakeholder requires HoD</p>	Complied

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		<p>approval, then max.3 days since receipt the proposal/request shall be sent to Plantation Controller.</p> <p>For PT. Berkat Nabati Sawit: Company received letter "Surat Permohonan Desa Air Hitam Besar No.B/382/SET.140/X/2022" dated 2022 with regards to application to have (tanah timbunan) amount 4 dump trucks and 1 heavy machinery to lays out the (tanah timbunan). This request then followed up by estate and reported "Corporate Social Responsibility & Kemitraan weekly report region I, 17-23 October 2022", Sapuansyah, Spv CSR & Kemitraan reported (tanah timbun) and road maintenance in Air Hitam Besar – Pembedilan.</p>	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Sukses Karya Sawit has established "SOP Komunikasi dan Pemberian Informasi No.SOP.SNA.Komunikasi.02" dated 28 October 2022. PT. Sukses Karya Sawit issued "Surat Keputusan No.004/CSR-SNA/SK/2020 tentang Petugas Pemberi Informasi Departemen Corporate Social Responsibility & Kemitraan" dated 2 May 2020 whereby company appointed Mrs. Noorhasanah Tasrifin as PIC for communication officer.</p> <p>Record of procedure socialization: Mrs. Noorhasanah Tasrifin made socialization "SOP Komunikasi dan Pemberian Informasi" and "SOP Penanganan Saran & Keluh Kesah Karyawan dan Stakeholder" to surrounding community by reading the flow process of procedure. This has been recorded for Natai Kuini village dated 14 November 2022 (attended 19 community members); to Koperasi Natai Aru Mitra Sejahtera on 24 November 2022 (attended 5 committee); to Pembedilan village community on 10 November 2022 (attended 9 communities).</p> <p>Record of consultation and communication: "Communication Action Record" For PT. Sukses Karya Sawit: Company had a meeting with school council SDN 04 Kendawangan on 22 July 2022. The meeting attended by school headmaster, committee leader, teachers, and village head. The school committee request audience to seek assistance in provision of furniture. SDN 04 Kendawangan issued proposal</p>	<p>Complied</p>

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		<p>"Permohonan Bantuan Prasarana dan Kesejahteraan Guru No.421.2/2633/SDN.04.3/2022" dated 20 July 2022, and received by company on 22 July 2022. CSR Manager issued letter to Head of Plantation PT. Sukses Karya Sawit No.019/CSR&Kemitraan-RO/VIII/2022 Permohonan Bantuan Prasarana dan Kesejahteraan Guru SDN04, Kendawangan, Desa Air Hitam Hulu" dated 18 August 2022. Single fund transfer on 29 August 2022 to headmaster account. Evidence of acceptance "Ucapan Terima Kasih kepada PT. Sukses Karya Sawit" dated 29 August 2022.</p> <p>Company had a meeting with Gabungan Kelompok Tani Desa Pembedilan on 14 February 2022. The meeting attended by chairman of farmer group and member and CSR manager. The farmer group request audience to seek assistance in drainage cleaning in Pembedilan village. PT. Sukses Karya Sawit then made drainage cleaning on period March 2022 of 1,421 meters; this was lacking due to weather condition. Farmer Group Pembedilan village then issued proposal "Permohonan Lanjutan Pekerjaan Cuci Parit Desa Pembedilan" dated 24 June 2022, and received by company on 25 June 2022. CSR Manager issued letter to Head of Plantation PT. Sukses Karya Sawit "No.004/CSR/SKS/VIII/2022 Permohonan normalisasi Parit Lanjutan Desa Pembedilan" dated 8 August 2022 indicating the remaining work needed for drainage cleaning of 4,984 meters. Follow up through contract agreement with CV Dua Putra PDL No.011/SKS3/W032/VII/2022 dated 26 August 2022 for drainage cleaning of 4,984 meters. Berita Acara Verifikasi Quality Control (QC) dated 26 September 2022 for drainage cleaning planned 4,983 meters whereby the work will be performed from 26 August – 26 December 2022.</p> <ul style="list-style-type: none"> - "Berita Acara Sosialisasi Kebakaran Hutan dan Lahan", dated 28 September 2021 in Pembedilan Village involving all hamlet under Pembedilan Village. Attended by 21 community member. 	
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		<ul style="list-style-type: none"> - Notulen Pertemuan dengan 3 Desa (Air Hitam Besar, Air Hitam Hulu dan Pembedilan), dated 21 October 2021. Requesting: additional incentive for village; Vaccination in Air Hitam Besar, Air Hitam Hulu and Pembedilan village in November 2021; Request from District level and boundary costing IDR 43M; road maintenance Air Hitam Village – Air Hitam Besar Village – Pembedilan Village – Air Hitam Kecil Village; job application if not accepted – please return the application letter; Request explanation on CSR fund; Village request TKD fund paid quarterly; request TKD’s HGU to be handed over to village; installation of (suar) in Muara Air Hitam and Pembedilan Village to avoid sinking. Meeting attended by Samsidi (Air Hitam Hulu), Nahrowi (Air Hitam Besar), Mahyudi (BPD Chairman), Anang Armadi (Ketua Adat), M Arifin (Pembedilan); Sudirman (BPD Air Hitam Besar). - “Notulen Rapat dengan Pemerintah Desa Pembedilan” dated 27 October 2022 in Air Hitam Besar Village and Pembedilan Village. The discussion related to: road construction from Air Hitam Besar to Pembedilan Village; requesting (tanah timbun) on road of 500 meters; installing culvert in main road leads to Pembedilan Village; Village want company check village recommendation prior to management appointing contractor; CSR in form of village office renovation or construction of early age education center. Management responded through CSR and Partnership Manager: The road construction to facilitate Air Hitam Besar village; Technical aspect for road construction taking into consideration field condition and company ability; explaining some contractors work for company is Pembedilan community. Meeting attended by Anang Armadi (Ketua Adat), Muhammad Arifin (Village Head), Husni Thamrin (Karang Taruna), Masrohan (Ketua RT 10), Ali Mursid (Sekdes Pembedilan); Feri Fahriwan (BPD Pembedilan). 	
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		- "Berita Acara Sosialisasi Kebakaran Hutan dan Lahan", dated 22 October 2022 with Pembedilan Village. Attended by M. Arifin (Village Head), Gapoktan, Karang Taruna, Ali Murod (Sekretaris Desa), and other community member	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	PT. Sawit Nabati Agro (SNA) and its company under it, PT. Sukses Karya Sawit (SKS), PT. Berkat Nabati Sejahtera (BNS), PT. Bumi Sawit Sejahtera (BSS) has developed list of stakeholders for each management unit.	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 -	<p>PT. Sawit Nabati Agro (SNA) and its company under it, PT. Sukses Karya Sawit (SKS), PT. Berkat Nabati Sejahtera (BNS), PT. Bumi Sawit Sejahtera (BSS) refers to "Kode Bisnis Perilaku & Etika IOI Group IOI Corporation Berhad" signed June 2020. This code of ethic covers aspect such as:</p> <p>Fairness: Each employee should endeavour to deal fairly with the Company's customers, suppliers, contractors, competitors and other employees.</p> <p>Diversity and Respect in the Workplace: Employees are expected to treat each other with respect and to value each other's differences and the diverse perspectives those differences bring. The Company considers harassment and discrimination to be unjust and damaging to work environment. IOI will not tolerate any act or threat of violence in the workplace. This being implemented through uptake of manpower/workforce from surrounding communities and workers from other region (Jawa, Nusa Tenggara, Timor, etc.)</p> <p>Equal Opportunity Employment: The Company fully supports all principles of providing equal opportunity in employment. This is implemented through providing information on job vacancy to</p>	Complied

		<p>surrounding villages – audit team verified this being done during stakeholder consultation.</p> <p>Protecting the Environment: The Company holds firmly to operating its businesses in ways that meet regulatory requirements on environmental impact in the countries or markets in which we operate.</p> <p>Safety, Health and Security at Work: At IOI, the health of the workers and the safety of the workplace shall always be a priority concern. This code implemented by preparing PT. SNA OHS policy, OHS plan, updated HIRADC, provision of PPE for workers, provision of medical clinic and social insurance for workers – audit team verified this being implemented.</p> <p>Appropriate Use of Company Assets and Equipment: Employees should not only follow policy of use but also help to safeguard our Company assets and immediately report any suspected theft, damage, misuse, fraud, embezzlement, or improper usage.</p> <p>Managing Documents: Prompt, accurate record keeping, and filing helps the integration of work processes.</p> <p>Dealing With Conflicts of Interest: Employees should avoid any situation that involves, or appears to involve, a conflict between their personal interests and the interests of the Company.</p> <p>Employment of Family Members and Relatives: Whilst the Company permits employment of employee’s family members and relatives, declaration of such relationship must be made prior to approval of such employment and subject to conditions as per Company’s policies.</p> <p>Verified implementation through checking company policy on recruitment and hiring. The employment procedures have been set in:</p> <ul style="list-style-type: none"> - SOP of Recruitment (No. SNA/SOP/HR/PKH/002 dated 1 August 2021). 	
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		<p>- Company Regulation period of 2022 - 2024, that has been endorsed by Manpower Agency (based on Decree No. 078/TKT-B.560/2022).</p> <p>In these documents has covered the clause related recruitment mechanism and process, promotion, mutation, and termination in accordance with National Act No. 13 of 2013 related employment. Based on interview with workers in the Estates and Mill, it is known that workers have received documentation of hiring (contractual agreement) and promotion. No recruitment fee paid by the worker.</p> <p>Checking on subcontractor compliance, demonstrated document "Due diligence on legal and Policy Compliance Sawit Nabati Agro" by CV Sultan Borneo Mandiri. The document checks organization formation, type of business, number of workers, legal aspect: deed of establishment, NPWP, TDP, Surat Izin Usaha; Manpower: work agreement, minimum wage, no under 18 years workers, payslip, ID retention, human right uphold; EHS: insurance, PPE; Business ethics: corruption, recruitment fee, hold when resigning; dated 1 September 2022.</p> <p>Company verifies the implementation of code of ethical conduct through internal audit process for activities related to plantation operation – including activities related to RSPO P&C implementation; and through independent financial audit by third party accountant to check on use of financial and other resources.</p>	
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1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>PT. Sawit Nabati Agro (SNA) and its company under it, PT. Sukses Karya Sawit (SKS), PT. Berkat Nabati Sejahtera (BNS), PT. Bumi Sawit Sejahtera (BSS) refers to "Kode Bisnis Perilaku & Etika IOI Group IOI Corporation Berhad" signed June 2020.</p> <p>PT. Sawit Nabati Agro demonstrated document "Due diligence on legal and Policy Compliance Sawit Nabati Agro" by CV Sultan Borneo Mandiri. The document checks organization formation, type of business, number of worker, legal aspect: deed of establishment, NPWP, TDP, Surat Izin Usaha; Manpower: work agreement, minimum wage, no under 18 years workers, payslip, ID retention, human right uphold; EHS: insurance, PPE; Business ethics: corruption, recruitment fee, hold when resigning; dated 1 September 2022.</p> <p>Company verifies the implementation of code of ethical conduct through internal audit process for activities related to plantation operation – including activities related to RSPO P&C implementation; and through independent financial audit by third party accountant to check on use of financial and other resources.</p>	Complied
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p> <p>- Critical (Major) compliance -</p>	<p>PT Sukses Karya Sawit as unit of certification has one (1) Mill namely Sukses Karya Sawit POM and supplied from 8 Nucleus Estates and 3 Scheme Smallholders (full managed). Supply bases is covering three (3) companies as follow:</p> <ol style="list-style-type: none"> 1. SKS-02 Estate, SKS-03 Estate, SKS-01 Plasma (PT Sukses Karya Sawit) 2. BNS-01 Estate, BNS-03 Estate, BNS-04 Estate, BNS-02 Plasma (PT Berkat Nabati Sejahtera) 	Complied

		<p>3. BSS-01 Estate, BSS-02 Estate, BSS-03 Estate, BSS-04 Plasma (PT Bumi Sawit Sejahtera)</p> <p>Total coverage under scope of certification is one Mill (cap. 90 MT/Hr) and Estates (23,763.82 Ha) and Building Rights for Mill/Hak Guna Bangunan "HGB" (22.34 Ha).</p> <p>Legal document of PT Sukses Karya Sawit:</p> <ul style="list-style-type: none"> - Legal entity of PT Sukses Karya Sawit as per company deed is Akta Pendirian Badan Hukum No. 61, dated 13 April 2004. Ministry of Law and Human Rights approval No. C-18383 HT.01.01.TH.2004, dated 22 July 2004. TaxPayer Number: 02.355.985.9-022.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/0976/Bappeda-D, tanggal 14 September 2007 terkait Informasi Lahan." Regent of Ketapang given the land is ± 13,450 ha as per Ministry of Forestry Decree "SK Menhutbun No. 259/KPTS-II/2000 tentang Peta Kawasan Hutan dan Perairan Kabupaten Ketapang" stated that proposed land located in Non-Forest Designated Area or "Area Penggunaan Lain". - "Risalah Pertimbangan Teknis Penatagunaan Tanah Dalam Rangka Pemberian HGU PT. SKS". "Laporan Pemeriksaan Lapang Nomor: 028/PT-PGT/VI/2008, tanggal 6 Juni 2008". Ground verification on 14-17 May 2008 conducted by National Land. Proposed of the land is ± 13,500 Ha located in Non-Forest Designated Area or "Area Penggunaan Lain". - "Risalah Pertimbangan Teknis Penatagunaan Tanah Dalam Rangka Pemberian HGU PT. SKS" Nomor: 028/RPT-PGT/VI/2008, tanggal 9 Juni 2008. Suggested areas for approval the land is ± 9,254.58 Ha of 13,500 Ha. - Location Permit issued by Ketapang Regent No: 363 Tahun 2007, dated 24 September 2007. Permitted area is 13,500 Ha located at 	
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		<p>Desa Air Hitam Besar, Kecamatan Kendawangan, Kabupaten Ketapang.</p> <ul style="list-style-type: none"> - Extension of location permit issued by Ketapang Regent Nomor: 491/PEM/2012, dated 21 November 2012. - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 466 Tahun 2009, dated 4 December 2009. Area permitted given is 9,580 Ha and Mill capacity 45 MT/Hr. - Revising Area of Plantation Permit as "Keputusan Bupati Ketapang Nomor: 664/DISBUN-D/2016, tanggal 11 November 2016". Changes of total plantation area permitted is from 9,580 Ha to 9,480.5 Ha. Completed with map scale 1:50,000. - Revising Plantation Permit as "Keputusan Bupati Ketapang Nomor: 084/DPMPSTP-D/2020, tanggal 6 April 2020". Changes of total plantation area permitted is from 9,480.5 Ha to ± 7,680 Ha and Mill capacity 90 MT/hr. Completed with map scale 1:50,000. - Environmental Permit for Plantation and Mill Activities or "Izin Lingkungan Kegiatan Perkebunan dan PKS" refer to Regent Ketapang Decree No. 357/DPMPSTP-D.B.2019, dated 26 June 2019. Scope of environmental permit is cover PT Sukses Karya Sawit for plantation 9,480.5 Ha and Mill capacity 90 MT/hr. - Letter of Forest Area Status for Proposing Land Use Rights (HGU) issued by Forestry Department of Kalimantan Barat Province No: 1329/Dishut-II/TGK/2017, dated 27 July 2017. Proposing of Land Use Rights (HGU) is 7,390.36 Ha as document of "Peta Bidang Tanah Nomor: 008-14.07-2017, tanggal 24 Januari 2017" which refer to "Peta Kawasan Hutan dan Konservasi Perairan Provinsi Kalimantan Barat SK Menteri Kehutanan Nomor: SK.733/Menhut-II/2014, tanggal 2 September 2014 and Penetapan Peta PIPPIB Revisi XI refer to SK.6347/MenLHK-PKTL/IPSDH/PLA.1/11/2016, tanggal 21 November 2016 stated that propose of land use rights is 7,390.36 	
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		<p>Ha. Those area located in Non-Forest Designated Area or "Area Penggunaan Lain" and no overlapping with others permit.</p> <p>Land Title (HGU) PT Sukses Karya Sawit as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 24/HGU/KEM-ATR/BPN/IV/2021, tanggal 21 April 2021" consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 441, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1,314.21 Ha. 2. Certificate HGU No. 442, issued on 21 July 2021, expiry date: 21 April 2056. Area: 3,137.27 Ha. 3. Certificate HGU No. 443, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1,048.97 Ha. 4. Certificate HGU No. 444, issued on 21 July 2021, expiry date: 21 April 2056. Area: 12.59 Ha. 5. Certificate HGU No. 445, issued on 21 July 2021, expiry date: 21 April 2056. Area: 10.10 Ha. 6. Certificate HGU No. 446, issued on 21 July 2021, expiry date: 21 April 2056. Area: 452.75 Ha. 7. Certificate HGU No. 447, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1.90 Ha. 8. Certificate HGU No. 448, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1.87 Ha. 9. Certificate HGU No. 449, issued on 21 July 2021, expiry date: 21 April 2056. Area: 14.00 Ha. <p>Total area Nucleus Estates of PT Sukses Karya Sawit (SKS-02 and SKS-03) is 5,993.66 Ha.</p> <p>Land Title (HGU) Scheme Smallholders "Koperasi Perkebunan Natai Aru Mitra Sejahtera" (SKS-01 Plasma) as refer to "SK Kementerian Agraria</p>	
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		<p>dan Tata Ruang/BPN No: 25/HGU/KEM-ATR/BPN/IV/2020, tanggal 7 April 2020” consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 368, issued on 5 May 2020, expiry date: 7 April 2055. Area: 649.58 Ha. 2. Certificate HGU No. 369, issued on 5 May 2020, expiry date: 7 April 2055. Area: 3.20 Ha. 3. Certificate HGU No. 370, issued on 5 May 2020, expiry date: 7 April 2055. Area: 6.17 Ha. 4. Certificate HGU No. 371, issued on 5 May 2020, expiry date: 7 April 2055. Area: 13.00 Ha. 5. Certificate HGU No. 372, issued on 5 May 2020, expiry date: 7 April 2055. Area: 7.52 Ha. <p>Total area for scheme smallholder Koperasi Perkebunan Natai Aru Mitra Sejahtera” (SKS-01 Plasma) is 679.47 Ha.</p> <p>Land Title (HGU) Scheme Smallholders “Koperasi Perkebunan Natai Sipun Mandiri” (SKS-01 Plasma) as refer to “SK Kementerian Agraria dan Tata Ruang/BPN No: 13/HGU/KEM-ATR/BPN/II/2020, tanggal 11 Februari 2020” consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 373, issued on 5 May 2020, expiry date: 11 Februari 2055. Area: 90.00 Ha. 2. Certificate HGU No. 374, issued on 5 May 2020, expiry date: 11 Februari 2055. Area: 216.38 Ha. 3. Certificate HGU No. 375, issued on 5 May 2020, expiry date: 11 Februari 2055. Area: 330.57 Ha. <p>Total area for scheme smallholder “Koperasi Perkebunan Natai Sipun Mandiri” (SKS-01 Plasma) is 636.95 Ha.</p>	
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		<p>Other permits of Sukses Karya Sawit Mill as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 5%;">No</th> <th style="width: 20%;">Permit Number</th> <th style="width: 15%;">Issued date</th> <th style="width: 40%;">Remark</th> <th style="width: 20%;">Last inspection</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>95/NAKER/2015</td> <td>26/01/2015</td> <td>Steam Separator</td> <td>11/08/2020</td> </tr> <tr> <td>2.</td> <td>560/234/NT.WASKER</td> <td>26/07/2021</td> <td>Pressure Vessel Boiler MacKanzie Serial #2170237</td> <td>Planned on 5-9 Dec 2022</td> </tr> <tr> <td>3.</td> <td>94/NAKER/2016</td> <td>16/01/2015</td> <td>Steam Boiler</td> <td>17/05/2019</td> </tr> <tr> <td>4.</td> <td>560/320/WASNAKER.1</td> <td>November 2019</td> <td>Sterilizer #3</td> <td>Planned on 5-9 Dec 2022</td> </tr> <tr> <td>5.</td> <td>94/NAKER/2015</td> <td>16/01/2015</td> <td>Steam Boiler</td> <td>17/05/2019</td> </tr> <tr> <td>6.</td> <td>98/NAKER/2015</td> <td>26/01/2015</td> <td>Back Pressure Vessel</td> <td>11/08/2020</td> </tr> <tr> <td>7.</td> <td>97/NAKER/2015</td> <td>23/03/2015</td> <td>Sterilizer</td> <td>11/08/2020</td> </tr> <tr> <td>8.</td> <td>96/NAKER/2015</td> <td>26/01/2015</td> <td>Sterilizer</td> <td>11/08/2020</td> </tr> <tr> <td>9.</td> <td>560/01/TU/STKT-C/2015</td> <td>16/02/2015</td> <td>Steam Turbine</td> <td>Planned on 5-9 Dec 2022</td> </tr> <tr> <td>10.</td> <td>560/05/MD/STKT-C/2015</td> <td>Feb 2015</td> <td>Motor Diesel</td> <td>-</td> </tr> <tr> <td>11.</td> <td>560/04/MD/STKT-C/2015</td> <td>16/02/2015</td> <td>Motor Diesel</td> <td>-</td> </tr> </tbody> </table> <p>Building Rights or "Hak Guna Bangunan" for Sukses Karya Sawit Mill covers 22.34 Ha as follow:</p> <p>a. Certificate HGB No. 05, dated 8 June 2022 refer to SK Kepala Kantor Wilayah BPN Provinsi Kalimantan Barat No. 01/SKHGB/BPN-61.00/V/2022, dated 11 May 2022. Area: 10.04 Ha. Allocated for Effluent Pond.</p>	No	Permit Number	Issued date	Remark	Last inspection	1.	95/NAKER/2015	26/01/2015	Steam Separator	11/08/2020	2.	560/234/NT.WASKER	26/07/2021	Pressure Vessel Boiler MacKanzie Serial #2170237	Planned on 5-9 Dec 2022	3.	94/NAKER/2016	16/01/2015	Steam Boiler	17/05/2019	4.	560/320/WASNAKER.1	November 2019	Sterilizer #3	Planned on 5-9 Dec 2022	5.	94/NAKER/2015	16/01/2015	Steam Boiler	17/05/2019	6.	98/NAKER/2015	26/01/2015	Back Pressure Vessel	11/08/2020	7.	97/NAKER/2015	23/03/2015	Sterilizer	11/08/2020	8.	96/NAKER/2015	26/01/2015	Sterilizer	11/08/2020	9.	560/01/TU/STKT-C/2015	16/02/2015	Steam Turbine	Planned on 5-9 Dec 2022	10.	560/05/MD/STKT-C/2015	Feb 2015	Motor Diesel	-	11.	560/04/MD/STKT-C/2015	16/02/2015	Motor Diesel	-
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		<p>b. Certificate HGB No. 06, dated 8 June 2022 refer to SK Kepala Kantor Wilayah BPN Provinsi Kalimantan Barat No. 02/SKHGB/BPN-61.00/V/2022, dated 11 May 2022. Area: 12.30 Ha.</p> <p>Document legal PT Bumi Sawit Sejahtera:</p> <ul style="list-style-type: none"> - Legal entity of PT Bumi Sawit Sejahtera as per company deed is Akta Pendirian Perseroan Terbatas No. 34, dated 12 March 2007. Ministry of Law and Human Rights approval No. W7-05870 HT.01.01.TH.2007, dated 28 May 2007. Taxpayer Number: 02.596.768.8-012.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/593/DPUTR-D, tanggal 7 September 2007 terkait Informasi Lahan untuk Perluasan Perkebunan Kelapa Sawit." - Location Permit or "Izin Lokasi" based on Regent of Ketapang Decree SK No. 364 Tahun 2007 (24 September 2007) and extended period refer to SK No. 417 Tahun 2010 (27 Juli 2010) with area 11,000 Ha. - Extension of location permit area refer to SK No. 1505/DPMPTSP-D/2017, dated 14 December 2017 with area 960 Ha. - Forest Release refer to Ministry of Forestry Decree No. SK.351/Menhut-II/2012, dated 20 July 2012 with area 10,067.21 Ha. - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 215 Tahun 2009, dated 25 May 2009. Area permitted given is 11,000 Ha and Mill capacity 45 MT/Hr. - Revising of Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 474/DISBUN-D/2015, dated 8 Jul 2015. Area permitted given is 8,844 Ha and Mill capacity 45 MT/Hr. - 2nd Revising of Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 043/DPMPTSP-D/2020, dated 27 February 2020. Area permitted given is 9,804 Ha and Mill capacity 45 MT/Hr. 	
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		<ul style="list-style-type: none"> - Sertipikat HGU (Land Title) No. 390, dated 3 June 2021, expired 12 March 2056. Permitted area: 7,510.10 Ha. Reference of Land Minister Decree: SK No.17/HGU/KEM-ATR/BPN/III/2021, dated 12 March 2021. Completed with Scale 1:100,000. <p>Land Title of Full Managed Smallholders of BSS-04 is under "Koperasi Perkebunan Citra Niaga".</p> <p>Sertipikat HGU (Land Title) No. 391, dated 3 June 2021, expired 18 February 2056. Permitted area: 1,697.39 Ha. Reference of Land Minister Decree: SK No.12/HGU/KEM-ATR/BPN/III/2021, dated 18 February 2021. Completed with Scale 1:100,000.</p> <p>Scope of land title of PT Bumi Sawit Sejahtera is 9,207.49 Ha, consist of:</p> <ul style="list-style-type: none"> - Nucleus Estates (BSS-01, BSS-02, BSS-03) = 7,510.10 Ha - Scheme Smallholders (BSS-04 Plasma) = 1,697.39 Ha <p>Document legal PT Berkat Nabati Sejahtera:</p> <ul style="list-style-type: none"> - Legal entity of PT Berkat Nabati Sejahtera as per company deed is Akta Pendirian Perseroan Terbatas No. 35, dated 12 March 2007. Ministry of Law and Human Rights approval No. W7-05871 HT.01.01.TH.2007, dated 28 May 2007. Taxpayer Number: 02.596.767.0-012.000. - Revision of Deed: "Akta Perubahan Anggaran Dasar PT Berkat Nabati Sejahtera No. 41, tanggal 31 Mei 2012". Ministry of Law and Human Rights approval No. AHU-32318.AH.01.02.TH.2012, dated 14 June 2012. Taxpayer Number: 02.596.767.0-703.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/0975/Bappeda-D, tanggal 14 September 2007 terkait Informasi Lahan untuk Perkebunan Kelapa Sawit." 	
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		<ul style="list-style-type: none"> - Location Permit or "Izin Lokasi" based on Regent of Ketapang Decree SK No. 362 Tahun 2007 (24 September 2007) with area 13,500 Ha and extended permit refer to SK No. 539/PEM/2012 (21 December 2012) with area ± 11,800 Ha. - Technical Review of Forest Status of "Telaah Teknis Fungsi Kawasan Hutan PT Berkat Nabati Sejahtera" No. S.672/BPKH.III/SPKH/PLA.1/8/2017, dated 21 August 2017. Stated that refer to Ministry of Forestry Decree No. SK.733/Menhut-II/2014, dated 2 September 2014, propose area of PT Berkat Nabati Sejahtera cover area 3,428.84 Ha is located in Non-Forest Designated Area or "Area Penggunaan Lain". - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 465 Tahun 2009, dated 4 December 2009. Area permitted given is 8,830 Ha and Mill capacity 45 MT/Hr. <p>Land Title (HGU) PT Berkat Nabati Sejahtera as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No.09/HGU/KEM-ATR/BPN/II/2020, tanggal 4 Februari 2020" consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 364, issued on 14 April 2020, expiry date: 4 February 2055. Area: 954.02 Ha. 2. Certificate HGU No. 365, issued on 14 April 2020, expiry date: 4 February 2055. Area: 1,005.03 Ha. 3. Certificate HGU No. 366, issued on 14 April 2020, expiry date: 4 February 2055. Area: 3,780.04 Ha. <p>BNS-02 is allocated for Smallholder Scheme (Plasma) which have legal entity in form of organization deed under "Akta Pendirian Koperasi Perkebunan Sawit Sejahtera Bersama, Nomor Badan Hukum: 259/BH/XVII.3/2009". Approval from Ministry of Cooperative through</p>	
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		<p>Decree (SK. Nomor: 262/BH/KOP.UKM&PERINDAG/V/2009, dated 5 May 2009).</p> <p>Land Title (HGU) "Koperasi Perkebunan Sawit Sejahtera Bersama" as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 03/HGU/KEM-ATR/BPN/I/2020, tanggal 6 Januari 2020" is Certificate HGU No. 367, issued on 14 April 2020, expiry date: 6 January 2055. Area: 1,507.15 Ha.</p> <p>Scope of land title of PT Berkat Nabati Sejahtera is 7,246.24 Ha, consist of:</p> <ul style="list-style-type: none"> - Nucleus Estates (BNS-01, BNS-03, BNS-04) = 5,739.09 Ha - Scheme Smallholders (BNS-02 Plasma) = 1,507.15 Ha <p>Note: During the liability disclosure declaration, it was based on Izin Usaha Perkebunan/Plantation business permit. While the certified area will be based reported in Table 5 is Hak Guna Usaha</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>Unit of certification has established documented system for ensuring legal compliance through procedure. The procedure is describing in "SOP Identifikasi dan Audit Pemenuhan Aturan dan Persyaratan Hukum Yang Berlaku (SNA-SOP-25-17-R0)", dated 14 Sep 2017.</p> <p>The updated evaluation of law and regulations compliance conducted annually. In example: "Formulir Evaluasi Kepatuhan Terhadap Peraturan dan Persyaratan Hukum", update 17 November 2022. Type of law and regulation that evaluated are Manpower, HCV and Protected Areas, Social, Environment, OHS and Licenses.</p>	Complied
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> <p>PT. Sukses Karya Sawit SKS-01 (Plasma)</p>	Complied

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Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor
SKS-321	2° 49' 17.37" S 110° 31' 18.74" E	2° 49' 17.12" S 110° 31' 19.15" E
SKS-322	2° 49' 09.41" S 110° 31' 20.87" E	2° 49' 09.41" S 110° 31' 21.27" E
SKS-323	2° 48' 54.87" S 110° 45' 36.76" E	2° 48' 54.68" S 110° 31' 24.53" E
SKS-324	2° 48' 39.07" S 110° 31' 21.79" E	2° 48' 39.20" S 110° 31' 21.76" E
SKS-02		
Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor
SKS-191	2° 46' 43.41" S 110° 36' 00.59" E	2° 46' 43.24" S 110° 36' 00.61" E
SKS-192	2° 46' 57.68" S 110° 36' 08.25" E	2° 46' 57.40" S 110° 36' 08.36" E
SKS-327	2° 48' 07.40" S 110° 35' 07.40" E	2° 48' 07.19" S 110° 35' 07.70" E
SKS-368	2° 48' 15.86" S 110° 34' 59.85" E	2° 48' 15.30" S 110° 35' 00.03" E
SKS-03		
Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor
SKS-289	2° 47' 38.95" S 110° 31' 25.94" E	2° 47' 38.98" S 110° 31' 25.96" E
SKS-290	2° 47' 28.41" S 110° 31' 30.31" E	2° 47' 28.49" S 110° 31' 30.41" E
SKS-295	2° 45' 48.99" S 110° 31' 59.23" E	2° 45' 49.17" S 110° 31' 59.26" E
PT Berkat Nabati Sejahtera BNS-01		

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Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor
BNS-175	2° 49' 07.28" S 110° 37' 59.86" E	2° 49' 07.29" S 110° 37' 59.88" E
BSS-048	2° 48' 51.66" S 110° 38' 08.59" E	2° 48' 51.76" S 110° 38' 08.61" E
BSS-015	2° 45' 38.70" S 110° 38' 13.01" E	2° 45' 38.83" S 110° 38' 13.17" E
BNS-02 (Plasma)		
Poles #	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor
BNS-054	2° 50' 51.11" S 110° 39' 44.35" E	2° 50' 50.26" S 110° 39' 44.37" E
BNS-112	2° 48' 40.61" S 110° 39' 41.80" E	2° 48' 40.45" S 110° 39' 41.83" E
BNS-051	2° 49' 17.71" S 110° 38' 27.64" E	2° 49' 17.72" S 110° 38' 27.48" E
<p>PT Bumi Sawit Sejahtera (BSS-04) allocated for scheme smallholder full managed namely "Koperasi Perkebunan Citra Niaga". Land title of "Koperasi Perkebunan Citra Niaga" is HGU and have a map of legal boundaries scale 1:20,000. Boundaries poles that mapped is only code BSS, while in land title map there are code of boundaries ENC 001 – 041. Based on field visit to BSS 4 Estate, the sampled boundary pole with BSS notation is in place and visibly maintained. Effective coordination with Badan Pertanahan Nasional for requirement boundary pole with ENC notation for BSS 4 Estate as in HGU map. <u>This is an Opportunity for Improvement (OFI).</u></p> <p>Based on ground verification on sample of legal boundaries as below:</p> <p>BSS-04 Plasma</p>		
Boundaries	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor

		<table border="1"> <tr> <td>BSS-056</td> <td>2° 53' 33.77" S 110° 45' 33.34" E</td> <td>2° 53' 33.46" S 110° 45' 33.94" E</td> </tr> <tr> <td>BSS-057</td> <td>2° 53' 09.88" S 110° 45' 36.76" E</td> <td>2° 53' 09.74" S 110° 45' 36.67" E</td> </tr> <tr> <td colspan="3">BSS-01</td> </tr> <tr> <td>Boundaries</td> <td>GPS coordinates monitoring in October 2022.</td> <td>GPS coordinates verified by auditor</td> </tr> <tr> <td>BSS-023</td> <td>2° 51' 23.12" S 110° 52' 01.73" E</td> <td>2° 51' 23.13" S 110° 52' 01.91" E</td> </tr> <tr> <td>BSS-024</td> <td>2° 51' 23.15" S 110° 52' 15.29" S</td> <td>2° 51' 23.14" S 110° 52' 15.45" E</td> </tr> <tr> <td>BSS-081</td> <td>2° 49' 30.97" S 110° 56' 14.88" E</td> <td>2° 49' 30.80" S 110° 56' 15.10" E</td> </tr> <tr> <td>BSS-082</td> <td>2° 49' 42.97" S 110° 56' 14.22" E</td> <td>2° 49' 42.82" S 110° 56' 15.75" E</td> </tr> </table> <p>OFI: Based on field visit to BSS 4 Estate, the sampled boundary pole with BSS notation is in place and visibly maintained. Effective coordination with Badan Pertanahan Nasional for requirement boundary pole with ENC notation for BSS 4 Estate as in HGU map.</p>	BSS-056	2° 53' 33.77" S 110° 45' 33.34" E	2° 53' 33.46" S 110° 45' 33.94" E	BSS-057	2° 53' 09.88" S 110° 45' 36.76" E	2° 53' 09.74" S 110° 45' 36.67" E	BSS-01			Boundaries	GPS coordinates monitoring in October 2022.	GPS coordinates verified by auditor	BSS-023	2° 51' 23.12" S 110° 52' 01.73" E	2° 51' 23.13" S 110° 52' 01.91" E	BSS-024	2° 51' 23.15" S 110° 52' 15.29" S	2° 51' 23.14" S 110° 52' 15.45" E	BSS-081	2° 49' 30.97" S 110° 56' 14.88" E	2° 49' 30.80" S 110° 56' 15.10" E	BSS-082	2° 49' 42.97" S 110° 56' 14.22" E	2° 49' 42.82" S 110° 56' 15.75" E	
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																											
2.2.1	A list of contracted parties is available. - Minor compliance -	PT. Sukses Karya Sawit – Sukses Karya Sawit POM and its supply base demonstrate list of contractors, updated February 2023.	Complied																								
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party. - Minor compliance -	PT. Sukses Karya Sawit – Sukses Karya Sawit POM and its supply base demonstrate contract with FFB supplier "Surat Perjanjian Kemitraaan Pengolahan dan Pembelian Berkelanjutan Industri Pengolahan Tandan Buah Segar (TBS) Kelapa Sawit Kelompok Pekebun dengan Pabrik Kelapa Sawit (PKS) PT. Sukses Karya Sawit" between PT. Sukses Karya Sawit POM and Kelompok Tani Mitra SKS Sejahtera, dated 22 February 2021. This agreement complemented with addendum No.003/SD-SKM/III/2022 between PT. Sukses Karya Sawit POM and Mitra SKS	Complied																								

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		<p>Sejahtera, dated 22 March 2022. The addendum including clause on comply with applicable laws and regulation in Indonesia.</p> <p>PT. Sukses Karya Sawit demonstrated document "Due diligence on legal and Policy Compliance Sawit Nabati Agro" by CV Sultan Borneo Mandiri. The document checks organization formation, type of business, number of workers, legal aspect: deed of establishment, NPWP, TDP, Surat Izin Usaha; Manpower: work agreement, minimum wage, no under 18 years workers, payslip, ID retention, human right uphold; EHS: insurance, PPE; Business ethics: corruption, recruitment fee, hold when resigning; dated 1 September 2022.</p>	
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM demonstrate contract with FFB supplier "Surat Perjanjian Kemitraaan Pengolahan dan Pembelian Berkelanjutan Industri Pengolahan Tandan Buah Segar (TBS) Kelapa Sawit Kelompok Pekebun dengan Pabrik Kelapa Sawit (PKS) PT. Sukses Karya Sawit" between PT. Sukses Karya Sawit POM and Kelompok Tani Mitra SKS Sejahtera, dated 22 February 2021. This agreement complemented with addendum No.003/SD-SKM/III/2022 between PT. Sukses Karya Sawit POM and Mitra SKS Sejahtera, dated 22 March 2022. The addendum including prohibit underage worker below 18 years old, prohibit forced labour, prohibit trafficked labour.</p> <p>PT. Bumi Sawit Sejahtera demonstrate contract "Surat Perjanjian Kerja Pekerjaan Pembuatan 1 Unit Trailer Mixing CV Tiga Bersaudara Aisy No.006/BSS1-TBA/VII/2022" dated 11 August 2022; Section 10. stipulates cannot employ children under age 18 years old; but has not contain clauses prohibit forced and trafficked labour.</p> <p>"Perjanjian Kerja Cuci Parit Collection Drain, Main Drain dan Boundary Drain No.008/BSS1-TOP/IX/2022" with PT. Tractor Oto Prayoga dated 1 September 2022; Section 2. stipulates cannot employ children under age 18 years; but has not contain clauses prohibit forced and trafficked labour.</p>	<p>Complied</p>

Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>PT. Sukses Karya Sawit – SKS POM has listed directly sourced FFB and recording the information on geolocation of FFB origins “Traceability Supply Base Mill Database” PT. Sukses Karya Sawit – Sukses Karya Sawit Mill, updated 1 September 2022.</p> <p>Supply from company owned plantation: PT. Berkat Nabati Sawit, PT. Sukses Karya Sawit, PT. Bumi Sawit Sejahtera.</p> <p>1 directly non-certified outgrower identified: PT. Kalimantan Prima Agro Mandiri; HGU 1,919.05 Ha; PIC Berniat; geolocation 110.96178 & - 2.75833, Desa Danau Buntar, Kecamatan Kendawangan, Kabupaten Ketapang, Provinsi Kalimantan Barat; hectarage planted 848.27 Ha; Production 1,806.93 tons; status Non-certified.</p>	Complied
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>PT. Sukses Karya Sawit – SKS POM has listed indirectly sourced FFB and recording the information on geolocation of FFB origins “Traceability Supply Base Mill Database” PT. Sukses Karya Sawit – Sukses Karya Sawit Mill, updated 1 September 2022.</p> <p>1 indirect supplier identified: Mitra SKS Sejahtera; consist of 29 farmers as supply base; total 24.22 Ha; PIC Nurhan; geolocation 110° 38’ 36.02” E & 2° 47’ 22.27” S, Desa Air Hitam Besar, Kecamatan Kendawangan, Kabupaten Ketapang, Provinsi Kalimantan Barat; Production 138.42 tons; status Non-certified.</p> <p>- Hasan Basri; SKT/STD-B on process; location Air Hitam Village, Kendawangan District; coordinate geolocation 110° 37’ 26.81” E & 2° 47’ 12.08” S; 0.48 Ha; volume 200 kg. Sighted “Formulir Pendaftaran Petani (<25 Ha)” No.01/KTM/SJ identifying the type of land ownership: SKT NO.01/KTM/SKS/SJ/2020; 1.8 Ha; status APL; planted 1.8 Ha in 2011 with seedling Lonsum; sales channel and buyer.</p>	Complied

		<p>- Adi; SKT/STD-B on process; location Air Hitam Village, Kendawangan District; coordinate geolocation 110^o 37' 37.197" E & 2^o 46' 20.47" S; 1.91 Ha; volume 650 kg. Sighted "Formulir Pendaftaran Petani (<25 Ha)" No.01/KTM/SJ identifying the type of land ownership: SKT NO.01/KTM/SKS/SJ/2020; 1.9 Ha; status APL; planted 1.9 Ha in 2012 with seedling Lonsum; sales channel and buyer identified.</p> <p>For proof of ownership status and trading license, see 5.3.2.</p> <p>PT. Sawit Nabati Agro has submitted case register to fulfil interim measure for indicator 2.3.2, for parent company IOI Corporation Berhad, RSPO membership No.2-0002-04-000-00; name of certified units SKS Mill – PT. Sukses Karya Sawit, RSPO PO_ID number: RSPO_PO1000004867, dated 25 November 2022. RSPO Certification Helpdesk acknowledge receipt on 25 November 2022.</p>																	
<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.</p> <p>- Critical (Major) compliance -</p>	<p>For all estates under PT. Sawit Nabati Agro, company developed 5 years business plan starting 2020/2021-2024/2025. The business plan including history and estimate of production of FFB, CPO and PK.</p> <p>The business plan including staff and labour requirement; palm costing statement; estimated CPO production; upkeep cost, harvesting and collection cost, general charges; general capital; this including for scheme smallholders.</p> <table border="1" data-bbox="1133 1198 1973 1380"> <thead> <tr> <th>Year</th> <th>2022/2023</th> <th>2023/2024</th> <th>2024/2025</th> </tr> </thead> <tbody> <tr> <td colspan="4">PT. Sukses Karya Sawit 5,993.68 Ha (HGU) & 5,022.11 Ha mature</td> </tr> <tr> <td>FFB</td> <td>99,280.00</td> <td>114,830.16</td> <td>104,854.81</td> </tr> <tr> <td>CPO/OER</td> <td>22,338.03/22.5%</td> <td>26,410.94/22.86%</td> <td>24,116.61/23.0%</td> </tr> </tbody> </table>	Year	2022/2023	2023/2024	2024/2025	PT. Sukses Karya Sawit 5,993.68 Ha (HGU) & 5,022.11 Ha mature				FFB	99,280.00	114,830.16	104,854.81	CPO/OER	22,338.03/22.5%	26,410.94/22.86%	24,116.61/23.0%	<p>Complied</p>
Year	2022/2023	2023/2024	2024/2025																
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		PK/KER	2,978.40/3%	3,444.90/3%	3,145.64/3%	
		PT. Sukses Karya Sawit 1 Plasma Natai Aru Mitra Sejahtera 679.48 Ha (HGU) & 635.00 Ha mature				
		FFB	11,340.00	13,020.14	14,243.91	
		PT. Sukses Karya Sawit 1 Plasma Natai Sipun Mandiri 636.96 Ha (HGU) & 616.30 Ha				
		FFB	12,390.00	14,161.08	15,351.29	
		PT. Berkat Nabati Sejahtera 5,993.68 Ha (HGU) & 5,524.29 Ha mature				
		FFB	67,940.00	81,483.49	89,144.06	
		CPO/OER	15,286.50/22.5%	18,741.20/23.0%	20,503.13/23.0%	
		PK/KER	2,038.20/3%	2,444.50/3%	2,674.32/3%	
		PT. Berkat Nabati Sejahtera 2 Plasma Koperasi Perkebunan Sawit Sejahtera Bersama 1,507.15 Ha (HGU) & 1,471.87 Ha mature				
		FFB	23,050.00	24,933.16	25,618.29	
		PT. Bumi Sawit Sejahtera 7,510.09 Ha (HGU) & 5,688.71 Ha mature				
		FFB	78,490.00	100,095.53	117,012.95	
		PT. Bumi Sawit Sejahtera 2 Plasma Koperasi Perkebunan Citra Niaga 1,443.85 Ha mature				
		FFB	13,590.09	15,911.85	18,787.25	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	PT. Sukses Karya Sawit estates, with planting year between 2009 – 2014. In 5 Years Business Plan indicated no replanting plan (will start 2034), including for scheme smallholders. PT. Berkat Nabati Sejahtera estates, with planting year between 2009 – 2014. In 5 Years Business indicated no replanting plan (will start 2034), including for scheme smallholders.				Complied

		PT. Bumi Sawit Sejahtera estates, with planting year between 2013-2015. In 5 Years Business Plan indicated no replanting plan (will start 2038), including for scheme smallholders.	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -	Management Review on Sustainability for PT. Sawit Nabati Agro on 25 November 2022. Discussion on Process Performance (EHS, GIS support, legal & public relation, sustainability finance & estate, estate operation, mill and marketing, agronomy); Internal audit from MY team; prevention and improvement action status; Improvement recommendation.	Complied
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification. - Critical (Major) compliance -	<p>PT. Sawit Nabati Agro demonstrated continuous improvement plan for its operation, taking into account social and environmental impact assessment result.</p> <p>In SKS Plasma 1 there was under pruning fronds at Block F16 and R07. Continuous Improvement Plan: Estate conducted pruning according to the program and placed fronds according to the procedure; frond cut into two pieces and placed makes U shape, first semester placed at interrow, and second semester placed between palms.</p> <p>There was flood at Block R07 and the ditch was not flows. Continuous improvement plan: coordination with water management team to re-check cleaning the outlet drain, main drain, collection drain and bridges to make water flows well. The continuous improvement plan has been discussed with the scheme smallholder/cooperative organization.</p> <p>For SKS palm oil mill; found that repair cost and diesel consumption are over budget. Root cause: throughput was not achieved, turbine load was low. Continuous improvement plan: install ban press KH7777.</p> <p>Boiler Mech 35 tons breakdown since June 2019. Root cause: spare parts is on the way from Jakarta, contractor entering the site in March 2021.</p>	Complied

		Continuous improvement plan: service Furnace Chamber, install ash conveyor to minimize impact from boiler ash.	
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 -	PT. Sawit Nabati Agro prepared 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 -	Unit of certification has established Standard Operating Procedures (SOPs) for the operation of oil palm plantation and mill, as follows: SOPs for Estate: <ul style="list-style-type: none"> • SOP.SNA.AGR.1.1 Rev #1 dated 1 May 2019, SOP Pembibitan di Pre Nursery. • SOP.SNA.AGR.1.2 Rev #1 dated 1 May 2019, SOP Pembibitan di Main Nursery. • SOP.SNA.AGR.2.1 Rev #1 dated 1 May 2019, SOP Pembukaan Lahan. • SOP.SNA.AGR.2.2 Rev #1 dated 1 May 2019, SOP Persiapan Lahan untuk Penanaman Baru dan Replanting. • SOP.SNA.AGR.3.1 Rev #1 dated 1 May 2019, SOP Penanaman Kacangan sebagai Tanaman Penutup Tanah (LCC). • SOP.SNA.AGR.4.1 Rev #1 dated 1 May 2019, SOP Kerapatan Tanaman Kelapa Sawit. • SOP.SNA.AGR.5.1 Rev #1 dated 1 May 2019, SOP Teknik Penanaman Kelapa Sawit. • SOP.SNA.AGR.6.1 Rev #1 dated 1 May 2019, SOP Penyemprotan. • SOP.SNA.AGR.7.1 Rev #1 dated 1 May 2019, SOP Analisa Daun. • SOP.SNA.AGR.8.0 Rev #1 dated 1 May 2019, SOP Pengambilan Sample Tanah. 	Complied

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		<ul style="list-style-type: none"> • SOP.SNA.AGR.9.1 Rev #1 dated 1 May 2019, SOP Aplikasi Pemupukan Secara Manual TBM dan TM. • SOP.SNA.AGR.9.2 Rev #1 dated 1 May 2019, SOP Aplikasi Pemupukan Bantuan Angkong TBM – TM. • SOP.SNA.AGR.9.3 Rev #1 dated 1 May 2019, SOP Aplikasi Pemupukan Bantuan Kerbau TBM – TM. • SOP.SNA.AGR.9.4 Rev #1 dated 1 May 2019, SOP Pemupukan Semi Mekanis TBM – TM. • SOP.SNA.AGR.9.5 Rev #1 dated 1 May 2019, SOP Pemupukan Kacangan Tanaman Penutup Tanah. • SOP.SNA.AGR.9.6 Rev #1 dated 1 May 2019, SOP Janjangan Kosong Sebagai Mulsa. • SOP.SNA.AGR.9.7 Rev #1 dated 1 May 2019, SOP Aplikasi POME. • SOP.SNA.AGR.9.8 Rev #1 dated 1 May 2019, SOP Pengambilan Sample Pupuk untuk dianalisa. • SOP.SNA.AGR.9.9 Rev #1 dated 1 May 2019, SOP Perencanaan dan Organisasi Aplikasi Pemupukan. • SOP.SNA.AGR.10.1 Rev #1 dated 1 May 2019, SOP Pengendalian Hama Tikus. • SOP.SNA.AGR.10.2 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Ulat Kantong dan Ulat Api secara Terpadu. • SOP.SNA.AGR.10.3 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Kumbang Badak. • SOP.SNA.AGR.10.4 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Ulat Perusak Tandan (<i>Thirataba mundella</i>). • SOP.SNA.AGR.10.5 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Rayap. • SOP.SNA.AGR.10.6 Rev #1 dated 1 May 2019, SOP Pengendalian 	
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		<p>Terpadu Ganoderma.</p> <ul style="list-style-type: none"> • SOP.SNA.AGR.11.1 Rev #1 dated 1 May 2019, SOP Menghasilkan Tandan Buah Segar (TBS). • SOP.SNA.AGR.11.2 Rev #1 dated 1 May 2019, SOP Panen Tandan Buah Segar Areal TM. • SOP.SNA.AGR.11.3 Rev #1 dated 1 May 2019, SOP Monitoring Panen Kualitas Tandan Buah Segar. • SOP.SNA.AGR.11.4 Rev #1 dated 1 May 2019, SOP Minimum Kematangan Buah. • SOP.SNA.AGR.11.5 Rev #1 dated 1 May 2019, SOP Pruning. • SOP.SNA.AGR.11.6 Rev #1 dated 1 May 2019, SOP Ablasi Pada Tahap TBM. • SOP.SNA.AGR.11.7 Rev #1 dated 1 May 2019, SOP Evakuasi dan Pengangkutan Tandan Buah Segar (TBS). • SOP.SNA.AGR.11.8 Rev #1 dated 1 May 2019, SOP Panen Bantuan Kerbau. • SOP.SNA.AGR.11.9 Rev #1 dated 1 May 2019, SOP Tanggung Jawab Tim Manajemen Perkebunan. • SOP.SNA.AGR.11.10 Rev #1 dated 1 May 2019, SOP Perencanaan dan Pengorganisasian Panen. • SOP.SNA.AGR.12.1 Rev #1 dated 1 May 2019, SOP Kesehatan Kerbau. • SOP.SNA.AGR.13.1 Rev #1 dated 1 May 2019, SOP Manajemen dan Monitoring Budidaya Kelapa Sawit pada Areal Gambut/Rendah. • SOP.SNA.AGR.14.1 Rev #1 dated 1 May 2019, SOP Penanaman Beneficial Plants di Estate. • SOP.SNA.AGR.16.1 Rev #0 dated November 2020, SOP Lahan Marginal. 	
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		<p>SOPs for Mill:</p> <ul style="list-style-type: none"> • SOP.SKS-POM.01 Rev #1 dated 22 July 2019, SOP Penerimaan dan Pemeriksaan TBS (FFB Receiving and Grading). • SOP.SKS-POM.02 Rev #1 dated 22 July 2019, SOP Loading Ramp. • SOP.SKS-POM.03 Rev #1 dated 22 July 2019, SOP Sterilizer. • SOP.SKS-POM.04 Rev #1 dated 22 July 2019, SOP Thresher. • SOP.SKS-POM.05 Rev #1 dated 22 July 2019, SOP Press. • SOP.SKS-POM.06 Rev #1 dated 22 July 2019, SOP Depericarper. • SOP.SKS-POM.07 Rev #1 dated 22 July 2019, SOP Nut & Kernel Plant. • SOP.SKS-POM.08 Rev #1 dated 22 July 2019, SOP Klarifikasi (Clarification). • SOP.SKS-POM.09 Rev #1 dated 22 July 2019, SOP Water Treatment Plant. • SOP.SKS-POM.10 Rev #1 dated 22 July 2019, SOP Boiler. • SOP.SKS-POM.11 Rev #1 dated 22 July 2019, SOP Engine Room. • SOP.SKS-POM.12 Rev #1 dated 22 July 2019, SOP Effluent Treatment Plant. • SOP.SKS-POM.13 Rev #1 dated 22 July 2019, SOP Workshop. • SOP.SKS-POM.14 Rev #1 dated 22 July 2019, SOP Laboratorium. • SOP.SKS-POM.15 Rev #1 dated 22 July 2019, SOP Gudang (Warehouse). • SOP.SKS-POM.16 Rev #1 dated 22 July 2019, SOP Dispatch CPO. • SOP.SKS-POM.17 Rev #1 dated 22 July 2019, SOP Dispatch PKO. • SOP.SKS-POM.18 Rev #1 dated 22 July 2019, SOP Pemanfaatan Air (Water Usage). • SOP.SKS-POM.19 Rev #1 dated 22 July 2019, SOP Pengelolaan 	
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		<p>Limbah Padat (Management of Solid Waste).</p> <ul style="list-style-type: none"> SOP.SKS-POM.20 Rev #1 dated 22 July 2019, SOP Penerimaan TBS Pihak Ketiga (FFB Receiving from 3rd Party). <p>OFI:</p> <p>PT. Sukses Karya Sawit has provided standard operating procedure for BMP, translated from English to Bahasa Indonesia such as SOP Panen No.SOP.SNA.AGR.11.2 r1 May 2019; SOP Evakuasi dan Pengangkutan Tandan Buah Segar No.SOP.SNA.AGR.11.7 r1 May 2019 – with better translation into Bahasa Indonesia.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Unit of certification has a procedure of Internal Audit (SNA.SOP.IA.X.2022 Rev.00, dated 28 October 2022. Objective of the procedure is to check consistent implementation of RSPO/ISPO requirements and IOI Group corporate standard.</p> <p>Sighted report of Agronomy Department visits to PT Sukses Karya Sawit, dated 18-20 April 2022; Operation Internal Audit Report of Sukses Karya Sawit Mill No.002/LHA/SNA-IA/IV/2021; RSPO Internal Audit of PT Sukses Karya Sawit and PT Berkat Nabati Sawit, dated 29 September 2022, there are 39 findings; RSPO Internal Audit of PT Bumi Sawit Sejahtera, dated 4 October 2022, there are 26 findings. Visit report and internal audit report contains visit result and action plan to follow up, due date and PIC. Internal audit report followed up with Progress Action Plan updated on 25 November 2022.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>For plantation, available "Laporan Kunjungan Lapangan Departemen Agronomy PT Sukses Karya Sawit Estate 02" dated 6 Sep 2021 and 18-20 Apr 2022, issued by Agronomy Manager. Sample of finding and action plan taken:</p> <p>SKS Estate 2</p>	Complied

		<ul style="list-style-type: none"> - Planting at Block M09 and N02 have indication of nutrient deficiency and fertilizer application are too far from the plant. Action Plan: extra fertilizer application for supplies palms. - Weeding needed at Block M09. Action plan: conducted weeding according to the round/program. <p>SKS Plasma 1</p> <ul style="list-style-type: none"> - There was under pruning fronds at Block F16 and R07. Action Plan: Estate conducted pruning according to the program and placed fronds according to the procedure; frond cut into two pieces and placed makes U shape, first semester placed at interrow, and second semester placed between palms. - There was flood at Block R07 and the ditch was not flows. Action plan: coordination with water management team to re-check cleaning the outlet drain, main drain, collection drain and bridges to make water flows well. <p>For mill, available Operation Internal Audit Report of Sukses Karya Sawit Mill No.002/LHA/SNA-IA/IV/2021 dated 14 Apr 2021. Finding and action plan taken, such as:</p> <ul style="list-style-type: none"> - Repair cost and diesel consumption are over budget. Root cause: throughput was not achieved, turbine load was low. Action plan: install ban press KH7777. Status: closed in July 2021. - Boiler Mech 35 tons breakdown since June 2019. Root cause: spare parts is on the way from Jakarta, contractor entering the site in March 2021. Action plan: service Furnace Chamber, install ash conveyor. Status: closed in May 2021. 	
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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>	<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>SEIAs has been conducted by interdisciplinary teams of experts in fields such as engineering, environmental science, and social science. The report also outlines any necessary monitoring or follow-up activities that should be carried out to ensure that the project is being implemented in an environmentally and socially responsible manner. Involving smallholder farmers and other affected stakeholders in the SEIA process is essential for ensuring that the assessment is comprehensive and takes into account the diverse perspectives and needs of the local community. This has been done through a variety of methods, such as public meetings, focus groups, surveys, and other forms of outreach.</p> <p>Unit of certification established Social Environment Impact Assessment document known as AMDAL, consist of:</p> <p>PT Bumi Sawit Sejahtera:</p> <ol style="list-style-type: none"> 1. "Analisis Dampak Lingkungan (AMDAL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Bumi Sawit Sejahtera", approved based on Keputusan Gubernur Kalimantan Barat No.200/BLHD/2013 dated 14 March 2013; covers 10,067.21 Ha; mill capacity 45 tons/hour. 2. "Rencana Pengelolaan Lingkungan Hidup (RKL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Bumi Sawit Sejahtera", approved based on Keputusan Gubernur Kalimantan Barat No.200/BLHD/2013 dated 14 March 2013; covers 10,067.21 Ha; mill capacity 45 tons/hour. 3. "Rencana Pemantauan Lingkungan Hidup (RKL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Bumi Sawit Sejahtera", approved based on Keputusan Gubernur Kalimantan Barat No.200/BLHD/2013 dated 14 March 2013; covers 10,067.21 Ha; mill capacity 45 tons/hour. 4. Scope of AMDAL is covering environmental and social aspects assessment for all plantation and mill operations. Hectarage of AMDAL scope is referred to "Keputusan Menteri Kehutanan No. 	<p>Complied</p>
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		<p>SK.351/Menhut-II/2012 tentang Pelepasan Kawasan Hutan Produksi yang dapat Dikonversi seluas 10,067.21 Ha yang terletak di Kelompok Hutan Sungai Jelai Kecamatan Kendawangan Kabupaten Ketapang Provinsi Kalimantan Barat”.</p> <p>5. Participatory with affected parties was conducted during SEIA assessment through Economic and Social Questionnaire “Pedoman Wawancara Untuk Sampel Penduduk” with adjacent communities of certification unit.</p> <p>PT Sukses Karya Sawit: AMDAL (Social and Environment Impact Assessment) consists of “Analisis Dampak Lingkungan Hidup (AMDAL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Sukses Karya Sawit”; “Rencana Pengelolaan Lingkungan Hidup (RKL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Sukses Karya Sawit”; “Rencana Pemantauan Lingkungan Hidup (RKL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Sukses Karya Sawit”. Approved based on Keputusan Gubernur Kalimantan Barat No.374/BLHD/2010 dated 12 Aug 2010; covers plantation ± 13,152 Ha and mill capacity 45 tons FFB/hour. Environmental Permit of Sukses Karya Sawit Mill based on “Keputusan Bupati Ketapang No. 357/DPMPSTP-D.B/2019 dated 26 Jun 2019, regarding “Izin Lingkungan Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit oleh PT Sukses Karya Sawit yang berlokasi di Kecamatan Kendawangan Kabupaten Ketapang” – environmental permit of plantation covers 9,480.50 Ha and mill of PT Sukses Karya Sawit with capacity 90 tons FFB/hour.</p> <p>PT Berkat Nabati Sejahtera: AMDAL (Social and Environment Impact Assessment) consists of “Analisis Dampak Lingkungan Hidup (AMDAL) Perkebunan dan Pabrik</p>	
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		<p>Pengolahan Kelapa Sawit PT Berkat Nabati Sejahtera”; “Rencana Pengelolaan Lingkungan Hidup (RKL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Berkat Nabati Sejahtera”; “Rencana Pemantauan Lingkungan Hidup (RKL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT Berkat Nabati Sejahtera”. Approved based on Keputusan Gubernur Kalimantan Barat No.375/BLHD/2010 dated 12 Aug 2010; covers plantation ± 10,910 Ha and mill capacity 45 tons FFB/hour.</p> <p>The information to have 45 MT/hour mill in each company does exist on each company’s AMDAL document. However, the company decided to build 1 mill with capacity 90 MT/hour in PT. Sukses Karya Sawit. The legal standing for PT. Sukses Karya Sawit POM with capacity 90 MT/hour was stated in the environmental permit issued 26 June 2019.</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>Environmental Management and Monitoring Plan (RKL-RPL) is part of SEIA or AMDAL document, where the participatory of affected parties was conducted during the assessment.</p> <p>Sukses Karya Sawit Mill and its supply bases has established identification the environmental aspect and impact assessment and reviewed annually. The plan was including monitoring that adaptive to operational changes and effective of the mitigation measures.</p> <p>The social and environment management and monitoring plan are available as per RKL-RPL that covered:</p> <ul style="list-style-type: none"> - Monitoring of community perception and social conflict potential - Monitoring of community health level - Monitoring of business opportunities - Monitoring of air ambience quality and noise - Monitoring surface water quality - Monitoring of peat subsidence 	<p>Complied</p>

		<ul style="list-style-type: none"> - Monitoring erosion rate - Monitoring of biodiversity - Potential of fire - Air emission quality <p>Participation of affected stakeholders particularly communities surrounding the plantation has been demonstrated by increased of job and business opportunity and crop compensation based on principles of FPIC.</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>Available document “Laporan Pelaksanaan RKL-RPL Semester I Periode Januari – Juni 2022”, document No.001/SUST-ADM/BSS-RPL-RKL/VII/2022 as evident of social and environmental management and monitoring implementation.</p> <p>Some program has been implemented such as no burning in land clearing and all operation, retain the riparian and categorized as conservation area, prohibit to conduct land clearing at secondary forest which has been set as HCV, not conducted planting at area identified as peat with depth > 3 m. The social and environmental management and monitoring plan also required some parameter such as:</p> <ul style="list-style-type: none"> - Physical-chemical component/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness). - Social-economy-cultural component/aspects: community welfare; community perception. - Health component: community health, hazardous waste management. - All these parameters are implemented by the unit of certification. 	<p>Non-compliance</p>

		<p>The implementation of RKL-RPL was reported periodically every six months to "Dinas Perumahan Rakyat, Kawasan Permukiman dan Lingkungan Hidup Kabupaten Ketapang".</p> <p>However, NC Critical issued.</p> <p>The social impact assessment's evaluation for PT. Sukses Karya Sawit, PT. Berkat Nabati Sejahtera has not updated in participatory manner inviting aspiration/issue from scheme smallholder cooperatives.</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.</p> <p>- Minor compliance -</p>	<p>The employment procedures have been set in:</p> <ul style="list-style-type: none"> - SOP of Recruitment (No. SNA/SOP/HR/PKH/002 dated 1 August 2021). - SOP of Resignation Guidance (No. SNA/SOP/HR/PKH/003 dated 1 October 2021). - Company Regulation period of 2022 - 2024, that has been endorsed by Manpower Agency (based on Decree No. 078/TKT-B.560/2022). <p>In these documents has covered the clause related recruitment mechanism and process, promotion, mutation, and termination in accordance with National Act No. 13 of 2013 related employment.</p> <p>Based on interview with workers in the Estates and Mill, it is known that workers have received documentation of hiring (contractual agreement) and promotion. The clauses in the contractual agreement have complied with the national employment regulation. The procedure of recruitment, and retirement has been disseminated and implemented well. There is no discrimination related recruitment processes, which the application and promotion assessed based on requirements and assessments of competencies and achievements, that has been described in the</p>	<p>OFI</p>

		<p>vacancies in advance. There is no distinguishment of rights and obligations in the same employment types.</p> <p>OFI: Based on interview with worker union, employment procedure including hiring and promotion communicated. Improved effectiveness communication on employment procedure for promotion requirement expected.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>Based on document review and interview with workers, it was known that recruitment procedure has been implemented. For instance, it was found recruitment documentation according to the procedure:</p> <ul style="list-style-type: none"> - Planning of appointment of casual worker to be permanent worker - List of candidates to be promote from casual workers to permanent workers. - Assessment forms per worker. - Decree of appointment to permanent worker (e.g for Ahmad Saepudin No. 409/HRD-BSS/SK/XI/2022 dated 1 November 2022). <p>NC Minor: Employment procedure stipulated the provision of staple food and household utilities however based on worker interview in BSS 1 Estate, new worker such as harvester and fertilizer applicator admitted they did not receive such provision.</p>	Non-compliance
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
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>The company has established the OHS policy that was signed by Group Plantation Director on 28 October 2017, stated that the company commit to provide safe and health workplace by implementation effectively management to prevent workplace accidents and unhealthy to all</p>	Non-compliance

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		<p>employees, guest and contractor. The policy was also displayed at in public board both in mill and estates.</p> <p>However, NC Critical issued.</p> <p>PT. Sukses Karya Sawit and management units prepared risk assessment document, however a number of activities, information related to risk has not been reviewed in the document.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The company has prepared the annual OHS program, consisted of:</p> <ul style="list-style-type: none"> - OHS meeting, - Installation OHS signs, - Provision of PPE, - OHS inspection, - Medical check-up (general and special) program - OHS training <p>The effectiveness of the OHS program to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none"> - Monthly OHS Committee meeting, to discuss and address current OHS issues. - Documentation of accident record and the calculation of LTA. - Annual review of HIRAC. - Trimester OHS Report, that has been submitted regularly to Labor Agency. <p>OFI:</p> <p>Company has provided sprayer worker with PPE based on risk assessment. Worker washing bay and bathroom available for worker</p>	<p>OFI</p>

		cleaning after work in all estate. Review on the use of overall for sprayer worker for better protection against chemical exposure expected.	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>The company has SOP Training Center (No. SOP.TC.001 dated 29 January 2019), as a guidance to provides training for workers in all area of work, including raking into account gender need.</p> <p>It has been observed the Training Programs for each unit (Mill and Estates), and gender specific need such as training of reproduction rights and protection.</p> <p>Field observation verified that the effectiveness of the training and to ensure health and safety, in particular for women workers such as in spraying activity. Based on field observation and interview with the women workers, it is known that the pesticides application has been conducted by methodes that has minimum risk and negative impacts to workers or environmental. The workers can demonstrate safe working practices in accordance with the existing procedures, such as spraying in the direction of the wind, or prohibition of spraying on riparian. They have understood the emergency response in the event of an accident.</p> <p>OFI: A documented training program for SKS POM is available, including training plan for boiler operator. A faster training program implementation for boiler operators is expected.</p>	OFI
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The company has maintained documentation of trainings including mandatory trainings that required accordance with national regulation, as well as internal training and awareness.</p> <p>Records of mandatory trainings:</p>	Complied

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		<ul style="list-style-type: none"> - Certification training of OHS Expert of Yusuf Fatkurrahman dated 02 – 14 December 2019. - Certification training of Steam Station Operator Aswat dated 30 April – 7 May 2018. - In general, all units have totalled 97 workers that has attended mandatory/licensed/certification trainings, including heavy vehicle operator, fire-fighting team, etc. <p>Records of internal trainings:</p> <ul style="list-style-type: none"> - Training of GHG calculation dated 02 – 06 June 2020. - Dissemination of Company Regulation dated 28 -29 August 2021. - Dissemination of company policy dated 19 March 2022. - Training of agronomy SOPs dated 15 September 2022. 	
<p>3.7.3</p>	<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>Training RSPO SCCS on 12-13 September 2022, attended by 26 employees from PT. Sukses Karya Sawit, PT. Berkat Nabati Sejahtera, PT. Bumi Sawit Sejahtera.</p> <p>Training on RSPO SCCS in Sukses Karya Sawit POM, dated 31 October 2022. Attended by Rachmad Pohan (Mill Manager), Timbul Sayekti (Sustainability), Frown Nofrizal (Asst. Mill), Wiyono (Asst. SCR), Wisnu Saputra (Supervisor Lab), Habib (Asst. Lab), Kholil (KTU), M. Chusri (Operator Weighbridge), Ari Agus (EHS-SPO), Yayat Kurniawan (EHS-SPO).</p>	<p>Complied</p>
<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>			
<p>3.8.1</p>	<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</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM established SOP “Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03” dated 7</p>	<p>Not Applicable</p>

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	<p>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>October 2022. Section 2.0 Scope stating the use of Module C – Mass Balance.</p> <p>Not applicable.</p>	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM established SOP “Prosedur Standar Rantai Pasok No.SOP.SPL.SCS-01 rev.03” dated 7 October 2022. Section 2.0 Scope stating the use of Module C – Mass Balance and Section 5.2 Supply Chain Module stating the management unit is using Mass Balance (MB).</p> <p>Sukses Karya Sawit POM received FFB from uncertified growers, as identified in 2.3.1 and 2.3.2.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM is yet to be certified, however has provide an estimated FFB production, CPO production, PK production. FFB forecast production for company’s financial year 2022/2023 at 276,277.40 MT; CPO production at 59,399.64 MT; PK production at 7,459.48 MT.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>RSPO IT PalmTrace for SKS Mill_PT. Sukses Karya Sawit No.RSPO_PO1000004867.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP on:</p> <ul style="list-style-type: none"> - SOP “Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03” dated 7 October 2022. 	Non-compliance

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	<ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>Identification of the role person having overall responsibility: "Surat Penunjukan sebagai Supply Chain Officer untuk Pabrik untuk Mr. Kholil" dated 25 October 2022, signed by appointed office. Based on interview, the PIC can explain the basic of receiving, recording, reporting mass balance on certified and non-certified FFB, CPO and PK.</p> <p>However, NC Critical issued: PT. Sukses Karya Sawit – Sukses Karya Sawit POM Standard Operation Procedure has not explained process for registration of transactions, shipping announcement and remove in the RSPO IT Platform.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRPL.SCS-01 rev.03"</p> <p>Internal audit report for RSPO SCCS sighted: "Action Plan for RSPO Audit Preparation" dated 26 October 2022. Findings issued on 3.8.5 related to SOP translation, Training on Supply Chain, Management Review on Sustainability for PT. Sukses Karya Sawit on 25 November 2022. Discussion on EHS, GIS support, legal & public relation, sustainability finance & estate, estate operation, mill and marketing, agronomy.</p>	<p>Complied</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. Section "5.3 Proses Rantai Pasok Penerimaan Bahan Mentah</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>(TBS)". Stated all SKS POM can received FFB from company owned estate and outgrower both certified and non-certified. All FFB delivery docket shall be completed with information on: Name and address of estate, name and address of mill, loading date/delivery date, quantity of FFB delivered, unique identification number, RSPO certificate number (still not applicable), product remarks.</p> <p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM demonstrated FFB delivery and its verification for certified product (simulation only): "Nota Pengiriman Buah SNA Plantation Group No.003221 dated 18 November 2022; Name and address of Buyer PT. Sukses Karya Sawit POM; Name and address of Seller PT. Sukses Karya Sawit Estate 2-block O3, OP2011; Air Hitam, Kendawangan, Ketapang; Delivery date 18 November 2022; RSPO certificate number (still not applicable); description of product FFB "certified" stamp; quantity 780 bunches; related transport document DT No.KB9881ZL; unique ID number 003221.</p> <p>Verified "certified" FFB weighed "PT. Sukses Karya Sawit Mill Ticket No.WB1/41623; Name and address of Buyer PT. Sukses Karya Sawit POM; Name and address of Seller PT. Sukses Karya Sawit Estate 2 – block O3, planting year 2011; Delivery date 18 November 2022; RSPO certificate number (still not applicable); description of product FFB "certified" stamp; quantity 780 bunches – nett weight 5,350 kg; related transport document DT NoKB9851ZL; unique ID number WB1/27606 – DO No.003221.</p> <p>PT. Sukses Karya Sawit– Sukses Karya Sawit POM demonstrated FFB delivery and its verification for non-certified product (simulation only): "Surat Pengantar Perjalanan No.P/KT.MS/2022 dated 15 November 2022; Name and address of Buyer PT. Sukses Karya Sawit POM; Name</p>	
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		<p>and address of Seller Kelompok Tani Mitra Sukses PT. Sukses Karya Sawit - Air Hitam Hulu, Kendawangan, Ketapang; Delivery date 15 November 2022; RSPO certificate number (still not applicable); description of product FFB "non-certified" stamp; quantity 450 bunches; related transport document DT No.KB9840HQ; unique ID number -.</p> <p>Verified "non-certified" FFB weighed "PT. Sukses Karya Sawit Mill Ticket No.WB1/41307; Name and address of Buyer PT. Sukses Karya Sawit POM; Name and address of Seller Plasma Lokal Kelompok Tani Air Hitam Hulu, planting year 2011; Delivery date 15 November 2022; RSPO certificate number; description of product FFB "non certified" stamp; quantity 450 bunches – nett weight 5,480 kg; related transport document DT No.KB9840HQ; unique ID number -.</p> <p>Projected overproduction: PT. Sukses Karya Sawit– Sukses Karya Sawit POM established SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. Section 8.0 explains projected overproduction will be communicated first through SKS POM to Sales Department. Sales officer/Sustainability Department has to inform the projected overproduction to CB.</p> <p>Handling non-conforming FFB and/or product: PT. Sukses Karya Sawit–Sukses Karya Sawit POM established SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. Section 10 Product non-conformity explains steps to handle product and/or document nonconformity. This includes product FFB, CPO and PK including its related documents.</p>	
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</p>	<p>PT. Sukses Karya Sawit– Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. Section 5.5 Pengiriman Hasil Produksi Pabrik. Stated all CSPO and CSPK shall be weighed. All delivery of CSPO and CSPK shall be completed</p>	Complied

	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> 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>with weighing ticket, minutes of delivery, Delivery Order, Shipping Document, included with information on: Name and address of buyer, name and address of seller, loading date/delivery date, description of product: CSCPO/MB or CSPK/MB, quantity of product delivered, identification number, RSPO certificate number.</p> <p>Sample:</p> <p>Verified CPO weighbridge ticket (simulation only) "PT. Sukses Karya Sawit Mill Ticket No.WB2/6348; Name and address of Seller PT. Sukses Karya Sawit POM; Name and address of Buyer PT. Bina Karya Prima; Delivery date 27 October 2022; RSPO certificate number (still not applicable); description of product CPO "RSPO MB" stamp; quantity nett weight 7,350 kg; related transport document DT KB9897HW; unique ID number D/O No.005/SKS-BKP/CPO/IX/2022.</p> <p>Verified Palm Kernel weighbridge ticket (simulation only) "PT. Sukses Karya Sawit Mill Ticket No.WB2/6677; Name and address of Seller PT. Sukses Karya Sawit POM; Name and address of Buyer PT. Kurnia Tunggal Nusa; Delivery date 27 October 2022; RSPO certificate number (still not applicable); description of product Palm Kernel "RSPO MB" stamp; quantity nett weight 6,130 kg; related transport document H1525PE; unique ID number D/O No.004/SKS-KTN/PK/VIII/2022.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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. ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 	<p>There is no outsources milling activities. The mill outsources activities related to transport of CPO and PK.</p> <ul style="list-style-type: none"> a) Legal ownership of the material owned by PT. Sukses Karya Sawit POM. This is stipulated in contract clause. For example, in contract with CPO transporter CV Citra Kalbar "Surat Perjanjian Jasa Transshipment CPO antara PT. Sukses Karya Sawit dengan CV. Citra Kalbar No.022/SPK-CPO/XI/2022" dated 14 November 2022. Section 1.1 stated CPO is product produced by PT. Sukses Karya Sawit. b) and d) Contract with contractor sighted to ensure independent third parties engaged provide relevant access for duly accredited CBs to 	<p>Non-compliance</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>their respective operations, systems, and all information, when this is announced in advance. For example in contract with CPO transporter CV Citra Kalbar "Surat Perjanjian Jasa Transhipment CPO antara PT. Sukses Karya Sawit dengan CV. Citra Kalbar No.022/SPK-CPO/XI/2022" dated 14 November 2022. Section 8.4 stated CV Citra Kalbar or its employee shall coordinate with PT. Sukses Karya Sawit if external parties/auditor requires information, then the contractor shall provide complete and correct information.</p> <p>However, NC Critical issued: In the current RSPO SCCS SOP, has not explained the explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>																					
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>List of transporters updated 28 October 2022, provided as at training:</p> <table border="1" data-bbox="1131 863 1975 1326"> <thead> <tr> <th>Land transport</th> <th>Address</th> <th>Contact</th> <th>Name</th> </tr> </thead> <tbody> <tr> <td>CV Candra Buana (CPO & PK)</td> <td>Dusun Danau Limau RT009/RW003, Air Hitam Besar, Kendawangan, Ketapang</td> <td>0852 5645 7473/0812 3114 2877</td> <td>Jailani</td> </tr> <tr> <td>CV Mega Jaya Pandawa (CPO)</td> <td>Jl Ahmad Wongso, Kelurahan madurejo, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat</td> <td>0822 4468 5708</td> <td>Ahmad Tabrani</td> </tr> <tr> <td colspan="4">Water transport</td> </tr> <tr> <td>CV Citra Kalbar</td> <td>Jl. Merpati, Kelurahan Sidorejo, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat</td> <td>0822 4616 0403</td> <td>Ainal Yakin (Velly)</td> </tr> </tbody> </table>	Land transport	Address	Contact	Name	CV Candra Buana (CPO & PK)	Dusun Danau Limau RT009/RW003, Air Hitam Besar, Kendawangan, Ketapang	0852 5645 7473/0812 3114 2877	Jailani	CV Mega Jaya Pandawa (CPO)	Jl Ahmad Wongso, Kelurahan madurejo, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat	0822 4468 5708	Ahmad Tabrani	Water transport				CV Citra Kalbar	Jl. Merpati, Kelurahan Sidorejo, Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat	0822 4616 0403	Ainal Yakin (Velly)	Complied
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		CV Sultan Borneo Mandiri	Jl. Pangeran Antasari GG. M. Saat, Desa Raja Kecamatan Arut Selatan	0813 3304 4756	Ulama Dahlan	
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.	PT. Sukses Karya Sawit – Sukses Karya Sawit POM has listed the contractors and can be called upon. Audit team interviewed Mr. Jailani from CV Candra Buana and Mrs. Velly from CV Citra Kalbar.				Complied
3.8.12	Record keeping i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three	PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP “Prosedur Standar Rantai Pasok No.SOP.SPL.SCS-01 rev.03” dated 7 October 2022. Section 5.6.5 stated the document retention time minimum 2 years. PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP “Prosedur Standar Rantai Pasok No.SOP.SPL.SCS-01 rev.03” dated 7 October 2022. Section 2.0 stated the module used Mass Balance. Format for Daily Production Report, Monthly report, Mass Balance report sighted. Audit team noted that recording for certified product has not been carries out because this is initial assessment.				Complied

	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).		
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>	Extraction rate deducted from "Laporan Produksi Harian". Audit team noted that recording of OER and KER for certified product has not been carries out because this is initial assessment.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rate deducted from "Laporan Produksi Harian". Audit team noted that recording of OER and KER for certified product has not been carries out because this is initial assessment.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. Section 2.0 stated the module used Mass Balance. Not Applicable.	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October 2022. Section 7.1.b stated the Business-to-business communication including information on shipping/delivery and announcement on palmtrace system and delivery document (please note this CH is yet to be certified).	Complied
3.8.17	Claims	PT. Sukses Karya Sawit – Sukses Karya Sawit POM has SOP "Prosedur Standar Rantai Pasok No.SOP.SRP.SCS-01 rev.03" dated 7 October	Complied

	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.	2022. Section 7 Claim. There is no claim from PT. Sukses Karya Sawit – Sukses Karya Sawit POM.	
General corporate communications			
4.1	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.	IOI Corporation Berhad, the parent company of PT. Sukses Karya Sawit – Sukses Karya Sawit POM is highlighting its commitment to the principles of RSPO.	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>IOI Corporation Berhad, in its website:</p> <p>a. Display its RSPO membership status: No, Sime Darby Plantation Berhad did not display its RSPO membership status. The parent company stated “22 SOUs in Indonesia have received the RSPO certification while the rest were audited for certification”</p> <p>b. Display the RSPO web address: No.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, Sime Darby Plantation Berhad stated “As a vertically integrated palm oil company, the majority of the palm products processed by our refineries originate from Sime Darby Plantation (SDP) mills which are certified to the Roundtable on Sustainable Palm Oil (RSPO).”</p> <p>d. State the member’s history with regards to the RSPO: Not in direct manner.</p> <p>Use of RSPO Trademark to promote its membership of the RSPO: No, Sime Darby Plantation Berhad, did not use RSPO trademark in its corporate communication such in website.</p>	Complied
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.	No, IOI Corporation Berhad did not display its RSPO membership status. 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.	Complied

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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.	No, IOI Corporation Berhad did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Sukses Karya Sawit – Sukses Karya Sawit POM’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, IOI Corporation Berhad did not display its RSPO Corporate Logo in any document during IAV2 assessment.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business-to-business communication related to RSPO certified product; between PT. Sukses Karya Sawit – Sukses Karya Sawit POM and their buyers (please note this CH is yet to be certified).	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.	When confirming the sale of certified oil palm products, PT. Sukses Karya Sawit – Sukses Karya Sawit POM followed the requirements of the RSPO SCCS. PT. Sukses Karya Sawit – Sukses Karya Sawit POM preparing template contract and delivery order document with allocation on the supply chain model and certificate number under which the claim is being made. Computer system indicate draft forms to indicate Mass Balance, but not in use. Audit team noted that putting RSPO certified Mass Balance for palm product has not been carries out because this is initial assessment.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However,	PT. Sukses Karya Sawit – Sukses Karya Sawit POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable

	<p>in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	CH is not yet certified; this is Initial Assessment Visit. The business-to-business communication is through the delivery documents. However, the communication is mainly of the RSPO certificate number and product description. There is no label used.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	CH planned to have 100% of the oil palm content in product, both CSPO and CSPK is RSPO MB (please note this CH is yet to be certified).	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.	CH is not yet certified; this is Initial Assessment Visit. No non-certified product claimed.	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'. 	CH is not yet certified; this is Initial Assessment Visit. The business-to-business communication is through the delivery documents. However,	Complied

	<ul style="list-style-type: none"> • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>the communication is mainly of the RSPO certificate number and product description. There is no messaging/label/trademark/label used.</p>	
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>CH is not yet certified; this is Initial Assessment Visit. The business-to-business communication is through the delivery documents. However, the communication is mainly of the RSPO certificate number and product description. There is no messaging/label/trademark/label used.</p>	<p>Complied</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>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>PT Sukses Karya Sawit is subsidiary of RSPO member IOI Group, therefore all corporate policies is following the group and available in website https://www.ioigroup.com/Content/S/S_Enquiries. Policy to respect of human rights is describe in IOI Group Sustainable Palm Oil Policy (October 2020) on Chapter #4 Human Rights and Workplace.</p> <p>Stated Respect and uphold the rights of all workers, including contract, temporary, and migrant workers, as well as protecting human rights defenders against threats and retaliation in accordance with the Universal Declaration of Human Rights, the International Labor Organizations core conventions, United Nations Guiding Principles on Business and Human Rights, united Nations Global Compact on human rights, labor, environmental and anti-corruption and the principles of Free and Fair Labor in Palm Oil Production.</p> <p>This policy is communicated to all levels of workforce, operations, supply chain and local communities. Sample document of socialisation as below:</p> <p>SKS Mill: 7 September 2022, attended by 97 Mill employees, consist of Operator (3), Workshop (16), Processing (38), Compound (6), Laboratory (14), Security (10), Office Employees (10).</p>	<p>Complied</p>

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4.1.2	<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>Based on interview with sample of workers at Estates, Mill, and local communities, information was obtained that unit of certification does not instigate violence or use any form of harassment.</p>	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<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>The mutually agreed system, open to all affected parties, resolves disputes are describes in procedure "SOP Penanganan Saran dan Keluh Kesah Karyawan dan Stakeholder (SNA/SOP/HR/PK/003, R.01), 1 September 2022".</p> <p>Timeline:</p> <ul style="list-style-type: none"> - Receiving, Recording and Validation (3 days) - Proposing/Rejection and Investigation (1 day) - Verification by dispute committee (2 days) - Preparation of Action Plan (3 days) - Action and Monitoring and Closing Process (varied on man-days). <p>There is available form of stakeholder complaint/disputes which contains:</p> <ol style="list-style-type: none"> a. Report Number b. Name c. Address d. Job e. Telephone Number f. Email g. Date h. Dispute/Complaint description i. Propose action to follow up 	Non-compliance

		<p>j. Annexes of supporting evidence k. Complainant</p> <p>PT. Sawit Nabati Agro has procedure on complaint and grievance handling but company has not demonstrated the procedure developed in mutual agreement with stakeholders; and further the SOP has not include requirement on ensuring anonymity of complainants, Human Rights Defender, community spokespersons and whistleblowers, where requested.</p> <p>Procedure of complaints handling "SOP Penanganan Saran dan Keluh Kesah Karyawan dan Stakeholder (SNA/SOP/HR/PK/003, R.01), 1 September 2022" was not describes protection anonymity of complainants, Human Rights Defender and whistle-blowers. This is raised as Non-Conformity</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. - Minor compliance -</p>	<p>The mutually agreed system, open to all affected parties, resolves disputes are describes in procedure "SOP Penanganan Saran dan Keluh Kesah Karyawan dan Stakeholder (SNA/SOP/HR/PK/003, R.01), 1 September 2022".</p> <p>PT. Sawit Nabati Agro issued "Surat Keputusan No.004/CSR-SNA/SK/2020 tentang Petugas Pemberi Informasi Departemen Corporate Social Responsibility & Kemitraan" dated 2 May 2020 whereby company appointed Mrs. Noorhasanah Tasrifin as PIC for communication officer.</p> <p>Record of procedure socialization: Mrs. Noorhasanah Tasrifin made socialization "SOP Komunikasi dan Pemberian Informasi" and "SOP Penanganan Saran & Keluh Kesah Karyawan dan Stakeholder" to surrounding community by reading the flow process of procedure. This has been recorded for Natai Kuini village dated 14 November 2022 (attended 19 community members); to Koperasi Natai Aru Mitra</p>	<p>Complied</p>

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		<p>Sejahtera on 24 November 2022 (attended 5 committee); to Pembedilan village community on 10 November 2022 (attended 9 communities).</p>	
<p>4.2.3</p>	<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>All the general grievances both internal and external parties are recorded in Complaint/Grievance Book. Unit of certification also has a Grievance List that it publishes and updates regularly on IOI website (https://www.ioigroup.com/Content/S/S_Track) as further assurance of IOI’s commitments in enhancing transparency and commitment to an open and transparent approach to resolve any outstanding grievances with all affected stakeholders. This process enables all internal and external stakeholders who have identified any issues within supply chains, which is deemed not in line with the principles stated in corporate Sustainable Palm Oil Policy, to raise a grievance through our Grievance Procedure. Grievances can be submitted through:</p> <ol style="list-style-type: none"> 1. Email to: grievance@ioigroup.com 2. Mailing address: IOI Corporation Berhad, Level 29, IOI City Tower 2, Lebuhr IRC, IOI Resort City, 62502 Putrajaya, Malaysia, with attention to Grievance Coordinator. or; 3. Address grievance directly to the unit (Estate or Mill) in each subsidiary. <p>Grievance List Update for public viewing is updated quarterly. All the gathered and investigated allegations are captured in specific grievance list: Grievances related to Suppliers (Direct and Indirect Suppliers) and Grievances related to Environmental, Social and Governance.</p> <p>With regards to complaint related to POME pollution from PT. Sukses Karya Sawit POM to Air Hitam River, Dinas Lingkungan Hidup Kabupaten Ketapang has made field visit and carried out water quality testing. The visit and analysis report available, however company has not communicated the information to wider affected community. Hence Minor NC was raised.</p>	<p>Non-compliance</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>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 are describes in Unit of Certification procedure.</p> <p>Based on information gathered during stakeholder consultation, when conflict raised, community are free to appoint their representative for conflict resolution including for mediation. Based on stakeholder consultation, in the last three years, there is no conflict raise in high risk level.</p>	Complied
<p>Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
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>Contributions to community development that are based on the result of consultation with local community has been conducted on 21 October 2021 involving surrounding village (Desa Air Hitam Besar, Desa Air Hitam Hulu and Desa Pembedilan). Attended by 9 persons.</p> <p>The actual contribution for local community is reported periodically in "Laporan Realisasi Program CSR Tahun 2022 Semester 1". Where the plan for upcoming or next community development plan was documented in "Rencana Program CSR Tahun 2023". The program containing: Economic Empowerment Community Based (Pemberdayaan Ekonomi Masyarakat), Development of Social Culture (Pembangunan Sosial Budaya), Infrastructure Development (Pembangunan Infrastruktur).</p> <p>In example: Animal husbandry and fishery program to Air Hitam Hulu village and Pembedilan village), land fire emergency response community-based (Masyarakat Peduli Api), Developing of demonstration plot of vegetable farming, Access road and infrastructure at Pembedilan village to Air Hitam Kecil village to support the beach tourism.</p>	Complied
<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>			

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<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>Legal document of PT Sukses Karya Sawit:</p> <ul style="list-style-type: none"> - Legal entity of PT Sukses Karya Sawit as per company deed is Akta Pendirian Badan Hukum No. 61, dated 13 April 2004. Ministry of Law and Human Rights approval No. C-18383 HT.01.01.TH.2004, dated 22 July 2004. TaxPayer Number: 02.355.985.9-022.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/0976/Bappeda-D, tanggal 14 September 2007 terkait Informasi Lahan." Regent of Ketapang given the land is ± 13,450 ha as per Ministry of Forestry Decree "SK Menhutbun No. 259/KPTS-II/2000 tentang Peta Kawasan Hutan dan Perairan Kabupaten Ketapang" stated that proposed land located in Non-Forest Designated Area or "Area Penggunaan Lain". - "Risalah Pertimbangan Teknis Penatagunaan Tanah Dalam Rangka Pemberian HGU PT. SKS". "Laporan Pemeriksaan Lapang Nomor: 028/PT-PGT/VI/2008, tanggal 6 Juni 2008". Ground verification on 14-17 May 2008 conducted by National Land. Proposed of the land is ± 13,500 Ha located in Non-Forest Designated Area or "Area Penggunaan Lain". - "Risalah Pertimbangan Teknis Penatagunaan Tanah Dalam Rangka Pemberian HGU PT. SKS" Nomor: 028/RPT-PGT/VI/2008, tanggal 9 Juni 2008. Suggested areas for approval the land is ± 9,254.58 Ha of 13,500 Ha. - Location Permit issued by Ketapang Regent No: 363 Tahun 2007, dated 24 September 2007. Permitted area is 13,500 Ha located at Desa Air Hitam Besar, Kecamatan Kendawangan, Kabupaten Ketapang. - Extension of location permit issued by Ketapang Regent Nomor: 491/PEM/2012, dated 21 November 2012. 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 466 Tahun 2009, dated 4 December 2009. Area permitted given is 9,580 Ha and Mill capacity 45 MT/Hr. - Revising Area of Plantation Permit as "Keputusan Bupati Ketapang Nomor: 664/DISBUN-D/2016, tanggal 11 November 2016". Changes of total plantation area permitted is from 9,580 Ha to 9,480.5 Ha. Completed with map scale 1:50,000. - Revising Plantation Permit as "Keputusan Bupati Ketapang Nomor: 084/DPMPTSP-D/2020, tanggal 6 April 2020". Changes of total plantation area permitted is from 9,480.5 Ha to ± 7,680 Ha and Mill capacity 90 MT/hr. Completed with map scale 1:50,000. - Environmental Permit for Plantation and Mill Activities or "Izin Lingkungan Kegiatan Perkebunan dan PKS" refer to Regent Ketapang Decree No. 357/DPMPTSP-D.B.2019, dated 26 June 2019. Scope of environmental permit is cover PT Sukses Karya Sawit for plantation 9,480.5 Ha and Mill capacity 90 MT/hr. - Letter of Forest Area Status for Proposing Land Use Rights (HGU) issued by Forestry Department of Kalimantan Barat Province No: 1329/Dishut-II/TGK/2017, dated 27 July 2017. Proposing of Land Use Rights (HGU) is 7,390.36 Ha as document of "Peta Bidang Tanah Nomor: 008-14.07-2017, tanggal 24 Januari 2017" which refer to "Peta Kawasan Hutan dan Konservasi Perairan Provinsi Kalimantan Barat SK Menteri Kehutanan Nomor: SK.733/Menhut-II/2014, tanggal 2 September 2014 and Penetapan Peta PIPPIB Revisi XI refer to SK.6347/MenLHK-PKTL/IPSDH/PLA.1/11/2016, tanggal 21 November 2016 stated that propose of land use rights is 7,390.36 Ha. Those area located in Non-Forest Designated Area or "Area Penggunaan Lain" and no overlapping with others permit. 	
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		<p>Land Title (HGU) PT Sukses Karya Sawit as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 24/HGU/KEM-ATR/BPN/IV/2021, tanggal 21 April 2021" consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 441, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1,314.21 Ha. 2. Certificate HGU No. 442, issued on 21 July 2021, expiry date: 21 April 2056. Area: 3,137.27 Ha. 3. Certificate HGU No. 443, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1,048.97 Ha. 4. Certificate HGU No. 444, issued on 21 July 2021, expiry date: 21 April 2056. Area: 12.59 Ha. 5. Certificate HGU No. 445, issued on 21 July 2021, expiry date: 21 April 2056. Area: 10.10 Ha. 6. Certificate HGU No. 446, issued on 21 July 2021, expiry date: 21 April 2056. Area: 452.75 Ha. 7. Certificate HGU No. 447, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1.90 Ha. 8. Certificate HGU No. 448, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1.87 Ha. 9. Certificate HGU No. 449, issued on 21 July 2021, expiry date: 21 April 2056. Area: 14.00 Ha. <p>Total area Nucleus Estates of PT Sukses Karya Sawit (SKS-02 and SKS-03) is 5,993.66 Ha.</p> <p>Land Title (HGU) Scheme Smallholders "Koperasi Perkebunan Natai Aru Mitra Sejahtera" (SKS-01 Plasma) as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 25/HGU/KEM-ATR/BPN/IV/2020, tanggal 7 April 2020" consist of:</p>	
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		<ol style="list-style-type: none"> 1. Certificate HGU No. 368, issued on 5 May 2020, expiry date: 7 April 2055. Area: 649.58 Ha. 2. Certificate HGU No. 369, issued on 5 May 2020, expiry date: 7 April 2055. Area: 3.20 Ha. 3. Certificate HGU No. 370, issued on 5 May 2020, expiry date: 7 April 2055. Area: 6.17 Ha. 4. Certificate HGU No. 371, issued on 5 May 2020, expiry date: 7 April 2055. Area: 13.00 Ha. 5. Certificate HGU No. 372, issued on 5 May 2020, expiry date: 7 April 2055. Area: 7.52 Ha. <p>Total area Koperasi Perkebunan Natai Aru Mitra Sejahtera” (SKS-01 Plasma) is 679.47 Ha.</p> <p>Land Title (HGU) Scheme Smallholders “Koperasi Perkebunan Natai Sipun Mandiri” (SKS-01 Plasma) as refer to “SK Kementerian Agraria dan Tata Ruang/BPN No: 13/HGU/KEM-ATR/BPN/II/2020, tanggal 11 Februari 2020” consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 373, issued on 5 May 2020, expiry date: 11 Februari 2055. Area: 90.00 Ha. 2. Certificate HGU No. 374, issued on 5 May 2020, expiry date: 11 Februari 2055. Area: 216.38 Ha. 3. Certificate HGU No. 375, issued on 5 May 2020, expiry date: 11 Februari 2055. Area: 330.57 Ha. <p>Total area “Koperasi Perkebunan Natai Sipun Mandiri” (SKS-01 Plasma) is 636.95 Ha.</p> <p>Building Rights or “Hak Guna Bangunan” for Sukses Karya Sawit Mill covers 22.34 Ha as follow:</p>	
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		<p>a. Certificate HGB No. 05, dated 8 June 2022 refer to SK Kepala Kantor Wilayah BPN Provinsi Kalimantan Barat No. 01/SKHGB/BPN-61.00/V/2022, dated 11 May 2022. Area: 10.04 Ha. Allocated for Effluent Pond.</p> <p>b. Certificate HGB No. 06, dated 8 June 2022 refer to SK Kepala Kantor Wilayah BPN Provinsi Kalimantan Barat No. 02/SKHGB/BPN-61.00/V/2022, dated 11 May 2022. Area: 12.30 Ha.</p> <p>Document legal PT Bumi Sawit Sejahtera:</p> <ul style="list-style-type: none"> - Legal entity of PT Bumi Sawit Sejahtera as per company deed is Akta Pendirian Perseroan Terbatas No. 34, dated 12 March 2007. Ministry of Law and Human Rights approval No. W7-05870 HT.01.01.TH.2007, dated 28 May 2007. Taxpayer Number: 02.596.768.8-012.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/593/DPUTR-D, tanggal 7 September 2007 terkait Informasi Lahan untuk Perluasan Perkebunan Kelapa Sawit." - Location Permit or "Izin Lokasi" based on Regent of Ketapang Decree SK No. 364 Tahun 2007 (24 September 2007) and extended period refer to SK No. 417 Tahun 2010 (27 Juli 2010) with area 11,000 Ha. - Extension of location permit area refer to SK No. 1505/DPMPTSP-D/2017, dated 14 December 2017 with area 960 Ha. - Forest Release refer to Ministry of Forestry Decree No. SK.351/Menhut-II/2012, dated 20 July 2012 with area 10,067.21 Ha. - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 215 Tahun 2009, dated 25 May 2009. Area permitted given is 11,000 Ha and Mill capacity 45 MT/Hr. 	
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		<ul style="list-style-type: none"> - Revising of Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 474/DISBUN-D/2015, dated 8 Jul 2015. Area permitted given is 8,844 Ha and Mill capacity 45 MT/Hr. - 2nd Revising of Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 043/DPMPTSP-D/2020, dated 27 February 2020. Area permitted given is 9,804 Ha and Mill capacity 45 MT/Hr. - Sertipikat HGU (Land Title) No. 390, dated 3 June 2021, expired 12 March 2056. Permitted area: 7,510.10 Ha. Reference of Land Minister Decree: SK No.17/HGU/KEM-ATR/BPN/III/2021, dated 12 March 2021. Completed with Scale 1:100,000. <p>Land Title of Full Managed Smallholders of BSS-04 is under "Koperasi Perkebunan Citra Niaga".</p> <p>Sertipikat HGU (Land Title) No. 391, dated 3 June 2021, expired 18 February 2056. Permitted area: 1,697.39 Ha. Reference of Land Minister Decree: SK No.12/HGU/KEM-ATR/BPN/III/2021, dated 18 February 2021. Completed with Scale 1:100,000.</p> <p>Scope of land title of PT Bumi Sawit Sejahtera is 9,207.49 Ha, consist of:</p> <ul style="list-style-type: none"> - Nucleus Estates (BSS-01, BSS-02, BSS-03) = 7,510.10 Ha - Scheme Smallholders (BSS-04 Plasma) = 1,697.39 Ha <p>Document legal PT Berkat Nabati Sejahtera:</p> <ul style="list-style-type: none"> - Legal entity of PT Berkat Nabati Sejahtera as per company deed is Akta Pendirian Perseroan Terbatas No. 35, dated 12 March 2007. Ministry of Law and Human Rights approval No. W7-05871 HT.01.01.TH.2007, dated 28 May 2007. Taxpayer Number: 02.596.767.0-012.000. - Revision of Deed: "Akta Perubahan Anggaran Dasar PT Berkat Nabati Sejahtera No. 41, tanggal 31 Mei 2012". Ministry of Law and Human 	
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		<p>Rights approval No. AHU-32318.AH.01.02.TH.2012, dated 14 June 2012. Taxpayer Number: 02.596.767.0-703.000.</p> <ul style="list-style-type: none"> - Land Information given by government. "Surat Bupati Ketapang Nomor 525/0975/Bappeda-D, tanggal 14 September 2007 terkait Informasi Lahan untuk Perkebunan Kelapa Sawit." - Location Permit or "Izin Lokasi" based on Regent of Ketapang Decree SK No. 362 Tahun 2007 (24 September 2007) with area 13,500 Ha and extended permit refer to SK No. 539/PEM/2012 (21 December 2012) with area ± 11,800 Ha. - Technical Review of Forest Status of "Telaah Teknis Fungsi Kawasan Hutan PT Berkat Nabati Sejahtera" No. S.672/BPKH.III/SPKH/PLA.1/8/2017, dated 21 August 2017. Stated that refer to Ministry of Forestry Decree No. SK.733/Menhut-II/2014, dated 2 September 2014, propose area of PT Berkat Nabati Sejahtera cover area 3,428.84 Ha is located in Non-Forest Designated Area or "Area Penggunaan Lain". - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 465 Tahun 2009, dated 4 December 2009. Area permitted given is 8,830 Ha and Mill capacity 45 MT/Hr. <p>Land Title (HGU) PT Berkat Nabati Sejahtera as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 09/HGU/KEM-ATR/BPN/II/2020, tanggal 4 Februari 2020" consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 364, issued on 14 April 2020, expiry date: 4 February 2055. Area: 954.02 Ha. 2. Certificate HGU No. 365, issued on 14 April 2020, expiry date: 4 February 2055. Area: 1,005.03 Ha. 3. Certificate HGU No. 366, issued on 14 April 2020, expiry date: 4 February 2055. Area: 3,780.04 Ha. 	
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		<p>BNS-02 is allocated for Smallholder Scheme (Plasma) which have legal entity in form of organization deed under "Akta Pendirian Koperasi Perkebunan Sawit Sejahtera Bersama, Nomor Badan Hukum: 259/BH/XVII.3/2009". Approval from Ministry of Cooperative through Decree (SK. Nomor: 262/BH/KOP.UKM&PERINDAG/V/2009, dated 5 May 2009).</p> <p>Land Title (HGU) "Koperasi Perkebunan Sawit Sejahtera Bersama" as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 03/HGU/KEM-ATR/BPN/I/2020, tanggal 6 Januari 2020" is Certificate HGU No. 367, issued on 14 April 2020, expiry date: 6 Januari 2055. Area: 1,507.15 Ha.</p> <p>Scope of land title of PT Berkat Nabati Sejahtera is 7,246.24 Ha, consist of:</p> <ul style="list-style-type: none"> - Nucleus Estates (BNS-01, BNS-03, BNS-04) = 5,739.09 Ha - Scheme Smallholders (BNS-02 Plasma) = 1,507.15 Ha 	
<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <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>The unit of certification has obtained land title in form of Hak Guna Usaha or HGU for all estates, including Plasma or smallholders full managed scheme. For the SKS Palm Oil Mill, also obtained land title namely Hak Guna Bangunan or Building/Premises Use Right.</p> <p>All the process to obtaining land title, the unit of certification follows the government procedures. Therefore, 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 already commenced during land compensation forum and "Risalah Pemeriksaan Tanah – B" prior issued the land title certificate.</p> <p>Based on interview with community from Pembedilan Village and Air Hitam Besar they stated company has carried out socialization of plantation development prior to engage community for compensation of growth/land use. Community stated Copies documents evidencing</p>	<p>Non-compliance</p>

		<p>agreement-making processes and negotiated agreements for "GRTT/Ganti Rugi Tebang Tebas" not available for them. PT. Sawit Nabati Agro has listed the negotiation and compensation procedure as well as the record of compensation as publicly available document.</p> <p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available in form of Land Compensation Procedure. However, the copies document evidencing agreement-making processes and negotiated agreements has not communicated to the previous landowner.</p> <p>However, NC Minor issued: PT. Sukses Karya Sawithas not communicated to the previous land owner the copies documents evidencing agreement-making processes and negotiated agreements.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>The unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken. This already implemented during land compensation forum and "Risalah Pemeriksaan Tanah – B" prior issued the land title certificate.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>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 are evident when social and environmental impact assessment or AMDAL has been conducted.</p>	
<p>4.4.3</p>	<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). - Critical (Major) compliance -</p>	<p>Maps of an appropriate scale showing the extent of recognised legal are described in Land Title documents. Maps are in scale 1:50,000 and available in every HGU document/certificate.</p> <p>Based on stakeholder consultation with previous landowner of Air Hitam Hulu and Air Hitam Kecil villagers, it is explained that no customary rights</p>	<p>Complied</p>

		within the unit of certification. Previously, user rights are existed however when unit of certification obtained land title and land compensation was commence, therefore no longer user rights is exist within the managed area. The only permissible for community is access road rights in the plantation area going to their farms.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	All relevant information and documents are available in Bahasa Indonesia and explained to villagers using local languages.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Based on stakeholder consultation with previous landowner of Air Hitam Hulu and Air Hitam Kecil villagers, explained that each community are represented through village chief or their own leader. Based on stakeholder consultation with GRTT receiver, the company in Air Hitam Hulu village represented by Satuan Pelaksana in village level, Satuan Tugas in Kendawangan district and TP3K team in Ketapang Regency.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No more land compensation occurs then no agreement negotiated implemented. Consultation with affected parties conducted annually through Join Committee Consultative or "MUSRENBANG".	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 -	No new plantings are established by unit of certification. Documents showing identification and assessment of demonstrable legal, customary and user rights are available as below: Legal document of PT Sukses Karya Sawit: - Legal entity of PT Sukses Karya Sawit as per company deed is Akta Pendirian Badan Hukum No. 61, dated 13 April 2004. Ministry of Law	Complied

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		<p>and Human Rights approval No. C-18383 HT.01.01.TH.2004, dated 22 July 2004. Taxpayer Number: 02.355.985.9-022.000.</p> <ul style="list-style-type: none"> - Land Information given by government. "Surat Bupati Ketapang Nomor 525/0976/Bappeda-D, tanggal 14 September 2007 terkait Informasi Lahan." Regent of Ketapang given the land is ± 13,450 ha as per Ministry of Forestry Decree "SK Menhutbun No. 259/KPTS-II/2000 tentang Peta Kawasan Hutan dan Perairan Kabupaten Ketapang" stated that proposed land located in Non-Forest Designated Area or "Area Penggunaan Lain". - "Risalah Pertimbangan Teknis Penatagunaan Tanah Dalam Rangka Pemberian HGU PT. SKS". "Laporan Pemeriksaan Lapang Nomor: 028/PT-PGT/VI/2008, tanggal 6 Juni 2008". Ground verification on 14-17 May 2008 conducted by National Land. Proposed of the land is ± 13,500 Ha located in Non-Forest Designated Area or "Area Penggunaan Lain". - "Risalah Pertimbangan Teknis Penatagunaan Tanah Dalam Rangka Pemberian HGU PT. SKS" Nomor: 028/RPT-PGT/VI/2008, tanggal 9 Juni 2008. Suggested areas for approval the land is ± 9,254.58 Ha of 13,500 Ha. - Location Permit issued by Ketapang Regent No: 363 Tahun 2007, dated 24 September 2007. Permitted area is 13,500 Ha located at Desa Air Hitam Besar, Kecamatan Kendawangan, Kabupaten Ketapang. - Extension of location permit issued by Ketapang Regent Nomor: 491/PEM/2012, dated 21 November 2012. - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 466 Tahun 2009, dated 4 December 2009. Area permitted given is 9,580 Ha and Mill capacity 45 MT/Hr. - Revising Area of Plantation Permit as "Keputusan Bupati Ketapang Nomor: 664/DISBUN-D/2016, tanggal 11 November 2016". Changes 	
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		<p>of total plantation area permitted is from 9,580 Ha to 9,480.5 Ha. Completed with map scale 1:50,000.</p> <ul style="list-style-type: none"> - Revising Plantation Permit as "Keputusan Bupati Ketapang Nomor: 084/DPMPSTSP-D/2020, tanggal 6 April 2020". Changes of total plantation area permitted is from 9,480.5 Ha to ± 7,680 Ha and Mill capacity 90 MT/hr. Completed with map scale 1:50,000. - Environmental Permit for Plantation and Mill Activities or "Izin Lingkungan Kegiatan Perkebunan dan PKS" refer to Regent Ketapang Decree No. 357/DPMPSTSP-D.B.2019, dated 26 June 2019. Scope of environmental permit is cover PT Sukses Karya Sawit for plantation 9,480.5 Ha and Mill capacity 90 MT/hr. - Letter of Forest Area Status for Proposing Land Use Rights (HGU) issued by Forestry Department of Kalimantan Barat Province No: 1329/Dishut-II/TGK/2017, dated 27 July 2017. Proposing of Land Use Rights (HGU) is 7,390.36 Ha as document of "Peta Bidang Tanah Nomor: 008-14.07-2017, tanggal 24 Januari 2017" which refer to "Peta Kawasan Hutan dan Konservasi Perairan Provinsi Kalimantan Barat SK Menteri Kehutanan Nomor: SK.733/Menhut-II/2014, tanggal 2 September 2014 and Penetapan Peta PIPPIB Revisi XI refer to SK.6347/MenLHK-PKTL/IPSDH/PLA.1/11/2016, tanggal 21 November 2016 stated that propose of land use rights is 7,390.36 Ha. Those area located in Non-Forest Designated Area or "Area Penggunaan Lain" and no overlapping with others permit. <p>Land Title (HGU) PT Sukses Karya Sawit as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 24/HGU/KEM-ATR/BPN/IV/2021, tanggal 21 April 2021" consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 441, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1,314.21 Ha. 2. Certificate HGU No. 442, issued on 21 July 2021, expiry date: 21 April 2056. Area: 3,137.27 Ha. 	
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		<p>3. Certificate HGU No. 443, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1,048.97 Ha.</p> <p>4. Certificate HGU No. 444, issued on 21 July 2021, expiry date: 21 April 2056. Area: 12.59 Ha.</p> <p>5. Certificate HGU No. 445, issued on 21 July 2021, expiry date: 21 April 2056. Area: 10.10 Ha.</p> <p>6. Certificate HGU No. 446, issued on 21 July 2021, expiry date: 21 April 2056. Area: 452.75 Ha.</p> <p>7. Certificate HGU No. 447, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1.90 Ha.</p> <p>8. Certificate HGU No. 448, issued on 21 July 2021, expiry date: 21 April 2056. Area: 1.87 Ha.</p> <p>9. Certificate HGU No. 449, issued on 21 July 2021, expiry date: 21 April 2056. Area: 14.00 Ha.</p> <p>Total area Nucleus Estates of PT Sukses Karya Sawit (SKS-02 and SKS-03) is 5,993.66 Ha.</p> <p>Land Title (HGU) Scheme Smallholders "Koperasi Perkebunan Natai Aru Mitra Sejahtera" (SKS-01 Plasma) as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 25/HGU/KEM-ATR/BPN/IV/2020, tanggal 7 April 2020" consist of:</p> <p>1. Certificate HGU No. 368, issued on 5 May 2020, expiry date: 7 April 2055. Area: 649.58 Ha.</p> <p>2. Certificate HGU No. 369, issued on 5 May 2020, expiry date: 7 April 2055. Area: 3.20 Ha.</p> <p>3. Certificate HGU No. 370, issued on 5 May 2020, expiry date: 7 April 2055. Area: 6.17 Ha.</p>	
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		<p>4. Certificate HGU No. 371, issued on 5 May 2020, expiry date: 7 April 2055. Area: 13.00 Ha.</p> <p>5. Certificate HGU No. 372, issued on 5 May 2020, expiry date: 7 April 2055. Area: 7.52 Ha.</p> <p>Total area Koperasi Perkebunan Natai Aru Mitra Sejahtera” (SKS-01 Plasma) is 679.47 Ha.</p> <p>Land Title (HGU) Scheme Smallholders “Koperasi Perkebunan Natai Sipun Mandiri” (SKS-01 Plasma) as refer to “SK Kementerian Agraria dan Tata Ruang/BPN No: 13/HGU/KEM-ATR/BPN/II/2020, tanggal 11 Februari 2020” consist of:</p> <p>1. Certificate HGU No. 373, issued on 5 May 2020, expiry date: 11 February 2055. Area: 90.00 Ha.</p> <p>2. Certificate HGU No. 374, issued on 5 May 2020, expiry date: 11 February 2055. Area: 216.38 Ha.</p> <p>3. Certificate HGU No. 375, issued on 5 May 2020, expiry date: 11 February 2055. Area: 330.57 Ha.</p> <p>Total area “Koperasi Perkebunan Natai Sipun Mandiri” (SKS-01 Plasma) is 636.95 Ha.</p> <p>Building Rights or “Hak Guna Bangunan” for Sukses Karya Sawit Mill covers 22.34 Ha as follow:</p> <p>a. Certificate HGB No. 05, dated 8 June 2022 refer to SK Kepala Kantor Wilayah BPN Provinsi Kalimantan Barat No. 01/SKHGB/BPN-61.00/V/2022, dated 11 May 2022. Area: 10.04 Ha. Allocated for Effluent Pond.</p> <p>b. Certificate HGB No. 06, dated 8 June 2022 refer to SK Kepala Kantor Wilayah BPN Provinsi Kalimantan Barat No. 02/SKHGB/BPN-61.00/V/2022, dated 11 May 2022. Area: 12.30 Ha.</p>	
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		<p>Document legal PT Bumi Sawit Sejahtera:</p> <ul style="list-style-type: none"> - Legal entity of PT Bumi Sawit Sejahtera as per company deed is Akta Pendirian Perseroan Terbatas No. 34, dated 12 March 2007. Ministry of Law and Human Rights approval No. W7-05870 HT.01.01.TH.2007, dated 28 May 2007. Taxpayer Number: 02.596.768.8-012.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/593/DPUTR-D, tanggal 7 September 2007 terkait Informasi Lahan untuk Perluasan Perkebunan Kelapa Sawit." - Location Permit or "Izin Lokasi" based on Regent of Ketapang Decree SK No. 364 Tahun 2007 (24 September 2007) and extended period refer to SK No. 417 Tahun 2010 (27 Juli 2010) with area 11,000 Ha. - Extension of location permit area refer to SK No. 1505/DPMPTSP-D/2017, dated 14 December 2017 with area 960 Ha. - Forest Release refer to Ministry of Forestry Decree No. SK.351/Menhut-II/2012, dated 20 July 2012 with area 10,067.21 Ha. - Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 215 Tahun 2009, dated 25 May 2009. Area permitted given is 11,000 Ha and Mill capacity 45 MT/Hr. - Revising of Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 474/DISBUN-D/2015, dated 8 Jul 2015. Area permitted given is 8,844 Ha and Mill capacity 45 MT/Hr. - 2nd Revising of Plantation Permit "Izin Usaha Perkebunan" issued by Ketapang Regent Nomor 043/DPMPTSP-D/2020, dated 27 February 2020. Area permitted given is 9,804 Ha and Mill capacity 45 MT/Hr. - Sertipikat HGU (Land Title) No. 390, dated 3 June 2021, expired 12 March 2056. Permitted area: 7,510.10 Ha. Reference of Land 	
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		<p>Minister Decree: SK No.17/HGU/KEM-ATR/BPN/III/2021, dated 12 March 2021. Completed with Scale 1:100,000.</p> <p>Land Title of Full Managed Smallholders of BSS-04 is under "Koperasi Perkebunan Citra Niaga".</p> <p>Sertipikat HGU (Land Title) No. 391, dated 3 June 2021, expired 18 February 2056. Permitted area: 1,697.39 Ha. Reference of Land Minister Decree: SK No.12/HGU/KEM-ATR/BPN/III/2021, dated 18 February 2021. Completed with Scale 1:100,000.</p> <p>Scope of land title of PT Bumi Sawit Sejahtera is 9,207.49 Ha, consist of:</p> <ul style="list-style-type: none"> - Nucleus Estates (BSS-01, BSS-02, BSS-03) = 7,510.10 Ha - Scheme Smallholders (BSS-04 Plasma) = 1,697.39 Ha <p>Document legal PT Berkat Nabati Sejahtera:</p> <ul style="list-style-type: none"> - Legal entity of PT Berkat Nabati Sejahtera as per company deed is Akta Pendirian Perseroan Terbatas No. 35, dated 12 March 2007. Ministry of Law and Human Rights approval No. W7-05871 HT.01.01.TH.2007, dated 28 May 2007. Taxpayer Number: 02.596.767.0-012.000. - Revision of Deed: "Akta Perubahan Anggaran Dasar PT Berkat Nabati Sejahtera No. 41, tanggal 31 Mei 2012". Ministry of Law and Human Rights approval No. AHU-32318.AH.01.02.TH.2012, dated 14 June 2012. Taxpayer Number: 02.596.767.0-703.000. - Land Information given by government. "Surat Bupati Ketapang Nomor 525/0975/Bappeda-D, tanggal 14 September 2007 terkait Informasi Lahan untuk Perkebunan Kelapa Sawit." - Location Permit or "Izin Lokasi" based on Regent of Ketapang Decree SK No. 362 Tahun 2007 (24 September 2007) with area 13,500 Ha 	
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		<p>and extended permit refer to SK No. 539/PEM/2012 (21 December 2012) with area ± 11,800 Ha.</p> <ul style="list-style-type: none"> - Technical Review of Forest Status of “Telaah Teknis Fungsi Kawasan Hutan PT Berkat Nabati Sejahtera” No. S.672/BPKH.III/SPKH/PLA.1/8/2017, dated 21 August 2017. Stated that refer to Ministry of Forestry Decree No. SK.733/Menhut-II/2014, dated 2 September 2014, propose area of PT Berkat Nabati Sejahtera cover area 3,428.84 Ha is located in Non-Forest Designated Area or “Area Penggunaan Lain”. - Plantation Permit “Izin Usaha Perkebunan” issued by Ketapang Regent Nomor 465 Tahun 2009, dated 4 December 2009. Area permitted given is 8,830 Ha and Mill capacity 45 MT/Hr. <p>Land Title (HGU) PT Berkat Nabati Sejahtera as refer to “SK Kementerian Agraria dan Tata Ruang/BPN No: 09/HGU/KEM-ATR/BPN/II/2020, tanggal 4 Februari 2020” consist of:</p> <ol style="list-style-type: none"> 1. Certificate HGU No. 364, issued on 14 April 2020, expiry date: 4 February 2055. Area: 954.02 Ha. 2. Certificate HGU No. 365, issued on 14 April 2020, expiry date: 4 February 2055. Area: 1,005.03 Ha. 3. Certificate HGU No. 366, issued on 14 April 2020, expiry date: 4 February 2055. Area: 3,780.04 Ha. <p>BNS-02 is allocated for Smallholder Scheme (Plasma) which have legal entity in form of organization deed under “Akta Pendirian Koperasi Perkebunan Sawit Sejahtera Bersama, Nomor Badan Hukum: 259/BH/XVII.3/2009”. Approval from Ministry of Cooperative through Decree (SK. Nomor: 262/BH/KOP.UKM&PERINDAG/V/2009, dated 5 May 2009).</p>	
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		<p>Land Title (HGU) "Koperasi Perkebunan Sawit Sejahtera Bersama" as refer to "SK Kementerian Agraria dan Tata Ruang/BPN No: 03/HGU/KEM-ATR/BPN/I/2020, tanggal 6 Januari 2020" is Certificate HGU No. 367, issued on 14 April 2020, expiry date: 6 Januari 2055. Area: 1,507.15 Ha.</p> <p>Scope of land title of PT Berkat Nabati Sejahtera is 7,246.24 Ha, consist of:</p> <ul style="list-style-type: none"> - Nucleus Estates (BNS-01, BNS-03, BNS-04) = 5,739.09 Ha - Scheme Smallholders (BNS-02 Plasma) = 1,507.15 Ha 	
<p>4.5.2</p>	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has obtained land title in form of Hak Guna Usaha or HGU for all estates, including Plasma or smallholders full managed scheme. For the SKS Palm Oil Mill, also obtained land title namely Hak Guna Bangunan or Building/Premises Use Right.</p> <p>All the process to obtaining land title, the unit of certification follows the government procedures. Therefore 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 already commenced during land compensation forum and "Risalah Pemeriksaan Tanah – B" prior issued the land title certificate.</p>	<p>Complied</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>The unit of certification has obtained land title in form of Hak Guna Usaha or HGU for all estates, including Plasma or smallholders full managed scheme. For the SKS Palm Oil Mill, also obtained land title namely Hak Guna Bangunan or Building/Premises Use Right.</p> <p>All the process to obtaining land title, the unit of certification follows the government procedures. Therefore 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 already commenced during land compensation</p>	<p>Complied</p>

		<p>forum and “Risalah Pemeriksaan Tanah – B” prior issued the land title certificate.</p> <p>Based on stakeholder consultation with Air Hutam Hulu village, one of the communities stated that he does not willing to release his land and company respect his decision, he still owns the land now.</p>	
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>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 are evident when social and environmental impact assessment or AMDAL has been conducted. Based on AMDAL document for each company PT. Sukses Karya Sawit, PT. Berkat Nabati Sejahtera, PT. Bumi Sawit Sejahtera, local community has access to staple food from community garden and local market; and clean water from utilizing bore well and river water. The development of plantation and smallholder plantation has been delineated to avoid disturbance to local community basic needs. Environmental management plan from RKL/RPL has regulate negative environmental impact shall be managed and monitor to meet environmental parameter so does not disturbing the environmental condition.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Based on information gathered during stakeholder consultation, community are free to seek independent information on formation/development of smallholder plantation, as proposed by company during initial development. The communities then consult with “Dinas Pertanian dan Perkebunan” to get information on scheme smallholder development, positive and negative impact (legal, economy, social, environmental aspect). Local communities then agreed to form scheme smallholder plantation, and this formalized by the potential land and potential smallholder member, decree by “Kepala Dinas Pertanian</p>	Complied

		<p>dan Perkebunan” issued to regulate and provide name, location of scheme smallholder plantation.</p> <p>Local communities have developed scheme smallholder/Plasma plantations where the management is fully managed scheme by a certification unit. The aim of developing fully managed smallholder estate is that affected local peoples have fair compensation and the opportunity for jobs are open, therefore the affected local people can increase their welfare and livelihood.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Based on information gathered during stakeholder consultation, community does give their blessing or initial approval when company conduct initial socialization of plantation development to surrounding communities. The community was enthusiast because they wanted their villages to be open for access to other villages and to district location.</p>	Complied
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>Unit of certification is an existing plantation and no new land clearing after 15 November 2018.</p> <p>Local communities have developed Plasma plantations where the management is fully managed scheme by a certification unit. The aim of developing fully managed smallholder estate is that affected local peoples have fair compensation and the opportunity for jobs are open, therefore the affected local people can increase their welfare and livelihood.</p>	Complied
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 and no new land clearing after 15 November 2018.</p> <p>The unit of certification has obtained land title in form of Hak Guna Usaha or HGU for all estates, including Plasma or smallholders full managed scheme. For the SKS Palm Oil Mill, also obtained land title namely Hak Guna Bangunan or Building/Premises Use Right.</p>	Complied

Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

<p>4.6.1</p>	<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 has develop mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. This procedure is describing within "SOP Pembebasan Lahan dan Area Baru (SNA-SOP-18-17-R0, dated 1 May 2017)".</p> <p>On Chapter 6.0 General Requirements</p> <ol style="list-style-type: none"> a. Management of SNA Group in carrying out land compensation must be based on an agreement with the right holders or parties who have an interest in it by way of buying and selling, payment for land compensation, land consolidation or other procedures in accordance with applicable regulations. b. Each time negotiating the payment price for land compensation with land rights holders (recipients of land compensation), must complete the Standard Negotiation Form that has been stipulated. c. Before payment for land compensation is carried out, a Minutes of Negotiation must be made which contains the garden, land area, land condition, land rights basis and the agreed land compensation value. d. Payment of compensation must be witnessed by internal and external parties (camat, PPAT notary, Danramil, Kapolsek and Village Head) to then make a list of attendees. e. Payment of land compensation funds is carried out after the related documents are signed, including: <ul style="list-style-type: none"> - Minutes of Mutual Agreement - Letter of Release of Land Rights - Statement letter - Receipt of Compensation - Recapitulation of Compensation - Compensation Map 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Records/Photos of submission of land compensation funds. f. The list of standard documents for payment for land compensation consists of: <ul style="list-style-type: none"> - Statement letter - Land Compensation Plot Map - Identity card - Land Compensation Payment Receipt - Land, Plant and Other Business Inventory Forms - Land Compensation Realization Report - Letter of Release of Land Rights - Recapitulation of Land Compensation Payments - Land Sketch - Land Certificate - Letter of Acknowledgment of Land Rights 	
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<p>4.6.2</p>	<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>Sample of "Berita Acara Ganti Rugi Tebang Tebas" as per interview with Previous Landowner (PLO), as below:</p> <p>Village of Pembedilan (PT SKS)</p> <table border="1" data-bbox="1133 480 1832 1123"> <thead> <tr> <th>No</th> <th>PLO Name</th> <th>Compensation document "Ganti Rugi Tebang Tebas"</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr><td>1</td><td>Muhyadi</td><td>081/SKS/VI/2010</td><td>1.33</td></tr> <tr><td>2</td><td>Ahmad Fauzi</td><td>101/SKS/VIII/2010</td><td>3.86</td></tr> <tr><td>3</td><td>Ahmad Suyanto</td><td>048/SKS/XII/2010</td><td>2.43</td></tr> <tr><td>4</td><td>Miun</td><td>013/SKS/IV/2011</td><td>8.70</td></tr> <tr><td>5</td><td>Iwansyah</td><td>090/SKS/XII/2012</td><td>7.60</td></tr> <tr><td>6</td><td>Borhanudin</td><td>012/SKS/VIII/2009</td><td>8.67</td></tr> <tr><td>7</td><td>Jainolah</td><td>007/SKS/XII/2011</td><td>15.21</td></tr> <tr><td>8</td><td>Abdul Halim</td><td>033/SKS/XII/2010</td><td>0.51</td></tr> <tr><td>9</td><td>Nazarudin</td><td>083/SKS/VI/2010</td><td>4.92</td></tr> <tr><td>10</td><td>Ujang Mardani</td><td>09/SKS/VI/2011</td><td>3.40</td></tr> <tr><td>11</td><td>Didi Erwandi</td><td>004/SKS/VI/2011</td><td>6.36</td></tr> <tr><td>12</td><td>Abdul Hakim</td><td>026/SKS/XII/2010</td><td>0.51</td></tr> <tr><td>13</td><td>Misran</td><td>010/SKS/VIII/2011</td><td>9.38</td></tr> </tbody> </table> <p>Village of Air Hitam Besar (PT BNS)</p> <table border="1" data-bbox="1133 1211 1832 1372"> <thead> <tr> <th>No</th> <th>PLO Name</th> <th>Compensation document "Ganti Rugi Tebang Tebas"</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr><td>1</td><td>Kamaroh</td><td>018/BNS/I/2010</td><td>2.75</td></tr> <tr><td>2</td><td>Bahriansyah</td><td>058/BNS/I/2010</td><td>3.72</td></tr> </tbody> </table>	No	PLO Name	Compensation document "Ganti Rugi Tebang Tebas"	Area (Ha)	1	Muhyadi	081/SKS/VI/2010	1.33	2	Ahmad Fauzi	101/SKS/VIII/2010	3.86	3	Ahmad Suyanto	048/SKS/XII/2010	2.43	4	Miun	013/SKS/IV/2011	8.70	5	Iwansyah	090/SKS/XII/2012	7.60	6	Borhanudin	012/SKS/VIII/2009	8.67	7	Jainolah	007/SKS/XII/2011	15.21	8	Abdul Halim	033/SKS/XII/2010	0.51	9	Nazarudin	083/SKS/VI/2010	4.92	10	Ujang Mardani	09/SKS/VI/2011	3.40	11	Didi Erwandi	004/SKS/VI/2011	6.36	12	Abdul Hakim	026/SKS/XII/2010	0.51	13	Misran	010/SKS/VIII/2011	9.38	No	PLO Name	Compensation document "Ganti Rugi Tebang Tebas"	Area (Ha)	1	Kamaroh	018/BNS/I/2010	2.75	2	Bahriansyah	058/BNS/I/2010	3.72	<p>Complied</p>
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		3	H. Idham	162/BNS/VIII/2010	4.28
		4	Mudranmudin	159/BNS/VIII/2010	4.26
		5	Amat	002/BNS/IV/2011	0.38
		6	Sualiansyah	003/BNS/IV/2011	0.53
		7	Tarkan	024/BNS/VII/2012	3.43
		8	Darmadi	081/BNS/VI/2010	7.01
		9	Oren	148/BNS/VIII/2010	4.26
		Village of Natai Kuini (PT BSS)			
		No	PLO Name	Compensation document "Ganti Rugi Tebang Tebas"	Area (Ha)
		1	Mustapa	008/BSS/XII/2012	5.78
		2	Mursyid. S	017/BSS/XII/2012	5.78
		3	Yuskari	024/BSS/XII/2012	5.78
		4	Julkifli	026/BSS/XII/2012	5.78
		Village of Air Hitam Hulu			
		No	PLO Name	Compensation document "Ganti Rugi Tebang Tebas"	Area (Ha)
		1	H. Syarip	003/SKS/VIII/2009	3.31
		2	Aliyas	006/SKS/VIII/2009	5.43
		3	Norhan	028/SKS/XII/2009	2.50
		4	Dollah	078/SKS/VI/2010	1.91
		5	Ibin Jauhari	121/SKS/VIII/2010	1.46

		<table border="1"> <tr> <td>6</td> <td>Ali Ahmad</td> <td>001/SKS/XI/2011</td> <td>2.09</td> </tr> <tr> <td>7</td> <td>Gapuri</td> <td>001/SKS/II/2012</td> <td>2.74</td> </tr> <tr> <td>8</td> <td>Saipul</td> <td>038/SKS/IV/2012</td> <td>4.34</td> </tr> <tr> <td>9</td> <td>Nur Bani</td> <td>043/SKS/IV/2012</td> <td>5.14</td> </tr> <tr> <td>10</td> <td>Sapuansyah</td> <td>018/SKS/IV/2012</td> <td>3.65</td> </tr> </table>	6	Ali Ahmad	001/SKS/XI/2011	2.09	7	Gapuri	001/SKS/II/2012	2.74	8	Saipul	038/SKS/IV/2012	4.34	9	Nur Bani	043/SKS/IV/2012	5.14	10	Sapuansyah	018/SKS/IV/2012	3.65	
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4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement). - Minor compliance -	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings is provided in land compensation minutes of meeting or "Berita Acara Ganti Rugi Tebang Tebas", as refer to indicator 4.6.2 above.	Complied																				
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them. - Minor compliance -	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 is available in land compensation minutes of meeting or "Berita Acara Ganti Rugi Tebang Tebas", as refer to indicator 4.6.2 above.	Complied																				
<p>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.</p>																							

<p>4.7.1</p>	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>Unit of certification has develop mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. This procedure is describing within "SOP Pembebasan Lahan dan Area Baru (SNA-SOP-18-17-R0, dated 1 May 2017)".</p> <p>On Chapter 6.0 General Requirements</p> <p>6.1 Management of SNA Group in carrying out land compensation must be based on an agreement with the right holders or parties who have an interest in it by way of buying and selling, payment for land compensation, land consolidation or other procedures in accordance with applicable regulations.</p> <p>6.2 Each time negotiating the payment price for land compensation with land rights holders (recipients of land compensation), must complete the Standard Negotiation Form that has been stipulated.</p> <p>6.3 Before payment for land compensation is carried out, a Minutes of Negotiation must be made which contains the garden, land area, land condition, land rights basis and the agreed land compensation value.</p> <p>6.4 Payment of compensation must be witnessed by internal and external parties (camat, PPAT notary, Danramil, Kapolsek and Village Head) to then make a list of attendees.</p> <p>6.5 Payment of land compensation funds is carried out after the related documents are signed, including:</p> <ul style="list-style-type: none"> - Minutes of Mutual Agreement - Letter of Release of Land Rights - Statement letter - Receipt of Compensation - Recapitulation of Compensation 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Compensation Map - Records/Photos of submission of land compensation funds. <p>6.6 The list of standard documents for payment for land compensation consists of:</p> <ul style="list-style-type: none"> - Statement letter - Land Compensation Plot Map - Identity card - Land Compensation Payment Receipt - Land, Plant and Other Business Inventory Forms - Land Compensation Realization Report - Letter of Release of Land Rights - Recapitulation of Land Compensation Payments - Land Sketch - Land Certificate - Letter of Acknowledgment of Land Rights 	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented in land compensation minutes of meeting or "Berita Acara Ganti Rugi Tebang Tebas", as refer to indicator 4.6.2 above.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Communities are given opportunities to benefit from plantation development in form of Plasma with fully managed smallholder scheme.</p> <ul style="list-style-type: none"> - Koperasi Perkebunan Natai Aru Mitra Sejahtera" (SKS-01 Plasma) is 679.47 Ha. The cooperative consist of 818 members and the allocated land was formalized through "Keputusan Dinas Perkebunan No.259/Disbun-B/2015 tentang Calon Petani Calon Lahan Koperasi Perkebunan Natai Aru Mitra Sejahtera – PT. Sukses Karya Sawit" dated 10 July 2015. 	Complied

		<ul style="list-style-type: none"> - "Koperasi Perkebunan Natai Sipun Mandiri" (SKS-01 Plasma) is 636.95 Ha. The cooperative consist of 590 members and the allocated land was formalized through "Keputusan Dinas Perkebunan No.476/Disbun-B/2015 tentang Calon Petani Calon Lahan Koperasi Perkebunan Natai Sipun Mandiri – PT. Sukses Karya Sawit" dated 10 July 2015. - "Koperasi Perkebunan Citra Niaga" (BSS-04 Plasma) is 1,697.39 Ha. The cooperative consist of 1134 members and the allocated land was formalized through "Keputusan Dinas Perkebunan No.466/2010 tentang Calon Petani Calon Lahan Koperasi Perkebunan Citra Niaga – PT. Berkat Nabati Sejahtera" dated 6 August 2010. - "Koperasi Perkebunan Sawit Sejahtera Bersama" (BNS-02 Plasma) is 1,507.15 Ha. The cooperative consist of 298 members and the allocated land was formalized through "Keputusan Dinas Perkebunan No.743/Distanakbun-F/2018 tentang Calon Petani Calon Lahan Koperasi Perkebunan Sawit Sejahtera Bersama – PT. Berkat Sawit Sejahtera" dated 9 November 2018. <p>Agreement with scheme smallholder "Perjanjian Kerjasama No.001/SSB-PK/I/2014 No.001/BNS-PK/I/2014 Antara Koperasi Perkebunan Sawit Sejahtera Bersama Dengan PT. Berkat Nabati Sejahtera Tentang Pembangunan Dan Pengelolaan Kebun Kelapa Sawit Dengan Pola Kemitraan Desa Air Hitam Besar, Kecamatan Kendawangan" signed by all parties on 14 May 2014. Section 8 Hak dan Kewajiban Pihak Pertama – stipulates cooperative can get work opportunity in plantation development, upkeep, and FFB transport.</p> <p>Audit team noted that all cooperatives/"Koperasi" are full managed by companies therefore individual cooperative member does not have individual plantation block in each of the estate. Hence the smallholder plantation issued with Hak Guna Usaha/land title instead of individual land certificate/"Sertifikat Hak Milik".</p>	
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		Company does all the plantation upkeep until harvesting. Cooperative/koperasi receive the monthly report of plantation performance and payment information.	
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	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>The unit of certification has obtained land title in form of Hak Guna Usaha or HGU for all estates, including Plasma or smallholders full managed scheme. For the SKS Palm Oil Mill, also obtained land title namely Hak Guna Bangunan or Building/Premises Use Right.</p> <p>All the process to obtaining land title, the unit of certification follows the government procedures. Therefore, 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 already commenced during land compensation forum and "Risalah Pemeriksaan Tanah – B" prior issued the land title certificate.</p> <p>Based on information gathered during stakeholder consultation, when conflict raised the company will handle with their own procedures and involve stakeholders depend on conflict level. Also, the company has legal person that will determine to choose independent lawyer or mediator. Within last three years, there is no conflict raise in high risk level.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Based on information gathered during stakeholder consultation, when conflict raised the company will handle with their own procedures and involve stakeholders depend on conflict level. Also, the company has legal person that will determine to choose independent lawyer or mediator. Within last three years, there is no conflict raise in high risk level.</p>	Complied

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4.8.3	<p>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).</p> <p>- Minor compliance -</p>	<p>The unit of certification has obtained land title in form of Hak Guna Usaha or HGU for all estates, including Plasma or smallholders full managed scheme. For the SKS Palm Oil Mill, also obtained land title namely Hak Guna Bangunan or Building/Premises Use Right.</p> <p>All the process to obtaining land title, the unit of certification follows the government procedures. Therefore 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 already commenced during land compensation forum and "Risalah Pemeriksaan Tanah – B" prior issued the land title certificate.</p>	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<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 are describes in Unit of Certification procedure.</p> <p>Based on information gathered during stakeholder consultation, when conflict/dispute occurred, community are free to appoint their representative for conflict/dispute resolution including for mediation. Based on stakeholder consultation, in the last three years, there is no conflict/dispute raise in high risk level.</p>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Unit of certification refer to Provincial Decree "Keputusan Gubernur Kalimantan Barat 442/DISBUN/2018 dated 7 Aug 2018 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa Sawit dari Pekebun Provinsi Kalimantan Barat". Current and previous FFB price are available and informed to the smallholders, for example in "Berita</p>	Complied

		<p>Acara Rapat Penetapan Indeks K dan Harga TBS Kelapa Sawit Produksi Pekebun Kalimantan Barat Periode II Bulan Oktober 2022.</p> <p>CPO price: IDR 10,695.42/kg</p> <p>PK price: IDR 5,190.55/kg</p> <p>Index "K": 90.48%</p> <p>FFB Price = K ((CPO Price x OER) + (PK Price x PKER))</p> <table border="1" data-bbox="1133 596 1765 970"> <thead> <tr> <th>Oil Palm Age (years)</th> <th>FFB price/kg (IDR)</th> <th>Oil Palm Age (years)</th> <th>FFB price/kg (IDR)</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>1,727.03</td> <td>10-20</td> <td>2,316.75</td> </tr> <tr> <td>4</td> <td>1,851.28</td> <td>21</td> <td>2,273.14</td> </tr> <tr> <td>5</td> <td>1,981.76</td> <td>22</td> <td>2,262.00</td> </tr> <tr> <td>6</td> <td>2,043.99</td> <td>23</td> <td>2,204.90</td> </tr> <tr> <td>7</td> <td>2,177.25</td> <td>24</td> <td>2,126.52</td> </tr> <tr> <td>8</td> <td>2,186.40</td> <td>25</td> <td>2,052.97</td> </tr> <tr> <td>9</td> <td>2,224.61</td> <td></td> <td></td> </tr> </tbody> </table> <p>Based on field visit to SKS Mill, the FFB price of period is stated on announcement board. Based on interview with representative of Kelompok Tani Mitra SKS Sejahtera, as FFB supplier, he informed that SKS Mill informed the FFB price on regular basis evident through "Tanda Terima Penyerahan Dokumen". Confirm in the report that data of FFB prices in current and previous period of time e.g. year 2021-2022 are accessible by smallholder.</p>	Oil Palm Age (years)	FFB price/kg (IDR)	Oil Palm Age (years)	FFB price/kg (IDR)	3	1,727.03	10-20	2,316.75	4	1,851.28	21	2,273.14	5	1,981.76	22	2,262.00	6	2,043.99	23	2,204.90	7	2,177.25	24	2,126.52	8	2,186.40	25	2,052.97	9	2,224.61			
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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>Based on interview with representative of Kelompok Tani Mitra SKS Sejahtera (FFB supplier), he informed that PT. Sukses Karya Sawit informed the FFB price on regular basis as evident evident through "Tanda Terima Penyerahan Dokumen".</p>	Complied																																

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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>Unit of certification refer to Provincial Decree "Keputusan Gubernur Kalimantan Barat 442/DISBUN/2018 dated 7 Aug 2018 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa Sawit dari Pekebun Provinsi Kalimantan Barat"- Governor decree on determining FFB purchase price.</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>The contract for FFB sales and pricing determination referring to the Regent decree, regulating the scheme smallholder development, financing, FFB sales, price determination, rights and obligation of scheme smallholder (cooperative) and rights and obligation of companies as managing parties. For detail on contracts refer to 5.1.5.</p> <p>For pricing, Unit of certification refer to Provincial Decree "Keputusan Gubernur Kalimantan Barat 442/DISBUN/2018 dated 7 Aug 2018 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa Sawit dari Pekebun Provinsi Kalimantan Barat"- Governor decree on determining FFB purchase price.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>The contract between scheme smallholders cooperative and company was referring to regent decree. The decree regulating the scheme smallholder development, financing, FFB sales, price determination, rights and obligation of scheme smallholder (cooperative) and rights and obligation of companies as managing parties. The contracts for FFB sales/purchase are fair, legal, transparent and have agreed timeframe.</p> <p>Contract for scheme smallholder available in</p> <ul style="list-style-type: none"> - "Keputusan Bupati Ketapang No.743/Distanakbun-F/2018 tentang Penetapan Pekebun Peserta Kemitraan Perkebunan Kelapa Sawit Anggota Koperasi Perkebunan Citra Niaga yang Bermitra dengan PT. Bumi Sawit Sejahtera di Desa Natai Kuini Kecamatan Kendawangan Kabupaten Ketapang" dated 9 November 2018. Sighted appendix of the decree listed 298 smallholder members. 	Complied

		<ul style="list-style-type: none"> - Agreement with scheme smallholder “Perjanjian Kerjasama No.001/KOPBUN.CN-SPK/V/2017 No.005/BSS-SPK/V/2017 Antara Koperasi Perkebunan Citra Niaga Dengan PT. Bumi Sawit Sejahtera Tentang Pembangunan Dan Pengelolaan Kebun Kelapa Sawit Dengan Pola Kemitraan” signed by all parties on 29 May 2017. Explanation on definition including direct cost, overhead cost, harvesting cost, interest, immature, mature (49 months – 25 years) since planted. Section 3 Lahan Kebun Kemitraan – explains the location of Koperasi Perkebunan Citra Niaga is separated from land of company with proportion 20% for cooperative and 80% for company within company coverage on “Izin Lokasi”. Section 5 Pembiayaan dan Agunan – explains the credit for plantation development. Company shall assist in finding financial facility. Section 7 Pendapatan dan Pembiayaan – explains the cost bearer; Cooperative bears the cost of credit instalment, actual direct cost, actual overhead cost, management cost 5%, harvest and transport cost, land and building cost. Income of cooperative: revenue from FFB nett sales, for mature phase distributed to smallholder members through cooperative account. Revenue before credit paid: FFB nett sales – (credit installment + direct cost + overhead cost) – management cost. Revenue after credit paid: FFB nett sales – (direct cost + overhead cost) – management cost. Section 10 Hak dan Kewajiban Pihak Kedua – explains company shall purchase all FB production from cooperative with price at level referring to Kalimantan Barat Province government. The agreement valid for 1 planting cycle. - “Keputusan Bupati Ketapang No.466/Tahun 2010 tentang Penetapan Calon Petani Peserta dan Calon Lahan Program Kemitraan/Revitalisasi Perkebunan Kelapa Sawit Anggota Koperasi Perkebunan Sawit Sejahtera Bersama yang Bermitra dengan PT. Berkat Nabati Sejahtera di Kecamatan Kendawangan Kabupaten 	
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		<p>Ketapang" dated 6 August 2010. Sighted the appendix of the decree listed 1134 smallholder members.</p> <ul style="list-style-type: none"> - Agreement with scheme smallholder "Perjanjian Kerjasama No.001/SSB-PK/I/2014 No.001/BNS-PK/I/2014 Antara Koperasi Perkebunan Sawit Sejahtera Bersama Dengan PT. Berkat Nabati Sejahtera Tentang Pembangunan Dan Pengelolaan Kebun Kelapa Sawit Dengan Pola Kemitraan Desa Air Hitam Besar, Kecamatan Kendawangan" signed by all parties on 14 May 2014. Explanation on definition including direct cost, overhead cost, harvesting cost, interest, immature, mature (49 months – 25 years) since planted. Section 3 Lahan Kebun Kemitraan – explains the location of Koperasi Perkebunan Citra Niaga is separated from land of company with proportion 20% for cooperative and 80% for company within company coverage on "Izin Lokasi"; additionally 6 Ha for "Tanah Kas Desa" and 2 Ha for "Kas Masjid". Section 4 Pembiayaan dan Agunan – explains the credit for plantation development. Company shall assist in finding financial facility. Section 6 Pendapatan dan Pembiayaan – explains the cost bearer; Cooperative bears the cost of credit instalment, actual direct cost, actual overhead cost, management cost 5%, harvest and transport cost, land and building cost. Income of cooperative: revenue from FFB nett sales, for mature phase distributed to smallholder members through cooperative account. Revenue before credit paid: FFB nett sales – (credit installment + direct cost + overhead cost) – management cost. Revenue after credit paid: FFB nett sales – (direct cost + overhead cost) – management cost. Section 9 Hak dan Kewajiban Pihak Kedua – explains company shall purchase all FFB production from cooperative with price at level referring to Kalimantan Barat Province government. Deduct the FFB sales from cooperative plantation and to bank for instalment. The agreement valid for 1 planting cycle. 	
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		<ul style="list-style-type: none"> - "Keputusan Bupati Ketapang No.476/Disbun-B/2015 tentang Petani Peserta Kemitraan Anggota Koperasi Perkebunan Natai Sipun Mandiri yang Bermitra dengan PT. Sukses Karya Sawit di Desa Pembedilan Kecamatan Kendawangan Kabupaten Ketapang" dated 10 July 2015. Sighted the appendix listed 590 smallholder members. - Agreement with scheme smallholder "Perjanjian Kerjasama No.001/SKS-SPK/XXI/2014 No./NSM-SPK/XII/2014 Antara Koperasi Perkebunan Natai Sipun Mandiri Dengan PT. Sukses Karya Sawit Tentang Pembangunan Dan Pengelolaan Kebun Kelapa Sawit Dengan Pola Kemitraan Desa Pembedilan, Kecamatan Kendawangan" signed by all parties on 3 December 2014. Explanation on definition including direct cost, overhead cost, harvesting cost, interest, immature, mature (49 months – 25 years) since planted. Section 3 Lahan Kebun Kemitraan – explains the location of plantation is separated from land of company with proportion 20% for cooperative and 80% for company based on total planted. Section 4 Pembiayaan dan Agunan – explains the credit for plantation development. Company shall assist in finding financial facility. Section 6 Pendapatan dan Biaya – explains the cost bearer; Cooperative bears the cost of credit instalment, actual direct cost, actual overhead cost, management cost 5%, harvest and transport cost, land and building cost. Income of cooperative: revenue from FFB nett sales, for mature phase distributed to smallholder members through cooperative account. Revenue before credit paid: FFB nett sales – (credit instalment + direct cost + overhead cost) – management cost. Revenue after credit paid: FFB nett sales – (direct cost + overhead cost) – management cost. Section 9 Hak dan Kewajiban Pihak Kedua – explains company shall purchase all FFB production from cooperative with price at level referring to Kalimantan Barat Province government. Deduct the FFB sales from 	
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		<p>cooperative plantation and to bank for instalment. The agreement valid for 1 planting cycle.</p> <ul style="list-style-type: none"> - "Keputusan Bupati Ketapang No.259/Disbun-B/2015 tentang Petani Peserta Kemitraan Anggota Koperasi Perkebunan Natai Aru Mitra Sejahtera yang Bermitra dengan PT. Sukses Karya Sawit di Desa Air Hitam Hulu Kecamatan Kendawangan Kabupaten Ketapang" dated 30 March 2015. Sighted the appendix listed 818 smallholder members. - Agreement with scheme smallholder "Perjanjian Kerjasama No.001/SKS-SPK/XII/2014 No.001/NAMS-SPK/XII/2014 Antara Koperasi Perkebunan Natai Aru Mitra Sejahtera Dengan PT. Sukses Karya Sawit Tentang Pembangunan Dan Pengelolaan Kebun Kelapa Sawit Dengan Pola Kemitraan Desa Air Hitam Hulu, Kecamatan Kendawangan" signed by all parties on 3 December 2014. Explanation on definition including direct cost, overhead cost, harvesting cost, interest, immature, mature (49 months – 25 years) since planted. Section 3 Lahan Kebun Kemitraan – explains the location of plantation is separated from land of company with proportion 20% for cooperative and 80% for company based on total planted. Section 4 Pembiayaan dan Agunan – explains the credit for plantation development. Company shall assist in finding financial facility. Section 6 Pendapatan dan Biaya – explains the cost bearer; Cooperative bears the cost of credit instalment, actual direct cost, actual overhead cost, management cost 5%, harvest and transport cost, land and building cost. Income of cooperative: revenue from FFB nett sales, for mature phase distributed to smallholder members through cooperative account. Revenue before credit paid: FFB nett sales – (credit installment + direct cost + overhead cost) – management cost. Revenue after credit paid: FFB nett sales – (direct cost + overhead cost) – management cost. Section 9 Hak dan Kewajiban Pihak Kedua – explains company shall purchase all FFB 	
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		<p>production from cooperative with price at level referring to Kalimantan Barat Province government. Deduct the FFB sales from cooperative plantation and to bank for instalment. The agreement valid for 1 planting cycle.</p>	
<p>5.1.6</p>	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given. - Critical (Major) compliance -</p>	<p>Agreed payments should be made in accordance with the terms of the contract. This includes making the payments on time and in the manner specified in the agreement. Receipts that specify the price, weight, deductions, and amount paid can help provide evidence of the transaction and can be used to verify that the payment was made in accordance with the terms of the contract. It is important to keep accurate and detailed records of all payments made under a contract, as this can help to ensure that both parties are fulfilling their obligations and can provide a reference point in the event of a dispute.</p> <p>Available payment for FFB supplier:</p> <ul style="list-style-type: none"> - Goods receipt "Berita Acara" dated 2 Nov 2022; FFB received 87,460 kg; grading 2,576 kg; FFB nett paid 84,884 kg from Koperasi Mitra SKS Sejahtera. Invoice 020/INV/PL/XI/2022 dated 2 Nov 2022 for (5,679 kg x Rp.2,209.47) + (14,169 kg x Rp.2,303) + (65,036 kg x Rp.2,316.75); total Rp.195,860,000. - Goods receipt "Berita Acara" dated 3 Oct 2022; FFB received period September 2022 is 34,030 kg; grading 962 kg; FFB nett paid 33,068 kg from Koperasi Mitra SKS Sejahtera. Invoice 019/INV/PL/X/2022 dated 3 Oct 2022 for (19,590 kg x Rp.2,357.55) + (6,139 kg x Rp.2,236.42) + (7,339 kg x Rp.2,333.14); total Rp.77,035,000. Payment available by Bank Transfer Document dated 18 Nov 2022. <p>Deduction in kg are based on sortation result, caused by water content, dirt, sand, long stalk and empty bunch. Confirm that all outgrowers and FFB supplier are agreed with this deduction.</p> <p>PT Sawit Nabati Agro through its management unit PT. Berkat Nabati Sawit has communicated the deadline for payment "Surat</p>	<p>Non-compliance</p>

		<p>No.124/BNSXII/2021 Perihal Surat Pernyataan Dateline Pembayaran Dana SHU Koperasi Sawit Sejahtera Bersama” dated 23 December 2021 to Koperasi Sawit Sejahtera Bersama. Payment of SHU will be carried out 25 of (bulan berjalan/following month) (ex: payment of SHU period November 2021 will be paid on 25 January 2022). Payment of SHU fund can be done before 25 of (bulan berjalan) during Religious Festivities. If the payment exceeds date 25 (bulan berjalan) then cooperative can stop operation in nucleus estate of PT. Berkat Nabati Sejahtera. This communication has been received “Tanda Terima Koperasi Sawit Sejahtera Bersama” dated 23 December 2021.</p> <p>However, NC Critical was issued:</p> <p>With regards to FFB payment process from company to scheme smallholder cooperative, there is no documented information on Mechanism for payment administration, and Payment time information that Agreed by both company and cooperative.</p>	
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>Unit of certification demonstrated weighbridge calibration by government body, as follows:</p> <ul style="list-style-type: none"> - “Surat Keterangan Hasil Pengujian UPT Metrologi Legal Tipe A Dinas Koperasi, UKM, Perdagangan dan Perindustrian Kabupaten Ketapang No.069/SKHP/MET-THE/VI/2022” dated 16 Jun 2022. For weighbridge Avery Weight Tronix E1205; 135150611 capacity 40,000 kg which tested on 11 Jun 2022. Result: Legally re-calibrated according to Law No.2 year 1981 concerning Legal Metrology, for year 2022, should be recalibrate on 11 Jun 2023. - “Surat Keterangan Hasil Pengujian UPT Metrologi Legal Tipe A Dinas Koperasi, UKM, Perdagangan dan Perindustrian Kabupaten Ketapang No.070/SKHP/MET-THE/VI/2022” dated 16 Jun 2022. For weighbridge Avery Weight Tronix E1205; 135150602 capacity 40,000 kg which tested on 11 Jun 2022. Result: Legally re-calibrated 	Complied

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		according to Law No.2-year 1981 concerning Legal Metrology, for year 2022, should be recalibrate on 11 Jun 2023.	
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>Unit of certification provides information related to RSPO certification to the third party FFB suppliers. Unit of certification prepared Competence identification matrix for FFB suppliers, related to OHS policy, social and environmental policy. As follow up, Unit of certification provides training to third party FFB supplier on 16-17 Nov 2022. The training performed by QC & Training Manager. The training covers OHS policy, risk assessment, use of PPE to control risk, environmental impact and HCV, code of ethical conduct, FPIC. Information related to certification covers legality of FFB source – traceable and transparent, certification purpose and benefit. Information of legality covers land legality type, legal ownership of the land as basis for traceability, production of FFB and transparency, oil palm plantation business permit.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification refers to “SOP Penanganan Saran dan Keluh Kesah Karyawan dan Stakeholder”, document No. SNA/SOP/HR/PK/003 Rev.01 dated 1 Sep 2022, for grievance mechanism. A grievance mechanism is a system that allows individuals or groups to raise concerns or complaints about issues that affect them. In the context of smallholder, a grievance mechanism can provide a way for smallholders to voice their concerns about issues such as unfair treatment, inadequate support, or other problems that may impact their livelihoods.</p> <p>Unit of certification is demonstrating a commitment to addressing the needs and concerns of smallholders. All grievances raised through this mechanism are dealt with in a timely manner, as this can help to build trust and improve the relationship between smallholders and the unit of certification. The grievance mechanism is accessible, transparent, and responsive to the needs of smallholders.</p> <p>There are complaints regarding CPO quality on 27 Jul 2022 and regarding PK quality dated 20 Sep 2022, both complaints have been</p>	Complied

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		<p>followed up by management of SKS Mill and approved by Head of Plantation.</p> <p>Based on interview with smallholder, there is complaint regarding timeframe of payment.</p>	
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>Based on interview with previous landowners, cooperative committees, the assessment for need to support and improve livelihood carried out by company. The form of support chooses in form of scheme smallholder development.</p> <p>PT. Sukses Karya Sawit and the group build the scheme smallholder plantation, in accordance to RSPO certification system; HCV assessment and RSPO NPP carried out prior to scheme smallholder plantation development.</p>	Complied
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. Sukses Karya Sawit has prepared training program “Program Kegiatan Pelatihan Estate Plasma SKS & Petani Mandiri – 2023”:</p> <p>SOP fertilizer training planned for May and October 2023; SOP harvesting training planned for February and August 2023; SOP Sprayer Training planned for April and September 2023; SOP IPM Census and Rat-baiting training, IPM Barn Owl Management training, IPM Beneficial Plant training planned for March-July-November 2023.</p> <p>SOP PPE Spraying training, SOP Chemical Mixing training; SOP Spill Kit Use Training; SOP Chemical Storage training planned for April & September 2023.</p> <p>RSPO P&C Training planned for January 2023; HCV and Wildlife Training planned for January 2023; Traceability Training planned or January 2023; Code of Business Ethic Training planned for January 2023; Hazardous waste management training planned for March 2023.</p>	Non-compliance

		<p>NC Minor issued for the CH: Company has not implement 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>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -</p>	<p>PT. Sukses Karya Sawit – Sukses Karya Sawit POM shows commitment to support the third party FFB supplier: Mitra SKS Sejahtera to obtain legal FFB production, prepared 26 November 2022:</p> <table border="1" data-bbox="1131 686 1948 1390"> <thead> <tr> <th colspan="4">Company</th> </tr> <tr> <th>Activity</th> <th>Criterion</th> <th>Time frame</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Identify and inventory farmer group/community</td> <td>All independent community supplying FFB</td> <td>2022-2023</td> <td>Template prepared</td> </tr> <tr> <td>Measurement and mapping</td> <td>Location and hectarage is accurate</td> <td>2022-2023</td> <td>Measurement witnessed landowner and village authority; Identification with map scale 1:50,000</td> </tr> <tr> <td>Application of "Surat Keterangan Tanah"</td> <td>From applicant to Village</td> <td>2022-2024</td> <td>Required administration fee</td> </tr> <tr> <td>Issuance of "Surat Keterangan Tanah"</td> <td>Issued by village government</td> <td>2022-2024</td> <td></td> </tr> <tr> <td>Application of "Surat Tanda Daftar Budidaya"</td> <td>From applicant to Plantation Service</td> <td>2023-2024</td> <td>Location in Ketapang</td> </tr> </tbody> </table>	Company				Activity	Criterion	Time frame	Remarks	Identify and inventory farmer group/community	All independent community supplying FFB	2022-2023	Template prepared	Measurement and mapping	Location and hectarage is accurate	2022-2023	Measurement witnessed landowner and village authority; Identification with map scale 1:50,000	Application of "Surat Keterangan Tanah"	From applicant to Village	2022-2024	Required administration fee	Issuance of "Surat Keterangan Tanah"	Issued by village government	2022-2024		Application of "Surat Tanda Daftar Budidaya"	From applicant to Plantation Service	2023-2024	Location in Ketapang	<p>Complied</p>
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		Issuance of "Surat Tanda Daftar Budidaya"	Issued by Plantation Service "Dinas Pertanian, Peternakan, Perkebunan"	2023-2024	STD-B requires "Surat Keterangan Tanah"	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Sukses Karya Sawit prepared training plan for scheme smallholder and independent smallholder "Program Kegiatan Pelatihan – 2023", comprise of SOP Fertilizer, SOP Harvesting, SOP Sprayer, SOP IPM – Censur and Rat Baiting, Barn Owl Management, Beneficial Plant, Palm Upkeep; SOP training on OHS Spraying and Work ergonomic, SOP OHS PPE for spraying; SOP OHS Chemical Mixing; SOP OHS Use and Storage Spill Kit; SOP OHS Chemical Storage.</p> <p>In PT. Bumi Sawit Sejahtera shows "Berita Acara Training No.2/QC-BSS/SNA-Group/X/2022" dated 12 October 2022 for assistant, mandores, sprayers. Attended by 10 employee and 2 staffs.</p> <p>Laporan Kegiatan Training 15 November 2022 – Integrated Pest Management/"Pengendalian Hama Terpadu"; attended by Ramadhan and Alpaniam, member of cooperative Natai Aru Mitra Sejahtera and work in company.</p> <p>Berita Acara Training dan Simulasi Cara Kerja Sensus Hama dan Penyakit pada Tanaman Kelapa Sawit PT. Berkat Nabati Sejahtera, dated 22 November 2022. Attended by 9 person, including Jantarmas and Sibah, member of cooperative SSB.</p>				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>PT. Sukses Karya Sawit and group maintains the progress report, both operational and financial for oil palm plantation development in the scheme smallholder/cooperative.</p> <p>During this initial assessment visit, 4 scheme scheme smallholder/cooperative become part of assessment scope.</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>The company has established the policy of equal opportunity, non-discrimination and treatment in employment, which is contained in the IOI Group Policy dated 28 October 2017.</p> <p>The policy was explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>This policy is in place and has been disseminated to relevant workers on 19 March 2022.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Based on employee list, can be concluded that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender. The workers came from various religion, ethnic, and area.</p> <p>Based on interview with workers, Labor Union, Gender Committee, Plantation Agency and Manpower Agency, they mentioned that there is no indication of discrimination conducted by the company. The job vacancies were published, the recruitment and promotion were based on assessment of competencies and suitability with the role needed.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Besides the policy, the company has procedures in recruitment and selection that set the recruitment process are based on skills, capabilities, qualities and medical fitness necessary for the jobs available:</p> <ul style="list-style-type: none"> - SOP of Recruitment (No. SNA/SOP/HR/PKH/002 dated 1 August 2021). 	Complied

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		<ul style="list-style-type: none"> - SOP of Resignation Guidance (No. SNA/SOP/HR/PKH/003 dated 1 October 2021). - Company Regulation period of 2022 - 2024, that has been endorsed by Manpower Agency (based on Decree No. 078/TKT-B.560/2022). <p>Based on document review and interview with workers, it was known that recruitment procedure has been implemented. For instance, it was found recruitment documentation according to the procedure:</p> <ul style="list-style-type: none"> - Planning of appointment of casual worker to be permanent worker - List of candidates to be promote from casual workers to permanent workers. - Assessment forms per worker. - Decree of appointment to permanent worker (e.g for Ahmad Saepudin No. 409/HRD-BSS/SK/XI/2022 dated 1 November 2022). <p>Based on interview with workers, Labor Union, Gender Committee, Plantation Agency and Manpower Agency, they mentioned that there is no indication of discrimination conducted by the company. The job vacancies were published, the recruitment and promotion were based on assessment of competencies and suitability with the role needed.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on company's policy and procedure in recruitment, also based on interview with interview with female workers, Labor Union, Gender Committee, can be concluded that pregnancy women will not be treated as a discriminatory measure, rather, to protect their reproduction organ and fetus. For instance, the company will not employ pregnant women in the chemical related position.</p> <p>Company has performed monthly pregnancy screening for female worker, to prevent pregnant or breastfeeding women performing pesticide related work. When identified/tested positive pregnant, then alternative work (non-chemical, non-high risk) is recommended by company doctor.</p>	Complied

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		<p>In PT. Sukses Karya Sawit (SKS) Estate 2 and 3, pregnancy screening performed, and report sighted for period January – October 2022. For female worker identified pregnant, company doctor recommends moving to other section or perform other non-heavy work. Sampled pregnant female worker and the recommendation: SKS 2 Estate identified Agustina Taus (sprayer) positive pregnant on screening 2 November 2022, Company Doctor Recommendation "Surat Rekomendasi No.105/KLINIK-SKS/SR/XI/2022", dated 2 November 2022 - Recommendation to move to another department. Identified Ema Susanti (SKS 3 Estate sprayer) positive pregnant on screening 26 October 2022, Company Doctor Recommendation "Surat Rekomendasi No.96/KLINIK-SKS/SR/XI/2022", dated 26 October 2022 - Recommendation to move to worker housing cleaning team.</p> <p>Based on interview with new mother, when they identified/tested positive pregnant, Mrs. Anita and Mrs. Yorika, they are recommended to work in housing complex.</p>	
<p>6.1.5</p>	<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. - Critical (Major) compliance -</p>	<p>The company has established Gender Committee and the Officials in every unit to develop awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>Based on document review and interview with Gender Committee, can be concluded that there was no issue concerning discrimination based on gender in recruitment and promotion, harassment in the workplace, or violation of reproduction rights. The female workers in the field has understood the existence and function of the Gender Committee.</p>	<p>Complied</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>Based on interview with management, workers, Labor Union, and Gender Committee, the evidence of equal pay for the same work scope has been demonstrated based on payment list and sample of payment slips. The employs wages payment referred to the minimum wage consists of basic wage plus a fixed allowance.</p>	<p>Complied</p>

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		<p>For instance, the casual workers for upkeep in SKS 3 Estate ID No. S300185 and S3KT011 have been paid equally amount of IDR 115,600 / day. This rate has complied with minimum wage of 2022.</p>	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<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>Documentation of pay and working conditions are set in Company Regulation (Peraturan Perusahaan) and related employment procedure, as well as in respective employment agreement. In those documents, wage and working conditions have been explained such as the meaning of wages, minimum wage based on government regulation, wage systems, family allowances, holiday allowances and increased wages for employees.</p> <p>The explanation related to working days and working hours is clearly presented, where working days are 6 working days in a week and working hours are 7 (seven) hours a day and 40 (forty) hours in a week, this refers to the applicable laws and regulations in Indonesia (Law No. 13 of 2003 concerning Manpower).</p> <p>The company has documented Governor Decree of Minimum Wage and Company's Director Decree regarding minimum wage and salary structure for all workers in accordance with legal minimum wage. The auditor has verified payment slip of workers in all Estates and Mill for the period. Based on verification, the minimum wage paid to the workers has above legal minimum wage stated by the Governor.</p> <p>The documentation as follows:</p> <ul style="list-style-type: none"> - Governor Decree of West Kalimantan No. 1462/DISNAKERTRANS/2021 relate minimum wage of Ketapang Regency, amount of IDR 2,876,252/month or IDR 115,050/day. - Head of Plantation Decree No. 083/HRD-SNA/INTERNAL/XII/2021 dated 20 December 2021 regarding worker wage based on worker 	<p>Complied</p>

		structure and level/grade year of 2022, in accordance with Governor Decree. Based on this Decree, the lowest grade worker's wage stated IDR 2,890,000/month or IDR 115,600/day (above legal minimum wage). For instance, the casual workers for upkeep in SKS 3 Estate ID No. S300185 and S3KT011 have been paid equally amount of IDR 115,600 / day.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>Documentation of pay and working conditions are set in Company Regulation and related employment procedure, as well as in respective employment agreement. In those documents, wage and working conditions have been explained such as the meaning of wages, minimum wage based on government regulation, wage systems, family allowances, holiday allowances and increased wages for employees.</p> <p>The explanation related to working days and working hours is clearly presented, where working days are 6 working days in a week and working hours are 7 (seven) hours a day and 40 (forty) hours in a week, this refers to the applicable laws and regulations in Indonesia (Law No. 13 of 2003 concerning Manpower).</p> <p>The Company Regulation period of 2022 - 2024, that has been endorsed by Manpower Agency (based on Decree No. 078/TKT-B.560/2022). Therefore, it has aligned with national regulation related employment.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The regulation related working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements has been set in Company Regulation, Employment SOPs, and Employment Contract.</p> <p>Based on document review, interview with workers and Labor Union, it is known that:</p> <ul style="list-style-type: none"> - working days are 6 working days in a week and working hours are 7 (seven) hours a day and 40 (forty) hours in a week. - Overtime were paid in accordance with national regulation. 	Complied

		<ul style="list-style-type: none"> - Sickness including menstruation leave and maternity leave: based on document review and interview with Gender Committee and Nurse/Midwife are been provided with no issue. - 12 days annual leave (complied with national regulation) - Worker protection: the company has provide Clinics, paramedic (nurse and midwife), regular medical check-up 	
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>The company has provided facilities to improve worker’s wellbeing based on document review, interview, and field observation, among others:</p> <ul style="list-style-type: none"> - Adequate housing: only one family occupy the house. - Sanitation facilities, domestic waste disposal, and drainage. - Water supplies: from water treatment and wells. - Medical facilities: Clinics in each Estate and paramedic (nurses and midwives) - Educational facilities: schools and school busses. - Staple food store: provided by worker cooperative. - Electricity: from Mill and gensets - Mosque and Church. - Sport facilities: Field of badminton, volley, football. <p>Based on field visit to worker housing in PT. Sukses Karya Sawit Estate and POM; PT. Berkat Nabati Sejahtera Estate; PT. Bumi Sawit Sejahtera Estates – audit team observed that worker provided with standard G6 house, with 2 rooms, 1 bathroom/toilet. Electricity provided using genset. Clean water provided by bore well.</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 company has established stores and provided store to sell staple foods with affordable price. Moreover, the company is located only 30 minutes from surrounding villages.</p>	Complied

6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>The company has calculated a living wage using the benefit approach that the company has provided to workers, including job support, rice allowances, facilities, housing, clean water, clinics, etc.</p> <p>The calculation has been made for casual and permanent worker. Based on calculation, the minimum wage plus in-kind benefit for casual workers are 23% above the minimum wage, where for permanent workers are 27% above the minimum wage.</p>	Complied
<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 the Circular of the Indonesian Palm Oil Association (GAPKI) No. 073/GAPKI/II/2013 concerning Circular on Activities of Work Process in Palm Oil Plantation Business Sector, stated that the core work in palm oil plantation industries consist of harvester and Mill's process workers. Based on employee list, field observation, and interview, it is known that no casual or temporary workers working in core work location.</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</p>	<p>The company has a policy of recognizing freedom of association and right to collective bargaining, which is contained in the IOI Group Policy dated 28 October 2017. The policy has been disseminated to workers</p>	Complied

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	<p>to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>on 19 March 2022.</p> <p>Based on interview with workers and Labor Union, it is known that the company has disseminated the freedom to form or join worker association.</p> <p>Worker union in PT. Sukses Karya Sawit POM member 88 workers, registration permit from Manpower Office No.130/OP-SPSB/SP-PT.SKS MILL/DFT/2017 since 2017. Worker union in PT. Sukses Karya Sawit Estate member 93 workers, registration permit from Manpower Office No.230/OP-SPSB/SPTP-PT.SKS/DFT/2019 since 2019.</p> <p>Worker union in PT. Berkah Nabati Sejahtera member 260 workers, registration permit from Manpower Office No.156/OP-SPSB/SPAHB-PT.BNS/DFT/2017 since 2017.</p>	
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>Meetings between Management and Labor Union were conducted regularly. For instance, recent meeting was conducted on 31 October 2022 to disseminate Company Regulation period of 2022 – 2024.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interview with Head of Labor Union and workers, it is known that the management does not interfere with the formation of labour union. There is no coercion and intervention to join the organization. The company also give permission to Labor Union Official to conduct meeting in working hours.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The prohibition of child labour has been set in the IOI Group Policy dated 28 October 2017, as well as in the SOP of Recruitment (No. SNA/SOP/HR/PKH/002 dated 1 August 2021) set the age verification to prevent children under 18 years old to be employed.</p>	Complied

		In the contractual agreement of FFB purchase with Kelompok Tani Mitra PKS Sejahtera dated 22 Feb 2021, also stated to prohibition to employ child labor.	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	Based on workers list verification in Estates and Mill updated October 2022 can be demonstrated that there are no workers with age under 18 years old at the time they were recruited. It is also has been verified during field observation and interview with stakeholders, that the company did not recruit child labor.	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	Based on workers list verification in Estates and Mill updated October 2022 can be demonstrated that there are no workers with age under 18 years old at the time they were recruited. It is also has been verified during field observation and interview with stakeholders, that the company did not recruit child labor.	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>	No child labor policy has been disseminated to workers on 19 March 2022. Based on interview with workers, Labor Union, Village Heads, including contractor, it was known that no child labor policy has been disseminated to relevant stakeholders.	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>The policy to prevent sexual and all other form of harassment and violence is set in IOI Group Policy dated 28 October 2017. This policy has been disseminated to workers on 19 March 2022.</p> <p>Based on interview with workers, Labor Union, and Gender Committee, it is known that they have understood the company’s policy to prevent sexual or other form of harassment.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual or other form of harassment, or violation of reproductive rights. Based on interview with Head of Gender</p>	Complied

		Committee and women workers, it is known that there is no negative issue related to sexual harassment or violation of reproductive rights.	
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>The policy to protect the reproductive rights is set in IOI Group Policy dated 28 October 2017. This policy has been disseminated to workers on 19 March 2022.</p> <p>Based on interview with workers, Labor Union, and Gender Committee, it is known that they have understood the company's policy to protect worker's reproductive rights.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual or other form of harassment, or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, it is known that there is no negative issue related to sexual harassment or violation of reproductive rights.</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>	<p>Company has assessed the needs of new mothers through consultation with new mothers. Sighted consultation form "Form Konseling Ibu Baru" filled in by sampled new mother: Kholifatur Riskiyah (SKS 1 Estate), Nur Halimah (SKS 2 Estate), Anita (SKS 2 Estate – interviewed by audit team), Noryani and Puspita Aini (BNS 1 Estate), Noraidan and Sabdatiyah (SKS POM – interviewed by audit team).</p> <p>Interview with company doctor, the medical team including the nurse and midwife stated the identified new mother need: new mother gets additional time to recover post-partum, company can provide childcare for working mother, medical services for new mother and their infant, family planning, and vaccination program for the new infant.</p> <p>Management has program and demonstrate implementation of their need by conducting monthly 'Posyandu' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. In each estate also available Clinic and nurse/midwife for</p>	Complied

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		giving birth as well as daycare/creche. The workers also have been given time to give breast feeding to their babies	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The company has had Whistle Blowing Policy (dated 1 October 2019) and procedure to address any dispute or grievance in SOP of Grievance Handling of Worker and Stakeholder (No. SNA/SOP/HR/PK/003 dated 1 September 2022), for grievance mechanism. A grievance mechanism is a system that allows individuals or groups to raise concerns or complaints about issues that affect them.</p> <p>This policy and SOP have been disseminated to workers on 19 March 2022. Based on interview with workers, Labor Union, and Gender Committee, it is known that they have understood the company's policy to submit grievance.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights.</p>	Complied
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage 	<p>The company has established policy and procedures about prohibition of force or trafficked labour. In those documents, stated that the company prohibit child labour, forced labour, and will provide work contract in language that understood by workers and make sure the payment given to workers in simple ways, on time and clear.</p> <p>These documents are:</p> <ul style="list-style-type: none"> - in IOI Group Policy dated 28 October 2017 - SOP of Recruitment (No. SNA/SOP/HR/PKH/002 dated 1 August 2021). 	Complied

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	<ul style="list-style-type: none"> • Withholding of wages - Critical (Major) compliance - 	<ul style="list-style-type: none"> - SOP of Resignation Guidance (No. SNA/SOP/HR/PKH/003 dated 1 October 2021). - Company Regulation period of 2022 - 2024, that has been endorsed by Manpower Agency (based on Decree No. 078/TKT-B.560/2022). <p>Based on document verification (list of employees, salary slips and payroll for the period of 2022) and interviews with company management and Manpower Agency, no work termination was identified that was not in accordance with the work contract, the determination of overtime time was in accordance with the Overtime Work Order (SPL) and was not identified there are employees who work because of debt with the company.</p> <p>Moreover, no salary deduction that was not in accordance with the regulations, even though there were subsidies and deductions for BPJS (employment insurance) contributions that were in accordance with applicable regulations. There was no work bond that impeded employee resignation, there was no indication of a cost involved in the employee recruitment process.</p> <p>Based on field observation, and interview with workers and Labor Union, is known that there is no migrant worker within the company. All workers also have been recruited in accordance with legal regulation and provided with contractual agreement.</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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Based on employee list, it has been identified that the company has employed temporary worker (PKWT), but not migrant worker. The specific procedure of PKWT is in Company Regulation Article 7, has describe the definition of PKWT, and differentiation compared to casual worker, also the contractual will refer to national regulation related to the PKWT (temporary worker).</p>	Complied
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			

<p>6.7.1</p>	<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>The responsible in health and safety has been established in accordance with the legal requirements, that is OHS Committee (<i>Struktur</i> P2K3) that has been endorsed by Manpower Agency, and the Secretary is a certified OHS Expert.</p> <p>PT Bumi Sawit Sejahtera (BSS)</p> <p>The OHS Committee of PT BSS has been endorsed based on Decree of Manpower Agency No. 120/Nakertrans.P2K3/2022 dated 23 November 2022. The Secretary is Mulyadi an OHS Expert based on Appointment Decree of Manpower Agency No. 5/./AS.01.03/VI/2022 dated 27 July 2022, valid for 3 years.</p> <p>PT Berkah Nabati Sejahtera (BNS)</p> <p>The OHS Committee of PT BNS has been endorsed based on Decree of Manpower Agency No. 121/Nakertrans.P2K3/2022 dated 23 November 2022. The Secretary is Ari Agus an OHS Expert. His license is invalid and being processed by PT Formasi based letter dated 4 February 2022.</p> <p>PT Suskes Karya Sawit (SKS)</p> <p>The OHS Committee of PT SKS has been endorsed based on Decree of Manpower Agency No. 122/Nakertrans.P2K3/2022 dated 23 November 2022. The Secretary is Yusuf Fatkurrahman, an OHS Expert based on Appointment Decree of Manpower Agency No. 5/10525/AS.02.04/XII/2022 dated 30 December 2019, valid for 3 years. The extension of appointment letter is being processed.</p> <p>The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and corrective actions to achieve target and improve the program such as Personal Protective Equipment (PPE), hazard from animal, safety notes, accidents etc. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of</p>	<p>Complied</p>
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		<p>accident, PPE Checklist update, result of internal audit, incident investigation, etc.</p> <p>The minutes of OHS Committee Meetings have been attached in the quarterly OHS Committee Reports. The reports regularly submitted to the Manpower Agency. The recent reporting has been conducted on 25 November 2022.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency policy and procedures</p> <p>The company has established policy and procedures related accident and emergency procedures including the mitigations, that are:</p> <ul style="list-style-type: none"> - IOI Group Policy dated 28 October 2017 - Company Regulation - SOP of PPE No. SOP.EHS.APD.01 dated 12 July 2021. - SOP of Accident Emergency Respond No. SOP.SNA.ERP.03 dated 16 May 2020. <p>These procedures have been disseminated to all workers in morning muster and planks/posters in the Mill, offices, and oil palm blocks.</p> <p>First aid equipment and officer</p> <p>The company has a clinic, including paramedic that has been trained with legal First Aid Handling training. The company also has established the <i>Struktur Petugas P3K</i> (First Aid Kit Officer Structure).</p> <p>The first aid kits are available in offices, several working areas in mill, and every activity in the Estate brought by Supervisor. The items have been in accordance with the legal regulation (21 items).</p> <p>Records of all accidents</p> <p>Records of all accidents are kept and periodically reviewed on OHS Committee Meeting. The record of accident describes in more detail in indicator 6.7.5.</p>	<p>Non-compliance</p>

		<p>However, Minor NC issued for the CH: The management of firstaid kit and emergency procedure was not effectively monitored.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -</p>	<p>PPE Provision Based on interview with workers and Labor union, the PPEs are provided to all workers without any charge. The type of PPE is defined based on risk analysis (HIRAC) and/or MSDS. It has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, manuring, mill’s machineries, harvesting, etc. Based on field observation in the high risk workplace in the Mill and Estate, known that the workers provided PPE in accordance with the HIRAC and/or MSDS. For instance: - Harvester: has been provided sickle and axe cover. - Manuring, spraying, checmical storage operator: has been provided rubber gloves, mask, face protector, apron, boots. - Genset/engine room, boiler operator: has been provided mask and ear muff/ear plug. Interview with the workers and Labor Union, the PPE has been provided, exchanged regularly or anytime if broken without any charge. The PPE stocks can be seen on material storage. Sanitation facilities for chemical aplicator Sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Division Offices. Therefore, technically the PPE and working tools are washed and stored in the special place and prohibited to be placed in worker’s houses. However, Critical NC issued: The PPE provision and usage is not effectively monitored.</p>	<p>Non-compliance</p>

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6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>The company has established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility.</p> <p>For further or un-handled medical care are covered in government employment and health insurance (<i>BPJS Ketenagakerjaan & BPJS Kesehatan</i>). This insurance has been paid monthly based on document review according to the applicable rule. For instance, BPJS Ketenagakerjaan of PT BNS has been paid on 15 November 2022, and BPJS Kesehatan has been paid on 7 November 2022.</p> <p>Based on interview with the workers and Labor Union, it is known there is no issue related medical care. If the clinics cannot handle the medical care, the patient will be brought to the partner hospital in the city. The compan</p> <p>For contractor's workers, based on document review and interview with contractor representative, it is known that the accident insurance for workers is covered by the contractors.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The company has recorded its occupational injuries using Lost Time Accident (LTA) metrics. LTA report of 2022 has been made by each company. For instance for PT SKS, to date October 2022:</p> <ul style="list-style-type: none"> - No of lost workday: 35 days. - Frequency rate:5.25 - Severity rate: 3.40 - Safety Index: 5.38 	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	Unit of certification's Integrated Pest Management (IPM) plan is a strategy for controlling pests in a way that is environmentally sustainable	Complied

	<p>- Critical (Major) compliance -</p>	<p>and cost-effective. IPM involves using a variety of methods to prevent, monitor, and manage pest problems, including physical, biological, and chemical methods. The goal of an IPM plan is to reduce the need for pesticides and other chemicals, and to minimize their impact on human health and the environment. An IPM plan may include a range of measures, such as:</p> <ul style="list-style-type: none"> - Monitoring pest populations to identify when and where control measures are needed. - Using physical barriers or traps to prevent pests from entering plantation's block. - Planting pest-resistant crops or using beneficial plants. - Using biological controls, such as predators or parasites, to control pest populations. - Applying pesticides only when necessary and using the least toxic option available. <p>Implementing an IPM plan can help to reduce costs and improve the overall efficiency and sustainability of pest management.</p> <p>Unit of Certification has committed to implement Integrated Pest Management (IPM) activities in which presented in several procedures, as follows:</p> <ul style="list-style-type: none"> - SOP.SNA.AGR.6.1 Rev #1 dated 1 May 2019, SOP Penyemprotan (Spraying); the procedure regulates about weeds control which covers weeds control in the nursery, immature and mature areas, equipment used for weeds control, safety procedures of control, guideline of agrochemicals uses and monitoring. - SOP.SNA.AGR.10.1 Rev #1 dated 1 May 2019, SOP Pengendalian Hama Tikus (IPM for rodent). - SOP.SNA.AGR.10.2 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Ulat Kantong dan Ulat Api secara Terpadu (IPM for Leaf 	
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		<p>eater caterpillar).</p> <ul style="list-style-type: none"> - SOP.SNA.AGR.10.3 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Kumbang Badak (IPM for <i>Oryctes rhinoceros</i>). - SOP.SNA.AGR.10.4 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Ulat Perusak Tandan (IPM for <i>Thirataba mundella</i>). - SOP.SNA.AGR.10.5 Rev #1 dated 1 May 2019, SOP Manajemen Pengendalian Rayap (IPM for . - SOP.SNA.AGR.10.6 Rev #1 dated 1 May 2019, SOP Pengendalian Terpadu Ganoderma (IPM for Ganoderma). <p>Procedures of Pests and Diseases (P&D) Control Management (IPM) covers early warning system, census, P&D attack threshold limits, evaluation and decision of pest and disease control, recommendation from Department of Research, P&D handling, recommendation of P&D control and evaluation.</p> <p>Evident of monitoring and control are available under document pest and disease census, planting and upkeep beneficial plant, census of animal attack and <i>Tyto alba</i> reproduction monitoring. Based on field verification and document review of "Rekapitulasi Deteksi UPDKS" (leaf eater caterpillar census) period January – October 2022 there is no caterpillar attack identified which exceeding the threshold.</p> <p>Available recommendation letter of IPM "Rekomendasi Pengendalian Hama" No.01/RND-BSS/VIII/2022 dated 3 Aug 2022 from R&D of PT SNA, stated that there is rat infestation (<i>Rattus sp.</i>) in BSS-1 (14%), BSS-2 (9%), BSS-3 (9%) and BSS-4 (12%) with category medium to heavy. Also found infestation of <i>Oryctes rhinoceros</i> with category light to medium. Stated that control shall be done according to rounds at blocks with heavy infestation. Control round shall be stop when the percentage of lost bait is <20%.</p>	
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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>The unit of certification has a list of Global Invasive Species and evaluate the status of existence in November 2022. Some species are naturally existed in the area, such as <i>Oryctes rhinoceros</i>, leaf eater caterpillar (<i>Setora nitens</i>, <i>Darna trima</i>, <i>Thosea bisura</i>, <i>Metisa plana</i>, <i>Mahasena corbetti</i>, <i>Cremastopsyche pendula</i>), <i>Rattus tiomanicus</i>, <i>Rattus diardii</i>, <i>Rattus argentiventer</i>, <i>Thirathaba</i>, <i>Coptotremes curvignathus</i>, <i>Marcotremes gilvus</i>. Monitoring: <i>Casia cobanensis</i>, <i>Antigonon leptopus</i>, <i>Turnera subulatta</i>; Wipping: <i>Imperata cylindrica</i>, <i>Paspalum conjugatum</i>; There are no species in the CABI list that used to manage areas in unit of certification.</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 field visit and document review, there is no use of fire for pest control in whole area Estate and Smallholder of PT Sukses Karya Sawit, PT Bumi Nabati Sejahtera and Bumi Sawit Sejahtera.</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 unit of certification has recorded list of pesticides uses, completed with justification of use according to the Ministry of Agriculture and listed in https://pestisida.id/simpes_app/. Available records of pesticides use by the unit of certification for period Jul 2019 to Jun 2022, e.g. for SKS 2 Estate:</p> <table border="1" data-bbox="1133 1082 1975 1394"> <thead> <tr> <th>Description</th> <th>UoM</th> <th>Jul 19 – Jun 20</th> <th>Jul 20 – Jun 21</th> <th>Jul 21 – Jun 22</th> <th>Trademark</th> </tr> </thead> <tbody> <tr> <td>Application Area</td> <td>Ha</td> <td>2,618.50</td> <td>2,618.50</td> <td>2,618.50</td> <td></td> </tr> <tr> <td>FFB</td> <td>Ton</td> <td>35,741.20</td> <td>35,589.20</td> <td>39,054.00</td> <td></td> </tr> <tr> <td>CPO</td> <td>Ton</td> <td>6,160.90</td> <td>5,938.80</td> <td>8,737.70</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Metsulfuron Methyl 20%</td> <td>Kg</td> <td>754</td> <td>261</td> <td>219</td> <td>Meta Prima 20 WG,</td> </tr> </tbody> </table>	Description	UoM	Jul 19 – Jun 20	Jul 20 – Jun 21	Jul 21 – Jun 22	Trademark	Application Area	Ha	2,618.50	2,618.50	2,618.50		FFB	Ton	35,741.20	35,589.20	39,054.00		CPO	Ton	6,160.90	5,938.80	8,737.70								Metsulfuron Methyl 20%	Kg	754	261	219	Meta Prima 20 WG,	Complied
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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>Available record of pesticides uses including active ingredients, LD50, area treated, amount of active ingredient per Ha and number of applications are provided for all Estate under PT Sawit Nabati Agro, as sample described in indicator 7.2.1. Other records available for pesticides are Agrochemical Stock Issues, "Rangkuman Penggunaan Pestisida/Herbisida 3 Tahun" – Three years' summary of pesticides uses, "Justifikasi Penggunaan Bahan Kimia" – Justification of chemical uses.</p>	Complied																																																					
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold. The uses of Brodifacoum 0.005% (2nd generation of anticoagulant rodenticide) is only apply for blocks with heavy level of rat</p>	Complied																																																					

		attack. Justification have been given by Agronomy Department. The unit of certification is under progress of introduction of <i>Tyto alba</i> (natural predator of rat). Currently, there is only 9 unit of barn-owl boxes established and 4 <i>Tyto alba</i> exist.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -	There is no prophylactic use of pesticides throughout all estate under PT Sawit Nabati Agro Group. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold. The uses of Brodifacoum 0.005% (2 nd generation of anticoagulant rodenticide) is only apply for blocks with heavy level of rat attack. Justification have been given by Agronomy Department.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: - Minor compliance - 7.2.5a Judgment of the threat and verify why this is a major threat.	There is no use of WHO Class 1A or 1B pesticide in whole plantation operation under PT Sawit Nabati Agro Group. The use of paraquat has been stopped refer to "Pedoman Pengelolaaan Agrokimia" – Guidance of Agrochemical Management (IOI/G/EV/006 rev.00 dated 28 Aug 2020), signed by Plantation Director. The guidance Section 4 mentioned that IOI prohibit the use of paraquat and pesticides that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions. Based on visit in field operation and agrochemical storage in PT Sukses Karya Sawit, PT Bumi Sawit Sejahtera and PT Bumi Nabati Sejahtera, there was no paraquat found. Based on the report of pesticide use in 2019 to 2022 – there were no paraquat noted in the report.	Complied
	7.2.5b Why there is no other alternative which can be used.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation under PT Sawit Nabati Agro Group.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or	

		Rotterdam Conventions, or paraquat in whole operation under PT Sawit Nabati Agro Group.	
	7.2.5d Process to limit the negative impacts of the application.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation under PT Sawit Nabati Agro Group.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation under PT Sawit Nabati Agro Group.	
7.2.6	<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>All Estate have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, Emergency Response Procedure training and First Aid training. Chemical warehouse and its infrastructure is ready (see criterion 4.6.6). Standard PPE for sprayer: helmet, face shield, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: face shield, masker, apron, rubber glove, safety boot.</p> <p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> - Minutes of training dated 2 Oct 2021, regarding the uses of PPE, pesticides application, emergency response procedure. Attended by all spraying workers; material by R&D and Estate Manager; location at Block M10 SKS 2 Estate. - Minutes of training dated 16-17 Nov 2022, regarding the uses of PPE, spraying tools and nozzle use, calibration, occupational health and safety. Attended by all spraying workers; material by R&D and EHS Teams; location at Block L15 SKS 2 Estate. 	Complied

<p>7.2.7</p>	<p>(C) Storage of all pesticides in accordance with recognized best practices. - Critical (Major) compliance -</p>	<p>Unit of certification has demonstrated that the storage of all pesticides is in accordance with recognized best practices. Based on site visit to SKS 2 Estate, BSS 1 Estate and BNS 1 Estate, there was found that:</p> <ul style="list-style-type: none"> ○ Pesticides are stored in the determined area separated from fertilizer and other chemicals. ○ Pesticide storage is provided in Divisions as well as in central storage. ○ Agrochemical storage is locked areas with limited access. The storage is ventilated. ○ MSDS and hazard symbol label are provided nearby of pesticides. ○ Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. ○ PPE for handling of pesticides was provided including boots, apron, safety glass, respiratory mask, and hand gloves. ○ The possible spill is managed. ○ Secondary containment is provided around the pesticide storage area. ○ Spill kit is also provided in the area. <p>All the workers have used the personal protective equipment meet with the safety rules and work instruction such as: Aprons, safety goggles, chemical mask, hand gloves (2 type: cotton inside and rubber outside) and safety shoes. All precautions attached to the products properly observed, applied, and understood by workers. All applications of agrochemicals were in accordance with the product label and storage instruction. MSDS of all products was understood by workers.</p>	<p>Complied</p>
<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging. - Minor compliance -</p>	<p>Unit of certification has established procedure of Waste Management including its environment and safety aspect as documented in "Keselamatan Kesehatan Kerja & Lingkungan Pengelolaan Limbah dan</p>	<p>Complied</p>

		<p>Landfill (SOP.EHS.LIM.01 Rev.00 dated 1 May 2019). For ex pesticide container, the procedure explained:</p> <ul style="list-style-type: none"> ○ Pesticides are stored in the determined area separated from fertilizer and other chemicals. ○ Pesticide storage is provided in Divisions as well as in central storage. ○ Agrochemical storage is locked areas with limited access. The storage is ventilated. ○ MSDS and hazard symbol label are provided nearby of pesticides. ○ Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. ○ PPE for handling of pesticides was provided including boots, apron, safety glass, respiratory mask, and hand gloves. ○ The possible spill is managed. ○ Secondary containment is provided around the pesticide storage area. ○ Spill kit is also provided in the area. ○ All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes. <p>Toxic and hazardous waste are handled according to applicable regulations. Permit of hazardous waste temporary storage (TPS LB3) from "Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu" of Ketapang Regency", were evident as follow:</p> <ul style="list-style-type: none"> - No.209.1/DPMPTSP-D.B/2018 date 22 June 2018 and valid for 5 years, for PT Sukses Karya Sawit, at Air Hitam Hulu Village, Kendawangan District. - No.209.2/DPMPTSP-D.B/2018 date 22 June 2018 and valid for 5 years, for PT Bumi Sawit Sejahtera, at Natai Kuini Village, Kendawangan District. 	
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		<ul style="list-style-type: none"> - No.208.1/DPMPSTSP-D.B/2018 date 22 June 2018 and valid for 5 years, for PT Berkat Nabati Sejahtera, at Air Hitam Besar Village, Kendawangan District. <p>Record of hazardous waste handover from PT Sukses Karya Sawit, dated 7 July 2022, that has been transported by and sent to PT Semesta Langgeng Sentosa, consisted of:</p> <ul style="list-style-type: none"> - Used oil (0.18 tons ~ 9 can) - Used rags (0.0065 tons ~ 1 pcs) - Ex pesticide container (0.1237 tons) - Used battery (0.0296 tons ~ 7 pcs) <p>Manifest of hazardous waste No.KLHK-1659918910 for Ex pesticide container (0.1237 tons), dated 7 July 2022, vehicle: KH 8711 GN, delivered by licensed transporter, PT Semesta Langgeng Sentosa. Activities of recycling and reusing are conducted by the third party, PT Semesta Langgeng Sentosa. Report of hazardous waste management and monitoring has regularly reported to Environmental Agency of Ketapang Regency.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>There is no aerial spraying in PT. Sukses Karya Sawit, PT. Berkat Nabati Sejahtera, PT. Bumi Sawit Sejahtera.</p> <p>Not applicable.</p>	Not Applicable
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has prepared annual medical surveillance program for pesticide operators. Implementation of medical surveillance for year 2022 has been conducted by company doctor and the result has been informed to the related pesticides operators. Medical surveillance consists of:</p>	Complied

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		<ul style="list-style-type: none"> • Physical examination for all workers (blood pressure, heart rate, respiration, height and general physical examination), on 27 – 30 June 2022, all workers checked are in normal health condition. • Specific Medical surveillance result of BSS-1 Estate workers dated 23 Nov 2022; for 15 workers consist of spraying and fertilizing workers; the result is all workers were in good condition to work; the result has been disseminated to related workers. • Cholinesterase check conducted for sprayers (twice a year). Latest check for SKS Estate has been done on 26 Sep 2022 to 29 workers – carried out by Company Doctor, all workers checked indicated in normal health condition - with choline content 75% - 100% (normal). • Spirometry checked conducted for sprayer workers (twice a year). Due to pandemic COVID-19 situation, spirometry test are still not yet conducted as per Decree Letter from Ministry of Manpower of Republic Indonesia, No.5/151/AS.02/XI/2020 regarding "<i>Pedoman Keselamatan dan Kesehatan Kerja (K3) Pelaksanaan Pemeriksaan Kesehatan Tenaga Kerja pada Masa Pandemi COVID-19</i>" - "OHS Guidelines for Occupational Health Checks during COVID-19 Pandemic". <p>PT. Sukses Karya Sawit and PT. Berkat Nabati Sejahtera performed medical surveillance for pesticide operators using cholinesterase test, period once per annum. Latest medical check-up carried out 27-30 June 2022 by PT. Cahaya Purnama Krisnako. Audit team checked medical check up for 102 workers (estate and mills) in PT. Sukses Karya Sawit and found the cholinesterase test below parameter and all (100%) is fit to work. Audit team checked medical check-up for 92 workers (estate) in PT. Berkat Nabati Sejahtera and found the cholinesterase test below parameter and all 92 workers (100%) is fit to work.</p> <p>In BNS 2 Estate, sprayer/slashing worker has general medical examination in November 2021, for specific medical surveillance in June</p>	
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		2022, the result for worker attended the training has been communicated.	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>Company has performed monthly pregnancy screening for female worker, to prevent pregnant or breastfeeding women performing pesticide related work.</p> <p>In PT. Sukses Karya Sawit (SKS) Estate 2 and 3, pregnancy screening performed, and report sighted for period January – October 2022. For female worker identified pregnant, company doctor recommends moving to other section or perform other non-heavy work. Sampled pregnant female worker and the recommendation: SKS 2 Estate identified Agustina Taus (sprayer) positive pregnant on screening 2 November 2022, Company Doctor Recommendation "Surat Rekomendasi No.105/KLINIK-SKS/SR/XI/2022", dated 2 November 2022 - Recommendation to move to another department. Identified Ema Susanti (SKS 3 Estate sprayer) positive pregnant on screening 26 October 2022, Company Doctor Recommendation "Surat Rekomendasi No.96/KLINIK-SKS/SR/XI/2022", dated 26 October 2022 - Recommendation to move to another department.</p>	Complied
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>Unit of certification has established procedure of Waste Management including its environment and safety aspect as documented in "Keselamatan Kesehatan Kerja & Lingkungan Pengelolaan Limbah dan Landfill (SOP.EHS.LIM.01 Rev.00 dated 1 May 2019). The procedure explained reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics.</p> <p>Hazardous and medical waste are transported and disposed to the licensed collector, whilst domestic waste is disposed to the landfill. Organic and inorganic waste is separated in line site. Inorganic wastes are sent to the landfill and some of it collected for re-cycle. Landfill location is far enough from the employee housing, around ± 2 km</p>	Non-compliance

		<p>distance. The audit team has visited the landfill of SKS 2 Estate which located at Bloc K17. Active landfill opened on 30 Oct 2022, whilst closed landfill opened on 31 Aug 2022 and closed on 30 Sep 2022. In general landfill conditions are good and maintained.</p> <p>Toxic and hazardous waste are handled according to applicable regulations. Permit of hazardous waste temporary storage (TPS LB3) from "Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu" of Ketapang Regency", were evident as follow:</p> <ul style="list-style-type: none"> - No.209.1/DPMPTSP-D.B/2018 date 22 June 2018 and valid for 5 years, for PT Sukses Karya Sawit, at Air Hitam Hulu Village, Kendawangan District. - No.209.2/DPMPTSP-D.B/2018 date 22 June 2018 and valid for 5 years, for PT Bumi Sawit Sejahtera, at Natai Kuini Village, Kendawangan District. - No.208.1/DPMPTSP-D.B/2018 date 22 June 2018 and valid for 5 years, for PT Berkat Nabati Sejahtera, at Air Hitam Besar Village, Kendawangan District. <p>Record of hazardous waste handover from PT Sukses Karya Sawit, dated 7 July 2022, that has been transported by and sent to PT Semesta Langgeng Sentosa, consisted of:</p> <ul style="list-style-type: none"> - Used oil (0.18 tons ~ 9 can) - Used rags (0.0065 tons ~ 1 pcs) - Ex pesticide container (0.1237 tons) - Used battery (0.0296 tons ~ 7 pcs) <p>Manifest of hazardous waste No.KLHK-1659918910 for Ex pesticide container (0.1237 tons), dated 7 July 2022, vehicle: KH 8711 GN, delivered by licensed transporter, PT Semesta Langgeng Sentosa. Activities of recycling and reusing are conducted by the third party, PT Semesta Langgeng Sentosa. Report of hazardous waste management</p>	
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		<p>and monitoring has regularly reported to Environmental Agency of Ketapang Regency.</p> <p>Sample of reuse and recycle in estates are reusing the fertilizer sack for loose fruit base, which previously triple rinsed; and recycle of 20 L ex-pesticides container, which triple rinsed, label removed, painted red recycled in the field. Reducing waste and recycling by SKS Mill are performed by reusing by product, that is fibre and shell as fuel of boiler. Detail of Shell and Fiber usage for period July 2021 to June 2022 are described in indicator 7.9.1.</p> <p>NC Minor: The implementation of waste management plan has not monitored properly.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview with workers and managers, demonstrated that they understood proper disposal of waste material, according to procedures. Hazardous and medical waste are disposed to the licensed collector, whilst domestic waste disposed to the landfill. License of collector:</p> <ul style="list-style-type: none"> - "Rekomendasi Pengangkutan Limbah Bahan Berbahaya dan Beracun (Limbah B3)" No.S.478/PSLB3-VPLB3/PPLB3/PLB.3/12/2021 dated 20 Dec 2021, issued by "Ditjen Pengelolaan Sampah, Limbah dan Bahan Beracun Berbahaya", this recomedation valid for 5 years. - "Izin Penyelenggaraan Angkutan Barang Khusus untuk mengangkut Barang Berbahaya (B3), dated 28 Dec 2018, for PT Semesta Langgeng Sentosa, Jl. Pramuka RT 02 Kel. Pasir Panjang Kecamatan Arut Selatan, truck KH 8722 GN, KH 8721 GN, KH 8718 GN, KH 8717 GN, and KH 8716 GN. 	Non-compliance

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		<p>- Contract No.195/SPK/SLS-BSS/IX/2022 dated 22 Sep 2022, between PT Bumi Sawit Sejahtera and PT Semesta Langgeng Sentosa regarding Transport and Collection of Hazardous and Toxic Waste.</p> <p>Organic and inorganic waste is separated in line site. Organic and Inorganic waste are sent to the landfill and some of it collected for recycle. Field visit to landfill area at Block K17 SKS-2 Estate, found that the location is in good condition and far from the emplacement. Date of landfill open and closed are available.</p> <p>Infectious waste from clinic; Clinic in PT. Sukses Karya Sawit handed over infectious waste to temporary hazardous waste storage (TPS Limbah B3): "Berita Acara Limbah B3 Klinik No.088/SKS/IX/2022" dated 20 September 2022, whereby clinic handed/disposed of sputum, IV hose, expired medicine, etc. – totalling 14 kg. "Berita Acara Limbah B3 Klinik No.041/SKS/VIII/2022" dated 4 August 2022, whereby clinic handed/disposed of used syringe, used glove, IV hose, testpack, etc. – totalling 16.5 kg.</p> <p>However, NC Minor issued:</p> <p>Waste management plan is in place, however audit team found food refuse from housing packed using plastic and disposed of into "TPSA Dapur" pit.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Based on field observation and interview with workers and stakeholders, there are no use of open fire for waste disposal.	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented. - Minor compliance -	<p>The organization has established SOP to maintain soil fertility that ensures optimal and sustained yield, as follows:</p> <ol style="list-style-type: none"> 1. SOP.SNA.AGR.7.1 Rev #1 dated 1 May 2019, "SOP Analisa Daun" – for leaf analysis. 2. SOP.SNA.AGR.8.0 Rev #1 dated 1 May 2019, "SOP Pengambilan 	Complied

		<p>Sample Tanah” – for soil sample taking.</p> <ol style="list-style-type: none"> 3. SOP.SNA.AGR.9.1 Rev #1 dated 1 May 2019, “SOP Aplikasi Pemupukan Secara Manual TBM dan TM” for fertilizer application in immature and mature oil palms. 4. SOP.SNA.AGR.9.2 Rev #1 dated 1 May 2019, “SOP Aplikasi Pemupukan Bantuan Angkong TBM – TM” – for fertilizer application in immature and mature using wheelbarrow. 5. SOP.SNA.AGR.9.3 Rev #1 dated 1 May 2019, “SOP Aplikasi Pemupukan Bantuan Kerbau TBM – TM” – for fertilizer application in immature and mature using buffalo. 6. SOP.SNA.AGR.9.4 Rev #1 dated 1 May 2019, “SOP Pemupukan Semi Mekanis TBM – TM” – for semi-mechanical fertilizer application. 7. SOP.SNA.AGR.9.5 Rev #1 dated 1 May 2019, “SOP Pemupukan Kacangan Tanaman Penutup Tanah” – for fertilizing land cover crop. 8. SOP.SNA.AGR.9.6 Rev #1 dated 1 May 2019, “SOP Janjangan Kosong Sebagai Mulsa” – for empty fruit bunch application. 9. SOP.SNA.AGR.9.7 Rev #1 dated 1 May 2019, “SOP Aplikasi POME” – for POME application. 10. SOP.SNA.AGR.9.8 Rev #1 dated 1 May 2019, “SOP Pengambilan Sample Pupuk untuk dianalisa” – for fertilizer sample taking for analysis. 11. SOP.SNA.AGR.9.9 Rev #1 dated 1 May 2019, “SOP Perencanaan dan Organisasi Aplikasi Pemupukan” – for planning and organizing fertilizer application. <p>The above SOPs cover leaf and soil analysis, fertilizer application, EFB and POME application.</p> <p>Leaf and soil analysis results were evident, as well as Fertilizer Recommendation and Application Program.</p>	
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<p>7.4.2</p>	<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>Records of periodical leaf sampling analysis are available for all estates of SKS, BNS and BSS. For example, the last periodical leaf sample analysis in SKS 1 Estate conducted in October 2021 for preparing fertilizer recommendation 2022. Leaf Analysis Report No.01/R&D PT SKS (Plasma)/10/2021 was issued by Citra Borneo Indah, analyze date 26 Oct 2021, consist of 16 samples (Lab No. 21L.9225 – 21L.9240). Sample seen Lab No. 21L.9240; Division A; Block S7; Sample code TM016; Analysis Result: 2.48% N; 0.156% P; 0.86% K; 0.47% Mg; 0.36% Ca; 11.2 ppm B; 7.9 ppm Cu; 9.9 ppm Zn; 405 ppm Mn; 86.7 ppm Fe.</p> <p>Records of soil sampling analysis are available for all estates of SKS, BNS and BSS. For example, latest Soil Analysis report of BNS-1 Estate was evident based on certificate of analysis No.013/LAB.02/EKS/XI/2021 dated of sample received 22 Oct 2021; based on reference No.02/R&D PT BNS 01/Inti/09/2021; analyze date 5 Nov 2021, consist of 20 samples. Sample verified Lab No.21B.5973; Div. A; Block B3; area 50.04 Ha; Sample code BNS 01/B3/0-15; Analysis Result: pH H₂O 4.21; 15.66% C-Organic; 0.28% N-Total; 404.5 ppm P-Total; 20.8 ppm P-Bray N; 17.38 m.e/100g CEC.</p>	<p>Complied</p>
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Permit for POME application based on “Keputusan Bupati Ketapang No.022/DPMPTSP-D.B/2019” dated 13 Feb 2019, regarding “Izin Pemanfaatan Air Limbah dari Industri Minyak Sawit pada Tanah di Perkebunan Kelapa Sawit kepada PT Sukses Karya Sawit seluas 226.03 Ha yang berlokasi di Kecamatan Kendawangan Kabupaten Ketapang” – permit of POME application on plantation of PT Sukses Karya Sawit, covers 226.03 Ha; valid for 5 years. Obligation of the company is BOD not more than 5000 mg/l and pH range at 6 – 9. Area of application consist of 20 blocks, which is I16B, I17A, J16B, J17A, J13B, J14A, J14B, J15A, J15B, I15A, I15B, I16A, J16A, I17B, J17B, I18A, I18B, J18B, J19A and I19B. total Block area is 508.65 Ha and total application area is 226.03 Ha.</p>	<p>Complied</p>

		<p>EFB application in SKS 2 Estate for period Jul 2021 to Jun 2022: Plan 23,632 tons; actual 18,731 tons; period Jul 2022 to Jun 2023: Plan 23,632 tons; actual 11,256 tons. EFB application in SKS 3 Estate for period Jul 2021 to Jun 2022: Plan 29,108 tons; actual 19,034 tons; period Jul 2022 to Jun 2023: Plan 29,482 tons; actual 2,914 tons. EFB application focused on sandy soil.</p>	
7.4.4	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizer recommendation described type and volume of fertilizer needed for each Block. Records of fertilizer inputs are available in "Fertilizer Recommendation and Application Program".</p> <p>Record of fertilizer inputs are available and maintained for all estates of SKS, BNS and BSS. For example, record of fertilizer input in SKS 2 Estate:</p> <ul style="list-style-type: none"> - Div. A; Block L2; fertilizer type Compound 44+B (AC); dosage 2.25 kg/palms; application in October 2022: 12.35 tons; 46.52 Ha. - Div. D; Block M15; fertilizer type Compound 44+B (AC); dosage 2.25 kg/palms; application in September 2022: 9.80 tons; 31.53 Ha. <p>Sample record of fertilizer input in BSS 2 Estate:</p> <ul style="list-style-type: none"> - Div. C; Block H14; fertilizer type Compound 65+B (AC); dosage 2.00 kg/palms; application in July 2022: 7.02 tons; 28.71 Ha; dosage 1.75 kg/palms; application in September 2022: 6.14 tons; 28.71 Ha. - Div. C; Block I17; fertilizer type Compound 65+B (AC); dosage 2.00 kg/palms; application in July 2022: 3.15 tons; 19.90 Ha; dosage 1.75 kg/palms; application in September 2022: 2.76 tons; 19.90 Ha. 	Complied
<p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT Sukses Karya Sawit and PT Berkas Nabati Sejahtera has performed soil survey analysis to identify soil type, slope, topography and land suitability class in June – Aug 2016, that the result is documented in "<i>Verifikasi dan Pemetaan Lahan Gambut</i>" – Peatland verification and Mapping by Aksenta, Dec 2016. Maps that identify marginal and fragile</p>	Complied

		<p>soils, including steep sloped land are available. Result of identification based on the document are:</p> <ul style="list-style-type: none"> - Peat area in PT SKS is 39.5% of all IUP area, consist of depth >300 cm is 482.6 Ha and depth <300 cm is 3,301.8 Ha. - Peat area in PT BNS is 208.44 Ha and all have <300 cm depth. - Peat in PT SKS is not included in map of "Kesatuan Hidrologi Gambut (KHG)" from Ministry of Environment and Forestry, whilst PT BNS is include in KHG Sungai Air Hitam and Sungai Jelai. - Based on hydrology, peat area in IUP PT SKS can be mapped into three KHG, which is KHG Sungai Buluh, KHG Sungai Pembedilan and KHG Sungai Sanal. - All peat in PT SKS and PT BNS can be used for oil palm cultivations. <p>PT Bumi Sawit Sejahtera has performed soil survey analysis to identify soil type, slope, topography and land suitability class in June – Aug 2014, that the result is documented in "Survey dan Pemetaan Lahan Gambut" – Peatland Survey and Mapping by Aksenta, Aug 2014. Maps that identify marginal and fragile soils, including steep sloped land are available. Result of identification based on the document are:</p> <ul style="list-style-type: none"> - Peat area in PT BSS is 1,437.22 Ha of which have depth ≥300 cm covers 427.31 Ha. Peat with depth <300 cm located in sporadic area with proportion 10.03% from the total area 10,067.21 Ha. - Peat in PT BSS have mineral soil substratum <i>Typic endoaquepts</i> and <i>Psamments</i> and not sulphite acid. - Maturity of peat in PT BSS is hemic-sapric. - Based on Indonesian regulation, peat area that has to be conserve is 427.31 Ha. <p>The unit of certification has performed soil survey that conducted by Param Agricultural Soil Survey Sdn. Bhd. in July 2018 Co. No.208039-H. reported that topography and drainage are estates has land with slope</p>	
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		<p>level 0-4% or 0-2°. Most of the areas are Marine/Estuarine plain and sandy beach ridges which are well to moderately well drained and these low-lying were imperfectly drained flooded/waterlogged in the natural state but now has been artificially drained using canals and control structures. The result of soil survey indicates that the soil can be placed into two (2) soil management group, as follow:</p> <ul style="list-style-type: none"> - Soil Management Group D: Main Characteristic: shallow (<50 cm) to moderately deep (50-100 cm) and deep (>100 cm) sandy (<10% clay) soils with albic and spodic horizons. Excessively drained. Moisture stress and yield fluctuation. Management practices needed: EFB application, frond stacking, erosion monitoring and mitigation, soil moisture conservation, cover crop (Mucuna) establishment, additional fertilizers (split), break cemented pan. - Soil Management Group I: Main Characteristic: Coastal silty clay to clay soils. Poor drainage. Acid sulphate layer below 50 cm or no acid sulphate layer. Management practices needed: Drained with some controls, fertilization. <p>There is no steep slope in all estates of PT SKS, PT BNS and PT BSS and no other fragile soil than peat and sandy soil.</p>	
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>There is no steep slope in all estates of PT SKS, PT BNS and PT BSS and no other fragile soil than peat and sandy soil.</p>	Complied
7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on soil survey and mapping conducted in 2014 and 2016, there is no steep terrain exist in plantation area of PT SKS, PT BNS and PT BSS.</p>	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>Unit of certification has implemented the long-term suitability of land for oil palm cultivation, as the cultivation of oil palms can have significant impacts on the environment and local communities. One of way to assess the suitability of land for oil palm cultivation is to use soil maps or soil surveys. These can identify marginal and fragile soils, including steep terrain, which may not be suitable for oil palm cultivation due to their susceptibility to erosion and other environmental degradation. In planning and operations, it is important to use this information to select suitable areas for oil palm plantations and to minimize negative impacts on the environment and local communities.</p> <p>The unit of certification has performed soil survey that conducted by Param Agricultural Soil Survey Sdn. Bhd. in July 2018 Co. No.208039-H. reported that topography and drainage are estates has land with slope level 0-4% or 0-2°. Most of the areas are Marine/Estuarine plain and sandy beach ridges which are well to moderately well drained and these low-lying were imperfectly drained flooded/waterlogged in the natural state but now has been artificially drained using canals and control structures. The result of soil survey indicates that the soil can be placed into two (2) soil management group, as follow:</p> <ul style="list-style-type: none"> - Soil Management Group D: Main Characteristic: shallow (<50 cm) to moderately deep (50-100 cm) and deep (>100 cm) sandy (<10% clay) soils with albic and spodic horizons. Excessively drained. Moisture stress and yield fluctuation. Management practices needed: EFB application, frond stacking, erosion monitoring and mitigation, soil moisture conservation, cover crop (Mucuna) establishment, additional fertilizers (split), break cemented pan. 	Complied

		<ul style="list-style-type: none"> - Soil Management Group I: Main Characteristic: Coastal silty clay to clay soils. Poor drainage. Acid sulphate layer below 50 cm or no acid sulphate layer. Management practices needed: Drained with some controls, fertilization. 	
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>PT Sukses Karya Sawit and PT Berkat Nabati Sejahtera has performed soil survey analysis to identify soil type, slope, topography and land suitability class in June – Aug 2016, that the result is documented in “<i>Verifikasi dan Pemetaan Lahan Gambut</i>” – Peatland verification and Mapping by Aksenta, Dec 2016. Maps that identify marginal and fragile soils, including steep sloped land are available. Result of identification based on the document are:</p> <ul style="list-style-type: none"> - Peat area in PT SKS is 39.5% of all IUP area, consist of depth >300 cm is 482.6 Ha and depth <300 cm is 3,301.8 Ha. - Peat area in PT BNS is 208.44 Ha and all have <300 cm depth. - Peat in PT SKS is not included in map of “Kesatuan Hidrologi Gambut (KHG)” from Ministry of Environment and Forestry, whilst PT BNS is include in KHG Sungai Air Hitam and Sungai Jelai. - Based on hydrology, peat area in IUP PT SKS can be mapped into three KHG, which is KHG Sungai Buluh, KHG Sungai Pembedilan and KHG Sungai Sanal. - All peat in PT SKS and PT BNS can be use for oil palm cultivations. <p>PT Bumi Sawit Sejahtera has performed soil survey analysis to identify soil type, slope, topography and land suitability class in June – Aug 2014, that the result is documented in “<i>Survey dan Pemetaan Lahan Gambut</i>” – Peatland Survey and Mapping by Aksenta, Aug 2014. Maps that identify marginal and fragile soils, including steep sloped land are available. Result of identification based on the document are:</p>	Complied

		<ul style="list-style-type: none"> - Peat area in PT BSS is 1,437.22 Ha of which have depth ≥ 300 cm covers 427.31 Ha. Peat with depth < 300 cm located in sporadic area with proportion 10.03% from the total area 10,067.21 Ha. - Peat in PT BSS have mineral soil substratum <i>Typic endoaquepts</i> and <i>Psammets</i> and not sulphite acid. - Maturity of peat in PT BSS is hemic-sapric. - Based on Indonesian regulation, peat area that has to be conserve is 427.31 Ha. <p>Planting on peatland can have significant environmental impacts, as peatlands play a critical role in carbon storage and the regulation of greenhouse gas emissions. Unit of certification carefully consider the suitability of peatland for planting and to follow a best-practice soil management plan if planting on peatland is necessary. A best-practice soil management plan for planting on peatland include measures to minimize the impact on the peat and to protect the peatland ecosystem.</p>	
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 surveys and topographic information that conducted by Param Agricultural Soil Survey Sdn. Bhd. in July 2018 are uses in the planning of drainage and irrigation systems, roads, and other infrastructure in oil palm plantations. Soil surveys provide information about the physical, chemical, and biological properties of the soil, including its drainage characteristics, which can help to inform the design of drainage systems. Topographic information, such as maps showing the elevation and slope of the land, can also be useful in the planning of infrastructure, as it can help to identify areas that may be prone to erosion or flooding and inform the design of appropriate infrastructure to manage these risks. In addition, soil surveys and topographic information helps to identify the most suitable locations for infrastructure such as roads and processing facilities, which can help to minimize the impact on the environment and local communities.</p>	Complied

Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<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>There is no new planting after 2014 within area of PT Sukses Karya Sawit and PT Berkat Nabati Sejahtera, planting year 2015-2017 is only existed in PT Bumi Sawit Sejahtera.</p> <p>There is no new planting on peatlands, regardless of depth, after 15 November 2018, in whole area of unit of certification.</p>	Complied
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p>	<p>PT Sukses Karya Sawit and PT Berkat Nabati Sejahtera has performed soil survey analysis to identify soil type, slope, topography and land suitability class in June – Aug 2016, that the result is documented in “<i>Verifikasi dan Pemetaan Lahan Gambut</i>” – Peatland verification and Mapping by Aksenta, Dec 2016. Maps that identify marginal and fragile soils, including steep sloped land are available. Result of identification based on the document are:</p> <ul style="list-style-type: none"> - Peat area in PT SKS is 39.5% of all IUP area, consist of depth >300 cm is 482.6 Ha and depth <300 cm is 3,301.8 Ha. - Peat area in PT BNS is 208.44 Ha and all have <300 cm depth. - Peat in PT SKS is not included in map of “Kesatuan Hidrologi Gambut (KHG)” from Ministry of Environment and Forestry, whilst PT BNS is include in KHG Sungai Air Hitam and Sungai Jelai. - Based on hydrology, peat area in IUP PT SKS can be mapped into three KHG, which is KHG Sungai Buluh, KHG Sungai Pembedilan and KHG Sungai Sanal. - All peat in PT SKS and PT BNS can be use for oil palm cultivations. <p>PT Bumi Sawit Sejahtera has performed soil survey analysis to identify soil type, slope, topography and land suitability class in June – Aug 2014, that the result is documented in “<i>Survey dan Pemetaan Lahan Gambut</i>” – Peatland Survey and Mapping by Aksenta, Aug 2014. Maps that</p>	Complied

		<p>identify marginal and fragile soils, including steep sloped land are available. Result of identification based on the document are:</p> <ul style="list-style-type: none"> - Peat area in PT BSS is 1,437.22 Ha of which have depth ≥ 300 cm covers 427.31 Ha. Peat with depth < 300 cm located in sporadic area with proportion 10.03% from the total area 10,067.21 Ha. - Peat in PT BSS have mineral soil substratum <i>Typic endoaquepts</i> and <i>Psammets</i> and not sulphite acid. - Maturity of peat in PT BSS is hemic-sapric. - Based on Indonesian regulation, peat area that has to be conserve is 427.31 Ha. <p>Peat Inventory Report has been submitted to RSPO Secretariat by email, include attachment Peat Boundary Shape file. Acknowledgement of receiving all documents for peat inventory has been made by RSPO GHG Unit on 22 July 2020.</p>	
<p>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).</p>			
<p>7.7.3</p>	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Subsidence of peat is monitored, documented and minimized according to procedure "Pengelolaan dan Monitoring Water Management Pada Areal Gambut & Rendahan" – Water management and monitoring on peat and low land (SOP.WMS.01 Rev.02 dated 1 Jul 2019); "Manajemen dan Monitoring Budidaya Kelapa Sawit pada Areal Gambut/Rendahan" – management and monitoring of oil palm cultivation on peat / lowland (SOP.SNA.AGR.13.1 Rev.0 May 2019).</p> <p>Available Water Management Plan 2022 PT Sukses Karya Sawit, which is a strategy for conserving and using water resources in a responsible and sustainable manner. A water management plan developed involving a range of measures, such as:</p> <ul style="list-style-type: none"> - Identifying and prioritizing water needs; 	<p>Complied</p>

		<ul style="list-style-type: none"> - Developing strategies for conserving water; - Developing and implementing policies to protect water quality and manage water use; - Protecting and restoring natural water resources; - Developing infrastructure, such as reservoirs and treatment facilities, to capture, store, and distribute water; <p>The goal of a water management plan is to ensure that water resources are used efficiently and sustainably, in a way that meets the needs of all stakeholders, including households, operations, and the environment.</p> <p>Unit of certification have installed and maintained water gates, main drain gate, main drainage, secondary drainage and collection drainage. Regular maintenance of drainages were evident. Monitoring and recording water level and water table in weekly interval – as well as take immediate action, to open/close water gate accordingly, in order to maintain water level in optimum level. This activity has been supported by trained supervisor.</p> <p>Monitoring of water management by means of regular inspection and recording of water level, piezo meter, peat subsidence level and water gate lever. Record of monitoring were evident, such as “Laporan Monitoring Laju Subsiden”, “Laporan Monitoring Tinggi Muka Air Tanah”, Map of monitoring point includes Piescale, piezometer, subsidence, logger and screw gate.</p> <p>Available decree of Determination of Groundwater Level Monitoring Points, Installation Points of Automatic Groundwater Level Gauges, and Rainfall Monitoring Station Points PT Bumi Sawit Sejahtera from Director General of Pollution and Environmental Damage Control as in “Keputusan Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan” No. SK.69/PPKL/PKG/PKL.0/11/2017, dated 16 Nov 2017, regarding “Penetapan Titik Penaatan Tinggi Muka Air Tanah, Titik</p>	
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		<p>Pemasangan Alat Pengukur Tinggi Muka Air Tanah Otomatis, dan Titik Stasiun Pemantauan Curah Hujan PT Bumi Sawit Sejahtera”.</p>																															
<p>7.7.4</p>	<p>(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -</p>	<p>Evidence of water and land cover management implementation were available such as “Laporan Monitoring Laju Subsiden”, “Laporan Monitoring Tinggi Muka Air Tanah”, Map of monitoring point includes Piescale, piezometer, subsidence, logger and screw gate.</p> <p>Water table level monitoring based on “Laporan Monitoring Tinggi Muka Air Tanah” period 2nd week of November 2022 recorded:</p> <table border="1" data-bbox="1133 655 1570 1399"> <thead> <tr> <th>Block</th> <th>Water table (cm)</th> </tr> </thead> <tbody> <tr><td>K8</td><td>6</td></tr> <tr><td>L8</td><td>-16</td></tr> <tr><td>L9</td><td>-8</td></tr> <tr><td>M9</td><td>-27</td></tr> <tr><td>M8</td><td>-18</td></tr> <tr><td>M7</td><td>-7</td></tr> <tr><td>M2</td><td>-19</td></tr> <tr><td>M3</td><td>-23</td></tr> <tr><td>M14</td><td>-33</td></tr> <tr><td>N9</td><td>-52</td></tr> <tr><td>N7</td><td>-48</td></tr> <tr><td>O1</td><td>12</td></tr> <tr><td>O3</td><td>-6</td></tr> <tr><td>O4</td><td>-25</td></tr> </tbody> </table>	Block	Water table (cm)	K8	6	L8	-16	L9	-8	M9	-27	M8	-18	M7	-7	M2	-19	M3	-23	M14	-33	N9	-52	N7	-48	O1	12	O3	-6	O4	-25	<p>Complied</p>
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		<table border="1"> <tr> <td>P3</td> <td>-3</td> </tr> <tr> <td>E20 (HCV)</td> <td>59</td> </tr> <tr> <td>F19 (HCV)</td> <td>n/a</td> </tr> <tr> <td>H11 (HCV)</td> <td>29</td> </tr> <tr> <td>H19</td> <td>-8</td> </tr> <tr> <td>I10 (HCV)</td> <td>8</td> </tr> <tr> <td>K14</td> <td>13</td> </tr> </table>	P3	-3	E20 (HCV)	59	F19 (HCV)	n/a	H11 (HCV)	29	H19	-8	I10 (HCV)	8	K14	13	<p>Available report of peatland monitoring as on "Berita Acara Pemantauan Lahan Gambut" No. 01/GIS/PT.BSS/XI/2022 dated 5 Nov 2022. Monitoring was conducted at Block Q6, P7, P6 and P5. In general, condition in first to third week of July were normal, whilst flooding in forth week. In first week of August were still flooding, whilst in second to forth week were normal. In first to second week of September condition were flooding, whilst in third to forth week were normal. In first to third week of October were flooding, whilst in forth week were normal.</p> <p>Based on visit to piezometer, subsidence pole and water level pole at Block N7 Division C SKS 2 Estate, logger at Block P6 Division A BSS 1 Estate, verified that water and land cover management were implemented according to the program and SOP.</p>	
P3	-3																	
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7.7.5	<p>(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</p>	<p>A drainability assessment is a study that evaluates the ability of a piece of land to drain water effectively. This assessment is conducted in order to determine the suitability of a site for development, or to identify potential issues with drainage that may need to be addressed.</p> <p>There are several factors that can impact the drainability of a site, including the soil type, slope, vegetation, and other physical characteristics. A drainability assessment involves collecting data on</p>	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>these and other factors and using this information to evaluate the site's drainage capabilities. This may include analyzing historical data on precipitation and runoff, conducting field inspections, and using computer modelling or other techniques to simulate the movement of water on the site.</p> <p>The age of the oil palms in whole are of unit of certification are range between 4 to 14 years. Replanting approximately started in 2034. Company will start record data for drainability assessment starting year 2025. Water management plan are established and implemented by unit of certification as per best management practices on peatland area and Indonesia national regulations requirements.</p> <p>Water management activities which conducted by unit of certification i.e permanent well monitoring, water gate installation, monitoring peat subsidence and monitoring flood area. As in the requirement, drainability assessment will be conducted 5 (five) years prior to replanting.</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>Unit of certification managed existing plantations on peat according to applicable laws and best management practices in order to minimize the negative impacts of oil palm cultivation on the environment and local communities. Unit of certification has followed RSPO's "Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands," which provide guidance on the responsible management of oil palm plantations on peatland. These guidelines cover a range of topics, including land use planning, soil and water</p>	Complied

		<p>management, and biodiversity conservation. By following these guidelines and applicable laws, companies can help to minimize the negative impacts of oil palm cultivation on peatlands and contribute to the sustainable development of the industry.</p>	
<p>7.7.7</p>	<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>Peat areas that are not already being used for oil palm cultivation has been protected as "peatland conservation areas", as example visited in Block M7. In these areas, unit of certification are not planting oil palms, constructing drainage channels, building roads, and installing electricity lines.</p> <p>Peatlands that are already being used for oil palm cultivation has been managed in accordance with the RSPO's Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands, along with relevant audit guidelines. Subsidence of peat is monitored, documented and minimized according to procedure "Pengelolaan dan Monitoring Water Management Pada Areal Gambut & Rendahan" – Water management and monitoring on peat and low land (SOP.WMS.01 Rev.02 dated 1 Jul 2019); "Manajemen dan Monitoring Budidaya Kelapa Sawit pada Areal Gambut/Rendahan" – management and monitoring of oil palm cultivation on peat / lowland (SOP.SNA.AGR.13.1 Rev.0 May 2019).</p> <p>Unit of certification have installed and maintained water gates, main drain gate, main drainage, secondary drainage and collection drainage. Regular maintenance of drainages was evident. Monitoring and recording water level and water table in weekly interval – as well as take immediate action, to open/close water gate accordingly, in order to maintain water level in optimum level. This activity has been supported by trained supervisor.</p> <p>Monitoring of water management by means of regular inspection and recording of water level, piezo meter, peat subsidence level and water gate lever. Record of monitoring were evident, such as "Laporan</p>	<p>Complied</p>

		<p>Monitoring Laju Subsiden”, “Laporan Monitoring Tinggi Muka Air Tanah”, Map of monitoring point includes Piescale, piezometer, subsidence, logger and screw gate.</p> <p>Available decree of Determination of Groundwater Level Monitoring Points, Installation Points of Automatic Groundwater Level Gauges, and Rainfall Monitoring Station Points PT Bumi Sawit Sejahtera from Director General of Pollution and Environmental Damage Control as in “Keputusan Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan” No. SK.69/PPKL/PKG/PKL.0/11/2017, dated 16 Nov 2017, regarding “Penetapan Titik Penaatan Tinggi Muka Air Tanah, Titik Pemasangan Alat Pengukur Tinggi Muka Air Tanah Otomatis, dan Titik Stasiun Pemantauan Curah Hujan PT Bumi Sawit Sejahtera”.</p>	
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Based on visit to employees housing complex at estates of PT Sukses Karya Sawit, PT Berkat Nabati Sejahtera and PT Bumi Sawit Sejahtera found that water source for bathing and washing are using ground water. Whilst water for consumption (drink and cooking), all employees buying bottled or refill water. Access to clean water is within reach of workers.</p>	Complied
	7.8.1b Workers have adequate access to clean water.	<p>Watercourses which available in unit of certification is stream and reservoir for Mill. Maintaining riparian areas is by planting with local woody species. Riparian areas are important for water quality, habitat, and other ecological functions. Maintaining riparian areas involve a variety of activities, including planting with local woody species. Planting trees, shrubs, and other woody plants along the banks of rivers and streams can help to stabilize the soil and prevent erosion. Plant species planted are native to the region and well-suited to the local climate and soil conditions.</p>	

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		Auditor team conducted onsite visit to stream buffer zones at Sungai Air Hitam and Sungai Jelai. The management of riparian areas which implemented by unit of certification is already following RSPO Manual on BMPs for the management and rehabilitation of riparian reserves (April 2017).	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>Company prepared Integrated Management Plan for HCV and conservation area including water buffer zone and water source. The monitoring carried out on regular manner, and company install signboard related to river buffer zone/conservation in strategic spot along the river buffer zone.</p> <p>Integrated Management Plan implementation in year 2022: promoting natural succession of <i>Nephrolepis biserrata</i> and <i>Malaleuca leucadendra</i> in Buluh river buffer zone 15.81 Ha; in Buluh river buffer zone 5.11 Ha.</p> <p>Company conducted socialization to surrounding community on the importance preserving river buffer zone and water source as well as preventing land and forest fire to surrounding community of Pembedilan village dated 27 July 2022; 16 community members attended.</p>	Complied
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Permit for POME application based on "Keputusan Bupati Ketapang No.022/DPMPSTP-D.B/2019" dated 13 Feb 2019, regarding "Izin Pemanfaatan Air Limbah dari Industri Minyak Sawit pada Tanah di Perkebunan Kelapa Sawit kepada PT Sukses Karya Sawit seluas 226.03 Ha yang berlokasi di Kecamatan Kendawangan Kabupaten Ketapang" – permit of POME application on plantation of PT Sukses Karya Sawit, covers 226.03 Ha; valid for 5 years. Obligation of the company is BOD not more than 5000 mg/l and pH range at 6 – 9. Area of application consist of 20 blocks, which is I16B, I17A, J16B, J17A, J13B, J14A, J14B, J15A, J15B, I15A, I15B, I16A, J16A, I17B, J17B, I18A, I18B, J18B, J19A and I19B. total Block area is 508.65 Ha and total application area is 226.03 Ha.</p>	Complied

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		<p>The quality of mill effluent discharged, is monitored in accordance with applicable regulations. Parameter monitored are debit, BOD₅, COD, pH, oil/fat, Pb, Cu, Cd and Zn. Sample of result verified: No. 2060/PKN/V/22 dated 21 Jun 2022; sample received on 25 May 2022; analysed on 31 May 2022 – 21 Jun 2022; result comply to Ministry of Health regulation - "Permentan No.32 Tahun 2017 Lampiran I".</p>																					
<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Raw water was utilized for mill operations (include boilers, processes, and domestics usage) that through the water treatment plant (using physicals and chemicals method) and for estate operations (include housing, pesticides mixings and office operations). Permit of water use based on "Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat No. 470/KPTS/M/2021" dated 16 Apr 2021, regarding "Pemberian Izin Pengusahaan Sumber Daya Air kepada PT Sukses Karya Sawit untuk Operasional Pabrik Kelapa Sawit di Sungai Buluh Kabupaten Ketapang Provinsi Kalimantan Barat". Located at 2° 46' 21" S and 110° 36' 21.64", quota of water usage is 22.5 L/sec.</p> <p>Flow meters were installed to monitor water usage. The monitoring of water volume utilization was conducted. Budget of water consumption for processing is 1.50 m³/ton FFB.</p> <p>According to the record of water consumption period July 2021 to October 2022, water consumption still below budget.</p> <table border="1" data-bbox="1133 1083 1951 1361"> <thead> <tr> <th>Month</th> <th>FFB Processing (ton)</th> <th>Water usage (m³)</th> <th>Mill water use per tonne of FFB</th> </tr> </thead> <tbody> <tr> <td>Jul-21</td> <td>17,659.60</td> <td>18,282.28</td> <td>1.04</td> </tr> <tr> <td>Aug-21</td> <td>18,464.40</td> <td>19,127.28</td> <td>1.04</td> </tr> <tr> <td>Sep-21</td> <td>14,039.69</td> <td>14,195.20</td> <td>1.01</td> </tr> <tr> <td>Oct-21</td> <td>15,488.29</td> <td>15,559.28</td> <td>1.00</td> </tr> </tbody> </table>	Month	FFB Processing (ton)	Water usage (m ³)	Mill water use per tonne of FFB	Jul-21	17,659.60	18,282.28	1.04	Aug-21	18,464.40	19,127.28	1.04	Sep-21	14,039.69	14,195.20	1.01	Oct-21	15,488.29	15,559.28	1.00	<p>Complied</p>
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Oct-21	15,488.29	15,559.28	1.00																				

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		<table border="1"> <tr><td>Nov-21</td><td>15,897.36</td><td>15,454.88</td><td>0.97</td></tr> <tr><td>Dec-21</td><td>17,529.12</td><td>17,186.12</td><td>0.98</td></tr> <tr><td>Jan-22</td><td>20,282.96</td><td>18,654.64</td><td>0.92</td></tr> <tr><td>Feb-22</td><td>20,321.06</td><td>18,301.36</td><td>0.90</td></tr> <tr><td>Mar-22</td><td>24,579.50</td><td>23,472.12</td><td>0.95</td></tr> <tr><td>Apr-22</td><td>23,608.86</td><td>22,749.88</td><td>0.96</td></tr> <tr><td>May-22</td><td>22,022.88</td><td>22,595.52</td><td>1.03</td></tr> <tr><td>Jun-22</td><td>23,211.43</td><td>23,469.84</td><td>1.01</td></tr> <tr><td>Jul-22</td><td>21,185.79</td><td>23,336.44</td><td>1.10</td></tr> <tr><td>Aug-22</td><td>16,883.65</td><td>18,845.40</td><td>1.12</td></tr> <tr><td>Sep-22</td><td>18,158.70</td><td>20,982.72</td><td>1.16</td></tr> <tr><td>Oct-22</td><td>18,797.29</td><td>19,575.16</td><td>1.04</td></tr> </table> <p>Payment of water tax has been paid to the related agency according to the regulation. Available "Surat Ketetapan Pajak Daerah (SKPD) Pajak Air Permukaan" - Regional Tax Assessment Letter (SKPD) No. 973/2365/UPTPPD-WIL.KTP period October 2022, complemented with Transaction information to Bank BRI refer to related SKPD dated 28 Oct 2022.</p>	Nov-21	15,897.36	15,454.88	0.97	Dec-21	17,529.12	17,186.12	0.98	Jan-22	20,282.96	18,654.64	0.92	Feb-22	20,321.06	18,301.36	0.90	Mar-22	24,579.50	23,472.12	0.95	Apr-22	23,608.86	22,749.88	0.96	May-22	22,022.88	22,595.52	1.03	Jun-22	23,211.43	23,469.84	1.01	Jul-22	21,185.79	23,336.44	1.10	Aug-22	16,883.65	18,845.40	1.12	Sep-22	18,158.70	20,982.72	1.16	Oct-22	18,797.29	19,575.16	1.04	
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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 -	Unit of certification has prepared program for improving efficiency of fossil fuels uses and to optimize renewable energy. Fossil fuel records and trends are maintained and available during audit. Energy uses are recorded include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as	Complied																																																

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		<p>boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Below are summary of fossil fuel usage for Sukses Karya Sawit Mill, for 3 years period:</p> <table border="1"> <thead> <tr> <th>Desc.</th> <th>Unit</th> <th>Jul 2019 – Jun 2020</th> <th>Jul 2020 – Jun 2021</th> <th>Jul 2021 – Jun 2022</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>MT</td> <td>211,391</td> <td>226,032</td> <td>233,105</td> </tr> <tr> <td>CPO</td> <td>MT</td> <td>46,826</td> <td>48,475</td> <td>50,439</td> </tr> <tr> <td>Diesel</td> <td>Lt</td> <td>540,542</td> <td>540,092</td> <td>557,543</td> </tr> <tr> <td>Diesel/Ton FFB</td> <td>Lt/ton FFB</td> <td>2.56</td> <td>2.39</td> <td>2.39</td> </tr> <tr> <td>Diesel/Ton CPO</td> <td>Lt/ton CPO</td> <td>11.54</td> <td>11.14</td> <td>11.05</td> </tr> <tr> <td>Electricity</td> <td>kWh/ ton FFB</td> <td>0.05</td> <td>0.08</td> <td>0.05</td> </tr> <tr> <td>Electricity</td> <td>kWh/ ton CPO</td> <td>0.25</td> <td>0.39</td> <td>0.24</td> </tr> </tbody> </table> <p>Below are Shell and Fiber usage for efficiency of fossil fuel usage per ton of CPO produce period July 2021 – October 2022:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Fiber Usage (MT)</th> <th>Shell Usage (MT)</th> <th>CPO Produce (MT)</th> <th>Efficiency of fossil fuel usage per ton CPO</th> </tr> </thead> <tbody> <tr> <td>Jul-21</td> <td>2,296</td> <td>512</td> <td>3,799.98</td> <td>0.7385</td> </tr> <tr> <td>Aug-21</td> <td>2,400</td> <td>542</td> <td>4,008.61</td> <td>0.7339</td> </tr> <tr> <td>Sep-21</td> <td>1,825</td> <td>425</td> <td>3,122.75</td> <td>0.7205</td> </tr> <tr> <td>Oct-21</td> <td>2,013</td> <td>485</td> <td>3,491.70</td> <td>0.7154</td> </tr> <tr> <td>Nov-21</td> <td>2,067</td> <td>512</td> <td>3,604.41</td> <td>0.7155</td> </tr> <tr> <td>Dec-21</td> <td>2,279</td> <td>575</td> <td>3,962.88</td> <td>0.7201</td> </tr> </tbody> </table>	Desc.	Unit	Jul 2019 – Jun 2020	Jul 2020 – Jun 2021	Jul 2021 – Jun 2022	FFB	MT	211,391	226,032	233,105	CPO	MT	46,826	48,475	50,439	Diesel	Lt	540,542	540,092	557,543	Diesel/Ton FFB	Lt/ton FFB	2.56	2.39	2.39	Diesel/Ton CPO	Lt/ton CPO	11.54	11.14	11.05	Electricity	kWh/ ton FFB	0.05	0.08	0.05	Electricity	kWh/ ton CPO	0.25	0.39	0.24	Month	Fiber Usage (MT)	Shell Usage (MT)	CPO Produce (MT)	Efficiency of fossil fuel usage per ton CPO	Jul-21	2,296	512	3,799.98	0.7385	Aug-21	2,400	542	4,008.61	0.7339	Sep-21	1,825	425	3,122.75	0.7205	Oct-21	2,013	485	3,491.70	0.7154	Nov-21	2,067	512	3,604.41	0.7155	Dec-21	2,279	575	3,962.88	0.7201	
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<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																																																					
<p>7.10.1</p>	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The source of greenhouse gas emission has been identified and assessed on Environmental aspect and impact identification, updated on 5 January 2022 for mill and estates, as listed below:</p> <ul style="list-style-type: none"> - Boiler stack emission including particulate and soot; - Diesel electric generator emission; - POME methane emission; - Use of fertiliser; - Vehicle and heave equipment emission. <p>Several efforts to reduce GHG emissions are prepared as follows:</p> <ul style="list-style-type: none"> - Zero burning; 	<p>Complied</p>																																																		

		<ul style="list-style-type: none"> - Utilization of waste fibre and shell as boiler fuel and electricity from turbines; - Reduce chemical fertilizer using EFB composting. <p>The source of pollution, type of pollution and its control are documented in list of environmental aspect and impact evaluation. Implementation records of each programme were sighted. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Sukses Karya Sawit Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters. Quality of wastewater effluent is monitored monthly by third party, which is Environmental Laboratories of PT Mutu Agung Lestari.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>There is no new planting after 2014 within area of PT SKS and PT BNS. Planting year 2015-2017 is only existed in PT BSS. PT BSS have conducted Carbon Stock Inventory – Full Assessment by Aksenta, January 2015. An estimate of carbon stock in PT BSS has been carried out along with potential sources of emissions that can occur directly as a result of the development.</p> <p>Summary of carbon pools in PT BSS and the use in total carbon stock calculation:</p> <ol style="list-style-type: none"> 1. Above Ground Biomass (AGB) each stratum: Sf-Secondary forest (standard error: ±17.74 ton/Ha; uncertainty CI95%: 24.22%); Sc-Scrub (±10.61 ton/Ha; 24.12%); BSc-Bush and Scrub (±6.48 ton/Ha; 24.72%); Bu-Bush (±0.39 ton/Ha; 30.20%); Op-Bare soil with young oil palm (±0.05 ton/Ha; 9.17%). 	Complied

		<p>2. Below Ground Biomass (root): Sf-Secondary forest (standard error: ± 8.71 ton/Ha; uncertainty CI95%: 26.12%); Sc-Scrub (± 3.34 ton/Ha; 15.60%); BSc-Bush and Scrub (± 4.14 ton/Ha; 32.88%); Bu-Bush (± 0.47 ton/Ha; 71.21%); Op-Bare soil with young oil palm (± 0.03 ton/Ha; 9.17%).</p> <p>3. Necromass:</p> <ul style="list-style-type: none"> - Woody debris (standard error: 2.49-63.2 ton/Ha; uncertainty CI95%: 17.25-124.48%). - Litters: Sf-Secondary forest (standard error: ± 2.44 ton/Ha; uncertainty CI95%: 22.91%); Sc-Scrub (± 1.60 ton/Ha; 12.94%); BSc-Bush and Scrub (± 1.16 ton/Ha; 29.76%); Bu-Bush (± 0.07 ton/Ha; 7.01%); Op-Bare soil with young oil palm (± 4.60 ton/Ha; 46.36%). <p>4. Soil Carbon: (standard error: 9.6 ton/Ha; uncertainty CI95%: 9.7%).</p>	
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has identified other significant pollutants such as emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. Monitoring of air emissions and ambient quality conducted every semester. Emissions test conducted by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Ambient in estates of PT SKS, PT BNS and PT BSS.</p> <p>Management efforts to reduce or minimize those pollutants are such as implementation of:</p> <ol style="list-style-type: none"> 1. Proper waste management: separating different types of waste, such as solid and liquid waste, and disposing of them in an environmentally responsible manner. This involves zero burning and utilization of EFB 	Complied

		<ol style="list-style-type: none"> 2. Effluent treatment: Treating the effluent (wastewater) generated by the mill to reduce the release of pollutants into the environment. 3. Energy efficiency: Improving energy efficiency to reduce greenhouse gas emissions and other pollutants associated with the mill's operations. 4. Water conservation: Using water efficiently to reduce the amount of effluent generated by the mill and minimize the impact on water resources. This involves recycling and reusing water, planting trees at the riparian, as well as implementing measures to reduce water consumption. 5. Chemical use reduction: Reducing the use of chemicals in the mill's operations to reduce the release of pollutants into the environment. <p>Sample of management efforts to reduce pollutants are observed during audit, such as there is no burning activities, there are bamboo and vetiver grass planted at the riparian area, and the Mill uses fibres and shell as fuel.</p>	
<p>Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.</p>			
<p>7.11.1</p>	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>PT Sukses Karya Sawit and Group as unit of certification has existing plantations with year of planting ranged from 2009 to 2014. There is no expansion area for plantations since then, therefore no new planting activity. Based on interview with workers and stakeholders, there is no land clearing activities conducted by burning. Land preparation is using mechanical (for felling and chipping palm crops). Replanting activities planned to be started in 2034, therefore no replanting activities as well.</p>	<p>Complied</p>
<p>7.11.2</p>	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -</p>	<p>Unit of certification established fire prevention and control measures for land such as provides Firefighting team and its equipment, established fire watch tower, conduct monitoring for hotspots and forming fire program by involving surrounding local communities.</p>	<p>Complied</p>

		<p>Available "Laporan Kesiapsiagaan Sistem, Sarana dan Prasarana Pengendalian Kebakaran Hutan dan Lahan" period January – June 2022, described Forest and Land Fire Prevention Team, consist of 3 prime team with 15 personnel, 3 secondary team with 15 personnel, and 3 third team with 15 personnel. Infrastructure consist of 12 unit of fire watch tower and 1 unit drone, other equipment such as helmet, lamp, glasses, mask, hand gloves, fire fighter shoe and suit, tent, first aid, etc. unit of certification has also prepared Fire Outbreak Preparedness Plan 2022.</p> <p>On 30 Jul 2019 there have been fire at conservation area of PT SKS block L11 and L12 with area 35 Ha. The location is not planted area, coverage is natural vegetation. Control performed by mechanical using 15 set of pump machines and 2 unit of excavator. Rehabilitation to the area has been performed by creation of natural land coverage, provision of seed, establish planting lines, planting, upkeep, install signboard, and security patrol.</p>	
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>Unit of certification has established program for fire prevention and control measures by involving surrounding local communities, evidence by dissemination to Pembedilan Village as in minutes of "Sosialisasi Multipihak Karhutla" dated 28 Sep 2021 attended by 31 participants; "Sosialisasi Pencegahan Karhutla" dated 22 Oct 2022 attended by 16 participants consist of Village Head, community leader, government agency and community representatives. The dissemination located at Pembedilan Village office. This dissemination has been published in local newspaper, Pontianak Post on 2 Oct 2021.</p> <p>In PT. Sukses Karya Sawit demonstrated "Berita Acara Sosialisasi Kebakaran Hutan dan Lahan", dated 28 September 2021 in Pembedilan Village involving all hamlet under Pembedilan Village. Attended by 21 community members.</p> <p>- "Berita Acara Sosialisasi Kebakaran Hutan dan Lahan", dated 22 October 2022 with Pembedilan Village. Attended by M. Arifin (Village</p>	Complied

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		Head), Gapoktan, Karang Taruna, Ali Murod (Sekretaris Desa), and other community member	
<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>New Planting Procedure within scope of certification (PT Sukses Karya Sawit, PT Berkat Nabati Sejahtera, PT Bumi Sawit Sejahtera) has been conducted in 2010.</p> <p>In 2014, proposed of new planting procedure (on going NPP) were conducted. After 30 days announced on RSPO website, no input or complaint from stakeholders.</p> <p>Land Use Change Analysis has been submitted to RSPO. According to LUCA review by RSPO, there is ZERO liability for entire estates of certification unit. This statement is determined by RSPO through the email dated 1 September 2022 and 8 October 2022. RSPO making statement that "Upon checking, the RaCP status of PT Sawit Nabati Agro</p>	Complied

		is not applicable. There is no liability, therefore concept note status is not applicable. Kindly proceed with the next course of action".							
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> - Critical (Major) compliance - <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Unit of certification have conducted HCV assessment in 2008 and 2010, where field survey conducted in period as below:</p> <p>PT Sukses Karya Sawit: 8 – 14 November 2008</p> <p>PT Bumi Sawit Sejahtera: 3 – 8 April 2010.</p> <p>PT Berkat Nabati Sejahtera: 8 – 14 November 2008</p> <p>HCV assessment is conducted with participatory mapping against location permit, meaning that the result of HCV area will be based on location permit (wider than land title area).</p> <p>According to the HCV Assessment result, the HCV area identified as below:</p> <p>PT. Sukses Karya Sawit: 355.7 Ha (scope under Plantation Permit/IUP 2012). The final HCV area in PT. Sukses Karya Sawit is 412.25 Ha; while additional 301.18 Ha as conservation area (excluding HCV area).</p> <p>PT. Bumi Sawit Sejahtera: 1,301.5 Ha, but actual managed is 1,809.8 Ha for HCV and other conservation area. The final HCV area in PT. Bumi Sawit Sejahtera is 604.82 Ha; while additional 1,165.51 Ha as conservation area (excluding HCV area).</p> <p>PT. Berkat Nabati Sejahtera: 332.19 Ha (scope under Plantation Permit/IUP 2012). The final HCV area in PT. Berkat Nabati Sejahtera is 5.69 Ha.</p> <table border="1" data-bbox="1133 1163 1966 1359"> <thead> <tr> <th data-bbox="1133 1163 1626 1315">Estate / Smallholders</th> <th data-bbox="1626 1163 1776 1315">HCV (Ha)</th> <th data-bbox="1776 1163 1966 1315">Conservation (Ha)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1133 1315 1626 1359">Berkat Nabati Sejahtera 1 Estate</td> <td data-bbox="1626 1315 1776 1359">5.69</td> <td data-bbox="1776 1315 1966 1359">0</td> </tr> </tbody> </table>	Estate / Smallholders	HCV (Ha)	Conservation (Ha)	Berkat Nabati Sejahtera 1 Estate	5.69	0	Complied
Estate / Smallholders	HCV (Ha)	Conservation (Ha)							
Berkat Nabati Sejahtera 1 Estate	5.69	0							

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	Berkat Nabati Sejahtera 3 Estate	0	0
	Berkat Nabati Sejahtera 4 Estate	0	0
	Sukses Karya Sawit 2 Estate	0	105.3
	Sukses Karya Sawit 3 Estate	412.25	188.82
	Bumi Sawit Sejahtera 1 Estate	604.82	505.34
	Bumi Sawit Sejahtera 2 Estate	0	75.11
	Bumi Sawit Sejahtera 3 Estate	0	405.55
	Koperasi Natai Aru Mitra Sejahtera & Koperasi Natai Sipun Mandiri (Sukses Karya Sawit 1 Estate Plasma)*	0	7.07
	Koperasi Sawit Sejahtera Bersama (Berkat Nabati Sejahtera 2 Estate Plasma)*	0	0
	Koperasi Citra Niaga (Bumi Sawit Sejahtera 4 Estate Plasma)*	0	214.7
	<p>Unit of certification is an existing plantation and no new land clearing after 15 November 2018.</p> <p>There is no new planting after 2014 within area of PT. Sukses Karya Sawit and PT. Berkat Nabati Sejahtera, planting year 2015-2017 is only existed in PT. Bumi Sawit Sejahtera.</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.	Please refer to indicator 7.12.2 a) above.		

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>	This indicator is Not Applicable for Indonesia.	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: 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 directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation and no new land clearing after 15 November 2018.</p> <p>According to the HCV Assessment result, the HCV area identified as below:</p> <ul style="list-style-type: none"> - PT Sukses Karya Sawit: 355.7 Ha (scope under Plantation Permit/IUP 2012). - PT Bumi Sawit Sejahtera: 1,301.5 Ha, but actual managed is 1,809.8 Ha for HCV and other conservation area. - PT Berkat Nabati Sejahtera: 332.19 Ha (scope under Plantation Permit/IUP 2012). <p>HCV identified area consist of freshwater peat swamp forest, riparian buffer zone, RTE's species habitat and sacred place. Also, PT Sukses Karya Sawit located directly adjacent to Nature Reserve of Muara Kendawangan (Cagar Alam Muara Kendawangan). Where the Nature Reserve has been determined by the government as conservation area. This area located in West side of PT Sukses Karya Sawit with landscape form as sandy soil and grassland or known as "Kerangas".</p> <p>According to this, unit of certification have Integrated Management Plan for 5 years. In example:</p>	Complied

		<p>Integrated Management Plan of PT Bumi Sawit Sejahtera period 2019-2023, issued in December 2020. An integrated management plan that develops by unit of certification is focused on management and monitoring HCV area with objects concern are HCV, HCS and Peat area. Working Plan for Management and Monitoring HCV in PT Bumi Sawit Sejahtera effectively as below:</p> <ol style="list-style-type: none"> 1. Establishment and Confirmation of HCV area by delineation and boundaries management upon Integrated HCV area; protecting and securing conservation areas from illegal land development and clearing activities; awareness of conservation areas to local peoples; HCS analysis approach as indicator of evaluation in conservation area. 2. Maintain and protecting existence of HCV area by Inventory of land cover crops above HCV area, Identify and mapping the spreads of key species; marking and re-wetting on peatland areas and securely management; reforestation and enrichment planting in HCV and conservation area; water management with surface hydrological methods and controlling sedimentation to the rivers and lake Gelinggang; securing from illegal hunting to key species like sunny bear, orangutan and other wildlife. 3. Increasing value and HCV function by enrichment planting and increasing biodiversity value; awareness to local community. 4. Protection and rehabilitation of riparian buffer zone and lake. 5. Develop policy and procedure to support management and monitoring HCV and conservation area by management unit. 6. Management of Land Fire Prevention by identifying of land fire risk assessment and monitoring of climate; training for management of land fire hazards; provision of firefighting equipment. 7. Report and evaluation. 	
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		<p>This integrated management plan was disseminated to local communities and affected stakeholders as evidence below:</p> <ul style="list-style-type: none"> - "Berita Acara Sosialisasi Kawasan Konservasi PT Bumi Sawit Sejahtera", dated 9 February 2022 located in Jembatan Keramat BSS-01 (Attended by 5 contractors) and Natai Kuini Village (attended by 20 villagers). - "Berita Acara Sosialisasi Program Pengelolaan Kawasan Konservasi PT Berkat Nabati Sejahtera" dated 28 July 2022, located Air Hitam Besar village, this meeting is attended by 15 villagers. - "Sosialisasi Program Pengelolaan Kawasan Konservasi PT Sukses Karya Sawit" dated 21 October 2022 located in Air Hitam Hulu village, and attended by 15 villagers. <p>Implementation of IMP HCV has been verified on the ground by visiting sample of HCV area as below:</p> <p>PT Berkat Nabati Sejahtera = field observation on HCV6 at Block F12 (sacred area). Sighted that signboard and boundaries are well demarcated. HCV1 at Block B5 (RTE habitat/ecosystem) are demarcated by ditches boundary and signboard is installed in that area. In general, status on this area is categorized as secondary forest with slowly succession stages.</p> <p>Unit of certification have concern and commitment to set, maintain and increase conservation area outside the designated HCV Managed area.</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>Unit of certification is an existing plantation and no new land clearing after 15 November 2018.</p> <p>Areas needed by affected communities to meet their basic needs, considering the potential for positive and negative changes in their livelihoods already captured during HCV Assessment in 2008 at PT Sukses Karya Sawit. In example: according to HCV Assessment Report November 2008, HCV 5 is identified as location for local people to fulfil</p>	Complied

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		<p>their basic needs. The area in form as paddy field, where in previous year prior HCV assessment that paddy field area was burnt by natural disaster (land fire).</p> <p>However, until the Initial Assessment conducted in 2022, the unit of certification still giving access to cross the plantation when local communities want going to their farm. Beside, the rights of local communities to get protein through fishing in plantation area, the access for this is given by the company.</p> <p>The unit of certification consider various management and tenure options to protect HCV management areas in a way that also protects the rights and livelihoods of local communities by develop plantation for smallholder scheme with fully managed or Plasma. Where SKS-01 Estate, BNS-02 Estate and BSS-04 Estate is allocated for Plasma.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>According to HCV Assessment in November 2008 and April 2010, RTE's species that were identified as below:</p> <p>HCV area at PT Sukses Karya Sawit and PT Berkat Nabati Sejahtera (HCV Assessment November 2008): <i>Pongo pygmaeus</i> Orangutan (EN); <i>Nasalis larvatus</i> Proboscis monkey (EN); <i>Hylobates agilis</i> Agile Gibbon (EN); <i>Macaca nemestrina</i> Pigtail macaque (VU); <i>Macaca fascicularis</i> Long-tailed macaque (EN); <i>Helarctos malayanus</i> Sun Bear (VU); <i>Neofelis nebulosa</i> Clouded leopard (VU); <i>Aonyx cinerea</i> Asian Small-clawed Otter (VU) <i>Cervus unicolor</i> Sambar (VU); <i>Sus barbatus</i> Bearded pig (VU); <i>Presbytis rubicunda</i> Red Langur (VU).</p> <p>HCV Area at PT Bumi Sawit Sejahtera (HCV Assessment April 2010): <i>Pongo pygmaeus</i> Orangutan (EN); <i>Nasalis larvatus</i> Proboscis monkey (EN); <i>Hylobates muelleri</i> Bornean Gibbon (EN); <i>Helarctos malayanus</i> Sun Bear (VU); <i>Tomistoma schlegelii</i> False Gharial (VU).</p> <p>Appropriate disciplinary measures taken by the unit of certification through dissemination information of HCV area including RTE's species to local communities, relevant stakeholders, and contractor.</p>	Complied

		<p>Dissemination information is documented in minutes meeting, in example:</p> <ul style="list-style-type: none"> - "Berita Acara Sosialisasi Kawasan Konservasi PT Bumi Sawit Sejahtera", dated 9 February 2022 located in Jembatan Keramat BSS-01 (Attended by 5 contractors) and Natai Kuini Village (attended by 20 villagers). - "Berita Acara Sosialisasi Program Pengelolaan Kawasan Konservasi PT Berkat Nabati Sejahtera" dated 28 July 2022, located Air Hitam Besar village, this meeting is attended by 15 villagers. - "Sosialisasi Program Pengelolaan Kawasan Konservasi PT Sukses Karya Sawit" dated 21 October 2022 located in Air Hitam Hulu village and attended by 15 villagers. <p>The socialization is more concern and focused on introduce an HCV area within PT Bumi Sawit Sejahtera and list of RTE's species founded within the HCV area. Also, awareness to local communities regarding disallowance to capture, harm, collect, trade, possess or kill these species.</p>	
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>Unit of certification is an existing plantation and no new land clearing after 15 November 2018.</p> <p>The status of HCVs area and other natural ecosystems, peatland conservation areas and RTE species is monitored in monthly basis.</p> <p>In example:</p> <p>19 November 2022: Block F19 SKS-03 Estate. Recovery area near secondary forest. No RTE species was found.</p> <p>On 3 December 2022: HCV Area BSS-04 Estate. Freshwater peat swamp. Sighted 6 species of birds.</p> <p>Result of monitoring report included into HCV Integrated Management Plan: PT. Sukses Karya Sawit identified area that was victim of land burning – monitoring for potential area for rehabilitation identified of 14</p>	Complied

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		<p>Ha in 2021. In Integrated Management Plan 2022, company planned to rehabilitating the area by planting forest tree such as <i>Shorea balangeran</i>, <i>Anacardium occidentale</i> and <i>Alstonia scholaris</i>; as of August 2022 5,176 seedlings have been planted with mortality rate 20%.</p>	
<p>7.12.8</p>	<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. - Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation and no new land clearing after 15 November 2018.</p> <p>New Planting Procedure within scope of certification (PT Sukses Karya Sawit, PT Berkat Nabati Sejahtera, PT Bumi Sawit Sejahtera) has been conducted in 2010.</p> <p>In 2014, proposed of new planting procedure (on going NPP) were conducted. After 30 days announced on RSPO website, no input or complaint from stakeholders.</p> <p>Land Use Change Analysis has been submitted to RSPO. According to LUCA review by RSPO, there is ZERO liability for entire estates of certification unit. This statement is determined by RSPO through the email dated 1 September 2022 and 8 October 2022. RSPO making statement that "Upon checking, the RaCP status of PT Sawit Nabati Agro is not applicable. There is no liability, therefore concept note status is not applicable. Kindly proceed with the next course of action".</p> <p>The conclusion is that unit of certification have no Remediation or Compensation.</p>	<p>Complied</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Sukses Karya Sawit 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 **Sukses Karya Sawit Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	49.47
PKO	0.00

Extraction	%
OER	21.62
KER	2.62

Production	t/yr
FFB Process	233,104.73
CPO Produced	50,406.20
PK Produced	6,115.59

Land Use	Ha
OP Planted Area	20,794.37
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	81.21
Total	

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	26,401.52	0.46	17,038.08	0.22	0.00	0.00	43,439.60	0.22
CO ₂ Emission from fertilizer	2,265.55	0.04	32,620.11	0.00	0.00	0.00	34,885.65	0.18
NO ₂ Emission	2,800.47	0.05	7,175.58	0.09	0.00	0.00	9,976.05	0.05
Fuel Consumption	748.93	0.01	465.10	0.01	0.00	0.00	1,214.03	0.006
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-34,191.43	-0.60	0.00	-0.11	0.00	0.00	-42,972.30	-0.22
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	-1,974.97	-0.03	48,518.00	0.61	0.00	0.00	56,565.87	0.29

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	37,633.55	0.20
Fuel Consumption	687.04	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	48,320.59	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

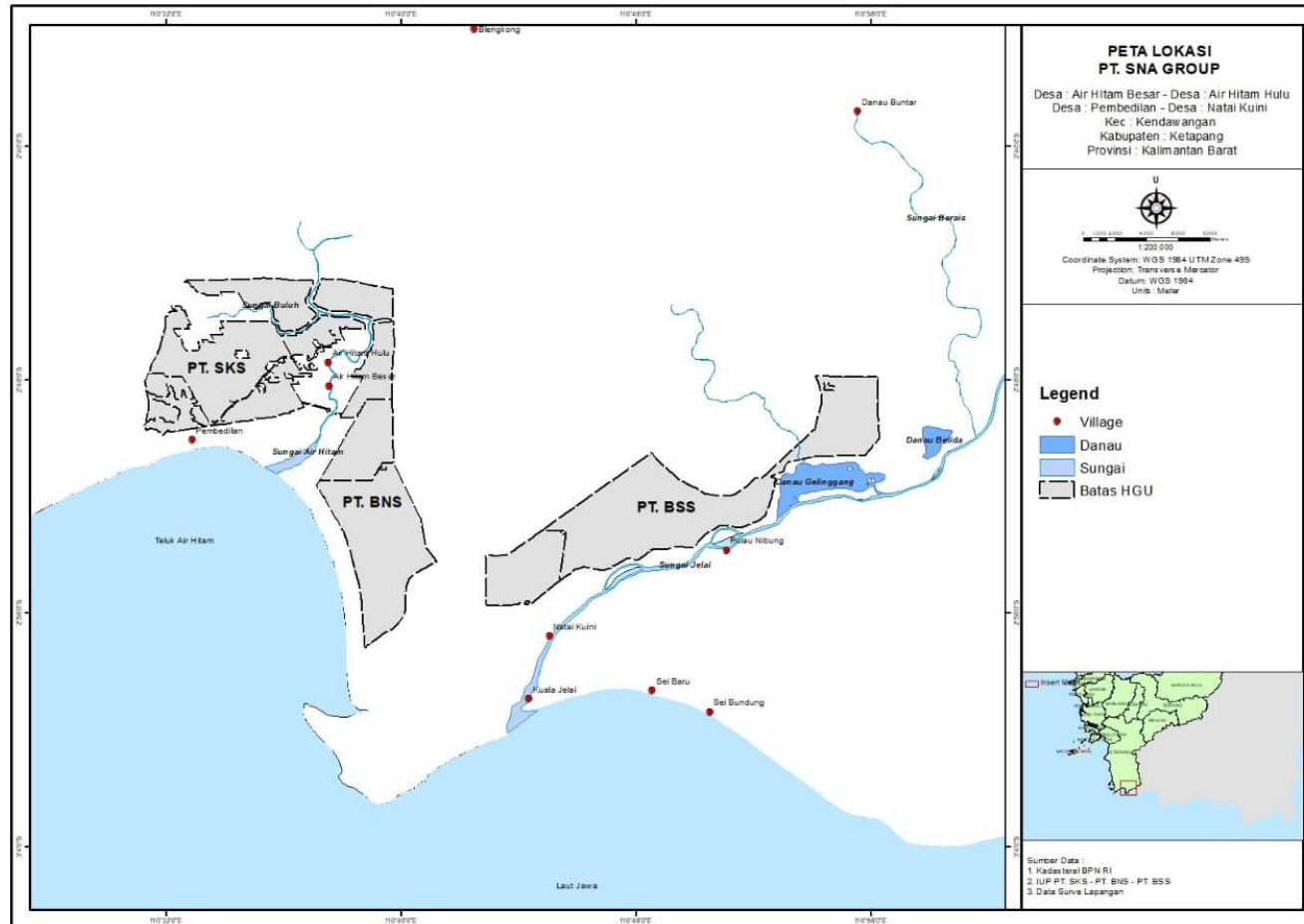
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

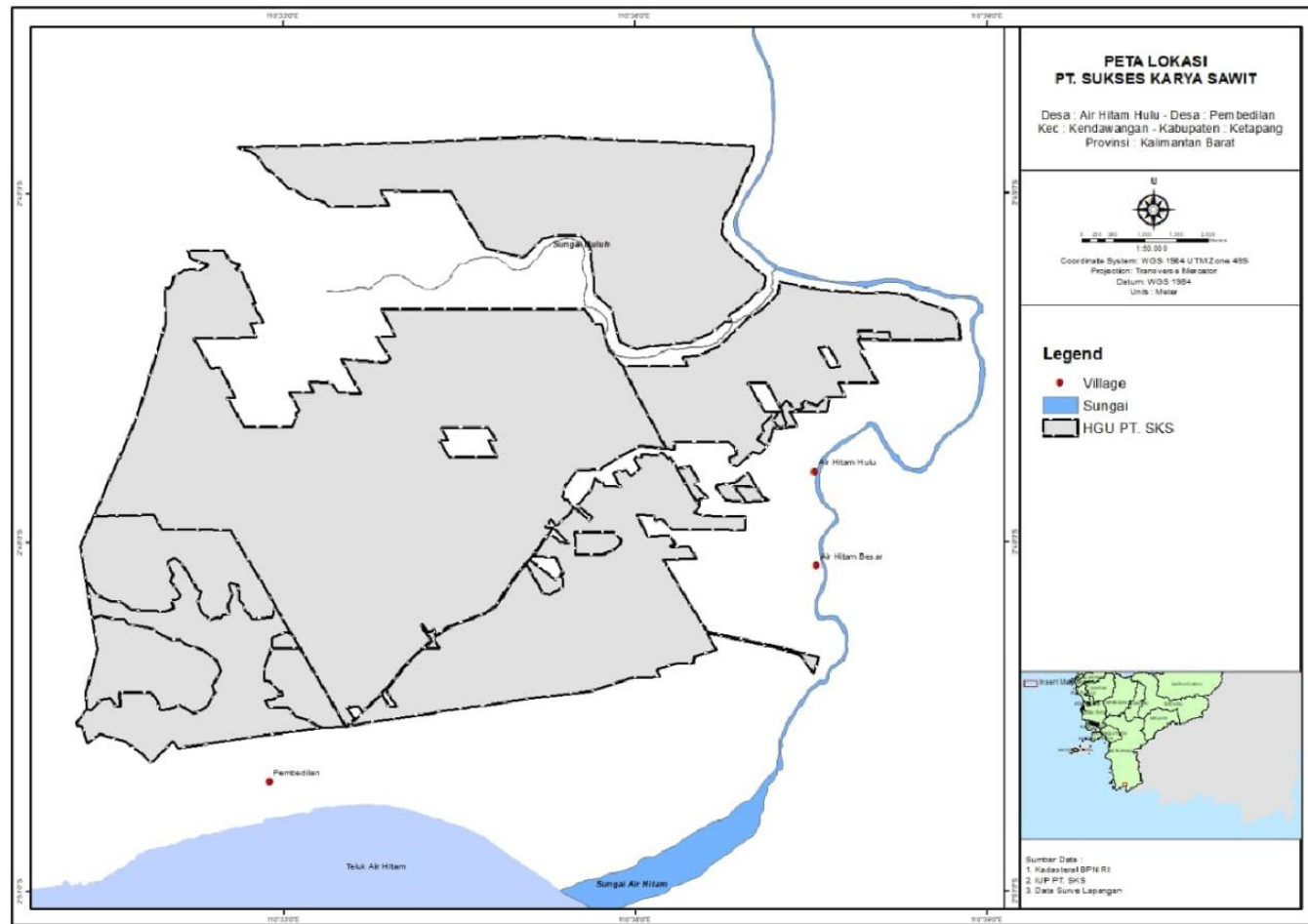
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic digestion (%)	100

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

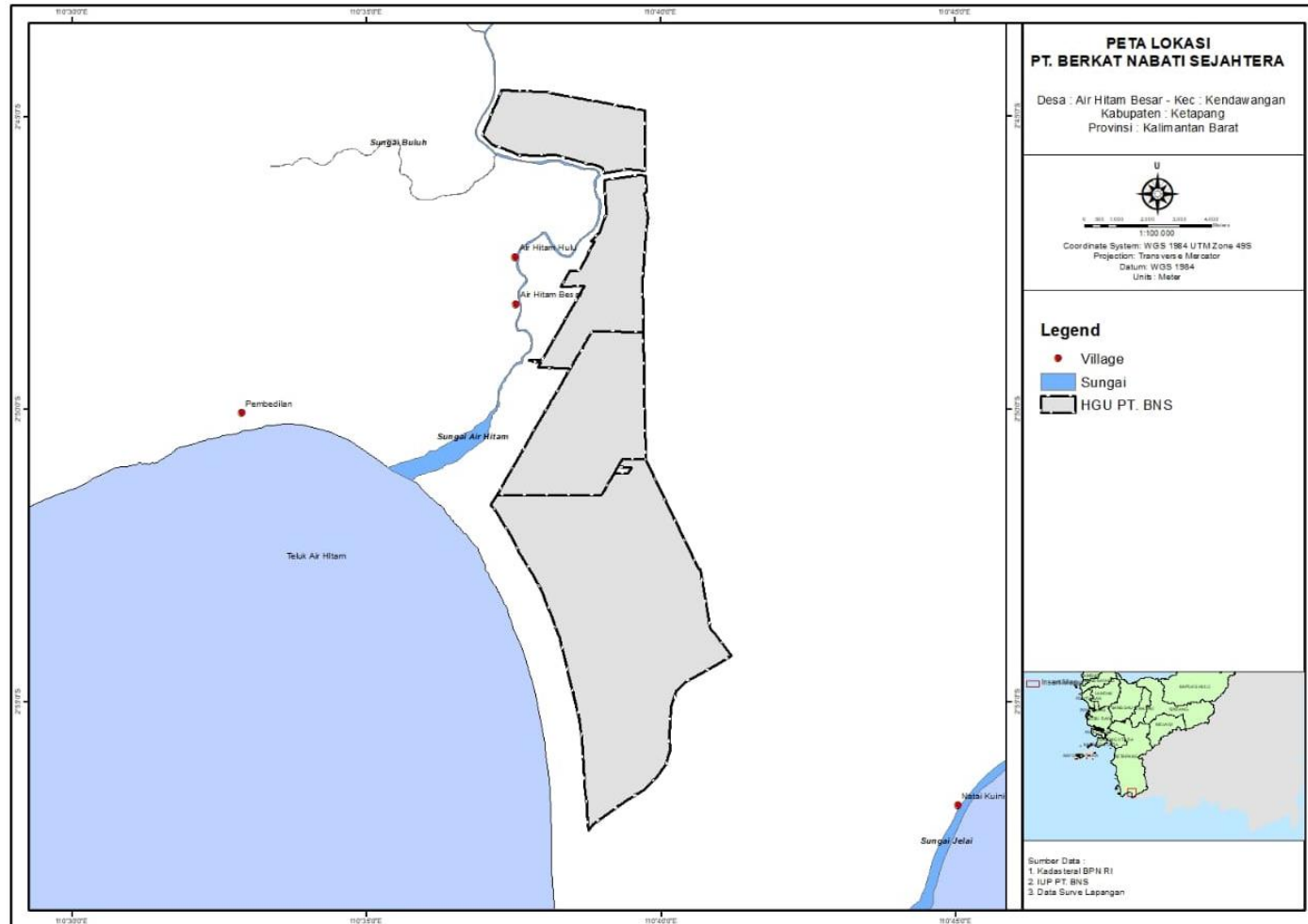
Appendix C: Location Map of Certification Unit and Supply bases



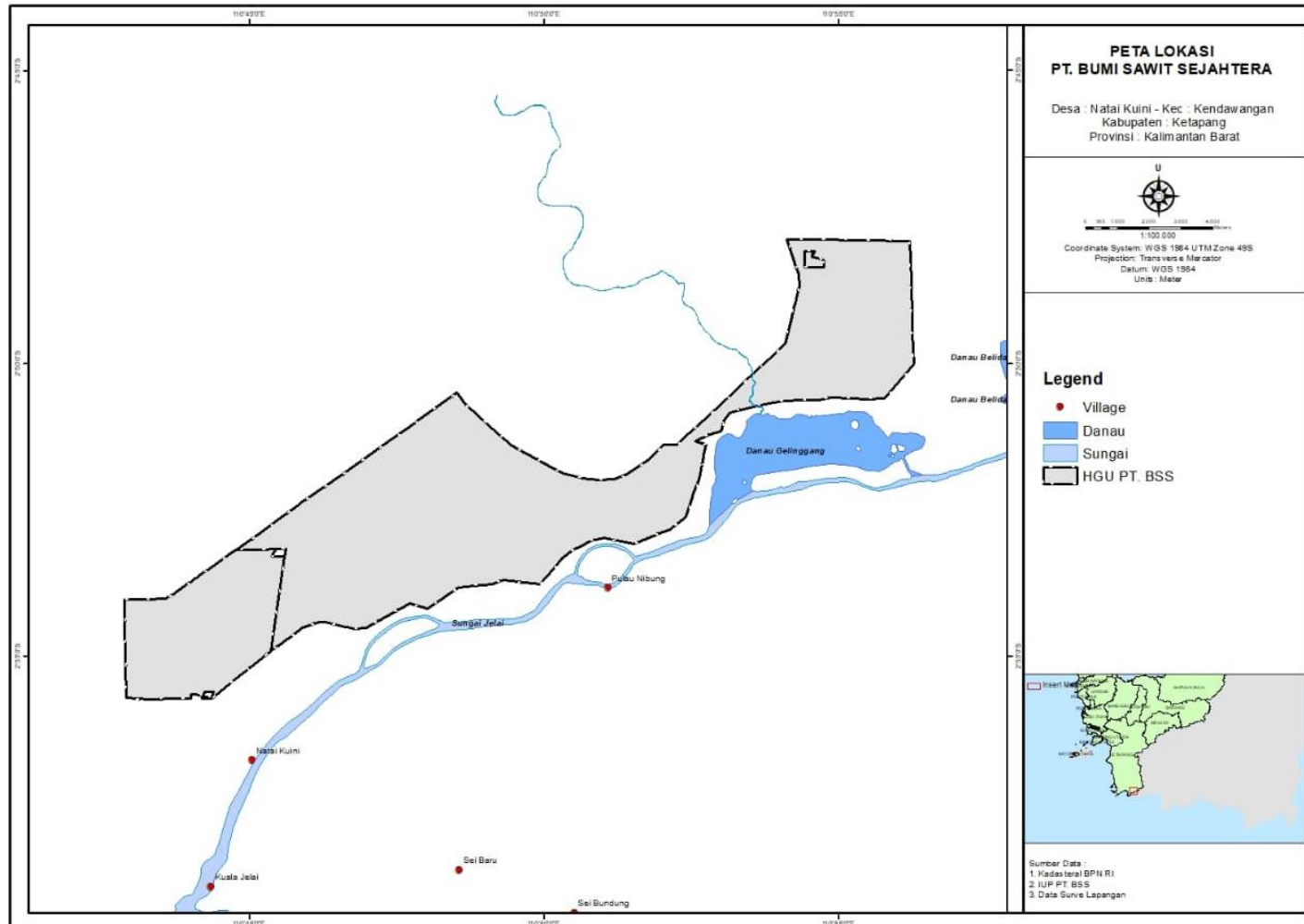
Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

N/A

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BNS	PT. Berkah Nabati Sejahtera
BSS	PT. Bumi Sawit Sejahtera
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
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
NPWP	Nomor Pokok Wajib Pajak/Tax Payer Identification Number
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
SKS	PT. Sukses Karya Sawit
SNA	PT. Sawit Nabati Agro (holding group in Indonesia operation)
SOP	Standard Operating Procedure
TDP	Tanda Daftar Perusahaan/Company Registration Number