

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company Name / Parent Company:</b> <b>Golden Agri-Resources Ltd</b>
Client Company / Parent Company Address: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535
Certification Unit: <b>PT Bumi Permai Lestari – Bukit Perak Mill</b> Location of Certification Unit: Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka Barat, 33364, Bangka Belitung Province, Indonesia
Date of Final Report: 13/10/2023

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Golden Agri-Resources Ltd		
<b>RSPO Membership Number</b>	1-0096-11-000-00	<b>Membership Approval Date</b>	30 January 2005
<b>Address</b>	RSPO registered company : 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535  Liaison Office : Sinar Mas Land Plaza, Tower II, 30 <sup>th</sup> Floor, JL. MH Thamrin No.51, Jakarta 10350, Indonesia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT Bumi Permai Lestari – Bukit Perak Mill		
<b>Location / Address</b>	Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka Barat, 33364, Bangka Belitung Province, Indonesia		
<b>Website</b>	<a href="http://www.goldenagri.com.sg">http://www.goldenagri.com.sg</a>		
<b>Management Representative</b>	Yahya Mustakim	<b>E-mail</b>	<a href="mailto:yahya.mustakim@sinarmas-agri.com">yahya.mustakim@sinarmas-agri.com</a>
<b>Telephone</b>	+62-21 5033 8899	<b>Facsimile</b>	+62-21 5033 8899

2. Certification Information			
<b>Certificate Number</b>	RSPO 733239	<b>Certificate Start Date</b>	08/09/2022
<b>Date of First Certification</b>	23/09/2015	<b>Certificate Expiry Date</b>	07/09/2027
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	The objective of the assessment was to conduct an Annual Surveillance Assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 <sup>th</sup> April 2020.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 tonnes FFB/hour

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<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input checked="" type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-ID218-20220136	ISCC	Intertek Utama Services	13/08/2023
BSI-ISPO 750840	ISPO	BSI	18/07/2026

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Bukit Perak Mill	Dendang Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia	1° 49' 13.26" S	105° 33' 07.52" E
Bukit Perak Estate	Dendang Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia	1° 51' 28.94" S	105° 35' 54.73" E
Bukit Permata Estate	Terentang and Kacung Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1° 51' 09.56" S	105° 30' 6.68" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area) <input type="checkbox"/> Yes (please refer to Principle 7 for details)				
<b>Estate / Smallholders</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Bukit Perak	3,793.62	51.66	439.67	4,284.95	88.69%
Bukit Permata	1,601.93	29.55	168.52	1,800.00	88.69%
<b>Total</b>	<b>5,395.55</b>	<b>81.21</b>	<b>608.19</b>	<b>6,084.95</b>	<b>88.69%</b>

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<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Perak	1,873.30	1,920.32	-	-	1,920.32	1,873.30
Bukit Permata	1,572.24	-	-	31.31	31.31	1,572.24
<b>Total (ha)</b>	<b>3,445.54</b>	<b>1,920.32</b>	<b>-</b>	<b>31.31</b>	<b>1,951.63</b>	<b>3,445.54</b>

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

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2022 – Aug 2023)	Actual (June 2022 – June 2023)		Forecast (Sept 2023 – Aug 2024)
		Previous license period (June 2022 – August 2022)	Current license period (Sept 2022 – June 2023)	
Bukit Perak	31,490.45	5,849.95	22,788.39	30,070.26
Bukit Permata	2,887.05	5,306.96	3,706.02	137.50
<b>Total</b>	<b>34,377.50</b>	<b>37,651.32</b>		<b>30,207.76</b>
<b>Ext Volume</b>	<b>41,726.24</b>			

**Note:**

- \*Forecast is based on 12 month actual production before audit
- \*In this assessment all BPTe planted area is on immature phase
- \*There is an certified FFB from other source in one group (BMSE, BINE, LWSE, and LWUE) amount 1,897.95 mt
- \*There is an extension volume with following detail :
  - FFB : 7,348.74 mt
  - CSPO : 1,451.43 mt
  - CSPK : 392.53 mt

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2022 – Aug 2023)	Actual (June 2022 – June 2023)		Forecast (Sept 2023 – Aug 2024)
		Previous license period (June 2022 – August 2022)	Current license period (Sept 2022 – June 2023)	
BMSE		474.09	834.02	
BINE		-	267.34	

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LWSE		58.53	171.30	
LWUE		49.76	42.81	
<b>Total</b>		<b>1,897.95</b>		
<b>Note:</b>				

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Sept 2022 – Aug 2023)</b>	<b>Actual (June 2022 – June 2023)</b>		<b>Forecast (Sept 2023 – Aug 2024)</b>
		Previous license period (June 2022 – August 2022)	Current license period (September – June 2023)	
BPAE	70,945.15	17,398.82	49,449.23	64,297.20
BLSE	14,652.77	3,734.94	10,062.39	13,097.97
Supplier	78,749.73	19,207.31	56,875.40	72,184.63
<b>Total</b>	<b>164,347.65</b>	<b>156,728.10</b>		<b>149,579.81</b>
<b>Note:</b>				

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Jun-22	3,391.77	14,271.13	17,662.80
2	Jul-22	3,880.49	11,829.66	15,710.15
3	Aug-22	4,467.13	14,240.28	18,707.41
4	Sep-22	4,170.85	12,465.55	16,636.40
5	Oct-22	3,195.25	13,935.52	17,130.77
6	Nov-22	2,715.41	11,932.40	14,647.81
7	Dec-22	2,285.86	10,778.24	13,064.10
8	Jan-23	1,036.67	9,147.77	10,184.44
9	Feb-23	1,304.35	7,974.87	9,279.22
10	Mar-23	2,009.32	9,879.61	11,888.93
11	Apr-23	2,830.01	11,236.82	14,066.83
12	May-23	3,735.93	15,347.39	19,083.32
13	Jun-23	4,526.23	13,688.79	18,215.02
	<b>TOTAL</b>	<b>39,549.27</b>	<b>156,728.03</b>	<b>196,277.20</b>

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**Note:**

\*There is certified FFB from other source in one group (BMSE, BINE, LWSE, and LWUE) amount 1,897.95 MT. Actual certified FFB production from BPTe and BPRE was 37,651.32 mt

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

Estimated last year (Sept 2022 – Aug 2023)	Actual (June 2022 – June 2023)		Forecast (Sept 2023 – Aug 2024)
	Previous license period (June 2022 – August 2022)	Current license period (September – June 2023)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
34,377.50 mt Ext Volume = 41,726.24 mt	11,156.91 mt	26,494.41 mt	30,207.76 mt
	<b>TOTAL</b>	37,651.32 mt Cert FFB from other source : 1,897.95 mt Total certified FFB : 39,549.27 mt	
<b>CPO (OER: 20.50 %)</b>	<b>CPO (OER: 16.92 %)</b>		<b>CPO (OER: 20 %)</b>
7,047.38 mt Ext volume = 8,498.81 mt	1,290.14 mt	5,401.71 mt	6,041.55 mt
	<b>TOTAL</b>	6,691.85	
<b>PK (KER: 5.50 %)</b>	<b>PK (KER: 5.28 %)</b>		<b>PK (KER: 5.50 %)</b>
1,890.76 mt Ext volume = 2,283.29 mt	616.13 mt	1,478.32 mt	1,661.42 mt
	<b>TOTAL</b>	2,094.95	

**Note :**

\*There is an extension volume with following detail :

- FFB : 7,348.74 mt
- CPO : 1,451.43 mt
- PK : 392.53 mt

\* Current conditions: Most are in immature phase and some are the initial phase of mature (transition from immature to mature) thus affecting FFB extraction

\*Forecast is based on 12 month actual production before audit

\*In this assessment all BPTe planted area is on immature phase

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

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	June-22	636.45	188.12
2	Jul-22	739.99	180.40
3	Aug-22	864.93	253.59
4	Sep-22	802.12	230.15

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5	Oct-22	600.40	186.85
6	Nov-22	519.50	136.65
7	Dec-22	433.74	124.80
8	Jan-23	197.13	57.52
9	Feb-23	260.27	78.35
10	Mar-23	393.18	104.86
11	Apr-23	552.33	141.14
12	May-23	750.78	200.77
13	Jun-23	892.26	217.23
<b>TOTAL</b>		<b>7,643.08</b>	<b>2,100.43</b>

**Note:**

\*Actual production from BPTC and BPRE are 6,691.85 mt for CSPO and 2,094.95 for CSPK. There is an CSPO and CSPK from other certified source (LWUE, LWSE, and BINE)

**11. Summary of Actual Volume sold**

**Current License period (September 2022 – June 2023)**

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	-	5,051.04	-	-	5,051.04
<b>PK (MT)</b>	1,400	-	-	-	1,400
<b>Credits</b>	-	-	-	-	-

**Previous License period (June – August 2022)**

<b>CPO (MT)</b>	1,290.14	-	-	-	1,290.14
<b>PK (MT)</b>	650.00	-	-	-	650.00
<b>Credits</b>	-	-	-	-	-

**Note:**

- UoC has a system in place to remove CSPO sold as conventional at their respective time interval which was not at this particular audit
- In this assessment period 4,695.94 Mt of CSPO stock had been removed. Other 355.1 Mt has also been removed but not during this audit period

**11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)**

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Company "A"	RSPO_PO1000002035	1,290.14	
2	Company "B"	RSPO_PO1000003168		650



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3	Company "C"	RSPO_PO1000006557		1,400
<b>TOTAL</b>			<b>1,290.14</b>	<b>2,050</b>
<b>Note:</b>				

<b>11B. Records of certified CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Classified	ISCC	5,051.04	
<b>TOTAL</b>			<b>5,051.04</b>	
<b>Note:</b>				

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
<b>TOTAL</b>			
<b>Note: There is no CPO &amp; PK sold as conventional since last audit</b>			

<b>11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
<b>TOTAL</b>			
<b>Note: There is no CPO &amp; PK sold as credit since last audit</b>			

<b>12. Independent Smallholders Certified Tonnage (MT) / Volume</b>									
Phase	Estimated last year			Actual			Forecast		
	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									
IS-CSPO	N/A								
IS-CSPKO									
IS-CSPKE									

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CSPK							
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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					
<b>TOTAL</b>						
<b>Note:</b> 1 mt = 1 credit						

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

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						
<b>TOTAL</b>							
<b>Note:</b>							

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))

Website: [www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 03 – 07 July 2023. 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.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA1_1)</b>	<b>Year 3 (ASA1_2)</b>	<b>Year 4 (ASA1_3)</b>	<b>Year 5 (ASA1_4)</b>
Bukit Perak Mill	X	X	X	X	X
Bukit Perak Estate	X	X	X	X	X
Bukit Permata Estate	X	X	X	X	X

**Tentative Date of Next Visit: July 1, 2024 - July 5, 2024**

**Total Number of Mandays: 15**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Haikal Ramadhan Kharismansyah (HR)	Team Leader	<p><b>Education:</b> Holds a bachelor degree in majoring Plant Pest and Disease from Padjadjaran University</p> <p><b>Work Experience:</b> 3 Years working experience in oil palm industry as Agronomy Assistant. More than five years working experience as RSPO Auditor and RSPO Lead Auditor</p> <p><b>Training attended:</b> Completed Endorsed RSPO P&amp;C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, RSPO P&amp;C Social and Labour Standards and the Mechanics of Social Auditing Training, ISO 9001:2008, ISO 14001 : 2015 Auditor/Lead Auditor Course, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course. RSPO P&amp;C Lead Auditor Training Course by checkmark training.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> Ethically and transparently aspect, Legal Requirements, social issues, FPIC, contribution to local development, stakeholder engagement, Human resources.</p>
Imam Fakhrurozi (IF)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree majoring in Agriculture Technology from Gadjah Mada University.</p>

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		<p><b>Work Experience:</b> 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p><b>Training attended:</b> Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&amp;C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETAR requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> Occupation Health Safety requirement, estate and mill best practices including, business ethical, grievance procedure, communication procedures.</p>
<p>Yudwi Wisnu Rahmanto (YWR)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor of Forestry with Silviculture background.</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> Completed Endorsed RSPO P&amp;C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&amp;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, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> Stakeholder consultation, SEIA, New planting procedure, HCV, Economic management plan, RSPO supply chain requirements, continuous improvement program. waste and GHG management, Environment management plans.</p>
<p>Pratama Agung Sedayu (PS)</p>	<p>Qualifying Review</p>	<p><b>Education:</b> Holds a Bachelor Degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> 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 and Endorsed RSPO P&amp;C Lead Auditor Course and Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements training.</p>

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		<b>Language proficiency:</b> Fluent in Bahasa Indonesia and English <b>Aspect covered in this audit:</b> Qualifying Review for Lead Auditor
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**Accompanying Persons:**

Name	Role
Nil	

**2.3 Assessment Plan**

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

Date	Time	Subjects	HR	IF	YW	PS
Monday, 03/07/2023	08.40 – 10.00	Flight Jakarta – Pangkal Pinang GA 136	√	√	√	√
	10.00 – 12.00	Traveling from Pangkal Pinang Airport to PT Bumi Permai Lestari	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 15.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Auditee Presentation (Introduction of PIC, Profile of Certified Management Unit)</li> <li>• Auditor Team Presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	√	√	√	√
	15.00 – 16.00	Document review // Tinjauan dokumen: <ul style="list-style-type: none"> <li>• Review of Basic Information Data, Time bound plan, partial certification verification</li> <li>• Verification of Supply Chain Data Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour)</li> </ul>	√	√	√	
	16.30 – 17.00	Daily progress & preparation for next day (Map, Muster cheat, public consultation, etc)	√	√	√	√
Tuesday, 04/07/2023	08.00 – 12.00	Stakeholder Consultation with affected parties <ul style="list-style-type: none"> <li>- Environment agency</li> <li>- Labour agency</li> <li>- Agriculture agency</li> <li>- National Land agency</li> <li>- Village, cooperative FFB supplier, Contractor, gender committee, worker union</li> </ul>	√	√	√	

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Date	Time	Subjects	HR	IF	YW	PS
	08.00 -12.00	Document and record verification (Estate & Mill) <ul style="list-style-type: none"> <li>• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Pengelolaan Sampah dan Limbah)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Review of Basic Information Data, Time bound plan, partial certification verification</li> <li>• Verification of Supply Chain Data Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour)</li> </ul>	√	√	√	
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	<b>Bukit Perak Mill</b> <ul style="list-style-type: none"> <li>• RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous &amp; Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond</li> <li>• Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop</li> </ul>	√	√	√	√
	16.30 – 17.00	<b>Daily Progress</b>	√	√	√	√

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Wednesday 05/07/2023	08.00 – 12.00	<p>Field Observation to <b>Bukit Perak Estate</b></p> <p>Aspect to be verified</p> <ul style="list-style-type: none"> <li>• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> </ul>	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	<p>Document and record verification (Estate &amp; Mill)</p> <ul style="list-style-type: none"> <li>• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).</li> <li>• Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management).</li> <li>• Implementation of Occupational Health &amp; Safety Aspect.</li> <li>• Implementation of Employment Procedure and Mechanism Aspect.</li> <li>• Review of Basic Information Data, Time bound plan, partial certification verification</li> <li>• Verification of Supply Chain Data Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour)</li> </ul>	√	√	√	√
	16.30 – 17.00	Daily progress	√	√	√	√



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Thursday 06/07/2023	08.00 – 12.00	Field Observation to <b>Bukit Permata Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area.</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application).</li> <li>• Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> </ul>	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 16.30	Document and record verification (Estate & Mill) <ul style="list-style-type: none"> <li>• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism</li> <li>• Time bound plan, partial certification verification</li> <li>• Verification of Supply Chain Data Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour)</li> </ul>	√	√	√	√
	16.30 – 17.00	Daily Progress	√	√	√	√
Friday 07/07/2023	08.00 – 11.30	Continuing Document Review	√	√	√	√
	11.30 – 14.00	Break	√	√	√	√

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Date	Time	Subjects	HR	IF	YW	PS
	14.00 – 15.30	Auditor discussion and report preparation	√	√	√	√
	16.00 – 17.00	Closing Meeting	√	√	√	√
Saturday	07.00 – 09.00	Site – Bandara Pangkal Pinang	√	√	√	√
08/07/2023	10.45 – 12.00	Pangkal Pinang – Jakarta GA 137	√	√	√	√

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Golden Agri-Resources Ltd. RSPO Timebound Plan 2022-2025 dated 19 May 2022. The timebound plan include name of all subsidiary companies, all estates and all mills under Golden Agri Resources Ltd.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No, there are numbers of estates and mills which has not been certified yet, due to reasons such as new acquisitions, RaCP in progress and land title in progress. The RSPO Membership for Golden Agri-Resources Ltd. dated 30 January 2005. Golden Agri-Resources Ltd. submitted the updated RSPO Timebound Plan 2022-2025 to RSPO Secretariat on 19 May 2022. RSPO Secretariat has approved the timebound plan on 14 Jun 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.	Yes, there are 22 units of new acquisitions made in 2021, therefore target year for new acquisition to be certified is 2024. Golden Agri-Resources Ltd. reported new acquisition in RSPO Timebound Plan 2022-2025, dated 19 May 2022. RSPO Secretariat has approved the timebound plan on 14 Jun 2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there are deviations from the maximum 5 years period since membership obtained in 30 Jan 2005. Golden Agri-Resources Ltd. has reported reason for deviation in RSPO Timebound Plan 2022-2025. RSPO Secretariat has approved the timebound plan on 14 Jun 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?	No, there is no change in time-bound plan since the last audit.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No, there is no deviations in the time-bound plan. Each certification unit has a specified timeline for the audit implementation.	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 <b>Major</b> non-compliance shall be raised	No, there is no fundamental failure. Each certification unit has a specified timeline for the audit implementation.	Complied

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<b>Un-Certified Units or Holdings</b>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Golden Agri Resources (GAR) has reported all replacement of primary forest to maintain HCV and HCS through submission of LUCA.</p> <p>Several companies under GAR initiated plantation development after November 2005, while the HCV/NKT assessment took place during the period 2010 - 2013.</p> <p>GAR and its subsidiaries initiated the Remediation and Compensation Procedure (RaCP), starting with the disclosure and Zero Liability reporting to RSPO via email on 29 August 2014. Among the 25 companies, 7 of them are certified units, while the remaining 18 are uncertified units. Here is the progress update for RaCP as of 27 January 2022, for uncertified units:</p> <p>a) 4 companies are in the process of having their RaCP Proposal (LC Batch 1) reviewed by an Independent Evaluator, namely:</p> <ol style="list-style-type: none"> <li>1. PT Kencana Graha Permai (Delima Estate) – West Kalimantan (supply base KNNM-certified)</li> <li>2. PT Sumber Indah Perkasa - Papua</li> <li>3. PT Kresna Duta Agroindo – East Kalimantan</li> <li>4. PT SKU (BGDE) - Jambi</li> </ol> <p>The latest progress indicates that the payment to the RSPO independent evaluator was made on 11 January 2023, and the review is currently ongoing.</p> <p>b) There are 2 companies undergoing the review of their Concept Note (LC Batch-2), namely:</p> <ol style="list-style-type: none"> <li>1. PT Paramitra Internusa Pratama – West Kalimantan</li> <li>2. PT Agrolestari Sentosa – Central Kalimantan.</li> </ol> <p>The latest progress indicates that the company has sent the revised Concept Note to RSPO on 17 January 2023.</p> <p>c) The companies currently in the process of preparing their Concept Note (LC Batch-3) are:</p> <ol style="list-style-type: none"> <li>1. PT Cahaya Nusa Gemilang - West Kalimantan</li> <li>2. PT Agrolestari Mandiri - West Kalimantan</li> <li>3. PT Persada Graha Mandiri - West Kalimantan</li> <li>4. PT Mitrakarya Agroindo - Central Kalimantan</li> </ol>	<p>Complied</p>

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

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	<ol style="list-style-type: none"> <li>3. PT Mitra Karya Agroindo – Kalteng,</li> <li>4. PT Binasawit Abadipratama – Kalteng,</li> <li>5. PT Aditunggal Mahajaya – Kalteng,</li> <li>6. PT Agrolestari Sentosa – Kalteng</li> <li>7. PT Agrokarya Primalestari – Kalteng,</li> <li>8. PT Buana Adhitama – Kalteng,</li> <li>9. PT Agrolestari Mandiri – Kalbar,</li> <li>10. PT Paramitra Internusa Persada – Kalbar</li> <li>11. PT Persada Graha Mandiri – Kalbar</li> <li>12. PT Bangun Nusa Mandiri – Kalbar,</li> <li>13. PT Kartika Prima Cipta – Kalbar,</li> <li>14. PT Kencana Graha Permai (Delima Estate) – Kalbar,</li> <li>15. PT Cahaya Nusa Gemilang – Kalbar,</li> </ol>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>There are no land conflicts. The company has established a mechanism for resolving land conflicts in accordance with RSPO criteria 4.2, 4.6, 4.7, and 4.8. These procedures are outlined in the Standard Operating Procedure (SOP) for Social Conflict Handling, registered under SOP/SMART/SCRD/NSDV/I/002 with revision 1 dated 18 May 2016, and the SOP for Handling Complaints and Dissatisfaction, registered under SOP/SMART/GIMS-SCMD/USDV/I/001 with revision 2 dated 11 April 2017. These procedures govern agreed-upon social conflict resolution. Conflict resolution can be conducted in a participatory manner or involve third-party mediation.</p> <p>The company also has procedures for addressing complaints before they escalate into conflicts. The specific process is outlined in SOP/SMART/GIMS-SCMD/USDV/I/001 with revision 2 dated 11 April 2017, which ensures that complaints are handled promptly and appropriately. GAR has initiated the process of becoming an RSPO DSF (Dispute Settlement Facility) member under the "Grower" category.</p> <p>Here's a summary of the complaint progress related to GAR as found on the RSPO website:</p> <ol style="list-style-type: none"> <li>1. Complaint RSPO/2021/12/CRP, date submitted 8 Nov 2021, date accepted 14 Feb 2022, addressed to PT Ramajaya Pramukti (a subsidiary of Golden Agri Resources Ltd) by Lembaga Adat Kenegerian Petapahan (Ninik Mamak Kenegerian Petapahan), Bahtera Alam &amp; Sawit Watch.</li> </ol> <p><b>Update as of 28 Jun 2023:</b></p>	<p>Complied</p>

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	<p>The Secretariat is in the midst of preparing the Briefing Note.</p> <p>2. Complaint RSPO/2021/11/HN, dated 11 July 2021, was lodged against PT SMART Tbk (West Kalimantan Region) regarding alleged procurement of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of Kencana Group (not an RSPO member), which had been involved in a series of violations against workers and indigenous communities in the district.</p> <p>The latest status indicates that the RSPO Complaint Panel issued a decision on the complaint on 17 January 2022, deciding to halt all proceedings related to the complaint. The decision letter was shared with both parties, providing them with an opportunity to file an appeal until 11 April 2022.</p> <p><b>Update as of 12 April 2022:</b></p> <p>The appeal submission period has concluded. The complaint is now formally closed.</p> <p>3. Complaint RSPO/2020/04/IR dated 2 March 2020, against GAR (Central Kalimantan Region) by the Forest Peoples Programme &amp; Elk Hills Research concerning allegations of land legality and bribery cases. From GAR's side, GIS-2 analysis for alert land clearance after November 2014, following discussions with the RSPO GIS manager on 21 May 2021, approved the sampling methodology. GAR's clarification report was submitted on 8 September 2021. However, regarding the legal review of anti-bribery policies and practices, the company rejected the ToR for the Legal Review on 26 March 2021. As of December 15, 2021, RSPO is awaiting the review results from the consultant.</p> <p>As of 31 May 2023, procurement process for the independent investigation is ongoing. The Expression of Interest along with the ToR has been published on the RSPO website.</p> <p><b>Update as of 28 Jun 2023:</b></p> <p>Selection process for the independent investigator ongoing.</p> <p>4. Complaint PreCAP/2014/03/IR was lodged on 13 October 2014, against PT Kartika Prima Cipta (West Kalimantan) by the Forest Peoples Programme (FPP) &amp; Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the Free, Prior, and Informed Consent (FPIC) process and 6 other issues. With the consent of GAR and FPP,</p>	
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	<p>RSPO divided the conflict resolution verification process into 5 phases (Phase 1 for NPP, maximum land holding, and new land development; Phase 2 for legality; Phase 3 for smallholders; Phase 4 for FPIC; and Phase 5 for HCV). GAR has responded up to Phase 5 on 26 August 2021, addressing all stages.</p> <p>The latest status as of 15 December 2021, indicates that the RSPO Complaint Panel has reached a decision for Phase 2 and is awaiting discussions for Phase 3 and 4.</p> <p><b>Update as of 28 Jun 2023:</b></p> <p>The Secretariat is still in the midst of preparing the Briefing Notes for Phases 3, 4 &amp; 5.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>In the RSPO Case Tracker, Audit team noted there was no active complaint related to labour disputes.</p> <p>The company has established procedures for addressing employee complaints before they escalate into conflicts. The procedure is the Complaint and Conflict Handling SOP, designated as SOP/SMART/SUST/IV/003, issued on 1 July 2014, with revision 3 on 8 March 2022.</p> <p>Procedures regarding employee issues are outlined in an internal flowchart because employees fall under the category of internal stakeholders. The means of lodging complaints involve official letters submitted through labour unions or deposited into suggestion boxes strategically placed in accessible locations.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>In the RSPO Case Tracker, Audit team noted there was not active complaint related to legal non-compliance.</p> <p>The company adheres to the applicable regulations in accordance with RSPO requirement 2.1.3, ensuring there are no violations of relevant plantation regulations. The company has established mechanisms to evaluate compliance with regulations as outlined in SOP/SMART/UMUM/SADV/I/002. This Standard Operating Procedure (SOP) outlines the procedures for meeting requirements, the necessary documentation, and flowcharts that provide a detailed process for evaluating compliance with legal regulations.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;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</p>	<p>The company has conducted a Compliance Audit/Internal Sustainability Verification (ISV) to assess conformity with RSPO standards and has also established a System within the company unit to be certified.</p> <p>For example:</p>	<p>Complied</p>



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<p>available and justified.</p>	<ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Bukit Kapur Mill and its supply bases carried out 12 December 2022.</li> <li>- Internal audit for PT Agrolestari Sentosa – Jalemo Mill and its supply bases carried out 21 November 2022.</li> <li>- Internal audit for PT Binasawit Abadi Pratama – Perdana Mill and its supply bases carried out 13 June 2022.</li> <li>- Internal audit for PT Aditunggal Mahajaya – Sako Mill and its supply bases carried out 14 November 2022.</li> </ul>	
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Yes, there are critical non-compliance raised during internal audits to uncertified management units. Management has prepared correction and corrective action.</p> <ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Bukit Kapur Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 6.2.1, 6.7.1, 7.2.6, 7.12.2; management has prepared correction and corrective action.</li> <li>- Internal audit for PT Agrolestari Sentosa – Jalemo Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 3.6.2, 7.2.11, 7.12.8; management has prepared correction and corrective action.</li> <li>- Internal audit for PT Binasawit Abadi Pratama – Perdana Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 3.6.1, 7.12.8; management has prepared correction and corrective action.</li> <li>- Internal audit for PT Aditunggal Mahajaya – Sako Mill and its supply bases; Internal audit team issued NC related to 2.1.1, 3.6.2, 6.2.2, 6.7.1, 7.12.8; management has prepared correction and corrective action.</li> </ul>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Audit team checked on internal audit reports and verified the stakeholder consultation has been carried out. Internal audit report checked:</p> <ul style="list-style-type: none"> <li>- Internal audit for PT Binasawit Abadi Pratama – Bukit Kapur Mill and its supply bases carried out 12 December 2022.</li> <li>- Internal audit for PT Agrolestari Sentosa – Jalemo Mill and its supply bases carried out 21 November 2022.</li> <li>- Internal audit for PT Binasawit Abadi Pratama – Perdana Mill and its supply bases carried out 13 June 2022.</li> </ul>	<p>Complied</p>

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	<p>- Internal audit for PT Aditunggal Mahajaya – Sako Mill and its supply bases carried out 14 November 2022.</p> <p>Audit team sent email to Wetlands, Sawit Watch, Aid Environment, WALHI, WWF, Forest Watch Indonesia, WCS Indonesia, LINKS and Solidaridad, until assessment ends, audit team did not received any response.</p>	
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**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>PT Bumi Permai Lestari – Bukit Perak Mill does not have scheme smallholder.</p>	<p>Not Applicable</p>

**Approved Time Bound Plan**

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

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Sungai Bengkal Mill	Indonesia	Sungai Bengkal Estate	Betung Bedarah Barah Village, Tebo Iilir Sub District, Rantau Api, Penapalan Village, Tanah Iilir Sub District, Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.5950	102.6100	2,364.49	Certified	-	2015	-
Sungai Bengkal Mill	Indonesia	Muara Kilis Estate	Muara Kilis Village, Tebo Iilir Sub District, Kandang, Pelayangan and Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.4450	102.5686	1,460.54	Certified	-	2015	-
Sungai Bengkal Mill	Indonesia	Sungai Bengkal KKPA	Betung Bedarah Barah Village, Tebo Iilir Sub District, Rantau Api, Penapalan Village, Tanah Iilir Sub District, Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.5950	102.6100	1,062.58	Certified	-	2015	-
Sungai Bengkal Mill	Indonesia	Kilis KKPA	Muara Kilis Village, Tebo Iilir Sub District, Kandang, Pelayangan and Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	2.2117	102.6422	938.77	Not Certified	2023	-	2021
Pelakar Mill	Indonesia	Pelakar Mill	Tanjung Village, Bathin VIII Sub-District, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	2.2117	102.6464	-	Certified	-	2020	-
Pelakar Mill	Indonesia	Pelakar Estate	Tanjung Village, Bathin VIII Sub-District, Sarolangun District, Jambi Province, Indonesia	2.2117	102.6931	4,405.90	Certified	-	2020	-
Pelakar Mill	Indonesia	Batang Merangin Estate	Kasang Melintang Village, Pauh Sub-District, Sarolangun District, Jambi Province, Indonesia	2.1117	102.3661	5,226.47	Certified	-	2020	-
Pelakar Mill	Indonesia	Tiga Serumpun KKPA	Tanjung Village, Bathin VIII Sub-District, Sarolangun District, Jambi Province, Indonesia	2.1283	102.3761	2,787.83	Not Certified	2023	-	2021

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Jelatang Mill	Indonesia	Jelatang Mill	Jelatang Village,Pamenang Sub-District,Merangin District, Jambi Province, Indonesia	2.1283	102.3753	-	Certified	-	2014	-
Jelatang Mill	Indonesia	Bangko Estate	Jelatang Village,Pamenang Sub-District,Merangin District, Jambi Province, Indonesia	2.1117	102.3661	237.96	Certified	-	2014	-
Langling Mill	Indonesia	Langling Mill	Langling Village,Bangko Sub-District,Merangin District, Jambi Province, Indonesia	2.1283	102.3753	-	Certified	-	2014	-
Langling Mill	Indonesia	Bangko Estate	Langling Village,Bangko Sub-District,Merangin District, Jambi Province, Indonesia	2.1117	102.3661	955.36	Certified	-	2014	-
Langling Mill	Indonesia	Batang Gading Estate	Bukit Kemang Village, Tanah Bumbu Sub District, Kab. Muara Bungo District,Jambi Province, Indonesia	-1.5503	101.8828	1,917.17	Not Certified	2023	-	2021
Langling Mill	Indonesia	Batang Gading KKPA	Bukit Kemang Village, Tanah Bumbu Sub District, Kab. Muara Bungo District,Jambi Province, Indonesia	-1.5510	101.8590	1,494.39	Not Certified	2023	-	2021
Muara Kandis Mill	Indonesia	Muara Kandis Mill	Lubuk Pandan Village, Muara Lakitan Sub District, Karya Sakti Village, Muara Kelingi Sub-District,Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9453	103.1708	-	Certified	-	2015	-
Muara Kandis Mill	Indonesia	Muara Kandis Estate	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District,Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9286	103.1772	6,635.44	Certified	-	2015	-
Muara Kandis Mill	Indonesia	Muara Tawas Estate	Karya Mukti Village, Lubuk Tua Village, Muara Kelingi Sub-District, Muara Megang Village, Megang Sakti Sub-District,Musi	2.9953	103.1186	4,322.84	Certified	-	2015	-

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			Rawas District, Sumatera Selatan Province, Indonesia							
Muara Kandis Mill	Indonesia	Pendawa Plasma	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	-2.9021	103.2113	1,795.50	Not Certified	2023	-	2021
Pangkalan Panji Mill	Indonesia	Pangkalan Panji Mill	Pangkalan Panji Village, Banyuasin III District, Banyuasin District, South Sumatera, Province Indonesia	2.9622	104.4664	-	Certified	-	2015	-
Pangkalan Panji Mill	Indonesia	Sawit Mas Estate	Pangkalan Panji Village, Banyuasin III District, Banyuasin Regency, South Sumatera Province, Indonesia	2.9456	104.4643	3,753.00	Certified	-	2015	-
Bumi Sawit Mill	Indonesia	Bumi Sawit Mill	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5456	104.3442	-	Certified	-	2015	-
Bumi Sawit Mill	Indonesia	Bumi Sawit Estate	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5289	104.3347	8,823.90	Certified	-	2015	-
Bukit Perak Mill	Indonesia	Bukit Perak Mill	Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8458	105.5508	-	Certified	-	2015	-
Bukit Perak Mill	Indonesia	Bukit Perak Estate	Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8125	105.4951	4,111.50	Certified	-	2015	-
Bukit Perak Mill	Indonesia	Bukit Permata Estate	Terentang and Kacung Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8625	105.4778	1,973.45	Certified	-	2015	-
Bukit Perak Mill	Indonesia	Bukit Permai Estate	Desa Sarang Mandi Village, Desa Romadhon Village, Sungai Selan Sub District, Bangka	-2.2666	105.9378	3,151.07	Not Certified	2024	-	-

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			Tengah District, Bangka Belitung Province Indonesia							
Bukit Perak Mill	Indonesia	Bukit Lestari Estate	Desa Sarang Mandi Village, Desa Romadhon Village, Sungai Selan Sub District, Bangka Tengah District, Bangka Belitung Province Indonesia	-2.2666	105.9378	664.27	Not Certified	2024	-	-
Leidong West Mill	Indonesia	Leidong West Mill	Terentang Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.9292	105.4764	-	Certified	-	2014	-
Leidong West Mill	Indonesia	Leidong West Selatan Estate	Berang Village, Simpang Teritip Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.9958	105.4997	642.73	Certified	-	2014	-
Leidong West Mill	Indonesia	Leidong West Utara Estate	Milsak, Tumbak Petar, Jebus & Ranggi Asam Village, Jebus Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.7625	105.4981	746.52	Certified	-	2014	-
Leidong West Mill	Indonesia	Bukit Intan Estate	Terentang, Kacung Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.8958	105.5097	5,055.02	Certified	-	2014	-
Leidong West Mill	Indonesia	Bukit Mas Estate	Ibul Village, Kelapa Sub District, Bangka Barat District, Bangka Belitung Province, Indonesia	1.9292	105.4681	3,183.50	Certified	-	2014	-
Tanjung Kembiri Mill	Indonesia	Tanjung Kembiri Mill	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	3.0464	107.7717	-	Certified	-	2014	-
Tanjung Kembiri Mill	Indonesia	Tanjung Kembiri Estate	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	3.0297	107.7689	6,089.30	Certified	-	2014	-
Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Estate	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	3.0631	107.7542	5,251.28	Certified	-	2014	-

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Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Plasma,	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	-3.0970	107.7630	496.99	Not Certified	2023	-	
Tanjung Kembiri Mill	Indonesia	Tanjung Sawit Estate	Perpat Village, Membalong District, Belitung Regency, Bangka Belitung Province, Indonesia	-3.0783	107.6437	2,633.80	Not Certified	2023	-	
Tanjung Kembiri Mill	Indonesia	Tanjung Sawit KKPA	Perpat Village, Membalong District, Belitung Regency, Bangka Belitung Province, Indonesia	-3.1520	107.6490	675.80	Not Certified	2023	-	
Sungai Buaya Mill	Indonesia	Sungai Buaya Mill	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1458	105.4386	-	Certified	-	2014	-
Sungai Buaya Mill	Indonesia	Sungai Buaya Estate	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1792	105.4358	5,114.39	Certified	-	2014	-
Sungai Buaya Mill	Indonesia	Mesuji (plasma)	Brabasan Village, Tanjung Raya Sub District, Mesuji District, Lampung Province, Indonesia	3.9958	105.3472	5,194.76	Certified	-	2014	-
Sungai Buaya Mill	Indonesia	Gedung Aji Lama (plasma)	Panduan Rajawali Village, Meraksa Aji Sub District, Tulang Bawang District, Lampung Province, Indonesia	4.3125	105.4317	5,009.95	Certified	-	2014	-
Sungai Merah Mill	Indonesia	Sungai Merah Mill	Sidomukti Village, Gedung Aji Baru Sub District, Tulang Bawang District, Lampung Province, Indonesia	4.2458	105.5889	-	Certified	-	2014	-
Sungai Merah Mill	Indonesia	Sungai Merah Estate	Sidang Gunung Tiga Village, Rawajitu Utara Sub District, Mesuji District, Lampung Province, Indonesia	4.2292	105.6347	4,046.01	Certified	-	2014	-



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Sungai Merah Mill	Indonesia	Gedung Aji Baru (plasma)	Sidoharjo Village, Penawartama Sub District, Tulang Bawang District, Lampung Province, Indonesia	4.1792	105.4400	4,505.75	Certified	-	2014	-
Muara Wahau Mill	Indonesia	Muara Wahau Mill	Sukamaju Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	1.1325	117.0065	-	Certified	-	2014	-
Muara Wahau Mill	Indonesia	Muara Wahau Estate	Makmur Jaya Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	1.1658	117.0065	3,603.12	Certified	-	2014	-
Muara Wahau Mill	Indonesia	Gunung Kombeng Estate	Sukamaju Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	1.1325	117.0203	3,274.42	Certified	-	2014	-
Jak Luay Mill	Indonesia	Jak Luay Mill	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1322	116.9144	-	Certified	-	2015	-
Jak Luay Mill	Indonesia	Jak Luay Estate	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1656	116.9313	3,845.74	Certified	-	2015	-
Jak Luay Mill	Indonesia	Pantun Mas Estate	Sidomulyo Village, Kongbeng Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	1.0322	116.9526	5,072.32	Certified	-	2015	-
Jak Luay Mill	Indonesia	Long Buluh Estate	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1656	116.9509	3,489.14	Certified	-	2015	-
Jak Luay Mill	Indonesia	Bukit Subur Estate	Jakuyak Village, Telen Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1822	116.8416	3,264.55	Certified	-	2015	-
Jak Luay Mill	Indonesia	Jakluay Plasma	Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.9378	116.8812	2,979.56	Not Certified	2023	-	2021

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Jak Luay Mill	Indonesia	Bukit Subur Plasma	Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.8673	116.8580	712.29	Not Certified	2023	-	2021
Batu Ampar Mill	Indonesia	Batu Ampar Mill	Serongga Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2156	116.0170	-	Certified	-	2012	-
Batu Ampar Mill	Indonesia	Batu Ampar Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2656	116.0170	3,944.07	Certified	-	2012	-
Batu Ampar Mill	Indonesia	Batu Mulia Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2156	116.1047	2,929.02	Certified	-	2012	-
Sungai Kupang Mill	Indonesia	Sungai Kupang Mill	Sungai Kupang Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.0822	116.0142	-	Certified	-	2020	-
Sungai Kupang Mill	Indonesia	Sungai Kupang Estate	Sangking Baru Village, Kelumpang Selatan Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.0656	116.1181	5,196.11	Certified	-	2020	-
Sungai Kupang Mill	Indonesia	Sungai Panci Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.1822	116.0256	4,077.40	Certified	-	2012	-
Sungai Kupang Mill	Indonesia	Sungai Panci (plasma)	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.1819	115.9986	3,822.17	Certified	-	2012	-
Sungai Kupang Mill	Indonesia	Sungai Kupang KKPA	Telagasari Village, Kelumpang Hilir District, Kota Baru Regency, Kalimantan Selatan Province, Indonesia	-3.1129	116.1855	3,858.70	Not Certified	2023	-	2021
Sungai Kupang Mill	Indonesia	Sungai Manunggul Estate	Sang Sang Village, Kelumpang Hilir District, Kota Baru Regency, Kalimantan Selatan Province, Indonesia	-2.7797	116.1733	1,174.68	Not Certified	2024	-	-

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Tanah Laut Mill	Indonesia	Tanah Laut Mill	Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2831	-	Certified	-	2012	-
Tanah Laut Mill	Indonesia	Tanah Laut Estate	Sungai Cuka, Sumber Jaya, Bukit Mulya Pasir Putih, Kintap Kecil Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2953	2,750.31	Certified	-	2012	-
Tanah Laut Mill	Indonesia	Kintapura Estate	Kintapura, Salaman Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8319	115.1400	1,443.50	Certified	-	2012	-
Libo Mill	Indonesia	Libo Mill	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.2061	-	Certified	-	2013	-
Libo Mill	Indonesia	Libo Estate	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.2061	4,871.77	Certified	-	2013	-
Libo Mill	Indonesia	Nenggala Estate	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.8947	101.2342	2,203.84	Certified	-	2013	-
Libo Mill	Indonesia	Sungai Rokan Estate	Samsam Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9114	101.2172	4,139.72	Certified	-	2013	-
Libo Mill	Indonesia	Sungai Tapung (plasma)	Sukamaju & Kota Bangun Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7781	101.2458	5,585.00	Certified	-	2013	-
Samsam Mill	Indonesia	Samsam Mill	Bekalar Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9614	101.3000	-	Certified	-	2013	-
Samsam Mill	Indonesia	Samsam Estate	Bekalar Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9614	101.3000	2,812.13	Certified	-	2013	-
Samsam Mill	Indonesia	Kandista Estate	Belutu Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.3514	3,562.64	Certified	-	2013	-
Samsam Mill	Indonesia	Palapa Estate	Bekalar Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9614	101.2808	3,209.80	Certified	-	2013	-

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Ujung Tanjung Mill	Indonesia	Ujung Tanjung Mill	Jambai Makmur Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2975	-	Certified	-	2013	-
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Estate	Jambai Makmur Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2650	3,253.00	Certified	-	2013	-
Ujung Tanjung Mill	Indonesia	Kandis Sejahtera KKPA	Pencing Bekulo Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9817	101.1525	418.01	Not Certified	2023	-	
Ujung Tanjung Mill	Indonesia	Swadaya Mas Bersama KKPA	Libo Jaya Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9602	101.3692	450.79	Not Certified	2023	-	
Kijang Mill	Indonesia	Kijang Mill	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.0450	-	Certified	-	2012	-
Kijang Mill	Indonesia	Kijang Mas Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8447	101.0494	2,369.39	Certified	-	2012	-
Kijang Mill	Indonesia	Kijang Kencana (plasma)	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8547	101.0911	8,147.79	Certified	-	2012	-
Nagasakti Mill	Indonesia	Nagasakti Mill	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0503	-	Certified	-	2012	-
Nagasakti Mill	Indonesia	Nagamas Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0464	5,042.58	Certified	-	2012	-
Nagasakti Mill	Indonesia	Nagasakti Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8114	101.0875	5,167.22	Certified	-	2012	-
Nagasakti Mill	Indonesia	Ramabakti Estate	Beringin Lestari Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.1722	2,903.79	Certified	-	2012	-
Ramarama Mill	Indonesia	Ramarama Mill	Petapahan Village,Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5614	101.0764	-	Certified	-	2012	-
Ramarama Mill	Indonesia	Ramarama Estate	Petapahan Village,Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	4,091.94	Certified	-	2012	-

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Ramarama Mill	Indonesia	Amarta Jaya (plasma)	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5341	101.0798	4,426.00	Certified	-	2012	-
Ramarama Mill	Indonesia	Ramarama KKPA	Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5600	100.9980	760.00	Not Certified	2023	-	2021
Ramarama Mill	Indonesia	Berkat Ridho KKPA	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.0450	739.99	Not Certified	2023	-	-
Ramarama Mill	Indonesia	Produsen Rama Sawit KKPA	Petapahan Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	174.95	Not Certified	2023	-	-
Indrasakti Mill	Indonesia	Indrasakti Mill	Sungai Limau Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	0.5950	102.3050	-	Certified	-	2013	-
Indrasakti Mill	Indonesia	Indrasakti Estate	Sungai Limau Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	0.5783	102.3325	820.87	Certified	-	2013	-
Indrasakti Mill	Indonesia	Indrasakti (plasma)	Sungai Limau Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.3088	-0.5693	5,023.50	Certified	-	2013	-
Indrasakti Mill	Indonesia	Indralestari (plasma)	Talang Bersemi Village, Batang Cenaku Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.1495	-0.7280	4,245.50	Certified	-	2013	-
Indrasakti Mill	Indonesia	Indragiri (plasma)	Kuala Gading Village, Batang Cenaku Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.2672	-0.6351	5,295.00	Certified	-	2013	-
Indrasakti Mill	Indonesia	Mandian Jaya PLASMA	Bandar Padang Village, Kec Seberida Sub District, Indragiri Hulu District, Riau Province, Indonesia	-0.5930	102.3600	404.62	Not Certified	2023	-	-

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Bumi Palma Mill	Indonesia	Bumi Palma Mill	Bagan Jaya Village,Tempuling Sub District,Indragiri Hilir District,Riau Province, Indonesia	0.5981	102.9836	-	Certified	-	2014	-
Bumi Palma Mill	Indonesia	Bumi Palma Estate	Bagan Jaya Village,Tempuling Sub District,Indragiri Hilir District,Riau Province, Indonesia	0.6039	102.9886	3,404.80	Certified	-	2014	-
Bumi Palma Mill	Indonesia	Bumi Lestari Estate	Pebanaan Village,Kritang Sub District,Indragiri Hilir District,Riau Province, Indonesia	0.5997	103.0264	3,285.20	Certified	-	2014	-
Bumi Palma Mill	Indonesia	Kharisma Estate	Talang Perigi Village, Rakit Kulim Sub District, Indragiri Hulu District,Riau Province, Indonesia	-0.5710	102.2390	344.94	Not Certified	2024	-	-
Bumi Palma Mill	Indonesia	Kharisma Plasma	Talang Perigi Village, Rakit Kulim Sub District, Indragiri Hulu District,Riau Province, Indonesia	-0.5620	102.2400	380.53	Not Certified	2024	-	-
Hanau Mill	Indonesia	Hanau Mill	Hanau Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.4114	112.1092	-	Certified	-	2012	-
Hanau Mill	Indonesia	Hanau Estate	Hanau Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.4114	112.1092	4,890.00	Certified	-	2012	-
Hanau Mill	Indonesia	Tasik Mas Estate	Hanau Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.3414	112.0928	5,045.48	Certified	-	2012	-
Hanau Mill	Indonesia	Tanjung Paring Estate	Batu Ampar Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.2803	112.1325	4,717.06	Certified	-	2012	-
Hanau Mill	Indonesia	Langadang Estate	Batu Ampar Sub District,Seruyan District,Central Kalimantan,Province, Indonesia	2.2347	112.1078	2,409.57	Certified	-	2012	-

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Hanau Mill	Indonesia	Medang Sari Estate	Desa Runtu Village, Arut Selatan Sub District, Kotawaringin Barat District Kalimantan Tengah Province Indonesia	-2.4179	111.6959	2,436.00	Not Certified	2025	-	2021
Sungai Rungau Mill	Indonesia	Sungai Rungau Mill	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3206	112.3339	-	Certified	-	2013	-
Sungai Rungau Mill	Indonesia	Sungai Rungau Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3286	112.3161	3,073.15	Certified	-	2013	-
Sungai Rungau Mill	Indonesia	Sungai Seruyan Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3089	112.2578	4,870.84	Certified	-	2013	-
Sungai Rungau Mill	Indonesia	Terawan Estate	Selunuk Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3453	112.3786	4,481.87	Certified	-	2013	-
Sungai Rungau Mill	Indonesia	Tangar Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2292	112.2928	4,445.15	Certified	-	2013	-
Sungai Rungau Mill	Indonesia	Bukit Tiga Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.1864	112.3222	3,281.78	Certified	-	2013	-
Semilar Mill	Indonesia	Semilar Mill	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2483	112.3406	-	Certified	-	2013	-
Semilar Mill	Indonesia	Semilar Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2517	112.3497	4,288.63	Certified	-	2013	-

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Semilar Mill	Indonesia	Sei Rindu Estate	Pantap Village, Mentaya Hulu District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.2536	112.4081	3,990.60	Certified	-	2013	-
Semilar Mill	Indonesia	Mandang Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2744	112.3381	5,170.35	Certified	-	2013	-
Semilar Mill	Indonesia	Puri Estate	Biru Maju Village, Telawang District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.3061	112.4203	3,638.42	Certified	-	2013	-
Kenanga Mill	Indonesia	Kenanga Mill	Randai Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1197	110.5939	-	Certified	-	2015	-
Kenanga Mill	Indonesia	Kencana Estate	Rangkung Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1325	110.5775	3,243.64	Certified	-	2015	-
Kenanga Mill	Indonesia	Cendana Estate	Belaban Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1053	110.6086	3,591.85	Certified	-	2015	-
Kenanga Mill	Indonesia	Kenanga Estate	Randai Village, Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1396	110.5079	2,618.10	Not Certified	2023	-	2021
Kenanga Mill	Indonesia	Delima Estate	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1231	110.5572	1,857.49	Not Certified	2023	-	2021
Kenanga Mill	Indonesia	Kencana Kemitraan	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.0833	110.5835	1,108.22	Not Certified	2024	-	2021
Kenanga Mill	Indonesia	Kenanga Kemitraan	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.0896	110.5516	439.00	Not Certified	2024	-	2021
Belian Mill	Indonesia	Belian Mill	Desa Tua Abang Village, Semitau Sub District, Kapuas Hulu District Propinsi Kalimantan Barat Province, Indonesia	0.4875	111.8447	-	Not Certified	2022	Audited in December 2022	2021



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Belian Mill	Indonesia	Muara Tawang Estate	Mantan Village, Suhaid Sub District, Kapuas Hulu District, Kalimantan Barat Province, Indonesia	-2.0149	112.2989	2,376.91	Not Certified	2023	-	2021
Belian Mill	Indonesia	Belian Estate	Seberuang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4850	111.8495	1,948.58	Not Certified	2022	Audited in December 2022	2021
Belian Mill	Indonesia	Tengkawang Estate	Tua Abang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5362	111.7985	3,467.01	Not Certified	2022	Audited in December 2022	2021
Belian Mill	Indonesia	Kapuas Hulu Estate	Perigi Village, Silat Hilir Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4069	111.7451	2,703.41	Not Certified	2023	-	2021
Belian Mill	Indonesia	Sungai Beran Estate	Sentabai Village, Silat Hilir Sub District, Kab. Kapuas Hulu District, Kalimantan Barat Province, Indonesia	0.4509	111.7400	2,810.85	Not Certified	2023	-	2021
Belian Mill	Indonesia	Belian Kkpa	Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5361	111.8600	1,798.13	Not Certified	2024	-	2021
Belian Mill	Indonesia	Muara Tawang Kkpa	Suhaid Sub District, Kapuas Hulu District, Kalimantan Barat Province, Indonesia	0.5272	112.0851	1,052.36	Not Certified	2024	-	2021
Belian Mill	Indonesia	Kapuas Hulu Kkpa	Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4729	111.7439	1,187.94	Not Certified	2024	-	2021
Pekawai Mill	Indonesia	Pekawai Mill	Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province Indonesia	-1.5212	110.4589	-	Not Certified	2023	-	2021
Pekawai Mill	Indonesia	Kayung Estate	Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province Indonesia	-1.5452	110.4578	2,210.35	Not Certified	2023	-	2021
Pekawai Mill	Indonesia	Pekawai Estate	Nanga Tayap Sub District, Ketapang District, Kalimantan Barat Province Indonesia	-1.5215	110.4617	2,867.93	Not Certified	2023	-	2021

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Pekawai Mill	Indonesia	Sungai Kelik Estate	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.6174	110.4144	2,466.81	Not Certified	2023	-	2021
Pekawai Mill	Indonesia	Nanga Tayap Estate	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5750	110.5309	2,007.59	Not Certified	2023	-	2021
Pekawai Mill	Indonesia	Kayung Kemitraan	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5727	110.4223	2,650.57	Not Certified	2024	-	2021
Sawita Mill	Indonesia	Sawita Mill	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5477	116.1401	-	Not Certified	2023	-	2021
Sawita Mill	Indonesia	Sawita Estate	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5516	116.1416	3,809.69	Not Certified	2023	-	2021
Sawita Mill	Indonesia	Pamukan Estate	Manunggul Baru Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.5533	116.2249	2,971.57	Not Certified	2023	-	2021
Sawita Mill	Indonesia	Sawita Kkpa	Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-1.5503	101.8828	1,154.47	Not Certified	2024	-	2021
Rantau Panjang Mill	Indonesia	Rantau Panjang Mill	Jak Luay Village, Muara Wahau Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	-	Not Certified	2023	-	2021
Rantau Panjang Mill	Indonesia	Rantau Panjang Estate	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	4,688.77	Not Certified	2023	-	2021
Rantau Panjang Mill	Indonesia	Rantau Panjang KKPA	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9726	116.8412	981.76	Not Certified	2024	-	2021

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Sungai Kikim Mill	Indonesia	Sungai Kikim Mill	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6343	103.2197	-	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Kikim Estate	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6293	103.2387	1,845.29	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Pangi Estate	Ulak Bandung Village, Kikim Barat Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.5507	103.1897	3,118.59	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Musi Estate	Gunung Kembang Lama Village, BTS Ulu Sub District, Musi Waras District, Sumatera Selatan Province, Indonesia	-3.5018	103.2300	1,736.24	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Saling Estate	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6249	103.2398	2,161.22	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Enim Estate	Arahan Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6300	103.6489	1,724.54	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Lematang Estate	Arahan Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6300	103.6489	2,081.48	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Bungur Estate	Patikal Lama Village, Kikim Timur District, Lahat Regency, Sumatera Selatan Province, Indonesia	-3.6581	103.4236	2,322.95	Not Certified	2023	-	2021
Sungai Kikim Mill	Indonesia	Sungai Lingsing Estate	Tanjung Lontar Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6359	103.3057	1,024.88	Not Certified	2023	-	2021

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Gunung Kongbeng Mill	Indonesia	Gunung Kongbeng Mill	Sukamaju Village,Kongbeng Sub District, Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1113	117.0210	-	Not Certified	2024	-	2021
Gunung Kongbeng Mill	Indonesia	Gunung Kongbeng KKPA	Kongbeng Sub District,Kutai Timur District, Kalimantan Timur Province, Indonesia	1.0992	117.0117	2,214.00	Not Certified	2024	-	2021
Sungai Magalau Mill	Indonesia	Sungai Magalau Mill	Sangsang Village,Kelumpang Tengah Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.7866	116.1707	-	Not Certified	2023	-	2021
Sungai Magalau Mill	Indonesia	Senakin Estate	Sangsang Village,Sampanahan Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.8081	116.1867	2,786.98	Not Certified	2023	-	2021
Sungai Magalau Mill	Indonesia	Sungai Magalau Estate	Sukamaju Village,Kelumpang Tengah Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.6658	116.1611	1,706.51	Not Certified	2023	-	2021
Bukit Kapur Mill	Indonesia	Bukit Kapur Mill	Bangkalan Melayu Village,Kelumpang Hulu Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.9427	116.0461	-	Not Certified	2025	-	2021
Bukit Kapur Mill	Indonesia	Sungai Cantung Estate	Bangkalan Melayu Village,Kelumpang Hulu Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.9591	116.0020	3,473.00	Not Certified	2025	-	2021
Bukit Kapur Mill	Indonesia	Bukit Kapur Estate	Karang Liwar Village,Kelumpang Hulu Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.8903	116.0432	2,950.00	Not Certified	2025	-	2021
Kasuari Mill	Indonesia	Kasuari Mill	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9731	140.0299	-	Not Certified	2023	-	2021
Kasuari Mill	Indonesia	Cendrawasih Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9314	139.9666	2,691.32	Not Certified	2023	-	2021

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Kasuari Mill	Indonesia	Nuri Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.8949	139.9259	2,532.16	Not Certified	2023	-	2021
Kasuari Mill	Indonesia	Rajawali Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9938	140.0926	3,675.16	Not Certified	2023	-	2021
Kasuari Mill	Indonesia	Mambruk Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-3.0306	140.0458	3,472.87	Not Certified	2023	-	2021
Sungai Air Jernih Mill	Indonesia	Sungai Air Jernih Mill	Pauh Village, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0853	102.4697	-	Not Certified	2023	-	2021
Sungai Air Jernih Mill	Indonesia	Sungai Air Jernih Estate	Pauh Village, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0844	102.8033	2,962.69	Not Certified	2023	-	2021
Sungai Air Jernih Mill	Indonesia	Sungai Mentawak Estate	Baru Village, Air Hitam Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0603	102.7106	2,754.24	Not Certified	2023	-	2021
Sungai Air Jernih Mill	Indonesia	Sungai Merak Estate	Wentawak Baru Village, Air Hitam District, Sarolangun Regency, Jambi Province, Indonesia	-2.0194	102.6364	3,969.33	Not Certified	2023	-	2021
Sungai Air Jernih Mill	Indonesia	Sungai Badak Estate	Wentawak Baru Village, Air Hitam District, Sarolangun Regency, Jambi Province, Indonesia	-2.0194	102.6364	1,576.24	Not Certified	2023	-	2021
Sungai Air Jernih Mill	Indonesia	Sungai Mentawak Kkpa	Baru Village, Air Hitam Sub District, Sarolangun District, Jambi Province, Indonesia	-2.1070	102.7030	922.31	Not Certified	2024	-	2021
Perdana Mill	Indonesia	Perdana Mill	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4225	112.3596	-	Not Certified	2025	-	2021

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				Latitude	Longitude					
Perdana Mill	Indonesia	Perdana Estate	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4202	112.3645	4,006.88	Not Certified	2025	-	2021
Perdana Mill	Indonesia	Lenggana Estate	Selunuk Village, Seruyan Raya Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4185	112.4174	2,274.97	Not Certified	2025	-	2021
Perdana Mill	Indonesia	Semandau Estate	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4317	112.3082	3,789.18	Not Certified	2025	-	2021
Perdana Mill	Indonesia	Muara Dua Estate	Terawan Village, Seruyan Raya Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4526	112.3852	4,116.37	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Kuayan Mill	Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9712	112.3698	-	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Bukit Santuhai Estate	Tumbang Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9490	112.3935	3,634.93	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Seranau Estate	Tumbang Sapiri Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0334	112.4052	3,653.62	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Sapiri Estate	Tukang Langit Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.8724	112.5321	2,392.25	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Tajur Beras Estate	Pematang Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0870	112.4630	3,667.46	Not Certified	2025	-	2021

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Kuayan Mill	Indonesia	Bukit Dua Estate	Rantau Katang Village, Telaga Antang Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.7376	112.5294	1,804.56	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Sapiri Plasma	Tukang Langit Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9371	112.7821	435.00	Not Certified	2025	-	2021
Kuayan Mill	Indonesia	Sungai Sambon Plasma	Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0724	112.4382	470.29	Not Certified	2025	-	2021
Tangar Mill	Indonesia	Tangar Mill	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2438	112.2981	-	Not Certified	2025	-	2021
Tangar Mill	Indonesia	Sulin Estate	Wanatirta Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2238	112.2625	4,173.17	Not Certified	2025	-	2021
Tangar Mill	Indonesia	Nahiyang Estate	Sandul Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2469	112.1932	3,723.32	Not Certified	2025	-	2021
Tangar Mill	Indonesia	Katayang Estate	Sahabu Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.1285	112.2342	3,443.31	Not Certified	2025	-	2021
Tangar Mill	Indonesia	Sulin Plasma	Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2470	112.1931	1,677.28	Not Certified	2025	-	2021
Sako Mill	Indonesia	Sako Mill	Suka Mandang Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0356	112.2387	-	Not Certified	2025	-	2021

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				Latitude	Longitude					
Sako Mill	Indonesia	Mentaya Estate	Ayawan Village,Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province,Indonesia	-2.0149	112.2989	3,341.84	Not Certified	2025	-	2021
Sako Mill	Indonesia	Kuayan Estate	Keminting Village,Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province,Indonesia	-1.9751	112.3566	3,519.82	Not Certified	2025	-	2021
Sako Mill	Indonesia	Sungai Nusa Estate	Gantung Pengayuh Village,Seruyan Tengah Sub District, Seruyan District,Kalimantan Tengah Province,Indonesia	-2.0960	112.2343	3,218.56	Not Certified	2025	-	2021
Sako Mill	Indonesia	Sungai Ayawan Estate	Suka Mandang Village,Seruyan Tengah Sub District, Seruyan District,Kalimantan Tengah Province,Indonesia	-2.0744	112.2426	3,732.70	Not Certified	2025	-	2021
Sako Mill	Indonesia	Sako Plasma	Seruyan Tengah Sub District, Seruyan District,Kalimantan Tengah Province,Indonesia	-2.2470	112.1931	1,014.42	Not Certified	2025	-	2021
Jalemo Mill	Indonesia	Jalemo Mill	Jalemo Village,Tumbang Jutu Sub District, Gunung Mas District,Kalimantan Tengah Province,Indonesia	-1.3482	113.5022	-	Not Certified	2025	-	2021
Jalemo Mill	Indonesia	Manuhing Estate	Tumbang Kalaken Village,Manuhing Sub District, Gunung Mas District,Kalimantan Tengah Province,Indonesia	-1.3745	113.4438	2,120.91	Not Certified	2025	-	2021
Jalemo Mill	Indonesia	Kajui Estate	Tumbang Sepan Village,Manuhing Sub District, Gunung Mas District,Kalimantan Tengah Province,Indonesia	-1.3907	113.4877	3,570.95	Not Certified	2025	-	2021
Jalemo Mill	Indonesia	Jalemo Estate	Hujung Prata Village,Rungan Barat Sub District, Gunung Mas District,Kalimantan Tengah Province,Indonesia	-1.3593	113.5048	3,350.89	Not Certified	2025	-	2021
Jalemo Mill	Indonesia	Manuhing KKPA	,Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province,Indonesia	-1.3745	113.4438	64.86	Not Certified	2025	-	2021

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				Latitude	Longitude					
Kenari Mill	Indonesia	Kenari Mill	Pangkalan Baru Village, Tribun Jaya Sub District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1655	110.9210	-	Not Certified	2025	-	2021
Kenari Mill	Indonesia	Gaharu Estate	Periangan Village, Jelai Hulu District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1000	110.8647	1,885.97	Not Certified	2025	-	2021
Kenari Mill	Indonesia	Kenari Estate	Kenari Sub District District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1708	110.9236	3,132.08	Not Certified	2025	-	2021
Kenari Mill	Indonesia	Gaharu Plasma	Jelai Hulu District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1119	110.9264	557.47	Not Certified	2025	-	2021
Kenari Mill	Indonesia	Kenari Plasma	Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.2064	110.8981	52.00	Not Certified	2025	-	2021
Sungai Perak Mill	Indonesia	Sungai Perak Mill	Besiq,Bermai,Muara Niliq,Mantar,Muara Begai Village,Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6619	115.5892	-	Not Certified	2024	-	-
Sungai Perak Mill	Indonesia	Sungai Perak Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6820	115.6030	2,810.00	Not Certified	2024	-	-
Sungai Perak Mill	Indonesia	Sungai Basung Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6421	115.6085	2,810.00	Not Certified	2024	-	-
Sungai Perak Mill	Indonesia	Sungai Pikan Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.5957	115.6298	2,351.00	Not Certified	2024	-	-
Sungai Perak Mill	Indonesia	Sungai Pilos Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6776	115.5297	3,361.00	Not Certified	2024	-	-

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				Latitude	Longitude					
Sungai Perak Mill	Indonesia	Sungai Pikan Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.5957	115.6298	2,266.34	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Sungai Tohan Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6267	115.5141	1,773.00	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Sungai Kedang Mill	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6587	115.4964	-	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Sungai Kedang Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6843	115.5019	3,338.00	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Sungai Tohan Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6267	115.5141	3,597.00	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Kedang Pahu Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6679	115.4458	1,928.00	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Sungai Pahu Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6141	115.4520	2,803.00	Not Certified	2024	-	-
Sungai Kedang Mill	Indonesia	Sungai Pahu Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6679	115.4458	567.56	Not Certified	2024	-	-

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## Note:

1. For the certification unit that was audited in 2022 (Belian Mill, Belian Estate and Tengawang Estate) by BSI, during the audit there was NC for indicator 7.12.8, the unit of certification cannot provide evidence to demonstrate that the HCV compensation project plan against Final Conservation Liability and Environmental Remediation Plan has been developed and accepted by the RSPO Compensation Panel. GAR is taking a proactive approach to monitor the progress of its Remediation and Compensation Plan (RaCP) of PT Paramitra Internusa Pratama – Belian Mill. Based on latest communication with GAR, obtained information as follow:
  - Concept Note (Annex 7) PT PIP – Belian Mill has been approved (endorsed) on 8 February 2023
  - Proposal Compensation Plan (Annex 8) PT PIP has been submitted on 28 March 2023
  - Revised Proposal of Compensation Plan (Annex 8) PT PIP – Belian Mill has been submitted on 1 September 2023
  - Update from RSPO on 12 September 2023, stated that the independent evaluator is currently reviewing the compensation plan.
  - On 18 September 2023: RSPO sent feed back from the independent evaluator.
  - On 29 September 2023: GAR resubmit the revised RaCP Annex 8 of GAR – Batch 1 & Batch 2 following the feedback from the evaluator shared on 18 September 2023. Responded by RSPO on 2 October 2023
  - On 9 October 2023: RSPO sent feedback from evaluator that requiring further clarification about the budget.
  - On 12 October 2023: GAR give explanation to RSPO regarding the budget. Responded by RSPO on 12 October 2023 stating that RSPO will forward the information along with the clarification note to the Evaluator in order for the evaluator to continue the evaluation process.
2. GAR is continuously working on the plan for certification, but this will depend on the speed of RaCP proposal approved by independent evaluator and the speed of the Concept Note approval.

### 3.3 Details of Nonconformities

During this Assessment there were as 0 minor and 0 major Nonconformity and One Opportunity For Improvement raised.

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

Opportunity for Improvements	
OFI #	Description
<b>OFI 1</b>	<p><b><u>Indicator 2.3.2</u></b></p> <p>Unit of certification has identified FFB suppliers who are categorized as indirect suppliers as follows:</p> <ul style="list-style-type: none"> <li>• CV Gunung Mas Lestari (GMLX)</li> <li>• Bumdes Sinar Harapan (BSHX)</li> <li>• CV Multi Nusa Pratama (MNPX)</li> <li>• Bina Mandiri Farmers Group (KBMX)</li> </ul> <p>Based on of document review and interviews with FFB supplier representatives, for example GMLX (CV Gunung Masa Lestari) and BSHX (Bumdes Sinar Harapan) it is known that suppliers receive FFB from other parties outside the plantations they manage so that they are included as indirect suppliers. There is a statement letter from the supplier of FFB GMLX and BSHX stating that the origin of FFB is from land that has obtained all land acquisition permits and is cultivated in accordance with the terms and conditions of regulations in force in Indonesia.</p> <p>It has been shown the geolocation data and village origin of the FFB supplier for the two indirect suppliers as well as the number of supplier members, namely 1,151 farmers for GMLX and 449 farmers for BSHX. Of the 1,151 farmers supplying GMLX, 44 people have SHM, 141 people have SKT, and 966 other people have unknown land legal rights. Of the 449 farmers supplying BSHX, 16 people already have SHM, 123 people have SKT and 310 other people have unknown land legal rights.</p>

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	Based on this, the unit of certification has the opportunity to remain consistent in completing detailed information for each FFB supplier according to the planned timeline.
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Positive Findings	
PF #	Description
PF 1	Develop GSIS system for carrying out document reviews.
PF 2	Commitment to implement the principles of sustainable palm oil

**3.3.1 Status of Nonconformities Previously Identified and Observations**

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

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b></p> <p>PT Bumi Permai Lestari already has a Code of Ethics Policy that has been set in 2021. As a form of implementation, the company has accommodated through policy communication to stakeholders, establishing contract terms with service providers, due diligence processes with service providers, monitoring service provider compliance, checking age of contractor workers, checking the payment of wages and BPJS for contractor workers, as well as other monitoring. Expected improvement of implementation records regarding code of ethics policy in the internal audit report information.</p>

	<p><b>Verification / Follow-up actions:</b></p> <p>Based on document verification, it is known that a socialization related to the code of conduct has been carried out. In addition, interviews with FFB supplier representatives (CV Gunung Mas Lestari and BUMDES Sinar Harapan) as well as contractor representatives (CV Berlian Utama) found that socialization regarding the code of ethics was routinely carried out and became one of the requirements for issuing work agreements.</p>
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### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
ASA1 – NCR 1	Major	2.1.1	Transfer Client	Closed on 13/12/2016
ASA1 – NCR 2	Major	4.7.2	Transfer Client	Closed on 15/12/2016
ASA1 – NCR 3	Major	6.5.2	Transfer Client	Closed on 24/12/2016
SA – NCR 1	Major	5.2.1	Transfer Client	Closed on 13/04/2017
SA – NCR 2	Major	6.1.1 & 6.1.2	Transfer Client	Closed on 17/04/2017
SA – NCR 3	Major	6.5.1	Transfer Client	Closed on 17/04/2017
ASA2 NCR 1	Minor	2.2.2	Transfer Client	Closed on 09/07/2018
ASA2 NCR 2	Major	4.7.2	Transfer Client	Closed on 28/08/2017
ASA2 NCR 3	Minor	4.7.5	Transfer Client	Closed on 09/07/2018
ASA2 NCR 4	Minor	5.1.3	Transfer Client	Closed on 09/07/2018
ASA2 NCR 5	Minor	5.3.3	Transfer Client	Closed on 09/07/2018
ASA3 NCR 1	Major	2.1.1	Transfer Client	Closed on 04/10/2018
ASA3 NCR 2	Major	4.6.6	Transfer Client	Closed on 04/10/2018
ASA3 NCR 3	Major	SCCS 5.5.2	Transfer Client	Closed on 04/10/2018
ASA3 NCR 4	Major	SCCS 5.6.1	Transfer Client	Closed on 04/10/2018
ASA4 NCR 1	Major	SCCS E.4.2	Transfer Client	Closed on 06/08/2019

### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Bumi Permai Lestari – Bukit Perak Mill 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

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workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Agriculture Agency	By phone
Governmental Department	Industrial Relations Disputes Section, Manpower Department of Bangka Barat Regency	By phone
Governmental Department	Land Registration Section, National Land Department	By phone
Governmental Department	Environmental Agency	By phone
Worker Union	Federasi Serikat Pekerja Seluruh Indonesia (FPSI)	Face to face interview
Gender Committee	Bukit Perak Estate and Bukit Perak mill	Face to face interview
Internal	New Mother	Face to face interview
Internal	Employee cooperative	Face to face interview
External	Terentang and Dendang Village	Face to face interview
External	FFB Supplier (CV Gunung Mas Lestari and BUMDES Sinar Harapan)	By phone
External	Contractor (CV Berlian Utama)	By phone
External	Previous land owner	Face to face interview

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> Industrial Relations Disputes Section, Manpower Department of Bangka Barat Regency (Bidang Perselisihan Hubungan Industrial, Dinas Penanaman Modal, Perijinan Satu Pintu dan Tenaga Kerja, Kabupaten Bangka Barat).</p> <ul style="list-style-type: none"> <li>• Provincial Minimum wage has been implemented to all workers without any disputes.</li> <li>• Periodic reporting of manpower status and its update from the company is cooperatively implemented.</li> <li>• In 2023, there is no negative issues related to industrial relationship in PT Bumi Permai Lestari</li> <li>• PT Bumi Permai Lestari fulfilled obligation related to minimum wage regulation of 2023 as instructed by Governor Provinsi Bangka Belitung. PT Bumi Permai Lestari also fulfilled the reporting obligation in timely manner.</li> <li>• PT Bumi Permai Lestari fulfilled obligation related to registration of worker health/insurance to BPJS Ketenagakerjaan. This includes for cooperative workers.</li> <li>• There is no dispute related to industrial relationship in PT Bumi Permai Lestari.</li> </ul>

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	<ul style="list-style-type: none"> <li>• PT Bumi Permai Lestari maintains the health and safety management system. Company maintains obligations; license, permit, operator competency related to occupational health and safety. Based on his monitoring, there was no work-related accident-causing fatality.</li> <li>• PT Bumi Permai Lestari has registered the bipartite organization and actively resolve industrial relation issues.</li> <li>• PT Bumi Permai Lestari has three registered worker union and communicates in good manner.</li> <li>• To his observation, there was no report related to fatality or severe injury from work related activity.</li> </ul>
	<p><b>Audit Team verification and response:</b>          Manpower aspect has been verified by related auditor.</p>
<p><b>2</b></p>	<p><b>Feedbacks:</b> Land Registration Section, National Land Department (<i>Bidang Pendaftaran Tanah, Kantor Pertanahan ATR/BPN, Kabupaten Bangka Barat</i>)</p> <ul style="list-style-type: none"> <li>- No report related land dispute/conflict noted;</li> <li>- There are areas occupied by communities inside HGU PT Bumi Permai Lestari. Company respect the decision and not force the landowners to release the right over the land;</li> <li>- PT Bumi Permai Lestari demonstrates legal ownership of the land through Hak Guna Usaha/HGU. The HGU comprised of 2 decrees, 3 certificates on 3 land parcels. All equipped with map.</li> </ul>
	<p><b>Audit Team verification and response:</b>          Land Title has been verified by related auditor.</p>
<p><b>3</b></p>	<p><b>Feedbacks:</b> Head of Terentang Village (year 2000 – 2010) and (yesar 2022 – present)</p> <p>So far, communication and coordination between the company and the village can be said to be quite good. The positive impacts felt include the recruitment of labor and the realization of social responsibility to the community. Currently it is in the exploratory stage for BUMDES business development. The company is willing to provide a facilitator for community productive activities. Regarding the history of the land, the source said that in 1992 the company had handed over land ownership to the company. There is no coercion during the process, prices are based on negotiations and landowners have the right to release or not to relinquish their land ownership rights. Over the past year there have been no issues regarding land disputes, environmental pollution or land fires.</p>
	<p><b>Audit Team verification and response:</b></p> <p>In general there is no negative issue that need further verification. Company social responsibility has been described in 4.3.1. Related land acquisition history described in principle 4</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b> Head of Dendang Village</p> <p>Communication and coordination with companies is quite good, the positive impact of the existence of companies includes the realization of social responsibility, for example in the form of financial assistance and physical development assistance. Until now it is in the initiation stage for the development of community economic enterprises such as forest honey cultivation, skullcap making, and dodol making. It needs to be improved in terms of recruitment workers from surrounding villages, especially Dendang Village.</p> <p>Over the past year there have been no issues regarding land disputes, environmental pollution or land fires.</p>
	<p><b>Audit Team verification and response:</b></p>



	In general there is no negative issue that need further verification. Company social responsibility has been described in 4.3.1. Related land acquisition history described in principle 4
<b>5</b>	<p><b>Feedbacks: FFB Supplier (CV Gunung Mas Lestari and BUMDES Sinar harapan)</b></p> <p>Cooperation relationship so far has been well established. TBS prices are informed through the whatsapp app regularly every week. FFB payments are made on time according to the agreement stated in the contract. The source of the FFB that was sent came from his own plantation and supplying farmers from surrounding villages.</p> <p><b>Audit Team verification and response:</b>          In general there is no negative issue that need further verification. FFB source both from direct and indirect supplier has been described in 2.3.1 and 2.3.2</p>
<b>6</b>	<p><b>Feedbacks: Contractor (CV Berlian Utama)</b></p> <p>The working relationship with the company is in accordance with the agreement letter that has been agreed upon by both parties. So far, the types of work carried out are housing construction, construction of culverts and bridges, to concreting factory roads. The company has routinely provided socialization regarding compliance with RSPO regulations and requests such as the use of PPE, understanding the minimum wage, to health insurance and work accidents for employees. Since the beginning of participating in the tender, the contractor is required to comply with this clause.</p> <p><b>Audit Team verification and response:</b>          In general there is no negative issue that need further verification.</p>
<b>7</b>	<p><b>Feedbacks: Plantation Section, Agriculture and Food Department (<i>Bidang Perkebunan, Dinas Pertanian dan Pangan, Kabupaten Bangka Barat</i>)</b></p> <ul style="list-style-type: none"> <li>- Next plantation assessment of PT Bumi Permai Lestari will conduct in Q3 or Q4 2023.</li> <li>- Provision of Oil Palm Seeds through the Credit Program has been approved by local government. This program already starts from May 2022 as part of smallholder support program. This program is a form of the company's response to community demands from 12 villages in 2017 regarding no smallholder scheme or plasma program.</li> <li>- Never submit Plantation Report, unless requested by Plantation department.</li> </ul> <p><b>Audit Team verification and response:</b>          Verification on this issue has been follow up by related auditors during audit.          Evidence submitting plantation report or "LKUP":          LKUP Semester-2 2021: accepted by "Kabid Perkebunan Dinas Pertanian Perkebunan dan Pangan tanggal 21 Feb 2022".          LKUP Semester-1 2022: accepted by "Kabid Perkebunan Dinas Pertanian Perkebunan dan Pangan tanggal 10 Oct 2022".          LKUP Semester-2 2022: accepted by "Kabid Perkebunan Dinas Pertanian Perkebunan dan Pangan tanggal 9 Mar 2023".</p>
<b>8</b>	<p><b>Feedbacks: Employee Cooperative</b></p> <ul style="list-style-type: none"> <li>- Total member joined with cooperative is 108 members.</li> <li>- Annual Member Meeting 2023 has been held in February 2023, where surplus of profit has been distributed to members.</li> </ul>

	<p><b>Audit Team verification and response:</b> Positive comments, no need to follow up.</p>
9	<p><b>Feedbacks :</b> Branch Leadership Council of Indonesia Worker Union Federation (<i>DPC FSPSI Kabupaten Bangka Barat</i>)</p> <ul style="list-style-type: none"> <li>- FSPSI is independent worker union federation where the organisation structure formed in national level. All the plantation and mill workers are members of the union, where the chairman of branch leadership council is local person and former employee at the company.</li> <li>- Until 2023, total member is ±1,100 members.</li> <li>- Workers' rights have been fulfilled by the company, including wages and other benefits.</li> <li>- In period Jan-Mar 2023, there are 8 contracted workers at Bukit Perak Mill has stop working due to contract period was expired. All workers' rights have been paid according to regulation.</li> </ul> <p><b>Audit team verification and response :</b> Positive comments, no need to follow up. Details for 8 contracted workers process, already verified under indicator 3.5.2</p>
10	<p><b>Feedbacks : Gender Committee</b> Dissemination of female protection has been conducted frequently at each operation unit (estate and mill). Since this committee was formed, no cases of sexual violence and domestic violence have been found.</p> <p><b>Audit team verification and response :</b> Based on interview with sample of female workers, there is no harassment or domestic violence occurs in this company.</p>
11	<p><b>Feedbacks : Environmental Agency</b> Have a good communication and cooperation with environmental agency. Has commit to implement zero burning and have a good waste management both for domestic or hazardous waste. Until now, on progress for amandment of Environmental document. There is no issue related fire or</p> <p><b>Audit team verification and response</b> Amandment progress for environmental document has been described in 3.4.1</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Yusuf	1992	± 2 Ha	Yes	Yes	Yes

Previous land owner / user comment	
1	<p><b>Feedbacks:</b> Yusuf (Head of Terentang Village 2000 – 2010 period and 2022 – present)</p> <p>Process of land acquisition has done in 1992. There is no intimidation or coercion during negotiation process. All process is based on agreement both parties which witnessed by multi stakeholder for example village representative and government representative.</p>


	<p><b>Audit Team verification and response:</b>          No negative issue that need further verification</p>
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**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 Bumi Permai Lestari – Bukit Perak Mill has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Bumi Permai Lestari – Bukit Perak Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Haikal Ramadhan Kharismansyah</b>	<b>Name: Yahya Mustakim</b>
<b>Company Name: BSI Group Indonesia</b>	<b>Company Name: PT Bumi Permai Lestari</b>
<b>Title: Lead Auditor</b>	<b>Title: Sustainability Management System and Certification</b>
<p><b>Signature:</b></p> 	<p><b>Signature:</b>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<b>Date: 20/08/2023</b>	<b>Date: 06/10/2023</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b>            Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.            - Critical (Major) compliance -</p>	<p>During ASA 1_1-year 2023, PT Bumi Permai Lestari has demonstrated the publicly management documents that are specified in the RSPO P&amp;C as per "Daftar Informasi untuk Stakeholder", updated on 5th January 2023 (ref: F/SMART/UMUM/SADV/004/003).</p> <p>Type information consisted of:</p> <ul style="list-style-type: none"> <li>• List of employee and basic salary list: "Jumlah Karyawan dan Daftar Upah Pokok Karyawan"</li> <li>• Document of land rights/cultivation rights (Criterion 4.4): "Dokumen Hak Guna Usaha dan Hak Guna Bangunan"/land title and building permit, "Bukti Penguasaan atas Tanah", "Izin Usaha Perkebunan"/plantation permit"</li> <li>• Occupational Health and Safety plans (Criterion 3.6): "Laporan Pembina Keselamatan dan Kesehatan"</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criterion 3.4): "Dokumen Lingkungan"/environmental document, "Laporan Identifikasi Social Impact Assessment"</li> <li>• High Conservation Value (HCV) documentation &amp; High Carbon Stock (HCS) (if relevant) (Criterion 7.12): "Laporan Identifikasi HCV"</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Pollution mitigation and reduction plan (Criterion 7.10): "Rencana Pengurangan dan Pencegahan Polusi"</li> <li>• Details of complaints and grievances (Criterion 4.2): "Dokumen Keluhan dan Ketidakpuasan"</li> <li>• Negotiation procedure (Criterion 4.6): "Prosedur Negosiasi"</li> <li>• Continuous improvement plan (Criterion 3.2): "Dokumen Program Perbaikan Berkelanjutan"</li> <li>• Public summary of the certification assessment report: "Laporan Audit RSPO"</li> <li>• Human Rights policy (Criterion 4.1): "Dokumen Kebijakan Hak Asasi Manusia"</li> <li>• General information:             <ul style="list-style-type: none"> <li>- "Akta pendirian,</li> <li>- Data areal dan produksi,</li> <li>- Data aplikasi pupuk"/Deed of establishment,</li> <li>- Hectare statement and production data,</li> <li>- Fertilizer application,</li> <li>- Data Nomor Pokok Wajib Pajak"/taxpayer number;</li> </ul> </li> </ul>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has document procedure for Stakeholder Engagement (No document: SOP/SMART/SENS-CSR/SADV/I/001). documents are written in Bahasa Indonesia, for ease of understanding by local staff, worker and by local people near the concession area.</p> <p>The procedure has been socialized to the internal or external stakeholder. For example, sighted the evidence of socialization related stakeholders on 1<sup>st</sup> July 2023. Location in Meeting Room BPRM that was attended by 9 participants.</p>	Complied

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		<p>All the publicly accessible document as explain in the previous indicator (1.1.1) such as company policy and sustainability report can be downloaded in their official website. The public summary of certification, for example RSPO public summary report can be downloaded in RSPO website. Meanwhile, the remain document can be accessed through the official request letter to the management representatives.</p>	
<p>1.1.3</p>	<p><b>(C)</b> Records of requests for information and responses are maintained.          - Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari maintain records for information and responses title "Buku Catatan Permintaan dan Tanggapan Informasi".</p> <p>For period 2023, there was 23 incoming and outgoing information recorded. Sample seen:</p> <ul style="list-style-type: none"> <li>• Incoming information from Kementrian Pekerjaan Umum dan Perumahan Rakyat – Balai Wilayah Sungai Bangka Belitung letter "Berita Acara Peninjuan Lapangan No.04/BA-REKOMTEK-BWS/SBabel/2023 Perihal Peninjuan Lapangan Pemohonan Rekomendasi Teknis Untuk Kegiatan Perpanjangan Izin Penggunaan/Pengusahaan Air dan Daya Air Sebagai Materi oleh Permohon PT Bumi Permlai Lesati" dated 12 January 2023. It was response from company application. Status: Completed.</li> <li>• Incoming information from Dinas Industri dan Perdagangan Propinsi Bangka Belitung letter "Undangan Rapat Koordinasi Industri Hijau No.005/0739/DISPEINDAG-II", dated 21<sup>st</sup> June 2023. It was response from company application. Status: Completed</li> </ul> <p>Outgoing Information: Report on emergency responses and preparedness – Laporan Kesiapsiagaan Tanggap Darurat periode July</p>	<p>Complied</p>

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		<p>– Desember 2022”, document number: 009/EM/BPRE/1/2023 to Dinas Pertanian dan Pangan Bangka Barat. Dated 11 January 2023</p>	
<p>1.1.4</p>	<p><b>(C)</b> 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>During ASA-1.1, PT Bumi Permai Lestari refers to communication and consultation procedure under “SOP Komunikasi dan Konsultasi No.SOP/SMART/ UMUM/SADV/I/004” dated 1 July 2014.</p> <p>The procedure has explained, i.e.:</p> <ul style="list-style-type: none"> <li>• The document stipulates type of communication: aspiration and suggestion, information for stakeholders, incident report, consultation with internal and external parties.</li> <li>• The procedure stipulates upon receiving aspiration/incoming letter, unit head inform related Department max.1 week after correspondence received; Unit Head prepare response plan max.3 weeks after correspondence received; Unit Head send for Top management max. 1 week to obtain guidance and approval.</li> </ul> <p>The procedure has been socialized to the internal or external stakeholder. For example, sighted the evidence of socialization related stakeholders on 1<sup>st</sup> July 2023. Location in Meeting Room BPRM that was attended by 9 participants.</p> <p>PT Bumi Permai Lestari has also appointed management official to consult and communicate with stakeholders. Evidence seen:</p> <ul style="list-style-type: none"> <li>• Bukit Perak POM appointed Mr. Pirma Hutagaol, Mill Manager, based on Production Controller – Region Babel No.001/PC-BABEL/I/2022; Perihal Penanggungjawab Sosial” dated 15 January 2022. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community, cultural leader, religious leader, social organization, and government officials.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Bukit Permata Estate appointed Mr. Andri P Ginting, Estate Manager, based on Regional Controller – Region Babel No.001/RC-BABEL/III/2020; Perihal Penanggungjawab Sosial” dated 3 March 2020. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community, cultural leader, religious leader, social organization and government officials.</li> <li>• Bukit Perak Estate appointed Mr. Suharto, Estate Manager, based on Regional Controller – Region Babel No.002/RC-BABEL/I/2016; Perihal Penanggungjawab Sosial” dated 2 January 2016. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community, cultural leader, religious leader, social organization and government officials.</li> </ul> <p>Sample of communication and consultation process verified e.g:</p> <ul style="list-style-type: none"> <li>• Incoming information from Kementrian Pekerjaan Umum dan Perumahan Rakyat – Balai Wilayah Sungai Bangka Belitung letter “Berita Acara Peninjuan Lapangan No.04/BA-REKOMTEK-BWS/SBabel/2023 Perihal Peninjuan Lapangan Pemohonan Rekomendasi Teknis Untuk Kegiatan Perpanjangan Izin Penggunaan/Pengusahaan Air dan Daya Air Sebagai Materi oleh Permohon PT Bumi Permlai Lesati” dated 12 January 2023. It was response from company application. Status: Completed.</li> <li>• Incoming information from Dinas Industri dan Perdagangan Propinsi Bangka Belitung letter “Undangan Rapat Koordinasi Industri Hijau No.005/0739/DISPEINDAG-II”, dated 21<sup>st</sup> June 2023. It was response from company application. Status: Completed – (objective: Letter Assignment No: 21/ST/BPRE/VI/VI/2023)</li> </ul>	
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		<ul style="list-style-type: none"> <li>Outgoing Information: Report on emergency responses and preparedness – Laporan Kesiapsiagaan Tanggap Darurat periode July – Desember 2022”, document number: 009/EM/BPRE/1/2023 to Dinas Pertanian dan Pangan Bangka Barat. Dated 11 January 2023</li> </ul>	
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>During ASA 1-1, PT Bumi Permai Lestari has demonstrated contact and detailed stakeholder information as per “Daftar Stakeholder – PT Bumi Permai Lestari, latest update 5<sup>th</sup> June 2023. The information completed with type of stakeholder, address, contact number and name of PIC.</p> <p>Sample of listed stakeholders, such as:</p> <ul style="list-style-type: none"> <li>Government: Kelapa District Head, Kapolsek Kelapa, Danramil Kelapa, Puskesmas Kelapa, Manpower Service Bangka Barat Regency, Environmental Service Bangka Barat Regency, Lands Office Bangka Barat Regency</li> <li>Local Community - Villages: Terentang village head, Kacung village head, Dendang village head, Tugang village head, Air Bulin village head.</li> <li>Worker organization: PUK SPSI PT. BPL-PT. MP LWI, DPC SPSI Bangka Barat, Women committee Bukit Perak Estate, Women committee Bukit Permata Estate, Women committee Bukit Perak POM</li> <li>Local contractor: CV Selamat Jaya, PT. Satrindo Jaya Agropalma, PT. EMKL, PT Valten Cahaya Anugerah, Lab DLHK Prov Babel, Lab MUTU</li> <li>Third-party FFB Supplier: CV Dua Serangkai, PT. Putra Bangka, BUMDes Bulin Berteras, BUMDes Sinar Harapan, BUMDes Jaya</li> </ul>	Complied

		<p>Bersatu, Koperasi Pertanian Tugang Jaya, CV Gunung Mas Lestari, BUMDes Bunga Desa, CV Multi Nusa Pratama</p> <ul style="list-style-type: none"> <li>• Cooperative: Koperasi Setia Mandiri Chairman</li> <li>• Academy/NGO: Universitas Bangka Belitung</li> </ul>	
<b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>During ASA 1-1, PT Bumi Permai Lestari has shown the policy for ethical conduct referring to "Kode Etik Golden Agri Resources" signed by Chairman, June 2021. The content of the code of ethical conduct is applicable in upholding integrity for employee, company, business partner, shareholder, and community.</p> <ul style="list-style-type: none"> <li>• Upholding integrity for employee covers respecting diversity, avoid discrimination, avoid harassment and violence, respect employee privacy, creating safe workplace environment, zero tolerance on illegal substance, and fair industrial relation practices including recruitment.</li> <li>• Upholding integrity for company covers protection of company assets, correct use of technology, responsible use of social media, confidential information, and intellectual asset protection, avoid conflict of interest, working outside and business affiliate activity, financial interest, gift, and hospitality regulation.</li> <li>• Upholding integrity for business partner covers provision of safe and high-quality product and service, fair treatment of business partner through fair deal with customer, fair treatment for supplier, government customer, fair competition through antitrust law, ethical sales and marketing, competitor information, prevent bribery and corruption, anti-money laundering, international business activity in dealing with import and export, reviewing economic sanction and boycotting.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Upholding integrity for shareholder covers accurate accounting book-keeping and recording, disclosure of financial report and fraud, management note, stock exchange transaction, insider trading, good corporate governance, communication with shareholders.</li> <li>• Upholding integrity for community explains upholding environmental and social sustainability, political activity, external communication.</li> <li>• The document code of ethical conduct including raising concerns through email and telephone number.</li> </ul> <p>In 2022 to 2023, PT Bumi Permai Lestari was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> <li>• Dated 1-2 November 2022 - document as per Notulensi Sosilasi SOP Sosial, Konflik, HCV dan Kode Etik. Location in Dendang Village was attended by 4 participants, in Kacung Village was attended by 10 participants, in Air Bulin Village was attended by 4 participants, in Dugang Village was attended 4 participants.</li> <li>• Dated 13 February 2023 – document as per Notulensi Sosilasi Hubungan Industrial dan Lingkungan Kerja, location in Cekroll Pagi Division 1 – Bukit Permata Estate that was attended by 107 workers.</li> <li>• Dated 30 June 2023 – document as per Sosialisasi Kode Etik, Kebijakan HAM, Pengaduan dan Keluhan, dan Hubungan Industrial. Location in Bukit Perak Mill. That was attended by 20 workers.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Dated 15 – 19 May 2023 - document as per Notulensi Sosilasi Hubungan Industrial dan Lingkungan Kerja, location in Lingkaran Pagi Divisiin– Bukit Perak Estate that was attended by 92 workers.</li> <li>• Dated 10 February 2023 to all contractor as per document of Notulensi Sosilasi SOP Sosial, Konflik, HCV dan Kode Etik. That was attended by 13 contractors.</li> </ul>	
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 Bumi Permai Lestari has shown the document to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>The implementation through carried out internal audit against RSPO P&amp;C on annual basis, covering indicator related to code of ethical conduct implementation in company operation and contractor:</p> <ul style="list-style-type: none"> <li>• Internal Audit Report as per document Laporan Internal Audit ISPO &amp; RSPO dated 6 – 10 March 2023.</li> <li>• Contract “Surat Pernyataan DO BUMDES SINAR HARAPAN” dated 1<sup>st</sup> October 2021. Point 4 stated the FFB coming from legally owned land, obtained all permit managed in line with laws and regulation and does not harvest illegally. Point 8 stated the contractor will accept the cooperation termination if proven conducting fraud behaviour/bribing POM employee.</li> <li>• Contractor inspection to review contractor readiness and implementation/understanding. Sampled for “Formulir Inspeksi Kontraktor PT. Satrindo Jaya Agropalma” dated 8<sup>th</sup> May 2023. The Safety officer checked on work environment condition, PPE use, emergency readiness, working tool condition, contractor competence, business ethics understanding incl. integrity, avoid bribery and corruption, avoid money-laundering, fair competition.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Sampled on time payment to contractor/Kernel transporter. Payment for Kernel supplier:             <ul style="list-style-type: none"> <li>- PO. No: 4700082980, dated 11 May 2023 to PT Ekspedisi Muatan Kapal Laut Tiga Berdikari (address: Pangkal Pinang). Total Unit: 450,000 MT</li> <li>- "Berita Acara Pengangkutan Inti Sawit", dated 20 May 2023, quantity 150 MT. Transporter: PT Ekspedisi Muatan Kapal Laut Tiga Berdikari.</li> <li>- Payment to PT Ekspedisi Muatan Kapal Laut Tiga Berdikari dated 31<sup>st</sup> May 2023.</li> <li>- Invoice for FFB from out grower (BUMDES Sinar Harapan), dated 29 – 31 May 2023 – based on "Berita Acara Serah Terima Barang periode 29-31 May 2023), total quantity of FFB is 50.24 MT.</li> </ul> </li> </ul> <p>Based on interview and document review against civil contractor (CV Berlian Utama – SPK: 028/BPRM/JKTO/04/2023 - BGN), in the contract has been stated that the contractor working in plantation of PT Bumi Permai Lestari shall adhere to Environment, Health and Safety requirement and be responsible to their worker’s health and safety. Contractor shall comply to act, and regulation related to worker.</p>	
<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies to relevant regulations.          - Critical (Major) compliance -</p>	<p>Unit of certification can show compliance with relevant regulation for example :  <b>Legal Aspect</b></p>	Complied

		<ul style="list-style-type: none"> <li>- Have HGU and Plantation Business Permits as described in indicator 4.4.1</li> </ul> <p><b>Employment Aspect</b></p> <ul style="list-style-type: none"> <li>- Has enrolled all employees in the Employment and Health social security program (BPJS)</li> <li>- Reported the use of PKWT Labor to the local manpower office which was last reported in May 2023</li> </ul> <p><b>Best Management Practices</b></p> <ul style="list-style-type: none"> <li>- Not use paraquat and pesticide WHO 1A/1B class</li> </ul>	
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> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Unit of Certification has procedure compliance with regulation &amp; other requirements which described in SOP/SMART/GENERAL/SADV/I/002 dated 1 July 2014. Procedure inform for example compliance with requirements, evaluating compliance with law, SPO requirements and other. The responsible person to update list according the SOP was PCDV for the national level and SPO officer for the regional level.</p> <p>UoC also has a list if legal regulation which described in Summary and Review of Conformity with Regulation and Other Requirements with the aspect of agribusinesss, employment, environment, legality, and other requirement related the company activities. UoC evaluated legal compliance for third parties with the principle of continuous improvement as described in indicator 2.2.2</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> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>The unit of certification has monitoring of HGU pole and a maintenance plan with a frequency of monitoring every three months. Based on the results of the last monitoring carried out in June 2023, it was found</p>	Complied

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		<p>that there were a total of 142 HGU pole for the BPRE and BPTe units and all of them were in good condition.</p> <p>Based on of field visits to several sample HGU pole, it was found that the condition of the HGU pole was in accordance with the results of the last monitoring. The sample HGU pole in question are as follows:</p> <p><b>BPRE</b></p> <ul style="list-style-type: none"> <li>• HGU pole No 63. Coordinate : 105° 32' 19.786" E 1° 50' 39.830" S</li> <li>• HGU pole No 64. Coordinate : 105° 32' 26.520" E 1° 50' 42.681"</li> <li>• HGU pole No 77. Coordinate : 105° 32' 29.105" E 1° 50' 59.936" S</li> <li>• HGU pole No 80. Coordinate : 105° 32' 33.406" E 1° 51' 5.002" S</li> </ul> <p><b>BPTe</b></p> <ul style="list-style-type: none"> <li>• HGU pole No 42. Coordinate : 105° 31' 54.184" E 1° 50' 1.008" S</li> <li>• HGU pole No 43. Coordinate : 105° 31' 50.798" E 1° 50' 22.186" S</li> <li>• HGU pole No 126. Coordinate : 105° 29' 51.603" E 1° 50' 20.065" S</li> <li>• HGU pole No 127. Coordinate : 105° 29' 51.210" E 1° 50' 5.492" S</li> </ul> <p>Apart from being boundaries by HGU pole, other markers are company roads or ditches. Thus it can be concluded that the unit of certification already has clear legal boundaries</p>	
<p><b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
<p>2.2.1</p>	<p>A list of contracted parties is available.                      - Minor compliance -</p>	<p>The unit of certification already has a list of updated stakeholders for 2023 which among other things also informs the number of contractors who have active work agreement. Based on the list, it is known that there are 9 contractors who have active work agreement with the following companies :</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- CV Selamat jaya (civil)</li> <li>- CV Berlian Utama (civil)</li> <li>- PT Satrindo Jaya Agropalma (Transporter)</li> <li>- PT EMKL (PK transporter)</li> <li>- PT Valen Cahaya Anugerah (Hazardous waste transporter)</li> <li>- PT Serumpun Pandan Perkasa (Occupational health and safety services company)</li> <li>- Lab DLHK Provinsi Babel (Environmental Laboratorium)</li> <li>- Lab MUTU (Environmental Laboratorium)</li> <li>- PT Formasi internasional (Occupational health and safety services company)</li> </ul>	
<p>2.2.2</p>	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>The unit of certification shows an example of a Cooperation Agreement with CV Berlian Utama as a housing renovation civil works contractor in accordance with Agreement No. 027/BPRE/JKTO/04/2023 – BGN April 28, 2023 valid until December 31, 2023. Article 5 concerning job specifications and conditions includes the obligation to comply with applicable legal clauses such as the minimum age limit for workers is 18 years, compliance with the fulfillment of wages minimum, provision of PPE, and enrolling its workforce in health and employment social security programs.</p> <p>CV Berlian Utama has been able to demonstrate compliance with the legal clauses written in the Work Agreement, i.e :</p> <ul style="list-style-type: none"> <li>• Proof of social and health insurance (BPJS) membership for 16 workers according to the Construction Service Contribution Receipt Number: 923062706578381 dated 27 June 2023</li> </ul>	<p>Complied</p>



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		<ul style="list-style-type: none"> <li>• Employment Agreement between CV Berlian Utama and 16 employees dated May 1, 2023</li> <li>• The lowest daily wage is Rp 140,000 and the highest is Rp 170,000. When compared to the Bangka Belitung minimum wage of IDR 3,498,479.00 per month or IDR 139,939.16, the determination and payment of workers daily wages is higher than the minimum wage</li> </ul> <p>Results of interviews with representatives of CV Berlian Utama revealed that socialization regarding the fulfillment of the legal obligation clause had been conveyed since the tender period began and was monitored regularly through evaluating the contractor's performance at the time before and at the end of the contract period.</p> <p>Based on the description above, it can be concluded that the unit of certification has proven that contracts with third parties already have legal obligation clauses and their fulfillment can be proven.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>The unit of certification shows an example of a Work Agreement with CV Berlian Utama as the contractor for residential renovation in accordance with agreement No. 027/BPRE/JKTO/04/2023 – BGN April 28, 2023 valid until December 31, 2023. Article 5 concerning job specifications and requirements includes the obligation to comply with applicable legal clauses such as the minimum age limit for workers is 18 years and prohibits practices work forced.</p> <p>In addition, the contractor commitment statement also stated that they will comply with GAR sustainability policies, which include commitments not to employ children and prohibition of forced labor. The results of interviews with representatives of CV Berlian Utama</p>	Complied

		found out that socialization regarding the prohibition of child labor and forced labor was conveyed since the tender period began and monitored regularly through evaluation of contractor performance at the time before and at the end of the contract period.	
<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>• Information regarding the geolocation of FFB origins;</li> <li>• Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>• If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Based on the results of a review of the FFB receipt document at Bukit Perak Mill, it is known that direct FFB suppliers are subsidiaries of the same group, namely :</p> <ul style="list-style-type: none"> <li>- Bukit Perak Estate (BPRE) PT Bumi Permai Lestari</li> <li>- Bukit Permata Estate (BPTE) PT Bumi Permai Lestari</li> <li>- Bukit Mas Estate (BMSE) PT Bumi Permai Lestari</li> <li>- Leidong West Selatan Estate (LWSE) – PT Maskapai Penerbangan Leidong West Indonesia</li> <li>- Leidong West Utara Estate (LWUE) - PT Maskapai Penerbangan Leidong West Indonesia</li> <li>- Bukit Permai Estate (BPAE) – PT Agrolestari Subur Sejahtera</li> <li>- Bukit Lestari Estate (BLSE) – PT Agrolestari Hijau Sentosa</li> </ul> <p>It has been shown geolocation information and examples of land legality information for these direct suppliers</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>Unit of certification has identified FFB suppliers who are categorized as indirect suppliers as follows:</p> <ul style="list-style-type: none"> <li>• CV Gunung Mas Lestari (GMLX)</li> <li>• Bumdes Sinar Harapan (BSHX)</li> <li>• CV Multi Nusa Pratama (MNPX)</li> <li>• Bina Mandiri Farmers Group (KBMX)</li> </ul>	OFI

		<p>Based on of document review and interviews with FFB supplier representatives, for example GMLX (CV Gunung Masa Lestari) and BSHX (Bumdes Sinar Harapan) it is known that suppliers receive FFB from other parties outside the plantations they manage so that they are included as indirect suppliers. There is a statement letter from the supplier of FFB GMLX and BSHX stating that the origin of FFB is from land that has obtained all land acquisition permits and is cultivated in accordance with the terms and conditions of regulations in force in Indonesia.</p> <p>It has been shown the geolocation data and village origin of the FFB supplier for the two indirect suppliers as well as the number of supplier members, namely 1,151 farmers for GMLX and 449 farmers for BSHX. Of the 1,151 farmers supplying GMLX, 44 people have SHM, 141 people have SKT, and 966 other people have unknown land legal rights. Of the 449 farmers supplying BSHX, 16 people already have SHM, 123 people have SKT and 310 other people have unknown land legal rights.</p> <p>Based on this, the unit of certification has the opportunity to remain consistent in completing detailed information for each FFB supplier according to the planned timeline. It become Opportunity for Improvement.</p>	
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b> Implement plans, procedures and systems for continuous improvement.</p>			
<p><b>Criteria 3.1:</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			

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<p>3.1.1</p>	<p><b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.          - Critical (Major) compliance -</p>	<p>During ASA 1.1, PT Bumi Permai Lestari has demonstrated business or management plan 5 years profitability analysis document 2023 – 2027 "Analisa Kelayakan Ekonomi 5 Tahun PT Bumi Permai Lestari Tahun 2023 s/d 2027 that signed by Finance – PT Bumi Permai Lestari dated 21<sup>st</sup> February 2023.</p> <p>That document covers estimate of production (FFB, CPO, PK, extraction rate) from own estate or FFB supplier, estate/mill cost, profit/loss, tax and net profit estimation.</p> <p>PT Bumi Permai Lestari did not have engagement with smallholder. Bukit Perak mill received FFB from independent supplier/out growers. Through the document obtain information that CH has had projected to produce FFB, CPO and PK as follows:</p> <table border="1" data-bbox="1131 869 1955 1364"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Year</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td colspan="6"><b>FFB production (Tonnes)</b></td> </tr> <tr> <td>BPRE</td> <td>38,311</td> <td>61,036</td> <td>83,042</td> <td>94,972</td> <td>100,382</td> </tr> <tr> <td>BPTE</td> <td>138</td> <td>229</td> <td>764</td> <td>1,374</td> <td>1,756</td> </tr> <tr> <td>Sub Total</td> <td>38,448</td> <td>61,265</td> <td>83,805</td> <td>96,347</td> <td>102,138</td> </tr> <tr> <td colspan="6"><b>Out growers (Tonnes)</b></td> </tr> <tr> <td>3<sup>rd</sup> party</td> <td>66,637</td> <td>73,301</td> <td>80,631</td> <td>88,694</td> <td>97,564</td> </tr> <tr> <td colspan="6"><b>Production (MT)</b></td> </tr> <tr> <td>CPO</td> <td>21,113</td> <td>27,036</td> <td>33,037</td> <td>37,177</td> <td>40,123</td> </tr> </tbody> </table>	Estate	Year					2023	2024	2025	2026	2027	<b>FFB production (Tonnes)</b>						BPRE	38,311	61,036	83,042	94,972	100,382	BPTE	138	229	764	1,374	1,756	Sub Total	38,448	61,265	83,805	96,347	102,138	<b>Out growers (Tonnes)</b>						3 <sup>rd</sup> party	66,637	73,301	80,631	88,694	97,564	<b>Production (MT)</b>						CPO	21,113	27,036	33,037	37,177	40,123	<p>Complied</p>
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	PT Bumi Permai Lestari has established replanting program, which has been implemented since 2018 – 2022. Annual review has been	Complied																								

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	<p>- Minor compliance -</p>	<p>conducted to evaluate performance. Below is annual replanting program of PT Bumi Permai Lestari:</p> <table border="1" data-bbox="1131 435 1966 866"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">BPRE (Ha)</th> <th colspan="2">BPTE (Ha)</th> <th colspan="2">Total (Ha)</th> </tr> <tr> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>242</td> <td>242.20</td> <td>-</td> <td>-</td> <td>242</td> <td>242.20</td> </tr> <tr> <td>2019</td> <td>1,549</td> <td>1,648.84</td> <td>-</td> <td>-</td> <td>1,549</td> <td>1,648.84</td> </tr> <tr> <td>2020</td> <td>6.555</td> <td>575.96</td> <td>-</td> <td>-</td> <td>6.555</td> <td>575.96</td> </tr> <tr> <td>2021</td> <td>1,093</td> <td>939.15</td> <td>129</td> <td>-</td> <td>1,232</td> <td>939.15</td> </tr> <tr> <td>2022</td> <td>30</td> <td>373.57</td> <td>1,371</td> <td>1,463.11</td> <td>1,401</td> <td>1,836.68</td> </tr> <tr> <td><b>Total</b></td> <td><b>3,570</b></td> <td><b>3,779.72</b></td> <td><b>1,501</b></td> <td></td> <td><b>5,701</b></td> <td><b>5,242.83</b></td> </tr> </tbody> </table> <p>All Replanting Program has been done in 2022</p>	Year	BPRE (Ha)		BPTE (Ha)		Total (Ha)		Plan	Actual	Plan	Actual	Plan	Actual	2018	242	242.20	-	-	242	242.20	2019	1,549	1,648.84	-	-	1,549	1,648.84	2020	6.555	575.96	-	-	6.555	575.96	2021	1,093	939.15	129	-	1,232	939.15	2022	30	373.57	1,371	1,463.11	1,401	1,836.68	<b>Total</b>	<b>3,570</b>	<b>3,779.72</b>	<b>1,501</b>		<b>5,701</b>	<b>5,242.83</b>	
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<p>3.1.3</p>	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has established documented procedures to conduct annual internal audit as per SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&amp;C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV (Laporan Internal Audit). Last internal audit conducted on 6 – 10 March 2023. All indicator has been addressed.</p> <p>Management review (annually) conducted on 20<sup>th</sup> March 2023 attended by RC, PC, EM, FM, and all key personals. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review,</p>	<p>Complied</p>																																																							

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		change that could affect management system, and recommendation for improvement. Document verified: Surat Keputusan No 074/RC-BABEL/III/2023)	
<b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1.1, PT Bumi Permai Lestari has shown the records of action plan for continuous improvement as per document RSPO Internal Audit Report.</p> <p>Internal audit conducted once a year. Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&amp;C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV (Laporan Internal Audit). Last internal audit conducted on 6 – 10 March 2023. All indicator has been addressed.</p> <p>Management review (annually) conducted on 20<sup>th</sup> March 2023 attended by RC, PC, EM, FM, and all key personals. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement. Document verified: Surat Keputusan No 074/RC-BABEL/III/2023)</p> <p>Implementation of action plan for continuous improvement considering the main social and environmental impact are based on “Dokumen Lingkungan” - environmental document, and “Laporan Identifikasi Social Impact Assessment”. Environmental documents</p>	Complied

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		<p>consist of Environmental Impact Assessment (AMDAL) conducted in 1995 by independent consultant (PT HSW International). The AMDAL document already approved by Ministry of Agriculture on 16 February 1996 as refer to letter number 046/ANDAL/RKL-RPL/BA/II/1996; and implementation of Environmental Management and Monitoring Plan (RKL-RPL). Environmental Management and Monitoring Plan (RKL-RPL) is part of SEIA or AMDAL document.</p> <p>Document verified: Report RKL-RPL period July – December 2022 (No Report: 01/Lingk/BPRM/02/2023 to Badan Lingkungan Hidup Daerah Provinsi Bangka Belitung – has been received by Ibu Dilla (Staff DLH, dated 21<sup>st</sup> February 2023).</p>															
<p>3.2.2</p>	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>Based on explanation of management representatives, until audit finish the RSPO Metric – 2022 has verified by the auditor team.</p> <p>Annual Communication of Progress (ACOP) 2021 also submitted to the RSPO Secretariat under organization name Golden Agri-Resources Ltd, membership No. 1-0096-11-000-00. Link <a href="https://rspo.org/members/1-0096-11-000-00/">https://rspo.org/members/1-0096-11-000-00/</a></p> <p>PT Bumi Permai Lestari has reported Annual report using RSPO metric template and submitted to CB. Based on the report, Annual Production Palm Oil and Palm Kernel in year 2022 reported are as follows:</p> <table border="1" data-bbox="1131 1141 1955 1289"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">CPO</th> <th colspan="2">PK</th> </tr> <tr> <th>Certified</th> <th>Non-certified</th> <th>Certified</th> <th>Non-certified</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>8,794,785</td> <td>27,940,670</td> <td>2,441,766</td> <td>7,971,624</td> </tr> </tbody> </table>	Year	CPO		PK		Certified	Non-certified	Certified	Non-certified	2022	8,794,785	27,940,670	2,441,766	7,971,624	<p>Complied</p>
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<p><b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>																	



<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.          - Critical (Major) compliance -</p>	<p>During ASA 1-1, PT Bumi Permai Lestari has demonstrated the document of operational procedure in estate and mill. Hardcopy of procedure are available and controlled. SOPs made were available at the point of use (in all section and division of estate and mill). Copy of the procedure was available on site and is it documented in <i>Bahasa Indonesia</i>. SOP distribution to all section and division were well documented in the Form F/SMART/UMUM/SADV/001/002 (document distribution register).</p> <p>1. Bukit Perak and Bukit Permata Estate - Oil Palm Agronomy Procedure:</p> <p>Procedure of Agronomy is arranged by Management Committee Agronomy and Research (MCAR) revised on 1 September 2012. Procedures were including new area and replanting planning, nursery, land clearing, preparation before planting, fertilising, upkeep, integrated pest management (IPM), road maintenance, peat land management, drainage system, mature and immature upkeep, integrated pest management and harvesting. Other than that, there were also procedures for several processes including riparian zone management, application of agrochemical. Procedure also described required PPE and other safe working practices.</p> <p>Procedure have been disseminated to all related employee (harvesting, loose fruit pickers and upkeep employee). Every morning, there is morning musters performed, basically to disseminate working procedure and instruction, and to monitor employee attendance as well</p> <p>Samples of Standard Operational Procedure for agronomy are as follows:</p> <ul style="list-style-type: none"> <li>• Procedure No. SOP/SMART/MCAR/I/TA-PPA about new planting.</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• Procedure No. SOP/SMART/MCAR/II/TA-PRP about replanting.</li> <li>• Procedure No. SOP/SMART/MCAR/III/TA-BBT about nursery.</li> <li>• Procedure No. SOP/SMART/MCAR/IV/TA-PLB about land preparation.</li> <li>• Procedure No. SOP/SMART/MCAR/V/TA-TNM about planting.</li> <li>• Procedure No. SOP Nomor SOP/SMART/MCAR/VI/TA-HPT replanting.</li> <li>• Procedure No. SOP/SMART/MCAR/VII/TA-TNM about integrated pest management.</li> <li>• Procedure No. SOP/SMART/MCAR/VIII/TA-PGM about weeding management.</li> <li>• Procedure No. SOP/SMART/MCAR/IX/TA-PPK about manuring.</li> <li>• Procedure No. SOP/SMART/MCAR/X/TA-PTB about field upkeep on immature area.</li> <li>• Procedure No. SOP No. SOP/SMART/MCAR/XI/TA-PMP about harvesting preparation.</li> <li>• Procedure No. SOP No. SOP/SMART/MCAR/XIII/TA-PNN about harvesting.</li> <li>• Procedure No. SOP/SMART/MCAR/XIV/TA-PPT about FFB transportation and delivery.</li> <li>• Procedure No. SOP/SMART/MCAR/XV/TA-PCH about rainfall</li> </ul> <p>2. Bukit Perak Palm Oil Mill procedures, such as:</p> <ul style="list-style-type: none"> <li>• Procedure regarding best manufacturing practice operation in Bukit Perak Palm Oil Mill is available in document of "SOP Pengolahan Pabrik Kelapa Sawit Management Committee for Mill Development (MCMD). As documented in SOP/SMART/MCMD/I/TM-PKS/Rev.07, Standard Operational</li> </ul>	
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		<p>Procedure of Palm Oil Process in SMART Group including PT Bumi Permai Lestari – Bukit Perak POM, revision 7 issued by Head Office Jakarta dated 3<sup>rd</sup> January 2022. The procedure describes operation instruction from FFB receiving through production, processing (grading, sterilization, threshing, pressing, clarification, nut, and kernel processing) and dispatch of CPO and PK.</p> <ul style="list-style-type: none"> <li>PT Bumi Permai Lestari has also developed work instruction for each process and equipment to described specifically stages of process and equipment utilization (e.g., Loading Ramp; Weighing Bridge; Sterilisation Station; Threshing Station; Pressing Station; Clarification Station; Recycling CPO; Nut and Kernel; Engine Room; Boiler; Water Treatment; Final Effluent; laboratory).</li> </ul> <p>SOP for RSPO Supply Chain has been established in "SOP Supply Chain Certification Standard Mass Balance" (PT.BPL.BPRM/SOP/RANTAI PASOK-MB/23) dated 6<sup>th</sup> February 2023. The procedures cover job and responsibility, workflow, receiving of raw material, verification of delivery note "Surat Penerimaan Barang", weighing, checking of raw material quality, processing, monitoring of process, validation of quality and quantity report, mass balance calculation, product delivery, registration of transaction and document control.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has established documented procedures to check consistent implementation of procedures as per SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&amp;C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV (Laporan Internal Audit). Last internal audit conducted on 6 – 10 March 2023. All indicator has been addressed.</p>	Complied

		<p>Management review (annually) conducted on 20<sup>th</sup> March 2023 attended by RC, PC, EM, FM, and all key personals. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement. Document verified: Surat Keputusan No 074/RC-BABEL/III/2023)</p> <p>PT Bumi Permai Lestari has also audit system to check operational performance which is Regional Controller (RC) visit and Production Controller (PC) visit. Visit report contains visit result and action plan to follow up. Sample seen: Report of To DO List DCEO PSM 2 Visit (dated 20 &amp; 23 February 2023). Issue: Exhaust pipeline no 1 in Sterilizer 1 is leaking. Followed up on 28<sup>th</sup> February 2023 (pipe has been welded).</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.          - Minor compliance -</p>	<p>During ASA 1-1, PT Bumi Permai Lestari has shown the record of monitoring and any actions taken.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>• Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&amp;C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV (Laporan Internal Audit). Last internal audit conducted on 6 – 10 March 2023. All indicator has been addressed.</li> <li>• Management review (annually) conducted on 20<sup>th</sup> March 2023 attended by RC, PC, EM, FM, and all key personals. Minutes of meeting available covers internal audit result, stakeholder</li> </ul>	<p>Complied</p>

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		<p>feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement. Document verified: Surat Keputusan No 074/RC-BABEL/III/2023)</p> <ul style="list-style-type: none"> <li>PT Bumi Permai Lestari has also audit system to check operational performance which is Regional Controller (RC) visit and Production Controller (PC) visit. Visit report contains visit result and action plan to follow up. Sample seen: Report of To DO List DCEO PSM 2 Visit (dated 20 &amp; 23 February 2023). Issue: Exhaust pipeline no 1 in Sterilizer 1 is leaking. Followed up on 28<sup>th</sup> February 2023 (pipe has been welded).</li> </ul> <p>VPA visit report that conducted on 3 - 4 October 2022. Issues raised are about pollination report performance (block F26). Action plan have been established and implemented by related personals, under responsibility of Estate Manager.</p>	
<p><b>Criteria 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>No changes of SEIA document. Progress of amendment environmental license still on going. Based on interview with Environmental agency of Pulang Pisau district there is some document need to be completed. Latest update in June 6, 2023 there is letter No 600.4/213/DLH/2023 from Environment Agency related data for agreement in amendment environment document i.e copy KA ANDAL, RKL/RPL, Map, HGU certificate, etc</p> <p>PT Bumi Permai Lestari as unit of certification established Environment Impact Assessment document known as AMDAL, consist of:</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> <li>1. Environmental Impact Framework or Kerangka Acuan ANDAL year 1993, conducted by independent consultant PT Gangsar Dipta Consultants. Approval from AMDAL commission Ministry of Agriculture Number 1431/AMDAL/III/1994, dated 9 March 1994.</li> <li>2. Environmental Impact Assessment (AMDAL) conducted in 1995 by independent consultant (PT HSW International). The AMDAL document already approved by Ministry of Agriculture on 16 February 1996 as refer to letter number 046/ANDAL/RKL-RPL/BA/II/1996.</li> <li>3. Environmental Management and Monitoring Plan (RKL-RPL).</li> </ol> <p>Scope of AMDAL is covering environmental and social aspects assessment for all plantation and mill operations. Hectarage of AMDAL scope is referred to location permit (<i>"Persetujuan Prinsip No.Hk.350/E4.226/03.90 dan Surat Panitia-B No. 540.1/5665/26</i>) with total area is 14,000 Ha and Mill capacity 30 MT FFB/hour up to 60 MT FFB/hour.</p> <p>Participatory with affected parties was conducted during EIA assessment through Economic and Social Questionnaire <i>"Pedoman Wawancara Untuk Sampel Penduduk"</i> with adjacent communities of certification unit.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Environmental Management and Monitoring Plan (RKL-RPL) is part of SEIA or AMDAL document, where the participatory of affected parties was conducted during the assessment.</p> <p>Bukit Perak 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 plan based on RKL RPL that covered:</p>	Complied

		<ul style="list-style-type: none"> <li>- Monitoring air ambience quality and noise 6 monthly</li> <li>- Monitoring surface water quality of Lagok river every 3 months</li> <li>- Monitoring erosion rate at area with slope &gt;16% and sedimentation</li> <li>- annually</li> <li>- Potential of fire every 6 months</li> <li>- Air emission quality from vehicle annually</li> <li>- Monitoring society perception annually</li> <li>- Monitoring flora and fauna every 3 months</li> </ul> <p>For social aspect, participation of stakeholders particularly communities surrounding the plantation has been involved in assistance program of small business empowerment.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>There were no significant changes required in current practices of identification and evaluation of environmental aspect and impact. The implementation of RKL-RPL was reported periodically every six months to BLH Bangka Barat Regency, BLH Bangka Belitung Province, Ministry of Environmental and Forestry (KLHK), and "<i>Pusat Pengendalian Pembangunan Ekoregion Sumatera</i>".</p>	Complied
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>Procedure of employee recruitment, appraisal, promotion, and remuneration explained specifically in several SOP. These procedure have been documented and socialized to the worker and their representative. Some of the SOP are :</p> <ul style="list-style-type: none"> <li>• SOP No. KHI-SMART/001-01 March 1, 2018 (Recruitment) which explains : <ul style="list-style-type: none"> <li>- Without distinction of race, caste, nationality, religion, and others</li> </ul> </li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Not withhold formal identity from prospective worker</li> <li>- Not accept prospective workers who are under 18 years old</li> <li>- Not charges fees or security deposits to prospective workers</li> <li>- Recruitment of workers based on need</li> <li>- Recruitment of employee in accordance with the requirements of the position</li> <li>• SOP No.KHI-SMART/010-00 dated August 1, 2017 (Promotion) which explains :             <ul style="list-style-type: none"> <li>- Promotion is based on the result of work performance assessment</li> <li>- Promotion is carried out based on annual evaluation</li> </ul> </li> <li>• SOP No.KHI-SMART/009-00 dated August 1, 2017 (Work Performance Assessment) which explains :             <ul style="list-style-type: none"> <li>- Assessment are for workers who have worked for at least 3 consecutive month</li> <li>- Assessment period is January 1 to December 31 (Evaluation)</li> </ul> </li> </ul> <p>UoC also has Termination Procedure (No.KHI-SMART/024-00 dated January 2, 2020 which explained termination of employment due resignation, reaching retirement age, committing serious mistake, efficiency and others.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>UoC has documented implementation of Employment Procedure which has been set. For example shown by some of the following documentation :</p> <ul style="list-style-type: none"> <li>- Recruitment :</li> </ul>	Complied



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		<p>Documentation for temporary worker (Adot and Ahmadi) covers application letter, ID Card, approval, result of medical check-up and work agreement letter for both worker (SPK No 017/BPL-BPRE/PKWT/I/2023 and SPK No 30/BPL-BPRE/PKWT/I/2023 dated January 1, 2023 valid until December 31, 2023)</p> <ul style="list-style-type: none"> <li>- Promotion :</li> </ul> <p>Email from Regional controller to BPRE Estate Manager on December 2022 related approval promotion for Harvesting Clerk and Harvesting Foreman to permanent worker. On July 5, 2023 Estate Manager receive another email from Human Resources Division to ensure this promotion</p> <ul style="list-style-type: none"> <li>- Termination :</li> </ul> <p>Due the end of temporary work agreement :</p> <table border="1" data-bbox="1131 821 1892 1348"> <thead> <tr> <th>Name</th> <th>Agreement Number</th> <th>Validation date</th> </tr> </thead> <tbody> <tr> <td>Ropinda</td> <td>067/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Hendro P</td> <td>065/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Mariyono</td> <td>069/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Renaldy</td> <td>070/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Juhendri</td> <td>071/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Hendrizaral</td> <td>072/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> </tbody> </table>	Name	Agreement Number	Validation date	Ropinda	067/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Hendro P	065/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Mariyono	069/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Renaldy	070/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Juhendri	071/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Hendrizaral	072/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	
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		<p>Supi 073/BPRM/PKWT/A-2/12/2022 01 December 2022 – 28 February 2023</p> <p>Alfikri 075/BPRM/PKWT/A-2/12/2022 01 December 2022 – 28 February 2023</p> <hr/> <p>Has been shown fulfillment of obligations by the company due to the termination of the employment relationship through Joint agreement for payment of compensation for employee layoffs dated March 1, 2023. Based on interview of worker union representative compensation has been conduct for the worker.</p>	
<p><b>Criteria 3.6:</b> An Occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.          - Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has shown the procedure and work instruction related to OHS management system (to comply with Government Regulation 50-year 2012 – "<i>Sistem Manajemen Keselamatan dan Kesehatan Kerja</i>", such as:</p> <ul style="list-style-type: none"> <li>• Development and Communication Policy (SOP/SMART/HESS-EHSD/SADV/I/01)</li> <li>• Hazard Identification and Risk Assessment – SOP Identifikasi Sumber Bahaya, Penilaian dan Pengendalian Risiko (SOP/SMART/HESS-EHSD/SADV/I/02)</li> <li>• OHS objectives and targets (SOP/SMART/HESS-EHSD/SADV/I/03)</li> <li>• OHS Programmes (SOP/SMART/HESS-EHSD/SADV/I/04)</li> <li>• Incident and Occupational Disease Handling (SOP/SMART/HESS-EHSD/SADV/I/05)</li> <li>• Material Handling (SOP/SMART/HESS-EHSD/SADV/I/06)</li> <li>• Design Review (SOP/SMART/HESS-EHSD/SADV/I/07)</li> <li>• Infrastructures Maintenance and Changes (SOP/SMART/HESS-</li> </ul>	<p>Complied</p>

		<p>EHSD/SADV/I/08)</p> <ul style="list-style-type: none"> <li>• Lock Out Tag Out (SOP/SMART/HESS-EHSD/SADV/I/009)</li> <li>• PPE Management (SOP/SMART/HESS-EHSD/SADV/I/010)</li> <li>• First Aid (SOP/SMART/HESS-EHSD/SADV/I/011)</li> <li>• Health Measurement (SOP/SMART/HESS-EHSD/SADV/I/012)</li> <li>• Fire Extinguisher (SOP/SMART/HESS-EHSD/SADV/I/013)</li> <li>• Hydrant Utilization (SOP/SMART/HESS-EHSD/SADV/I/014)</li> <li>• Safe work permit (SOP/SMART/HESS-EHSD/SADV/I/015)</li> <li>• OHS Measurement and Monitoring (SOP/SMART/HESS-EHSD/SADV/I/016)</li> <li>• OHS Management Review (SOP/SMART/HESS-EHSD/SADV/I/017)</li> </ul> <p>Risk Assessment for all operations regarding health and safety was available within the scope of oil palm mill processes activities and agricultural estate activities. As it was considered the stages of OHS risk control hierarchy, that is elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment).</p> <p>Record verification during ASA 1_1:</p> <ul style="list-style-type: none"> <li>• Bukit Perak Estate and Bukit Permata Estate – has defined risk assessment (ISBPPR) last review on 16<sup>th</sup> January 2023, the document covers processes and activities such as: spraying, fertilizing, weeding, replanting, road maintenance, firefighting simulation harvesting, transportation, warehouse, workshop, infrastructure, police (<b>minus: sensus Gupon</b>)</li> <li>• Bukit Perak POM – has defined risk assessment (ISBPPR), last review on 3<sup>rd</sup> April 2023, cover processes and activities related to production of CPO, such as: weighbridge, boiler, engine room,</li> </ul>	
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		<p>loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, CPO dispatch, firefighting simulation, water treatment, chemical warehouse.</p> <ul style="list-style-type: none"> <li>The risk assessment has been communicated to all employee, as evident below: <ul style="list-style-type: none"> <li>Bukit Perak Mill: Records of dissemination dated 12<sup>th</sup> June 2023, located at Bukit Perak Mill, attended by 33 workers. Data verified: Training material, attendance list and photograph.</li> <li>Bukit Perak Estate: Records of dissemination dated 15 – 15 May 2023, located at “Lingkaran Pagi Divisi”, that was attended by 92 workers form Division I, 64 workers form Division II, 58 workers from Division III, 40 workers from Division IV and attended by 50 workers from Division V. Data verified: Training material, attendance list and photograph.</li> <li>Bukit Permata Estate: Records of dissemination dated 15<sup>th</sup> February 2023, located at “Check roll Pagi – Division I”, that was attended by 107 workers. Data verified: Training material, attendance list and photograph.</li> </ul> </li> </ul>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.  - Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has prepared OHS plan to address health and safety as per “Program Kerja – form F/SMAR/HESS-EHSD/SADV/004/001” updated on 30<sup>th</sup> June 2023, consisted of:</p> <ul style="list-style-type: none"> <li>OHS Meeting (planned: monthly)</li> <li>Emergency response preparedness (planned in January 2023)</li> <li>Training for first aider (planned in February 2023)</li> <li>OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit (planned: monthly)</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• MCU both general and special check-up (planned February and March 2023)</li> <li>• Review on Risk Assessment (ISBPR) (planned in January 2023)</li> <li>• Evaluation of law, legal and others applicable requirement (planned in January 2023)</li> <li>• OHS Meeting (planned: monthly)</li> <li>• OHS inspection for contractor (planned: monthly)</li> <li>• OHS Internal Audit (planned: annually)</li> <li>• Report of OHS committee (P2K3) (planned in three monthly basis)</li> <li>• Review on OHS management system (planned (annually))</li> </ul> <p>Sample record on implementation the OHS program, such as:</p> <ul style="list-style-type: none"> <li>• Record of OHS meeting dated 7<sup>th</sup> April 2023, location in Bukit Perak Estate. The meeting was attended by OHS committee. Agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</li> <li>• Report on training of emergency response and preparedness (fire drill), dated 17<sup>th</sup> February 2023. Location in "Lapangan BINE". The training was attended by OHS Committee 71 personnel. Data verified: scenario, attendance list, evaluation, and photograph.</li> <li>• Record of training for first aider dated 11<sup>th</sup> February 2023, location in Longhouse Bukit Perak Estate. Data verified: Training material, attendance list and photograph.</li> <li>• Report of OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit, dated 1<sup>st</sup> July 2023. Location in Bukit</li> </ul>	
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		<p>Perak Estate. The inspection was carried by OHS Expert (Mr Saddam Alamsyah). The document reported OK – good controlled.</p> <ul style="list-style-type: none"> <li>• General Medical Check-Up (annually) conducted by Company Doctor to all workers. Sample seen:             <ul style="list-style-type: none"> <li>■ Dated 7 February 2023, that was attended by 140 workers including staff in Bukit Permai Mill.</li> <li>■ Dated 8<sup>th</sup> February 2023, location in Division I Bukit Perak Estate that was attended by 22 staff in Regional Office and 147 workers form Division I and II.</li> </ul> </li> <li>• Special Medical Check-Up (annually) conducted by Company Doctor to workers in high risk assessment:             <ul style="list-style-type: none"> <li>■ Dated 26<sup>th</sup> June 2023 – audiometry test, that was attended by 13 workers from high-risk station in Bukit Perak Mill (steriliser, pressing, boiler, engine room)</li> <li>■ Dated 7<sup>th</sup> March 2023 – spirometry test, that was attended by 14 workers (pesticides applicator) from Bukit Perak Estate</li> <li>■ Dated 27<sup>th</sup> February 2023 – cholinesterase test that was attended by 14 workers (pesticides applicator) from Bukit Perak Estate</li> </ul> </li> <li>• Record of PPE provision for workers as per “Formulir Berita Acara Serah Terima APD”, dated 10 April 2023 for 41 workers in Division II Bukit Permata Estate, PPE: AP Boot)</li> </ul> <p>Letter for testing the mill machinery – No: 031-SPP/B/VI/2023, regarding "Pemberitahuan Riksa Uji K3" dated 26<sup>th</sup> June 2023. Sample seen: Excavator PC-200-08 (location in Bukit Perak Estate), Air Compressor – sterilizer station and Diesel Genset No 3 125 KVA (location in Bukit Perak Mill).</p>	
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Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&amp;C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of Certification has identified the training needs by each worker according to their position and type of work that cover aspect of the RSPO Principles and Criteria. Based on the identification for the year 2023 the following training program has been prepared are :</p> <ul style="list-style-type: none"> <li>• OHS aspect : Emergency response procedures, emergency response simulations, refreshment of first aid understanding, awareness of OHS and medical check-up</li> <li>• Certification : Refreshment and awareness of RSPO/ISPO/ISCC EU, Supply chain, Waste and residue</li> <li>• Operational : Training of Best Management Practices for Agriculture and Mill</li> </ul> <p>Record of training and socialisation which conduct in 2023 i.e :</p> <ul style="list-style-type: none"> <li>• June 12, 2023 regarding MSDS socialization, Emergency Response, and ISPO/RSPO/ISCC certification refreshment attended by a total of 40 BPRM employees</li> <li>• February 17 2023 for the Preparedness and Emergency Response Simulation for Land Fire Prevention and First Aid attended by a total of 71 participants from PT BPL and PT MP LWI</li> <li>• February 14, 2023 for Pesticide Use and PHT Training attended by representatives of OPT control teams and pesticide applicators from BPRE and BPTE, a total of 10 attendant</li> <li>• February 15, 2023 for socialization of industrial relations and work environment (BPRE &amp; BPRM) explaining the GSEP (GAR Social and Environment Policy) attended by the representative of worker, FFB supplier, and contractor which includes a commitment to:               <ul style="list-style-type: none"> <li>• Management of the environment</li> <li>• Social and community engagement</li> <li>• Work environment and industrial relations</li> <li>• Trade and Supply Chain</li> </ul> </li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>February 15, 2023 for socialization of environmental management (BPTE) including socialization on the prohibition of burning waste, the prohibition on the use of used pesticide packaging, the control and management of Hazardous and Toxic Material waste.</li> </ul> <p>Based on the interviews with worker representatives, for example weight bridge officers, harvesters, pesticide applicators and contractor representatives from CV Berlian Utama and FFB Suppliers from CV Gunung Mas Lestari, it is known that socialization and routine training are carried out by the company.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The unit of certification already has a record of training participation for each personnel, for example shown by a recap of the list of attendance of personnel to take part in training or outreach as follows :</p> <ul style="list-style-type: none"> <li>Employee ID : 21154</li> </ul> <p>Training / Socialization has attended : GSEP Policy of GAR (February 15, 2023); Best Management Practice on Harvesting (Muster morning); Emergency response &amp; Environmental management (February 17, 2023)</p> <ul style="list-style-type: none"> <li>Employee ID : 22030</li> </ul> <p>Training / Socialization has attended : GSEP Policy of GAR (February 15, 2023); Best Management Practice on Harvesting (Muster morning); Emergency response &amp; Environmental management (February 17, 2023)</p>	Complied
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>The UoC has prove that appropriate training is provided for personnel who handle supply chain. Record of training for example held on February and June 2023 for BPRM worker. Based on interview with weight bridge officer and security they can explain their job description</p>	Complied



		including the source of FFB and how to documented certified and non-certified FFB source.	
<b>Criteria 3.8:</b> Supply chain requirements for mills. Procedure note: all requirements are classified as <b>Critical Indicators</b> . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<b>Identity Preserved Module</b> A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. 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.	Bukit Perak Mill received FFB from uncertified source, therefore mill implement MB module in its Supply Chain System. There is no change for previous assessment	Not Applicable
3.8.2	<b>Mass Balance Module</b> 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.	Bukit Perak Mill received FFB from uncertified source (as explained in 2.3.1 and 2.3.2). Mill implement MB module in its Supply Chain System	Complied

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<p>3.8.3</p>	<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&amp;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>Estimated certified product recorded in the last Assessment Report and Certificate, and updated in the RSPO Palm Trace. Actual certified produced has been verified during this assessment. The estimates of certified production for the next license period also have been set, in reasonable amount taking into account the last year production. The data are shown in the following table:</p> <table border="1" data-bbox="1131 571 1955 906"> <thead> <tr> <th>Product</th> <th>Estimate Production (MT) period of 23 Sept 2022 to 07 Sept 2023</th> <th>Actual Production (MT) of previous audit July 2022 – June 2023</th> <th>Estimate Production for 12 month (MT)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>34,377.50</td> <td>36,157.50</td> <td>37,965.38</td> </tr> <tr> <td>CSPO</td> <td>7,047.38</td> <td>7,006.63</td> <td>7,593.07</td> </tr> <tr> <td>CSPK</td> <td>1,890.76</td> <td>1,912.31</td> <td>2,088.09</td> </tr> </tbody> </table> <p>* License period : 23 Sept 2022 – 07 Sept 2023            * Estimate production for next 12 month based on actual production of last 12 month            *In 2022 BPTe all planted area is on Immature phase</p>	Product	Estimate Production (MT) period of 23 Sept 2022 to 07 Sept 2023	Actual Production (MT) of previous audit July 2022 – June 2023	Estimate Production for 12 month (MT)	FFB	34,377.50	36,157.50	37,965.38	CSPO	7,047.38	7,006.63	7,593.07	CSPK	1,890.76	1,912.31	2,088.09	<p>Complied</p>
Product	Estimate Production (MT) period of 23 Sept 2022 to 07 Sept 2023	Actual Production (MT) of previous audit July 2022 – June 2023	Estimate Production for 12 month (MT)																
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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>The mill has registered as RSPO member under Golden Agri Resources (No. 1-0096-11-000-00) and also has been registered in IT platform RSPO (palm trace) with following information :</p> <ul style="list-style-type: none"> <li>• Member Name : PT Bumi Permai Lestari</li> <li>• Member ID : RSPO_PO1000001761</li> <li>• Member country : Indonesia</li> <li>• Member category : Oil Mill</li> <li>• Core product : Palm oil</li> </ul>	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> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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.</li> <li>• The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>The mill has procedure related supply chain for example :</p> <ul style="list-style-type: none"> <li>• Procedure of Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17 dated 24/03/2022).</li> <li>• SOP Of FFB processing (No.SOP/SMART/MCMD/I/TM-PKS)</li> <li>• SOP of reporting certified product ( No.SOP-SMART/CERS-EHSD/SADV/003)</li> <li>• SOP of document and record controlling (No.SOP/SMART/UMUM/SADV/I/001)</li> </ul> <p>Supply chain procedure has referred to the latest RSPO Supply chain system. Procedure also covered all aspect in SCCS MB Module for example receiving and recording that identify the traceability of RSPO certified and non certified FFB source, FFB Processing, announcement in RSPO palm trace, key person (weighbridge clerk, despatch CPO/Kernel officer, production clerk, and administration Head).</p> <p>Based on interview with weight bridge officer and security they can explain their job description including the source of FFB and how to documented certified and non-certified FFB source.</p>	Complied

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<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p style="margin-left: 20px;">a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="margin-left: 20px;">b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Procedure of internal audit for supply chain has described in SOP Internal Audit No SOP/SMART/UMUM/SADV/I/009 dated 14 July 2014. From the procedure known that internal audit conduct once a year. Latest internal audit for SCCS carried out concurrently with the internal audit P&amp;C dated March 06 – 10, 2023 with the result all indicator for Supply Chain stated comply with RSPO P&amp;C Requirements.</p> <p>UoC also conduct Management review (annually). Last activity is on 20<sup>th</sup> March 2023 attended by RC, PC, EM, FM, and all key personals. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement. Document verified: Surat Keputusan No 074/RC-BABEL/III/2023)</p>	<p>Complied</p>																																				
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>BPRM has verified and documented the volumes of certified and non certified FFB as shown in the table below</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Month</th> <th style="text-align: right;">Certified FFB</th> <th style="text-align: right;">Non certified FFB</th> <th style="text-align: right;">Total</th> </tr> </thead> <tbody> <tr> <td>July</td> <td style="text-align: right;">3,880.49</td> <td style="text-align: right;">11,829.66</td> <td style="text-align: right;">15,710.15</td> </tr> <tr> <td>August</td> <td style="text-align: right;">4,467.13</td> <td style="text-align: right;">14,240.28</td> <td style="text-align: right;">18,707.41</td> </tr> <tr> <td>September</td> <td style="text-align: right;">4,170.85</td> <td style="text-align: right;">12,465.55</td> <td style="text-align: right;">16,636.40</td> </tr> <tr> <td>October</td> <td style="text-align: right;">3,195.25</td> <td style="text-align: right;">13,935.52</td> <td style="text-align: right;">17,130.77</td> </tr> <tr> <td>November</td> <td style="text-align: right;">2,715.41</td> <td style="text-align: right;">11,932.40</td> <td style="text-align: right;">14,647.81</td> </tr> <tr> <td>December</td> <td style="text-align: right;">2,285.86</td> <td style="text-align: right;">10,778.24</td> <td style="text-align: right;">13,064.10</td> </tr> <tr> <td>January</td> <td style="text-align: right;">1,036.67</td> <td style="text-align: right;">9,147.77</td> <td style="text-align: right;">10,184.44</td> </tr> <tr> <td>February</td> <td style="text-align: right;">1,304.35</td> <td style="text-align: right;">7,974.87</td> <td style="text-align: right;">9,279.22</td> </tr> </tbody> </table>	Month	Certified FFB	Non certified FFB	Total	July	3,880.49	11,829.66	15,710.15	August	4,467.13	14,240.28	18,707.41	September	4,170.85	12,465.55	16,636.40	October	3,195.25	13,935.52	17,130.77	November	2,715.41	11,932.40	14,647.81	December	2,285.86	10,778.24	13,064.10	January	1,036.67	9,147.77	10,184.44	February	1,304.35	7,974.87	9,279.22	<p>Complied</p>
Month	Certified FFB	Non certified FFB	Total																																				
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		<p>Beside the information on of FFB, Mill also have information on production estimates from the previous assessment and actual production in this assessment as described below :</p> <table border="1"> <thead> <tr> <th><b>Product</b></th> <th><b>Estimate period of 23 Sept 2022 to 07 Sept 2023</b></th> <th><b>Production</b></th> <th><b>Actual Production (MT) of previous audit July 2022 – June 2023</b></th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>34,377.50</td> <td></td> <td>36,157.50</td> </tr> <tr> <td>CSPO</td> <td>7,047.38</td> <td></td> <td>7,006.63</td> </tr> <tr> <td>CSPK</td> <td>1,890.76</td> <td></td> <td>1,912.31</td> </tr> </tbody> </table>	<b>Product</b>	<b>Estimate period of 23 Sept 2022 to 07 Sept 2023</b>	<b>Production</b>	<b>Actual Production (MT) of previous audit July 2022 – June 2023</b>	FFB	34,377.50		36,157.50	CSPO	7,047.38		7,006.63	CSPK	1,890.76		1,912.31					
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		<p>* License period : 23 Sept 2022 – 07 Sept 2023</p> <p>*There is an certified FFB from other source in one group (BMSE, BINE, LWSE, and LWUE) amount 1,315.47 MT</p> <p>The data in the table above is a comparison for the current 12 months. Meanwhile, if following the license period (23 September 2022 – 07 September 2023) the actual production (September 2022 – June 2023) is as follows:</p>																					

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		<ul style="list-style-type: none"> <li>• FFB : 27,809.88 MT</li> <li>• CSPO : 5,401.71 MT</li> <li>• CSPK : 1,478.32 MT</li> </ul> <p>From the explanation above known that there is no projected overproduction of certified tonnage. Related the handling of nonconforming oil palm products has been set in the SOP of Handling Complaints and Dissatisfaction document number SOP/SMART/SUST/IV/003 Rev3.0 dated 14 February 2022 which inform generally applied to all complaints aspects including complaints for nonconforming products from buyer.</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> </ol>	<p>Bukit Perak Mill showed the example of delivery document of certified product during license period e.g weighbridge ticket, delivery order, and buyer as described below :</p> <p><b>Palm Kernel</b></p> <ul style="list-style-type: none"> <li>• DO No. 2650/KER/2650/23P018</li> <li>• Transaction ID : TR-a17a5fb2-b1cd</li> <li>• Creation date : 09 Juni 2023</li> <li>• Confirmation date : 16 Juni 2023</li> <li>• Buyer : PT Sumber Indah Perkasa Member ID : RSPO_PO1000006557</li> <li>• Sales contract number : DIC/2650/240423/0001</li> <li>• Volume : 50 MT</li> <li>• Weight bridge card : No.K222BPRMG 08044 dated 07 September 2022 for CPO Volume 15.330 Kg certificate ID : RSPO 33239-22091510/RSPO MB. Transporter PT Satrindo Jaya Abadi</li> </ul> <p><b>Crude Palm Oil</b></p>	<p>Complied</p>

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	<p>i) A unique identification number.</p>	<ul style="list-style-type: none"> <li>• DO No. 2650/CPO/2650/22/T012</li> <li>• Transaction ID : TR-b6422692-22ea</li> <li>• Creation date : 03 Okt 2022</li> <li>• Confirmation date : 27 Okt 2022</li> <li>• Volume : 53,11 MT</li> <li>• Buyer : PT Sumber Indah Perkasa Member ID : RSPO_PO1000006557</li> </ul> <p>Weight bridge card : No K222BPRMG 30695 dated 06 June 2023 for PK Volume 10.850 kg certificate ID : RSPO 33239-22091510/RSPO MB. transporter PT EMKL Tiga Berdikari.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>BPRM didnt conduct outsource of milling activities. Outsource is for CPO and PK transport. Mill has a list of contractors for transporting oil palm products which inform name of contractor, address, work agreement and validity period as follow :</p> <ul style="list-style-type: none"> <li>• Agreement No.001/BPL/BPRM/04/2022.CPO dated 22 April 2022 between PT Bumi Permai Lestari and PT BSA Logistic Indonesia (PT BSA Logistic is holding for PT Satrindo Jaya Agropalma) valid until 31 December 2024 for CPO transportation. There is a statement letter from the Director of PT BSA Logistics Indonesia dated March 31, 2023 stating that they are willing to comply with the conditions required for sustainable palm oil certification and are willing to be questioned in the framework of a certification audit conducted by a certification body</li> <li>• Agreement No.001/BPL/BPRM/01/2023 – PK dated 11 January 2023 between PT Bumi Permai Lestari and PT EMKL Tiga Berdikari valid until 30 December 2023 for PK transportation. There is a statement letter from the Director of PT EMKL Tiga Berdikari Indonesia dated June 3, 2023 stating that they are willing to comply with the conditions required for sustainable palm oil</li> </ul>	<p>Complied</p>

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	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.	certification and are willing to be questioned in the context of a certification audit conducted by a certification body	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	BPRM has the record detail information of its contractor covering company profile, contact person, address and phone number. The list of contractor are : 1. PT BSA Logistic : Mr Yosi Faradiman; Pangkal Pinang Bangka PT EMKL Tiga Berdikari : Mr Nopianto; Jakarta Pusat DKI Jakarta	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is no new contractor used by the BPRM for the physical handling of RSPO certified oil palm product since the last assessment.	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:	BPRM has up to date record and report relate supply chain for example MB record keeping, sales contract, buyer reference, delivery order, and shipping announcement. Based on Procedure of Document Control and Monitoring (No.SOP/SMART/UMUM/SADV/1/001 dated 05 December 2022) retention time for all records and report are kept for 10 years.  Record of certified FFB, CSPO, and CSPK for the period of 12 month before audit (July 2022 – June 2023) presented below : <ul style="list-style-type: none"> <li>• FFB : 36,157.50 MT</li> <li>• CSPO</li> </ul>	Complied



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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Production 7,006.63 MT. Opening stock from previous month 871.32 MT. Sold as under RSPO scheme 2,031.16 MT, sold as other scheme 5,051.04 MT. Stock are 795.75 MT</p> <ul style="list-style-type: none"> <li>• CSPK            Production 1,912.81MT. Opening stock from previous month 149.38 MT. Sold under RSPO scheme 1,920 MT. Stock are 141.69 MT</li> </ul> <p>Based on the record keeping known that MB sales deliver only from positive stock.</p>	
3.8.13	<p><b>Extraction Rate</b>            The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly, and yearly production. Extraction rate follow actual data from last 12 month period (July 2022 – June 2023). From its period known that OER are 19.38% while for KER are 5.31%</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rate follow actual data from last 12 month period (July 2022 – June 2023). From its period known that OER are 19.38% while for KER are 5.31%</p>	Complied
3.8.15	<p><b>Processing</b>            For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Bukit Perak Mill applied SCCS module MB due received FFB both form certified and non certified sources</p>	Complied
3.8.16	<p><b>Registration of Transactions</b>            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</p>	<p>Bukit Perak Mill are registered in RSPO IT Platform (palmtrace) with number RSPO_PO1000001761. Mill carry out shipping announcement not more than 3 month after despatch for example :  <b>Palm Kernel</b></p>	Complied

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	<p>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>	<ul style="list-style-type: none"> <li>• Transaction ID : TR-a17a5fb2-b1cd</li> <li>• Creation date : 09 Juni 2023</li> <li>• Confirmation date : 16 Juni 2023</li> <li>• Buyer : PT Sumber Indah Perkasa Member ID : RSPO_PO1000006557</li> <li>• Sales contract number : DIC/2650/240423/0001</li> <li>• Volume : 50 MT</li> </ul> <p><b>Crude Palm Oil</b></p> <ul style="list-style-type: none"> <li>• Transaction ID : TR-b6422692-22ea</li> <li>• Creation date : 03 Okt 2022</li> <li>• Confirmation date : 27 Okt 2022</li> <li>• Volume : 53,11 MT</li> <li>• Buyer : PT Sumber Indah Perkasa Member ID : RSPO_PO1000006557</li> </ul> <p>During this audit period there were CSPO sales as other schemes amounting to 5,051.04 Mt. In response to this, 4,695.94 Mt of stock has been removed, while the remaining 355.1 Mt has not been removed following the removal period that is still permitted in the UoC system.</p>	
<p>3.8.17</p>	<p><b>Claims</b></p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>Based on announcement and transaction report concluded that all RSPO certified product submitted are in compliance with RSPO Rules on Market Communication and Claims</p>	<p>Complied</p>
<p><b>General corporate communications</b></p>			

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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.	PT Bumi Permai Lestari – Bukit Perak Mill did not conducted corporate communication. Corporate communication are conducted by Golden Agri-Resources (GAR) as RSPO member with membership No. 1-0096-11-000-00, member since 30 January 2005 on website: <a href="https://goldenagri.com.sg">https://goldenagri.com.sg</a> .	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (www.rspo.org)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member’s history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member’s profile page.</p>	In corporate communication, GAR has display its RSPO membership status, display a link to the RSPO web address, stated that GAR support the work of the RSPO and stated GAR’s history with regard to the RSPO. GAR did not uses RSPO trademark in the website.	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.	In the website, GAR not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	In the website, GAR ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	In the website, GAR does not uses the RSPO corporate logo.	Complied

**Business to business communications**

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5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Bumi Permai Lestari – Bukit Perak Mill made Business to Business communication by stated in sales documents, e.g. Sales Contract and Delivery Note that the product sold is RSPO Certified CPO or PK model MB.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Supply chain model and RSPO certificate number were stated on the delivery document, e.g. Delivery Note and weighbridge ticket.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	PT Bumi Permai Lestari – Bukit Perak Mill is not a distributor or wholesaler.	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status</p>	PT Bumi Permai Lestari – Bukit Perak Mill is not producing or selling end-product to consumer. No labelling on product whatsoever. Not applicable.	Not Applicable

	of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.	Not Applicable
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.	Not Applicable
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.	Not Applicable
<b>Messaging (IP)</b>			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.</p>	<p>Not Applicable</p>
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Minimum Mass Balance content</b></p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.</p>	<p>Complied</p>
	<p>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.</p>	<p>The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.</p>	<p>Complied</p>

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

	<ul style="list-style-type: none"> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b>          Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has shown policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD) as per "Kebijakan Bisnis dan Hak Asasi Manusia", dated June 2021 – was signed by Head of Policy and Compliance Division. The policy relating to human rights, there are 12 statements related to the human right.</p> <p>Particularly related to Human Right Defender (HRD) is describe clearly on poin 9; is explained in point 9, stating that: <i>"Perusahaan menghormati dan melindungi hak-hak pelapor pelanggaran dan pembela hak asasi manusia."</i></p> <p>The policy is also published to use posters at any strategic places in the plantations (Bukit Perak Estate, Bukit Permata Estate and Bukit</p>	<p>Complied</p>



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		<p>Perak Mill. Corporate policy has been socialized/dissemination to all levels of employees, sample seen:</p> <ul style="list-style-type: none"> <li>• Dated 30<sup>th</sup> June 2023, location in Bumi Permai Mill. Subject: "Sosialisasi Kode Etik, Kebijakan HAM, Pengaduan &amp; Keluhan, dan Hubungan Industrial", that was attended by 20 workers.</li> <li>• Dated 13 February 2023 – document as per "Notulensi Sosilasi Kode Etik, Kebijakan HAM, Pengaduan &amp; Keluhan, Hubungan Industrial dan Lingkungan Kerja", location in Cekroll Pagi Division 1 – Bukit Permata Estate that was attended by 107 workers.</li> <li>• Dated 30 June 2023 – document as per "Sosialisasi Kode Etik, Kebijakan HAM, Pengaduan dan Keluhan, dan Hubungan Industrial". Location in Bukit Perak Mill. That was attended by 20 workers.</li> <li>• Dated 15 – 19 May 2023 - document as per "Notulensi Sosilasi Hubungan Industrial dan Lingkungan Kerja", location in Lingkaran Pagi Divisiin– Bukit Perak Estate that was attended by 92 workers.</li> <li>• Dated 10 February 2023 to all contractor as per document of "Notulensi Sosilasi Kode Etik, Kebijakan HAM, Pengaduan &amp; Keluhan, SOP Sosial, Konflik, HCV dan Kode Etik". That was attended by 13 contractors.</li> </ul> <p>Based on interview with sample of workers during audit (dated 5-6 July 2023), there was declare that policy always disseminated during muster morning. For stakeholders, dissemination of the policy through email and notice board at village office.</p>	
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 workers and stakeholders during ASA 1_1 was obtained information that PT Bumi Permai Lestari does not intimidate or violence (including any form of harassment or paramilitary usage) to solve any problem.</p>	Complied

		According to interview above there was clearly inform that since they are working with the company, no violence occurs.	
<b>Criteria 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has shown procedure “<i>SOP Penanganan Keluhan dan Ketidakpuasan</i> (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated 11 April 2017)”.</p> <p>The procedure was covering complaints and dissatisfaction records, classification, communication, planning, resolution, monitoring and reporting of complaint and dissatisfaction handling, including form of any sexual harassment to workers nor children sourced from internal and external parties.</p> <p>This procedure is used for handling of any complaints and dissatisfaction to all affected parties. Within the procedure stated:</p> <ul style="list-style-type: none"> <li>• Any complaints (direct or indirectly) receives and record in Form F/SMART/GIMS-SCMD/USDV/I/001/001 by social officer or administration head.</li> <li>• Entire data and complaint information can be publicly available or classify to affected parties upon approval by reporter. Unit of certification ensure anonymity of complainants and whistle-blower with aims to reducing retaliation risks.</li> <li>• Complaints and disputes can be delivered by mailbox to Head Office, or by phone through hotline and app or email.</li> <li>• Response shall be made within 14 working days after complaints or disputes receives.</li> </ul>	Complied

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		If complaints and dissatisfaction are submitted verbally (the complainant cannot read or write) or by telephone, the recipient of the report must assist in writing/recording the complaint.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	<p>Procedure “<i>SOP Penanganan Keluhan dan Ketidakpuasan (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated 11 April 2017)</i>” are in place and accommodate inclusivity for illiterate parties.</p> <p>The procedure describes that:</p> <ul style="list-style-type: none"> <li>• The process of delivering and handling complaints and grievances internally and externally.</li> <li>• The company guarantees the anonymity of the whistle-blower. Head clerk is responsible for record all complaints and grievances that exist both orally and in writing from the external.</li> <li>• Responses to the complaint and dissatisfaction is given as soon as possible and not later than 14 working days after the issue received.</li> </ul> <p>Based on interviews with management during ASA 1_1-year 2023, obtained information that if there is no solution in the complaint mechanism, can be brought to the RSPO Complaint System.</p>	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	<p>Whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and Dissatisfaction document number: F/SMART/SIGSCSRD/SADV/003/001.</p> <p>According to interviews with sample of workers and communities there are no complaints or dissatisfaction with the company in 2022 - 2023. Data verified: F/SMART/SIGSCSRD/SADV/003/001 reported nil complaint.</p>	Complied

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>During interview with stakeholders, there was no complaints occurs for the last five years. Data verified: F/SMART/SIGSCSRD/SADV/003/001 reported nil complaint. However, if the complaints or grievance occurs, can be used phone call directly to hotline number which installed at the office. Procedures regulate access to independent legal and technical advice if it cannot be resolved internally or if the complainant is not satisfied</p>	Complied
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Program to support local community development is based on the result of consultation during social livelihood assessment baseline on 15-19 November 2021.</p> <p>There are several programs for developing local communities through Community Economic Empowerment, containing:</p> <ul style="list-style-type: none"> <li>- "Program Gerakan Sekolah Menyenangkan &amp; Youth Development". The actual program started on 26 September – 21 October 2022 covers 4 elementary schools surrounding the plantation, i.e.: SDN 20 Dendang, SDN 10 Dendang, SDN 26 Terentang, SDN 27 Kacung. The program was demonstrated through the set-up of interactive learning props to stimulate students with more fun, confidence, and focus. Also, hand over storytelling books for children to encourage reading activities.</li> <li>- Catfish cultivation with Bioflok system. This program for 3 months and started on 4-21 October 2023, located in sub-village Rumpis, Berang village. Farmer group name Rumpis Jaya Lestari.</li> <li>- Wild forest bees Honey program. The actual Training on Development of Wild Forest Honey Cultivation started on 30 Sep – 6 October 2022. Attended by 21 participants (1 farmer group) and located in Dendang village.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Homemade "Dodol", snack from glutinous rice, coconut milk, palm sugar. Produced by some housewife group located in Ranggi Asam village. This program is partnership between unit of certification and local Small and Medium Enterprise (UMKM) Desa Ranggi Asam. Because this production activity was established since 2017.</li> <li>- Training Program LOKAKREASI or Workshop on Craft and Culinary Business Scale Up, Jun-Nov 2022.</li> </ul> <p>Beside those activity, the unit of certification also demonstrate the actual CSR program in 2022 such as: Provides Clean Water in Dendang village, Road Maintenance at surrounding village and supporting other activities of villages.</p> <p>Social Impact Assessment and other social program review at two years period refer to SOP Pengelolaan dan Pemantauan Dampak Sosial (SOP/SMART/SUST/IV/002, Rev.1, dated 1 July 2014). Stated on point 4.6.10 that review Social Management and Monitoring Plan reviewed at least once in two years.</p>	
<p><b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit has a total HGU area of 14,319.08 Ha and of this area the scope of certification is 6,084.95 Ha because of the 4 estates that are members of PT Bumi Permai Lestari (BMSE, BINE, BPTe, BPRe) only BPTe and BPRe are included the scope of this certification.</p> <p>The details of the HGU owned are as follows:</p> <ul style="list-style-type: none"> <li>• Decree of the State Minister for Agrarian Affairs/Head of the National Land Agency No.26/HGU/BPN/95 dated 12 April 1995 for the granting of HGU for PT Bumi Permai Lestari with an area of 3,418.52 Ha. The HGU rights were originally valid until 2030 and</li> </ul>	<p>Complied</p>

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		<p>have been extended until 2090 in accordance with the Decree of the Head of BPN No.134/HGU/BPN/2004 dated 2 November 2004</p> <ul style="list-style-type: none"> <li>Decree of the State Minister for Agrarian Affairs/Head of the National Land Agency No.58/HGU/BPN/95 dated 25 August 1995 for the granting of HGU for PT Bumi Permai Lestari with an area of 9,574.03 Ha. The HGU rights were originally valid until December 31, 2030 and have been extended until March 5, 2092 in accordance with the Decree of the Head of BPN No.134/HGU/BPN/2004 dated October 28, 2004. The HGU area was then revised to 10,900.56 Ha in accordance with the decision of the Head of BPN RI No.1/RIt/HGU/BPN RI/2013 dated 9 September 2013</li> </ul> <p>Based on the explanation above, it is known that initially the area of HGU issued by the government for Unit Certification was 12,992.55 Ha and in 2013 it changed to 14,319.08 Ha.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994.</p> <p>Results of an interview with one of the previous land owners who was also the Head of Terentang Village for the 2000 – 2010 period and the 2022 period – now, known that the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights. The company has explained to the</p>	Complied

	<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>landowners or their representatives regarding the impact that will be caused by the plantation development.</p>	
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).          - Critical (Major) compliance -</p>	<p>The unit of certification already has maps that identify their legal rights, as shown in the Operational Map with a scale of 1 : 150,000 made by the PNMP team. The map has provided information about HGU boundaries, boundaries between blocks, enclave areas, boundary areas, including maps of river distribution and HCV.</p> <p>The reference used in making the map is the field map listed in the HGU certificate as follows:</p> <ul style="list-style-type: none"> <li>• Certificate of Proof of Title – Land Book No.01 No.04.04.80.02.2.00001 with Situation Map No.1427/1996 of 8,234.13 Ha” dated 8 August 1996 scale 1:50,000.</li> <li>• Certificate of Proof of Title – Land Book No.01 No.04.04.77.04.2.00001 with Situation Map No.413/1997 of 2,666.43 Ha” dated 5 March 1997 scale 1:40,000.</li> <li>• Land title “Certificate of Proof of Rights – Land Book No.01 No.04.04.77.03.2.00001 with Situation Drawing Map No.1471/1996 of 3,418.52 Ha scale 1:50,000.</li> </ul> <p>The results of interviews with the Heads of Dendang and Terentang Villages show that until now the company is operating in the area according to the permits it has. Stakeholders can access information about the map if necessary</p>	<p>Complied</p>

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4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on the interview with one of the previous land owners who was also the Head of Terentang Village for the 2000 – 2010 period and the 2022 period – now, known that preliminary information regarding the plantation development plans has been conveyed to the community. The company also conducts a social assessment process including informing what benefits will be obtained when the plantation operates. The source also said that in the process there was never any coercion on the land owners to relinquish their ownership rights. Everyone has the right to disagree with giving land to the company.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Based on information obtained from one of the previous land owners who was the Head of Terentang Village for the period 200 – 2010 and the 2022 period – it is currently known that the community represented themselves during the land acquisition process. Apart from that, there is also a village team tasked with monitoring and being a witness when the compensation process is approved</p>	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>As previously explained, the land concession process has been completed since 1994. From the results of interviews with one of the previous landowners who was also the Head of Terentang Village, it is known that several agreements have been implemented related to the opening of plantations including the absorption of labor from surrounding villages and the running of the program. CSR. The annual review of the FPIC process is not carried out directly but can be represented through the SIA program and its reviews.</p>	Complied
<p><b>Criteria 4.5:</b> 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.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Until now the Unit of Certification has not conduct new land clearing and the land compensation process has been completed since 1994. The legal ownership right is HGU covering an area of 14,319.08 Ha with details as described in 4.4.1</p>	Complied



<p>4.5.2</p>	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities’ own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interviews with one of the previous land owners who was also the Head of Terentang Village for the 2000 – 2010 period and the 2022 period – it is currently known that the land compensation process has been based on the agreement of both parties starting with initial socialization, negotiations, and agreements. In the process there has never been an element of coercion on the community to relinquish their land rights.</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>Based on the results of interviews with one of the previous land owners who was also the Head of Terentang Village for the 2000 – 2010 period and the 2022 period – it is currently known that the land compensation process has been based on the agreement of both parties starting with initial socialization, negotiations, and agreements. In the process there has never been an element of coercion on the community to relinquish their land rights. Everyone has the right to disagree with giving land to the company.</p> <p>Evidence of this is the existence of an enclave/land bank area, namely an area owned by the community within the company's HGU, which has refused to be compensated from the start. Based on the results of identification by the company, there is an area of 72.95 Ha in BPTE and an area of 190.05 Ha in BPRE which is still under community management.</p> <p>The results of field visits to sample areas such as the BPTE G15 block show that the conditions between the community area and the company area have been given clear boundaries,</p>	<p>Complied</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>Based on the interviews with one of the previous land owners who was also the Head of Terentang Village for the 2000 – 2010 period and the 2022 period – now, known that the land compensation process has been based on the agreement of both parties starting with initial socialization, negotiations, and agreements. In the process there has never been an element of coercion on the community to relinquish their land rights. The source said that the existence of the company did not have a negative impact on the residents' water or food supplies</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 the interviews with one of the previous land owners who was also the Head of Terentang Village for the 2000 – 2010 period and the 2022 period – now, known that the land compensation process has been based on the agreement of both parties starting with initial socialization, negotiations, and agreements. In the process there has never been an element of coercion on the community to relinquish their land rights. Everyone has the right to disagree with giving land to the company.</p>	Complied
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 obtained from one of the previous land owners who was the Head of Terentang Village for the period 200 – 2010 and the 2022 period –now, known that the community represented themselves during the land acquisition process. Apart from that, there is also a village team tasked with monitoring and being a witness when the compensation process is approved</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>Based on a document review and interviews with relevant stakeholders, such as the Village Head (Dendang and Terentang) and Representatives of the Bangka Barat Regency Government, it is known that the company did not open new plantations after November 15 2018</p>	Complied

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4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on information obtained from the Head of Dendang Village and the Head of Terentang Village as well as Bangka Barat Regency Government Representatives, it is known that there are no local communities who voluntarily isolate themselves within the company's permit area.</p>	Complied
<p><b>Criteria 4.6:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>UoC has procedure of Land Compensaton No.SOP/SMATRT/SENS-CSR/SADV/I/003 dated 01 July 2014 revision 01 dated 8 November 2017. This procedure describe identifying legal, customary or user rights and for identifying people entitled to compensation.</p> <p>UoC also has SOP Penerapan Persetujuan Atas Dasar Informasi Awal Tanpa Paksaan (Free Prior Inform Consent) No.SOP/SMART/SENS-CSR/SADV/I/003" Rev.1 dated 8 November 2017. The SOP consist of process such as conveying information visit to community, meeting with government, meeting with community, identification and participatory mapping of the area/community land, identification result from meeting, coordination for decision making process, preparing agreement with community, coordination for agreement implementation preparation, monitoring of implementation.</p> <p>Based on interview with representative of Dendang and Terentang Village known the procudere has been communicated to related parties.</p>	Complied
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>UoC has procedure of Land Compensation No.SOP/SMATRT/SENS-CSR/SADV/I/003 dated 01 July 2014 revision 01 dated 8 November 2017. This procedure describe identifying legal, customary or user rights and for identifying people entitled to compensation. Based on</p>	Complied

	- Critical (Major) compliance -	interview with representative of Dendang and Terentang Village known the procedure has been communicated to related parties. The resource person also said that until now there were no negative issues regarding the land compensation process, which had been completed since 1994.	
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 -	Until now, the Unit of Certification does not yet have a smallholder scheme. This does not violate regulations because the business license owned has been obtained before 2007 when the regulation regarding smallholder scheme obligations was issued. In addition, the HGU has been extended since 2004 and 2013 so that the ATR Regulation No. 7 of 2017 cannot be applied either. Nonetheless social responsibility and community economic development efforts have been pursued as explained in more detail in indicator 4.3.1. Results of interviews with representatives of Terentang Village and Dendang Village found that the community empowerment program carried out did not discredit certain genders. Both men and women have the same opportunity to be involved in the program	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 -	Until now there has been no additional company area or new permit arrangements. The land compensation process has been completed since 1994. The results of interviews with one of the landowners who was also the Head of Terentang Village for the period 2000 – 2010 and 2022 – now it is known that the compensation process is proceeding according to the agreement without any coercion. In addition, in the past year there have been no issues regarding land disputes in the past. Some examples of the destruction of records include the following: <ul style="list-style-type: none"> <li>Land owner : Seran. compensation date 29 June 1993, Terentang Sub-Village, Kacung Village, identified area in Division IVA Block H11, 0.5 Ha, compensation value Rp.150,000 by PT. Bumi Permai</li> </ul>	Complied

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		<p>Lestari. Statement letter "Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh" dated 29 June 1993. Informing PT. Bumi Permai Lestari has compensating rubber, betel nut, durian vegetation over land 0.5 Ha with valuation Rp.150,000. It has been signed by all parties including witnesses; Head of Sub-Village, Village Head, District Head, registered number 593.83/03/KIP/93.</p> <ul style="list-style-type: none"> <li>Land owner : Usman, compensation date 29 June 1993, Terentang Sub-Village, Kacung Village, identified area in Division IVA Block H11, 0.5 Ha, compensation value Rp.125,000 by PT. Bumi Permai Lestari. Statement letter "Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh " dated 29 June 1993. Informing PT. Bumi Permai Lestari has compensating Usman' rubber, betel nut, durian vegetation over land 0.5 Ha with valuation Rp.125,000. It has been signed by all parties including witnesses; Head of Sub-Village, Village Head, District Head, registered number 593.83/03/KIP/93.</li> </ul>	
<p><b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
<p>4.7.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.          - Critical (Major) compliance -</p>	<p>UoC has procedure of Land Compensaton No.SOP/SMART/SENS-CSR/SADV/I/003 dated 01 July 2014 revision 01 dated 8 November 2017. This procedure describe identifying legal, customary or user rights and for identifying people entitled to compensation.</p> <p>UoC also has SOP Penerapan Persetujuan Atas Dasar Informasi Awal Tanpa Paksaan (Free Prior Inform Consent) No.SOP/SMART/SENS-CSR/SADV/I/003" Rev.1 dated 8 November 2017. The SOP consist of process such as conveying information visit to community, meeting with government, meeting with community, identification and participatory mapping of the area/community land, identification result</p>	<p>Complied</p>

		<p>from meeting, coordination for decision making process, preparing agreement with community, coordination for agreement implementation preparation, monitoring of implementation.</p> <p>Based on interview with representative of Dendang and Terentang Village known the procedure has been communicated to related parties</p>	
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>UoC has procedure of Land Compensation No.SOP/SMATRT/SENS-CSR/SADV/I/003 dated 01 July 2014 revision 01 dated 8 November 2017. This procedure describe identifying legal, customary or user rights and for identifying people entitled to compensation. Based on interview with representative of Dendang and Terentang Village known the procedure has been communicated to related parties. The resource person also said that until now there were no negative issues regarding the land compensation process, which had been completed since 1994.</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>Based on the interviews with representatives of Dendang and Terentang Villages, it is known that the positive impacts from the company include the following:</p> <ul style="list-style-type: none"> <li>• Labor recruitment</li> <li>• There is productive business development (forest honey, skullcap crafts, fish farming, etc.)</li> <li>• Access to benefits to meet household needs, such as empty stumps of mushrooms and fish from company area</li> </ul>	Complied

**Criteria 4.8:** The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.

<p>4.8.1</p>	<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>Based on interviews with management representatives and representatives of Terentang Village and Dendang Village as well as representatives of the Bangka Barat Regency Government Office, it is known that over the past year there has been no information or issues regarding land dispute in the PT BPL area, especially for the scope of certification, namely BPTe and BPRe.</p> <p>Within the company HGU there are still areas that are still controlled by the community. Based on the results of identification by the company, there is an area of 72.95 Ha in BPTe and an area of 190.05 Ha in BPRe which is still under community management because they did not want compensation from the start. The results of a visit to one of these areas, for example the G15 BPTe block, found that there were clear marking boundaries between community-owned plantations and company-owned plantations and there was no indication of any conflict.</p> <p>For the FPIC process, it is contained in the SOP for the Application of Free Prior Informed Consent No. SOP/SMART/SENS-CSR/SADV/I/003" Rev.1 dated 8 November 2017. The SOP consist of such process as conveying information visit to community, meeting with government, meeting with community, identification and participatory mapping of the area/community land, identification result from meeting, coordination for decision making process, preparing agreement with community, coordination for agreement implementation preparation, monitoring of implementation.</p>	<p>Complied</p>
<p>4.8.2</p>	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification</p>	<p>As described in 4.8.1 there is no land conflict that exist in scope of certification</p>	<p>Complied</p>

	addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	There is no evidence that acquisition through diposession or forced abandonment of customary and user right prior to the current operations. Land acquisition process is based on agreement related parties.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	As described in 4.8.1 there is no land conflict or land dispute that exist in scope of certification	Complied
<b>Principle 5: Support smallholder inclusion</b>			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
<b>Criteria 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	Unit of certification has no program for scheme smallholder, therefore FFB price does not refer to the Plantation Department of Bangka Barat Decree. Bukit Perak Mill also receives FFBs from outsider suppliers (non-certified) as FFBs agent located in surrounding villages and collected from independent smallholders. FFB price is determined by the FFB purchase department where the FFB price is informed to the suppliers based on the company's own calculation.  Current and previous period prices for FFB are informed through cell phone directly to the suppliers. The FFB prices period Jan-Jun 2023 as below:	Complied



		<table border="1"> <thead> <tr> <th>Month</th> <th>FFB interval price/kg (IDR)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2,170 – 2,360</td> </tr> <tr> <td>Feb</td> <td>2,220 – 2,460</td> </tr> <tr> <td>Mar</td> <td>2,320 – 2,540</td> </tr> <tr> <td>Apr</td> <td>1,950 – 2,400</td> </tr> <tr> <td>May</td> <td>1,900 – 2,050</td> </tr> <tr> <td>Jun</td> <td>1,810 – 1,930</td> </tr> </tbody> </table> <p>FFB supplier namely BUMDES Sinar Harapan and CV. Gunung Mas Lestari which supplied FFBS to Bukit Perak Mill, explained that FFB prices are informed directly through cell phone.</p>	Month	FFB interval price/kg (IDR)	Jan	2,170 – 2,360	Feb	2,220 – 2,460	Mar	2,320 – 2,540	Apr	1,950 – 2,400	May	1,900 – 2,050	Jun	1,810 – 1,930		
Month	FFB interval price/kg (IDR)																	
Jan	2,170 – 2,360																	
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Apr	1,950 – 2,400																	
May	1,900 – 2,050																	
Jun	1,810 – 1,930																	
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence is available that the unit of certification regularly explains the FFB pricing to the FFB suppliers.</p> <p>Based on interview with FFB supplier sample BUMDES Sinar Harapan and CV. Gunung Mas Lestari, informed that PT. Bumi Permai Lestari informed the FFB price on regular basis through phone chat. Sampled FFBS price sighted:</p> <ul style="list-style-type: none"> <li>- Chat on 13 Jun 2023: FFB price of Bukit Perak Mill started 14 Jun 2023 is IDR 1,870.</li> <li>- Chat on 16 Jun 2023: FFB price of Bukit Perak Mill started 17 Jun 2023 is IDR 1,900.</li> <li>- Chat on 19 Jun 2023: FFB price of Bukit Perak Mill started 20 Jun 2023 is IDR 1,930.</li> </ul>		Complied														

5.1.3	<p><b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has no program for scheme smallholder, therefore FFB price does not refer to the Plantation Department of Bangka Barat Decree but based on the company's own calculation.</p> <p>However, FFB pricing is already explained in the FFBs supplier contracts, where the FFB supplier are collecting the FFBs from independent smallholders.</p> <p>Sample contract sighted:</p> <ol style="list-style-type: none"> <li>1. Statement Letter of Commitment to supply FFBs from Mrs. Ely Susanti on behalf of BUMDES Sinar Harapan, dated 1 October 2021.</li> <li>2. Statement Letter of Commitment to supply FFBs from Mr. Marzuki on behalf of CV. Gunung Mas Lestari, dated 1 October 2021.</li> </ol> <p>On point 3 stated that FFB price determined by the company and refer to applicable commercial prices and possible to change at any time.</p> <p>This indicator is Not Applicable.</p>	Complied
5.1.4	<p><b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has no program for scheme smallholder, therefore no contracts developed for smallholders.</p> <p>This indicator is Not Applicable.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Unit of certification has no program for scheme smallholder, therefore no contracts developed for smallholders.</p> <p>However, sample of FFB suppliers' contracts sighted are consist of transparency, including agreed timeframe for payment. Based on information gathered during interview with representative of BUMDES</p>	Complied

		<p>Sinar Harapan and CV. Gunung Mas Lestari, contract are fairly implemented.</p> <p>This indicator is Not Applicable.</p>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has no program for scheme smallholder, therefore no contracts developed for smallholders.</p> <p>However, unit of certification also have other local business such as FFB suppliers who supplied FFB to Bukit Perak Mill. Sample contract of FFB suppliers sighted are BUMDES Sinar Harapan and CV. Gunung Mas Lestari. Where contract stated that payment shall be paid within 2 weeks.</p> <ul style="list-style-type: none"> <li>- BUMDES Sinar Harapan:</li> <li>- CV. Gunung Mas Lestari:</li> </ul> <p>This indicator is Not Applicable.</p>	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari – Bukit Perak POM demonstrate that weighing equipment is verified by an independent third party.</p> <p>Document sighted:</p> <p>In 2022, weighbridge equipment at Bukit Perak Mill has been calibrated as per official document issued by “Dinas Koperasi, UKM dan Perindustrian” in form of certificate of calibration results or “Surat Keterangan Hasil Pengujian” No. 6/SKHP-SMBP/DKUP.BABAR/VII/BM/2022 dated 26 July 2022.</p> <p>Specification: Brand Avery Weight Tronix.          Type/Serial Number: ZM 510/190250025          Capacity/Class: 40,000 kg/III          User: PT Bumi Permai Lestari Bukit Perak Mill.</p>	Complied

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		<p>“Surat Keterangan Hasil Pengujian” No. 5/SKHP-SMBP/DKUP.BABAR/VII/BM/2022 dated 26 July 2022.</p> <p>Specification: Brand Avery Weight Tronix.</p> <p>Type/Serial Number: E1205/171050154</p> <p>Capacity/Class: 50,000 kg/III</p> <p>User: PT Bumi Permai Lestari Bukit Perak Mill.</p>	
<p>5.1.8</p>	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari provides information related to RSPO certification to the third party FFB suppliers. PT. Bumi Permai Lestari prepared Competence identification matrix for FFB suppliers, related to OHS policy, social and environmental policy, RSPO-SCCS-ISPO-ISCC certification, legality – dated 8 January 2020.</p> <p>As follow up, PT Bumi Permai Lestari provides training to third party FFB supplier on 18 April 2020. The training performed by D&amp;L Bukit Perak Estate to Koptan Tugang Jaya, BumDes Sinar Harapan, BumDes Air Bulin, CV Dua Serangkai, BumDes Desa Tugang. 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> <p>PT. Bumi Permai Lestari prepared competence identification matrix in relation to FFB suppliers, related to OHS policy, social and environmental policy, RSPO-SCCS-ISPO-ISCC certification, legality – dated 10 January 2021.</p> <p>PT. Bumi Permai Lestari provides training to third party FFB suppliers on 19 April 2020. The training performed by Mill Manager to Koptan Tugang Jaya, BumDes Sinar Harapan. The training covers OHS policy,</p>	<p>Complied</p>

		<p>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> <p>Addition, PT. Bumi Permai Lestari has received aspiration and application from community interested in oil palm seedling credit program. Information “Permohonan Kredit Bibit Sawit PT. Bumi Permai Lestari” dated 16 August 2021 from 26 potential smallholder in Terentang village.</p> <p>PT. Bumi Permai Lestari summarized the application oil palm seedling credit program: Tumbak Petar village requires 10,523 seedling for 82.55 Ha area; Kacung village requires 4,147 seedling for 30.5 Ha area; Berang village requires 8,155 seedling for 63.55 Ha area; Kelapa village requires 2,864 seedling for 22 Ha area; Terentang village requires 3,335 seedling for 31.5 Ha area; Air Bulin village requires 300 seedling for 2.5 Ha area; Tugang village requires 5,106 seedling for 44 Ha area;</p> <p>PT. Bumi Permai Lestari prepared plan for seedling credit scheme for smallholders. For year 2022, the timeline: Coordination with Agriculture Service Kepulauan Bangka Belitung Province planned March-July 2022; Socialization program seedling credit by Agriculture Service, accommodated by Company planned July-August 2022; Fulfilment of identity document ID and “Kartu Keluarga” planned March-August 2022; Fulfilment of legal ownership of the land document planned March-August 2022; Mapping and coordinate recording planned July-October 2022; Establishment Smallholder Group, smallholder database planned July-August 2022; Application for seed producer permit planned March-April 2022; Technical recommendation from UPTD BPMB planned May-June 2022; Obtaining</p>	
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		<p>seed production permit "Surat Izin Produksi Benih Tanaman Perkebunan" planned June-July 2022; Obtaining distribution permit "Surat Izin Penyaluran Benih Kelapa Sawit" planned August-October 2022; Obtaining seed certificate planned November-December 2022; Credit application from each smallholder group to company planned August-October 2022; Proposed area mapping planned August-October 2022; Establishment of potential farmer and their land by Government planned September-October 2022; Cooperation agreement and acknowledgement by Government planned November-December 2023; Handover of oil palm seedling to smallholder and supervision planned to begin January 2023 onward.</p> <p>So far, company milestone:</p> <ul style="list-style-type: none"> <li>- Company consultation and communication with the House of Representative "Dewan Perwakilan Rakyat Daerah Kabupaten Bangka Barat" dated 21 February 2022.</li> <li>- Coordination with Agriculture Service Kepulauan Bangka Belitung Province planned March-July 2022 – done. Evidence minutes of meeting with Agriculture Service "Notulen Rapat Review dan Diskusi Perjanjian Kerjasama Program Kredit Bibit PT. Bumi Permai Lestari" dated 14 June 2022. This meeting then communicated back to House of Representative through management letter "Surat PT. Bumi Permai Lestari No.22/REG-BPL/VI/2022 Perihal Hasil Review Surat Perjanjian Kerjasama Program Kredit Bibit Sawit" dated 17 June 2022 – received by House of Representative on 24 June 2022;</li> <li>- Application for seed producer permit planned March-April 2022 – done. Evidence receipt of application "Surat Tanda Terima Berka Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Provinsi Kepulauan Bangka Belitung No.503/352/TTB-</li> </ul>	
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		<p>DPMPSTP/2022 terkait Izin Usaha Produksi Benih Perkebunan” dated 17 June 2022;</p> <ul style="list-style-type: none"> <li>- Technical recommendation from UPTD BPMB planned May-June 2022 – done. Evidence “Surat Dinas Pertanian dan Ketahanan Pangan Provinsi Kepulauan Bangka Belitung No.09/RK/PSMB-BUN/SAWIT/IV/2022 Rekomendasi Sebagai Produsen Benih Tanaman Perkebunan” dated 18 April 2022;</li> </ul> <p>Until this assessment agreement of seed credit hasn’t sighted by related parties due Derendang and Terentang Village still in the potential mapping process.</p>	
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>PT Bumi Permai Lestari refers to “SOP Penanganan Keluhan dan Ketidakpuasan No.SOP/SMART/GIMS-SCMD/USDV/I/001 rev.2” dated 1 July 2017.</p> <p>Based on interview with contractors, so far no complaint or grievance to PT Bumi Permai Lestari related to FFB sales.</p> <p>Unit of certification has no program for scheme smallholder, therefore this indicator is Not Applicable.</p>	Complied
<b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Unit of Certification has collaborated or initiated productive business development in surrounding villages for example :</p> <ul style="list-style-type: none"> <li>• Procurement of Collaborative oil palm seeds for the community</li> </ul> <p>Up to surveillance 1.1, the progress of providing oil palm seeds/seeds for the community is as follows:</p> <ul style="list-style-type: none"> <li>- Oil palm seed production standard certificate Number 81203150117960003 from OSS dated 18 April 2023 for PT BPL as a provider of development seeds</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Terentang Village has already carried out a measurement of 78.60 Ha, Kacung Village 4.86 Ha and Dendang are in the process of assessing and land availability</li> <li>- "Draft Partnership Agreement for Facilitation of Seed Credit Production Facilities" until now has not been signed by the parties</li> </ul>	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>The unit of certification develops and implements livelihood improvement programmes through Community Economic Empowerment, containing:</p> <ul style="list-style-type: none"> <li>- "<i>Program Gerakan Sekolah Menyenangkan &amp; Youth Development</i>". The actual program started on 26 September – 21 October 2022 covers 4 elementary schools surrounding the plantation, i.e.: SDN 20 Dendang, SDN 10 Dendang, SDN 26 Terentang, SDN 27 Kacung. The program was demonstrated through the set-up of interactive learning props to stimulate students with more fun, confidence, and focus. Also, hand over storytelling books for children to encourage reading activities.</li> <li>- Catfish cultivation with Bioflok system. This program for 3 months and started on 4-21 October 2023, located in sub-village Rumpis, Berang village. Farmer group name Rumpis Jaya Lestari.</li> <li>- Wild forest bees Honey program. The actual Training on Development of Wild Forest Honey Cultivation started on 30 Sep – 6 October 2022. Attended by 21 participants (1 farmer group) and located in Dendang village.</li> <li>- Homemade "Dodol", snack from glutinous rice, coconut milk, palm sugar. Produced by some housewife group located in Rangi Asam village. This program is partnership between unit of certification and local Small and Medium Enterprise (UMKM) Desa Rangi Asam. Because this production activity was established since 2017.</li> <li>- Training Program LOKAKREASI or Workshop on Craft and Culinary Business Scale Up, Jun-Nov 2022.</li> </ul>	Complied



		This program was not focused on oil palm cultivation to smallholders only, but other activities with aims capacity building to enhance productivity, quality, organisational and managerial competencies for other commodities.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	One of proof that UoC support to smallholder to promote legality FFB production is with the seed collaboration program as described in 5.2.1 and geolocation data collection and land ownership as described in 2.3.1	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Unit of certification has no program for scheme smallholder partnership.  This indicator is Not Applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Unit of certification has no program for scheme smallholder partnership.  This indicator is Not Applicable.	Complied
<p><b>Principle 6: respect workers’ rights and conditions</b>          Protect workers’ rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1:</b> Any form of discrimination is prohibited.</p>			

<p>6.1.1</p>	<p><b>(C)</b> A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.          - Critical (Major) compliance -</p>	<p>The company has a non-discrimination and equal opportunity policy in place as indicated in the GAR Social and Environmental Policy (GSEP) which set On October 1, 2022. The policy states that provides equal opportunities for all workers and embrace diversity without regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or worker union membership and ensure that workers are protected from acts of discrimination at all stages of the employment relationship.</p> <p>Interviews with worker union representatives and worker representatives during field visits, such as harvesters, upkeep teams, BPRM process officers, and security, it is known that so far this policy has been implemented properly. Everyone has the opportunity and is treated equally as workers</p>	<p>Complied</p>
<p>6.1.2</p>	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.          - Critical (Major) compliance -</p>	<p>Interviews with representatives of the Bangka Barat Regency Manpower Office, Worker Union Representatives, and Mill or Estate workers during the field visit there was no indication of discrimination in the work area of PT Bumi Permai Lestari. In addition, based on the list of employees updated in June 2023, it is known that workers come from various ethnicities, religions and races, including workers from surrounding villages and from outside the Bangka Barat region.</p>	<p>Complied</p>
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.          - Minor compliance -</p>	<p>Based on the document review, it is known that the recruitment and promotion process is based on assessing the qualifications and capabilities of workers. There is some documentation of job acceptance as follows:</p> <ul style="list-style-type: none"> <li>• <b>Recruitment :</b></li> </ul> <p>Documentation for temporary worker (Adot and Ahmadi) covers application letter, ID Card, approval, result of medical check-up and work agreement letter for both worker (SPK No 017/BPL-</p>	<p>Complied</p>

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		<p>BPRE/PKWT/I/2023 and SPK No 30/BPL-BPRE/PKWT/I/2023 dated January 1, 2023 valid until December 31, 2023)</p> <ul style="list-style-type: none"> <li>• <b>Promotion :</b></li> </ul> <p>Email from Regional controller to BPRE Estate Manager on December 2022 related approval promotion for Harvesting Clerk and Harvesting Foreman to permanent worker. On July 5, 2023 Estate Manager receive another email from Human Resources Division to ensure this promotion</p> <p>Results of interviews with trade unions revealed that so far the recruitment and selection process had been carried out in a transparent manner and the information could be accessed by every worker.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>The pregnancy test conducted by the unit of certification is not a form of discrimination but is part of the company protection of pregnant and lactating female employees from working with chemicals such as fertilizers and pesticides. The results of interviews with representatives of the gender committee and representatives of trade unions as well as representatives of female workers (pesticide applicators) show that routine pregnancy tests are carried out to ensure that no pregnant or breastfeeding mom work with chemicals. If there are pesticide or fertilizer applicators who are pregnant or breastfeeding, they will be transferred to other jobs with low risk.</p>	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit already has a gender committee for each unit such as BPRE, BPTe and BPRM. The results of interviews and review of documents regarding the activities of the Gender Committee found that the focus of activities among others was the prevention of sexual harassment and violence including domestic violence. Apart from that,</p>	Complied

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		<p>the activities are also in the form of increasing understanding of women's health and reproductive rights.</p> <p>The results of interviews with representatives of women workers revealed that so far there were no issues regarding harassment or sexual violence and domestic violence. Employees also know how the reporting process flows if there are such cases.</p>					
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope.          - Minor compliance -</p>	<p>Based on employee payroll and results of interviews with workers' representatives, it is known that the unit of certification has implemented equal pay for the same scope of work. This can be seen from the sample salary slip for the May 2023 period as follows :</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;"> <p>NIK 21154 (Harvester)</p> <p>Basic Salary : 3.498.479</p> <p>Unpaid day : 3</p> <p>Nett : 3.157.674</p> </td> <td style="width: 50%;"> <p>Wages paid : 3.078.662</p> <p>Harvesting premi : 82.367</p> <p>Pruning premi : 111.600</p> <p>Insurance allowance : 228.801</p> <p>Insurance deduction : 333.756</p> <p>Worker union deduction : 10.000</p> </td> </tr> <tr> <td> <p>NIK 22030 (Harvester)</p> <p>Basic salary : 3.498.479</p> <p>Unpaid day : 1</p> <p>Nett : 3.449.709</p> </td> <td> <p>Wages paid : 3.358.540</p> <p>Harvesting premi : 143.004</p> <p>Pruning Premi : 98.100</p> <p>Social insurance allowance : 228.801</p> <p>Health insurance allowance : 139.939</p> <p>Social insurance deduction : 333.756</p> </td> </tr> </table>	<p>NIK 21154 (Harvester)</p> <p>Basic Salary : 3.498.479</p> <p>Unpaid day : 3</p> <p>Nett : 3.157.674</p>	<p>Wages paid : 3.078.662</p> <p>Harvesting premi : 82.367</p> <p>Pruning premi : 111.600</p> <p>Insurance allowance : 228.801</p> <p>Insurance deduction : 333.756</p> <p>Worker union deduction : 10.000</p>	<p>NIK 22030 (Harvester)</p> <p>Basic salary : 3.498.479</p> <p>Unpaid day : 1</p> <p>Nett : 3.449.709</p>	<p>Wages paid : 3.358.540</p> <p>Harvesting premi : 143.004</p> <p>Pruning Premi : 98.100</p> <p>Social insurance allowance : 228.801</p> <p>Health insurance allowance : 139.939</p> <p>Social insurance deduction : 333.756</p>	<p>Complied</p>
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		Health insurance deduction : 174.924 Worker union deduction : 10.000	
<b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p><b>(C)</b> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>The remuneration basis used by the unit of certification includes the following :</p> <ul style="list-style-type: none"> <li>• Decree of Kepulauan Bangka Belitung Governor No 188.44/653/DISNAKER/2022 dated 25 November 2022 which inform the minimum wages of Kepulauan Bangka Belitung Province for the year 2023 are IDR 3,498.479</li> <li>• Decree No.232/CEOPSM2/HRPSM2/12/2022 dated 3 December 2022 stated that daily wage for the daily worker are IDR 139.940/Day</li> <li>• Decree No.231/CEOPSM2/HRPSM2/12/2022 dated January 1, 2023 concerning the structure and wage scale of Permanent Workers of PT Bumi Permai Lestari Region Babel in 2023 Lowest: PT4 (T) 3,498,979 Highest: PT1 (A) 3,919. 979</li> </ul> <p>Interviews with workers representatives and results of the document review, it is known that the implementation of the minimum wage has been implemented by the company. Similar information was also obtained from representatives of worker unions who stated that so far there had never been any problems regarding the application of the minimum wage. Remuneration documentation, for example, is indicated by NIK 21154 and NIK 22030 with details as in indicator 6.1.6</p>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for</p>	<p>The unit of certification has a Collective Labour Agreement (period 2021 – 2023) which, among other things, contains rules regarding wages, overtime, leave, working hours, and termination of</p>	Complied

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	<p>dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>employment. The CLA has been approved by both parties and is known by the local Manpower Office so that it refers to national legal regulations.</p> <p>In addition, regulations regarding employment, especially for contract workers (PKWT) are listed in the SPK of each worker as can be seen in SPK No 017/BPL-BPRE/PKWT/I/2023 dated 01 January 2023 valid until 31 December 2023 for NIK employees 21154 and SPK No 30/BPL-BPRE/PKWT/I/2023 dated 01 January 2023 for NIK 22030 employees valid until 31 December 2023.</p> <p>Based on the results of interviews with workers' representatives during the field visit, it was found that they were aware of the existence of a CLA and a work contract that explained the rights and duties of employees.</p>	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has been able to prove legal compliance with labor regulations, for example as shown by some of the following documentation:</p> <ul style="list-style-type: none"> <li>• Working Hour 7 hours per day for 6 working days</li> <li>• Minimum wage Has implemented payment of wages in accordance with government stipulations as explained in more detail in 6.2.1</li> <li>• Overtime NIK : 07003 (Steam Power). Overtime pay (May 2023) : IDR 1,039,168. It can be shown the calculation of the employee's daily overtime with a total of 27.67 overtime hours and 50.95 hours paid hours (26 – 29 April 2023; 05, 08, 09, 11, 12, 13 May 2023). The calculation of overtime is in accordance with applicable labor</li> </ul>	Complied

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		<p>regulations. With the amount of hourly wages overtime is IDR 20,395.83</p> <ul style="list-style-type: none"> <li>• Work termination</li> </ul> <p>Due the end of temporary work agreement :</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Name</th> <th style="text-align: left;">Agreement Number</th> <th style="text-align: left;">Validation date</th> </tr> </thead> <tbody> <tr> <td>Ropinda</td> <td>067/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Hendro P</td> <td>065/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Mariyo no</td> <td>069/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Renaldy</td> <td>070/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Juhendri</td> <td>071/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Hendrizaral</td> <td>072/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Supi</td> <td>073/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> <tr> <td>Alfikri</td> <td>075/BPRM/PKWT/A-2/12/2022</td> <td>01 December 2022 – 28 February 2023</td> </tr> </tbody> </table> <p>Has been shown fulfillment of obligations by the company due to the termination of the employment relationship through Joint agreement for payment of compensation for employee layoffs dated March 1, 2023. Based on interview of worker union representative compensation has been conduct for the worker.</p> <ul style="list-style-type: none"> <li>• Maternity leave</li> </ul>	Name	Agreement Number	Validation date	Ropinda	067/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Hendro P	065/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Mariyo no	069/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Renaldy	070/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Juhendri	071/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Hendrizaral	072/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Supi	073/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	Alfikri	075/BPRM/PKWT/A-2/12/2022	01 December 2022 – 28 February 2023	
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		Interviews with female workers representative, it is known that they get H-1 (Menstrual leave) and H-2 (Maternal Leave) leave. H-1 leave is obtained on the first day of the menstrual period while H-2 leave is given a total of 90 days with a period of 45 days before giving birth and 45 days after giving birth	
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field observation known that facility provided by the company for the worker i.e :</p> <ul style="list-style-type: none"> <li>• Housing area</li> <li>• Worship</li> <li>• Clinic</li> <li>• School bus</li> <li>• Clean water</li> <li>• Daycare</li> <li>• Landfill</li> <li>• Electricity</li> <li>• Sports area (Football, Volley, Badminton)</li> <li>• Emergency response facility</li> <li>• Ambulance</li> <li>• Etc</li> </ul> <p>From field observation also known that the facilities in good condition. Interview with worker representative known So far there have been no complaints about the facilities provided by the company</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>	Results of field visits to employee residential areas and interview, it is known that access to basic needs such as food and clean water sources can be reached easily. Clean water is provided by the company through drilled wells, while access to food is made easier by traders	Complied



		who regularly enter the housing area. In addition, there are market days during the employee payday period where one of the items sold is staples such as rice, cooking oil, and side dishes.																
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours. - Minor compliance -	Unit of certification has calculated the prevailing wage and in-kind benefits based on RSPO guideline. Prevailing wage is taken from basic wages and for in-kind of benefit taken from other benefit provide by the company for example electricity, housing, daycare, bus school, school, health facilities, etc. Until now there is no benchmark for DLW in Indonesia. Interviews with worker representatives it is known that there are other benefits provided by the company besides wages	Complied															
<p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> <li>1. Payment of minimum wages in accordance with applicable regulations</li> <li>2. Assessment of wages paid (prevailing wages) and in-kind benefits.</li> </ol> <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>																		
6.2.7	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. - Minor compliance -	<p>Based on the results of a document review and interviews with management representatives of Bukit Perak Estate, it is known that there are PKWT workers for harvesting. The use of PKWT workers is because for now the company is in the replanting period so that the need for harvesting workers is dynamic following the development of the productive plantation area. It has been shown that the Man Power Analysis of the harvest workforce for the 2023 period is as follows :</p> <table border="1"> <thead> <tr> <th rowspan="2">Mature Area (Ha)</th> <th rowspan="2">Norm (HK/Ha)</th> <th rowspan="2">Man Power (Need)</th> <th colspan="3">Actual</th> </tr> <tr> <th>PKWT</th> <th>PT</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Mature Area (Ha)	Norm (HK/Ha)	Man Power (Need)	Actual			PKWT	PT	Total							Complied
Mature Area (Ha)	Norm (HK/Ha)	Man Power (Need)				Actual												
			PKWT	PT	Total													

		2,510.77	0.048	120	41	113	154	
<p><b>Criteria 6.3:</b> The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		<p>*PT : Permanent            *PKWT : contract</p> <p>The company also shows a target of changing the BPRE crop phase from immature to mature in 2025 so that during the mature phase all harvester will have PT status (permanent workers).</p>						
6.3.1	<p><b>(C)</b> A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established policy regarding freedom of association and right to collective bargaining in national languages as per "Kebijakan Hubungan Industrial – Kebebasan Berserikat", nomor: KHI-SMART/018-00.</p> <p>Unit of certification has demonstrated document of Collective Labour Agreement (No: KEP.4/HI.00.01/19.1905.210621001/B/X/2021, dated 29 October 2021, in article 39 related to retirement and article 40 related to termination (pemutusan hubungan kerja), Article 3 "the recognition on the rights of the company and the union labour" and in Article 4 "leeway for trade union labour officials". This policy is written in Indonesian and published on the sign board of each unit (estates and mill), so that all employees can understand.</p> <p>This policy is publicly available, and stakeholder can access it upon request.</p> <p>Dissemination of company policies to all related workers have been implemented regularly, as example on 23 May 2022 – located in Bukit Perak Estate that was attended by 48 workers from Division 1, 47 workers from Division 2 and 43 workers from Division 3 and 6.</p>						Complied

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		The unit of certification already has a worker union namely PUK SPPP – Serikat Pekerja Seluruh Indonesia PT BPL and has been registered with the Manpower and Transmigration Office of Bangka Barat Regency with registration number No. 045.2/07/III.10/2009 dated 9 January 2019.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request. - Minor compliance -	The unit of certification with trade unions have frequently meeting to discuss manpower issues. The latest meeting conducted on 12 May 2023. Some issues discussed was: - Reminding for disallowance of domestic waste disposal bu burning. - Socialized to the workers for develop organic mini dump site sized 1 x 1 x 0.5 meter in housing backyard.	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. - Minor compliance -	Based on data verification and interviews with several employees and Chairman of <i>PUK SPPP – Serikat Pekerja Seluruh Indonesia</i> PT BPL during Recertification assessment – June 2022, unit of certification has facilitated space/rooms for workers union to carry out their activities and conduct monthly meetings. Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	Complied
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	The certification unit has a GAR Social and Environment Policy which is at point 3 part Work Environmental and Industrial Relations states that companies prohibit the employment of children and take action to prevent the use of child labor in our activities. In addition the company also Circular Letter from the Human Resources Director No.002/SE-HRDV/03/09 dated March 31, 2009 concerning minimum age of worker are 18 years old refer to Law No 13 of 2003.	Complied

		For FFB contractors and suppliers there is a separate statement regarding the prohibition of using child labor and it is signed with the Cooperation contract	
6.4.2	<p><b>(C)</b> Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	Based on review of PT BPL employee documents updated in June 2023, it is known that there were no employees who were less than 18 years old when they started work and are currently working. This is in accordance with information submitted by the foreman level and representatives of trade unions as well as representatives of contractors and FFB suppliers which states that the minimum age limit for workers is 18 years. Warning or sign prohibiting child labor also available in main office, divisional offices and residential areas	Complied
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	As explained in 6.4.2 there are no workers who are under 18 years of age as the minimum age set by the company comply with regulation in force.	Complied
6.4.4	<p>The unit of certification demonstrates communication about its ‘no child labour’ policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Based on interviews with worker representatives, contractor representatives (CV Berlian Utama) and FFB supplier representatives (CV Gunung Mas Lestari and Bumdes Sinar Harapan) it is known that socialization regarding the prohibition of child labor has been communicated regularly. Records of documentation that can be shown include the 15 February 2023 socialization of the GSEP (GAR Social and Environment Policy) for employees, contractors and FFB suppliers.</p> <p>GSEP is a group policy with a commitment to</p> <ol style="list-style-type: none"> <li>Management of the environment</li> <li>Social and community engagement</li> <li>Work environment and industrial relations</li> <li>Trade and Supply Chain</li> </ol>	Complied
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

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<p>6.5.1</p>	<p><b>(C)</b> A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>The unit of certification has a GSEP (GAR Social and Environment Policy) policy dated 01 October 2022 which was approved by the Head of Upstream, CEO Down Stream &amp; Commercial, Executive Director &amp; CFO, and Managing Director of Sustainability&amp; SSE. The policy stated that the company does not tolerate acts of sexual harassment and any other forms of harassment and violence.</p> <p>Socialization of this policy is routinely carried out to workers, for example during morning briefing and safety briefings when contractors are going to do work. In addition, in the residential area, a warning was posted about protection against violence or sexual harassment. The results of interviews with workers' representatives and the gender committee as well as trade union representatives revealed that so far there had never been a case of violence or sexual harassment in the workplace. The resource person also knows the flow of the complaint process and the party to be contacted if they find or experience this case.</p>	<p>Complied</p>
<p>6.5.2</p>	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Policies on the reproductive rights of workers, especially women, are included in the Policy on Industrial Relations – Female Workers (KHI-SMART/005-00) at point 2.5 which states that menstrual leave is given to female workers for 2 days-off without any salary deduction. Apart from that, the PKB for the period 2021 – 2023 is also stated to be related to menstrual (H-1) Leave and Maternal (H-2) Leave. Maternity leave is given 90 days (45 days before and 45 after giving birth)</p> <p>The results of interviews with BPRM weighbridge operators who gave birth in April 2023 found that the company had implemented a policy regarding D-1 leave and D-2 leave. During the leave period, the employee's wages are still paid in full without any deductions</p>	<p>Complied</p>

<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>The unit of certification can show a new mother needs analysis including:</p> <ul style="list-style-type: none"> <li>• Pregnancy test for workers with late menstruation</li> <li>• Check-up by the company doctor</li> <li>• POSYANDU activity</li> <li>• Provide nutrition guide for pregnant women</li> <li>• Periodic consultation related to pregnancy</li> <li>• Nutrition guide and provision of pregnancy books for mothers</li> <li>• Giving permission for mothers to breastfeed their children</li> </ul> <p>In identifying needs, the certification unit has involved various parties such as gender committees, representatives of women workers, and representatives of worker unions. The results of interviews with company doctors and employee representatives found that the company had provided good services and information for new mothers, including regular assistance and consultations.</p>	<p>Complied</p>
<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The unit of certification has a Complaint and Grievance procedure No.SOP/SMART/SUST/IV/003 dated 08 March 2022. The procedure guarantees the anonymity of the reporter and whistle-blower. In addition, there is also the Sinarmas Agribusiness and Food Human Rights Policy which was ratified on December 12, 2019 by the Head of Policy and Compliance Division which stated in point 9 Respect and Protect the rights of whistleblowers and Human Rights Defender.</p> <p>Interview with worker representative known that until now there have been no complaints or disputes with the company. If there is a dispute, it will usually be resolved by deliberation assisted by the union.</p>	<p>Complied</p>

<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker’s consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Based on the interviews with workers' representatives, worker union representatives, village community representatives, and the Bangka Barat Regency Manpower Office, it is known that there is no issue of forced labor at the company. The results of the document review also show that every worker has a work bond with a company that has clearly regulated their rights and obligations. Implementation of work and overtime work is in accordance with the agreement. There were no issues regarding the withholding of identity documents, withheld wages, payments during the recruitment process and other employment issues.</p>	Complied
6.6.2	<p><b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>At the time this assessment was carried out there was contract work for harvesting and upkeep worker. Specific labor regulations are listed in the SPK of each worker which has been signed and also known by the Bangka Barat Regency Manpower Office. In addition, there is also a GSEP policy that guarantees workers' rights regardless of contractual or permanent status</p>	Complied
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1_1 PT Bumi Permai Lestari has appointed responsible person for Health and Safety as per P2K3 (Safety Committee). P2K3 has been validated by Manpower Office of Kepulauan Bangka Belitung Province.</p> <p>Sample seen during ASA 1_1, such as:</p>	Complied

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		<ul style="list-style-type: none"> <li>• Bukit Perak Mill – there was no changed for OHS Committee. OHS Committee (P2K3) approved based on decree letter from Head of Kepulauan Bangka Belitung Province’s Manpower Office No.188.4/021/P2K3/DISNAKER/2022 regarding “<i>Pengesahan Perubahan Tim Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Team Tanggap Darurat</i>”- Approval of Changes to the Occupational Safety and Health Committee Team (P2K3) and the Emergency Response Team of PT Bumi Permai Lestari – Bukit Perak Mill” issued 4 July 2022.</li> <li>• Bukit Perak Estate - there was no changed for OHS Committee. OHS Committee (P2K3) approval based on decree letter from Head of Kepulauan Bangka Belitung Province’s Manpower Office No.188.4/016/P2K3/DISNAKER/2020 regarding “<i>Pengesahan Perubahan Tim Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Team Tanggap Darurat</i>”- Approval of Changes to the Occupational Safety and Health Committee Team (P2K3) and the Emergency Response Team of PT Bumi Permai Lestari – Bukit Perak Estate” issued May 2020. OHS Committee is led by Suharto (Estate Manager) and Habib Twindy Lubis as the secretary concurrently as OHS expert.</li> <li>• Bukit Permata Estate - there was no changed for OHS Committee. OHS Committee (P2K3) approval based on decree letter from Head of Kepulauan Bangka Belitung Province’s Manpower Office No.188.4/018/P2K3/DISNAKER/2020 regarding “<i>Pengesahan Perubahan Tim Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) dan Team Tanggap Darurat</i>”- Approval of Changes to the Occupational Safety and Health Committee Team (P2K3) and the Emergency Response Team of PT Bumi Permai Lestari – Bukit Permata Estate” issued May 2020. OHS Committee is led by A. P Ginting (Estate Manager) and Adi Irawan as the secretary concurrently as OHS expert.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• OHS Committee is led by Pirma Hutagaol (Mill Manager) and Hanif Gigih Tri Utama as the secretary concurrently as OHS expert. Licensed number Reg. 019789/PK3/AJ/31/2022/PO dated 17 February 2022 – valid until 3 years</li> <li>• OHS Expert Certificate on behalf Habib Twindy Lubis is available No.Ser.17.4262/AK3/U/VI/2017 dated 5 June 2017; Decree Letter of OHS Expert from Ministry of Manpower - "<i>Keputusan Menteri Ketenagakerjaan RI</i>" No.5/3615/AS.02.04/III/2020 regarding "<i>Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum</i>" - Appointment of General OHS Expert dated 30 March 2020 valid until 3 years. Licence No. Reg. 40304/PK3/AJ/31/2020/P1 dated 30 March 2020 valid until 30 March 2023.</li> <li>• OHS Expert Certificate on behalf Adi Irawan is available No.Ser.17.4262/AK3/U/VI/2017 dated 5 June 2017; Decree Letter of OHS Expert from Ministry of Manpower - "<i>Keputusan Menteri Ketenagakerjaan RI</i>" No.5/17758/AS.02.04/XII/2021 regarding "<i>Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum</i>" - Appointment of General OHS Expert dated 31 December 2021 valid until 3 years. License No. Reg. 23074/PK3/AJ/31/2021/P2 dated 31 December 2021 valid until 31 December 2024.</li> </ul> <p>The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident.</p> <p>Sample seen: Record of OHS meeting dated 7<sup>th</sup> April 2023, location in Bukit Perak Estate. The meeting was attended by OHS committee. Agenda: discussed regarding OHS plan achievement and corrective</p>	
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		<p>actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</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>During ASA 1_1, PT Bumi Permai Lestari has shown the procedure for emergency response preparedness under "SOP Kesiapsiagaan Tanggap Darurat" (SOP/SMART/UMUMSADV/I/2005) dated 30 May 2014, and procedure on occupational accidents and disease under "SOP Penanganan Kecelakaan dan Penyakit Akibat Kerja" No.SOP/SMART/HESS-EHSD/SADV/I/2005" dated 1 July 2014.</p> <p>The procedure described that:</p> <ul style="list-style-type: none"> <li>• The roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health centre.</li> <li>• Emergency contact number of each internal emergency team and external related parties were evident.</li> <li>• Evacuation route and muster point are available and made known to the employee.</li> </ul> <p>Accident and investigation reports described accident chronology, cause and impacts of the accident, analysing root causes of the accident and determine correction and corrective action. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> <p>PT Bumi Permai Lestari has shown, and appointed person has certificate and license of first aider, example: Mr M Bangrono, Certificate No. Ser 560/36-P3K/DISNAKER/2020 dated 15<sup>th</sup> June 2020.</p>	<p>Complied</p>

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		<p>The training record related to emergency response, such as:</p> <ul style="list-style-type: none"> <li>• Report on training of emergency response and preparedness (fire drill), dated 17<sup>th</sup> February 2023. Location in "Lapangan BINE". The training was attended by OHS Committee 71 personnel. Data verified: scenario, attendance list, evaluation, and photograph.</li> <li>• Record of training for first aider dated 11<sup>th</sup> February 2023, location in Longhouse Bukit Perak Estate. Data verified: Training material, attendance list and photograph</li> </ul> <p>During ASA 1_1, the audit team has field observation to harvesting, spraying and upkeep activities in estates and to FFB processing activities at mill as well, first aid equipment are available and sufficient. At field, first aid kit brought by the Mandor (supervisor), whilst at mill, first aid kit located at office and processing station.</p>	
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has demonstrated that workers use appropriate Personal Protective Equipment (PPE) which is provided free of charge to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities called "<i>Rumah Bilas</i>" for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>• Report of OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit, dated 1<sup>st</sup> July 2023. Location in Bukit Perak Estate. The inspection was carried by OHS Expert (Mr Saddam Alamsyah). The document reported OK – good controlled.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>Record of PPE provision for workers as per "Formulir Berita Acara Serah Terima APD", dated 10 April 2023 for 41 workers in Division II Bukit Permata Estate, PPE: AP Boot)</li> <li>Letter for testing the mill machinery – No: 031-SPP/B/VI/2023, regarding "Pemberitahuan Riksa Uji K3"" dated 26<sup>th</sup> June 2023. Sample seen: Excavator PC-200-08 (location in Bukit Perak Estate), Air Compressor – sterilizer station and Diesel Genset No 3 125 Kva (location in Bukit Perak Mill).</li> <li>PPE monitoring – "Inspeksi Kedisiplinan Pemakaian APD" dated 17 March 2023 located at Division 6 Bukit Permata; reported OK (all workers using PPE as required at risk assessment)</li> </ul>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has shown that all workers in mill and estates have been covered by Medical and Social Insurance (BPJS), as required by applicable regulation.</p> <p>Records of insurance payment available in:</p> <ul style="list-style-type: none"> <li>BPJS registration number updated in July 2023</li> <li>Monthly BPJS insurance premium payment</li> </ul> <p>The records of monthly payment for national incident insurance (BPJS) with percentage 0.54 % from the wages are evident. The reports of monthly payment were evident or period year 2022 - 2023.</p> <p>Payment record of Medical and Accident Insurance (<i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>):</p> <ul style="list-style-type: none"> <li>Bumi Permai Mill: Billing statement; amount due to payment IDR **,445,525. Number of employees is 110 workers, number of dependent 231. Status PAID on 7<sup>th</sup> June 2023. (<i>BPJS Kesehatan</i>)</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Billing statement; amount due to payment IDR **,463,233. Status: PAID – dated 7<sup>th</sup> June 2023 (<i>BPJS Ketenagakerjaan</i>).</li> </ul> <p>PT Bumi Permai Lestari has also prepared Medical Check Up program as presented in "<i>Formulir Program Pemeriksaan Kesehatan</i>" (F/SMART/ HESS-EHSD/SADV/012/001). Sample seen:</p> <ul style="list-style-type: none"> <li>General Medical Check-Up (annually) conducted by Company Doctor to all workers. Sample seen:             <ul style="list-style-type: none"> <li>Dated 7 February 2023, that was attended by 140 workers including staff in Bukit Permai Mill.</li> <li>Dated 8<sup>th</sup> February 2023, location in Division I Bukit Perak Estate that was attended by 22 staff in Regional Office and 147 workers form Division I and II.</li> </ul> </li> <li>Special Medical Check-Up (annually) conducted by Company Doctor to workers in high risk assessment:             <ul style="list-style-type: none"> <li>Dated 26<sup>th</sup> June 2023 – audiometry test, that was attended by 13 workers from high-risk station in Bukit Perak Mill (steriliser, pressing, boiler, engine room)</li> <li>Dated 7<sup>th</sup> March 2023 – spirometry test, that was attended by 14 workers (pesticides applicator) from Bukit Perak Estate</li> <li>Dated 27<sup>th</sup> February 2023 – cholinesterase test that was attended by 14 workers (pesticides applicator) from Bukit Perak Estate</li> </ul> </li> </ul>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	PT Bumi Permai Lestari has shown the accident report available as per "Laporan Kecelakaan Kerja Tahun 2022-2023".  The Lost Time accidents and injuries were determined according to Decree of the Minister of Manpower and Transmigration No. 609 year	Complied

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		<p>2012. In 2022 up to June 2022, there was no accident occurred. This accident report has been reported to Manpower Agency through OHS Committee report.</p> <p>Data seen: Form Rekapitulasi Kecelakaan Kerja reported Value of SR/SR is 0 (zero).</p>	
<p><b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b></p>			
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestari has committed to implement Integrated Pest Management (IPM) activities in which presented in several procedures, as follows:</p> <ul style="list-style-type: none"> <li>• No. SOP/SMART/MCAR/VIII/TS-PGM dated 12 June 2012 about weeds control which covers weeds control in the nursery, immature and immature areas, equipment used for weeds control, safety procedures of control, guideline of agrochemicals uses (include paraquat) and monitoring.</li> <li>• No. SOP/SMART/MCAR/VII/TA-HPT dated 12 June 2012 about Pests and Diseases (P&amp;D) Control Management which covers early warning system, census, P&amp;D attack threshold limits, evaluation and decision of pest and disease control, recommendation from SMARTRI (Research Department), P&amp;D handling, recommendation of P&amp;D control and evaluation.</li> </ul> <p>The details of P&amp;D control have presented in several work instruction (WI), for example as follows:</p> <ul style="list-style-type: none"> <li>• WI No. IK/SMART/MCAR/VII/TA-HPT/01 about leaf eating caterpillar detection.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• WI No. IK/SMART/MCAR/VII/TA-HPT/02 about leaf eating caterpillar census.</li> <li>• WI No. IK No. IK/SMART/MCAR/VII/TA-HPT/03 about leaf eating caterpillar control.</li> <li>• WI No. IK/SMART/MCAR/VII/TA-HPT/04 about census and management of Oryctes rhinoceros.</li> <li>• WI No. IK/SMART/MCAR/VII/TA-HPT/05 about census and management of termites.</li> <li>• WI No. IK/SMART/MCAR/VII/TA-HPT/07 about census and management of rats.</li> </ul> <p>Based on document verification, estates have had IPM program for year 2023 as per “Program Pengendalian Hama Penyakit Tanaman 2023” – updated 6<sup>th</sup> June 2023, as follows:</p> <ul style="list-style-type: none"> <li>• Pest and disease census: programmed monthly.</li> <li>• Planting and upkeep beneficial plant: programmed monthly.</li> <li>• Animal infestation census: programmed every two months.</li> <li>• Barn owl box census: programmed monthly.</li> </ul> <p>PT Bumi Permai Lestari has also shown the report of monitoring and control under document pest and disease census, planting and upkeep beneficial plant, census of animal attack and Tyto alba reproduction monitoring.</p> <p>Sample record verification:</p> <ul style="list-style-type: none"> <li>• Record of “Rekapitulasi Deteksi UPDKS” (leaf eater caterpillar census) period January – May 2023. The result for Rat Attack is</li> </ul>	
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		<p>2.38 % (maximum tolerant attack is 5%), there is no caterpillar attack in January to May 2023</p> <ul style="list-style-type: none"> <li>Monitoring of Barn-owl <i>Tyto alba</i> performed monthly, monitoring records are available for period January to May 2023 Based on last monitoring record May 2023, <ul style="list-style-type: none"> <li>Bukit Perak Estate: there are 495 barn-owl boxes, containing 495 active barn-owl boxes, there are 344 adult barn-owl, 170 child and 21 eggs</li> </ul> </li> </ul> <p>Bukit Permata Estate: there are 244 barn-owl boxes, containing 223 active barn-owl boxes, there are 222 adult barn-owl, 124 child and 45 eggs</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has a list of Global Invasive Species and evaluate the status of existence in Bukit Perak and Bukti Permata Estate updated in May 2023.</p> <p>There was species are naturally existed in the area and the spreading are controlled manually and herbicides spraying, e.g., Monitoring: <i>Casia tora</i>, <i>Urea lobasta</i>; Wipping: <i>Imperata cylindrica</i>; Upkeep: <i>Turnera ulmifolia</i>; Unroot or chemical: <i>Clidemia hirta</i>, <i>Mimosa invisa</i>; Circle racking: <i>Micania micrantha</i>, <i>Asystasia intrusa</i>, <i>Dicranopteris leniariis</i>.</p> <p>Based on document review, there are no species in the 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 during ASA 1_1 (dated 5 &amp; 6 July 2023), there is no use of fire for pest control in whole area of Bukit Perak Estate and Bukit Permata Estate.</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><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1_1, PT Bumi Permai Lestaeri has shown the record of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <p>Data verified as per "Daftar Pestisida Yang Digunakan Merujuk Pada Buku Kompas – Tahun 2023":</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Rolifos 150 SL</td> <td>Glufosinate Ammonium 150 SL</td> <td>II</td> <td>Grasses weed</td> <td>RI.01030120103683</td> <td>31/01/2025</td> </tr> <tr> <td>Erkafuron 20 WG</td> <td>Metil metsulfuron 20%</td> <td>U</td> <td>Ferns, Broad Leaf, Sedges</td> <td>RI.01030120134861</td> <td>31/01/2025</td> </tr> <tr> <td>Garlon 670 EC</td> <td>Triklopir</td> <td>II</td> <td>Wood, bamboo, broad leaf</td> <td>RI.10103012055148</td> <td>31/12/2025</td> </tr> <tr> <td>Garlon Mix 333/17 EW</td> <td>Triklopir butoksi etil ester 333 g/l; Aminopro</td> <td>II</td> <td><i>Tetracera indica, Melastoma malabatri</i></td> <td>RI.0103012015148</td> <td>31/01/2025</td> </tr> </tbody> </table>				Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Rolifos 150 SL	Glufosinate Ammonium 150 SL	II	Grasses weed	RI.01030120103683	31/01/2025	Erkafuron 20 WG	Metil metsulfuron 20%	U	Ferns, Broad Leaf, Sedges	RI.01030120134861	31/01/2025	Garlon 670 EC	Triklopir	II	Wood, bamboo, broad leaf	RI.10103012055148	31/12/2025	Garlon Mix 333/17 EW	Triklopir butoksi etil ester 333 g/l; Aminopro	II	<i>Tetracera indica, Melastoma malabatri</i>	RI.0103012015148	31/01/2025	Complied
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			palid potassium 17 g/l		<i>cum, Clidemia hirta, Lantana camara</i>			
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	During ASA 1_1, PT Bumi Permai Lestar has shown records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications per Ha and per ton FFB) as per "Rekapitulasi Penggunaan Pestisida year 2023"						Complied
		Pesticide use in PT Bumi Permai Lestari in 2023:						
		Trademark		UoM	Volume			
					BPRE	BPTE		
		Roll Up 480 SL		Litter	5,548.88	470.56		
		Starane 480 EC		Litter	360.27	-		

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		<table border="1" data-bbox="1135 362 1912 560"> <tr> <td>Rolifos 150 SL</td> <td>Litter</td> <td>-</td> <td>-</td> </tr> <tr> <td>Erkafuron 20 WG</td> <td>Kg</td> <td>1,195.05</td> <td>24.91</td> </tr> <tr> <td>Garlon Mix 333/17</td> <td>Litter</td> <td>147.58</td> <td>385.88</td> </tr> <tr> <td>Decis 25 EC (deltamethrin)</td> <td>Litter</td> <td>-</td> <td>-</td> </tr> </table> <p data-bbox="1135 614 1957 738">Records of active ingredient, LD50 and area treated are available for both estates as per "Rekap Penggunaan Pestisida". Verified sample records of active ingredient, LD50, area treated in May 2023, as follows:</p> <ul data-bbox="1135 751 1957 1013" style="list-style-type: none"> <li>• Bukit Perak Estate: Pesticide: Roll Up 480 SL; Active ingredient: Isopropilamina glifosat; LD50: 5000; application volume: 1,055.50 L; active ingredient amount: 432.78 kg; area treated: 4,222.00 Ha.</li> <li>• Bukit Permata Estate: Pesticide: Garlon Mix, active ingredient: triklopir butoksi etil ester: 333 g/l. LD50: 2574; application volume: 137.53 L; active ingredient amount: 7.60 kg; area treated: 137 Ha</li> </ul>	Rolifos 150 SL	Litter	-	-	Erkafuron 20 WG	Kg	1,195.05	24.91	Garlon Mix 333/17	Litter	147.58	385.88	Decis 25 EC (deltamethrin)	Litter	-	-	
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7.2.3	<p data-bbox="239 1034 1113 1098"><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p data-bbox="239 1106 600 1137">- Critical (Major) compliance -</p>	<p data-bbox="1135 1034 1957 1257">PT Bumi Permai Lestari is diligent in monitoring the of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide is only used to reduce/eliminate existing pest, which has exceeded the economic threshold. This information shows that the company is actively working to reduce its use of pesticides, which is in line with its Integrated Pest Management plan.</p> <p data-bbox="1135 1265 1957 1394">Additionally, the unit of certification has implemented an internal procedure to reduce the use of pesticides in weeding activities, specifically reducing the number of rounds of weeding from 4 to 3 per year, especially in mature areas. These efforts demonstrate the</p>	Complied																

		<p>company's commitment to reducing its impact on the environment through responsible and sustainable pesticide use, and the unit's continuous monitoring and adaptation of its Integrated Pest Management plan.</p> <p>Several increase of pesticide uses are occurred in Bukit Perak Estate, due to most of Bukit Perak area is Immature area that need concern in weed control. Justification have been given by Regional Controller.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>Based on document verification, interviews, and field observations, it has been determined that the company does not engage in prophylactic use of pesticides.</p> <p>The Integrated Pest Management plan prioritizes the use of natural predators and alternative methods of pest control, and pesticides are only used in response to actual pest infestations and for chemical weeding. This approach helps to reduce the overall use of pesticides and minimize the impact on the environment.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p> <p>7.2.5d Process to limit the negative impacts of the application.</p>	<p>Based on the data for goods in and goods out at the pesticide store, it has been confirmed that the unit of certification does not use pesticides that are classified as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions.</p> <p>The use of paraquat has been stopped since 2015. CH has policy on safe use of chemical including pesticides which sated in GAR Social and Environment Policy, dated September 8<sup>th</sup>, 2015. The company has also established memorandum that the use of paraquat is prohibited under Memorandum of President Director No.032/PD/VIII/2015 dated 13 August 2015.</p> <p>Based on visit in field operation and agrochemical storage in Bukit Perak Estate Bukit Permata Estate, there was no paraquat found.</p>	Complied

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	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on report of pesticide use in 2020 to 2023 – there were no paraquat noted in the report.	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>All Estate have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training. Chemical warehouse and its infrastructure is ready (see criterion 4.6.6).</p> <p>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>Training on sprayer related to technical, economic, regulatory aspects, Risk analysis covers risk of intoxication, environmental pollution, etc. Latest training of pesticide handling carried out on 16 January 2023, attended by 31 participants of Division III in Bukit Perak Estate and dated 17 March 2023, attended by 24 participants of Division I I in Bukit Permata Estate</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has shown the document of Waste Management Procedure (SOP/SMART/LEMS-ESHD/SADV/I/002) and Work Instruction No. IK/SPO/SMART/LH-09/01 regarding ex-pesticide containers handling (washing and cleaning).</p> <p>Based on a field visit to the agrochemical storage, it has been confirmed that the unit of certification stores all pesticides properly. Each pesticide product is accompanied by a Material Safety Data Sheet (MSDS) to provide information on safe handling and use.</p> <p>In addition, the storage facility is equipped with the necessary personal protective equipment (PPE), hand and eye wash facilities, and first aid kit to ensure the safety of employees who handle the pesticides. The different types of pesticides and herbicides are stored separately, based on their level of toxicity, material, and intended use.</p>	Complied

<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>All pesticide containers that are disposed refer to waste management procedure "SOP Pengelolaan Limbah No.SOP/SMART/LEMS-EHSD/SADV/I/002", dated 2 July 2014. Within the procedure explained that all wastes produced from unit of certification (mill and estate) will disposed refer to applicable regulation, where for pesticides/herbicides containers will collect in hazardous waste permitted storage or "Tempat Penyimpanan Sementara Limbah B3" located in Bukit Perak Mill.</p> <p>Unit of certification has records the pesticides/herbicides waste in logbook. Record of logbook sighted in quarter II Year 2023:</p> <ul style="list-style-type: none"> <li>- TPS Limbah B3 Bukit Perak Mill: incoming 1,381 ton Used lubricant/Oli Bekas – outgoing 1,381 ton used lubricant/Oli Bekas on 7 Feb; remain stock per 30 Jun 2023 is 1,366 ton used lubricant/Oli Bekas;</li> <li>- TPS Limbah B3 Bukit Perak Mill: incoming 0,2069 ton used lubricant filter/Filter Bekas – outgoing 0,2069 ton used lubricant filter/Filter Bekas on 7 Feb 2023; remain stock per 30 Jun 2023 is 0,1581 ton used lubricant filter/Filter Bekas;</li> <li>- TPS Limbah B3 Bukit Perak Mill: incoming 0,1960 ton Rags/Majun Bekas – outgoing 0,1960 ton rags/Majun Bekas on 7 Feb 2023; remain stock per 30 Jun 2023 is 0,1110 ton rags/Majun Bekas;</li> <li>- TPS Limbah B3 Bukit Perak Mill: incoming 0,0850 ton used batteries/Aki Bekas – outgoing 0,0850 ton used batteries/Aki Bekas; remain stock per 30 Jun 2023 is 0,1005 ton used batteries/Aki Bekas;</li> <li>- TPS Limbah B3 Bukit Perak Mill: incoming 0,155 ton chemical containers/Kemasan Bekas – outgoing 0,1546 ton chemical containers/Kemasan Bekas on 7 Feb 2023; remain stock per 30 Jun 2023 is 0,1946 ton chemical containers/Kemasan Bekas.</li> </ul>	<p>Complied</p>
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		<p>Minutes of agrochemical containers or hazardous waste to licensed transporter of PT Valten Cahaya Anugrah, on 7 Feb 2023:</p> <ul style="list-style-type: none"> <li>- Used lubricant/Oli bekas 1,3810 ton ~ 6 drum;</li> <li>- Used batteries/Aki bekas 0,0850 ton ~ 1 drum;</li> <li>- Used lubricant oil/Filter bekas 0,2069 ton ~ 3 drum;</li> <li>- Rags/Kain Majun bekas 0,1960 ton ~ 1 drum;</li> </ul> <p>Supported manifest documents:</p> <ul style="list-style-type: none"> <li>- Waste Manifest "limbah B3" PT. Bumi Permai Lestari (KLH-2494) No.KLHK-1680651161 for contaminated containers = 0,1546 ton; date 7 Feb 2023; waste code B104d; vehicle no.: BN 8022QU; transported by PT. Valten Cahaya Anugrah (KLH-3672) to PT. Valten Cahaya Anugrah (KLH-3672).</li> <li>- Waste Manifest "limbah B3" PT. Bumi Permai Lestari (KLH-2494) No.KLHK-1680651744 for used Fluorescent Lamp or "lampu TL bekas" = 0,0065 ton; dated 7 Feb 2023; waste code B107d; vehicle: BN 8022QU; transported by PT. Valten Cahaya Anugrah (KLH-3672) to PT. Valten Cahaya Anugrah (KLH-3672).</li> <li>- Waste manifest "limbah B3" PT. Bumi Permai Lestari (KLH-2494) No.KLHK-1680652132 for rags = 0,4029 ton; dated 7 Feb 2023; waste code B110d; vehicle: BN 8022QU; transported by PT. Valten Cahaya Anugrah (KLH-3672) to PT. Valten Cahaya Anugrah (KLH-3672).</li> <li>- Waste Manifest "limbah B3" PT. Bumi Permai Lestari (KLH-2494) No.KLHK-1680652267 for used batteries = 0,085 ton; dated 7 Feb 2023; waste code B102d; vehicle: BN 8024QU; transported by PT. Valten Cahaya Anugrah (KLH-3672) to PT. Valten Cahaya Anugrah (KLH-3672).</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Waste Manifest "limbah B3" PT. Bumi Permai Lestari (KLH-2494) No.KLHK-1680652368 for used lubricant oil = 1,381 ton; dated 7 Feb 2023; waste code B105d; vehicle: BN 8022QU; transported by PT. Valten Cahaya Anugrah (KLH-3672) to PT. Valten Cahaya Anugrah (KLH-3672).</li> <li>- Waste Manifest "limbah B3" PT. Bumi Permai Lestari (KLH-2494) No.KLHK-1680652760 for medical waste = 0,01 ton; dated 7 Feb 2023; waste code A337-1; vehicle: BN 8024QU; transported by PT. Valten Cahaya Anugrah (KLH-3672) to PT. Valten Cahaya Anugrah (KLH-3672).</li> </ul>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	The information obtained from the document verification, interview with the Estate Manager, Field Assistant, and workers confirms that there is no aerial spraying of pesticides in Bukit Perak and Bukit Permata Estate	Not Applicable
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has prepared annual medical surveillance program for pesticide operators as presented in "<i>Formulir Program Pemeriksaan Kesehatan</i>" (F/SMART/ HESS-EHSD/SADV/012/001).</p> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>• General Medical Check-Up (annually) conducted by Company Doctor to all workers. Dated 8<sup>th</sup> February 2023, location in Division I Bukit Perak Estate that was attended by 22 staff in Regional Office and 147 workers from Division I and II.</li> <li>• Special Medical Check-Up (annually) conducted by Company Doctor to workers in high risk assessment:</li> </ul>	Complied



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		<ul style="list-style-type: none"> <li>■ Dated 7<sup>th</sup> March 2023 – spirometry test, that was attended by 14 workers (pesticides applicator) from Bukit Perak Estate</li> <li>■ Dated 27<sup>th</sup> February 2023 – cholinesterase test that was attended by 14 workers (pesticides applicator) from Bukit Perak Estate</li> </ul>	
7.2.11	<p><b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has established policy to prohibit pregnant and breastfeeding worker to work as a sprayer worker, fertilizer workers and other working related to agrochemical. This is according to a policy KHI-SMART/005-000 dated 1 August 2017 regarding female workers.</p> <p>Based on the report of pregnancy testing, who is women workers in pregnant then is not allowed to work in related to chemicals.</p> <p>Based on field observation, interview with women workers, Labor Union, and Gender Committee, there is 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>Pregnancy test to female spraying workers and fertilizer workers has been conducted monthly by company midwife PT Bumi Permai Lestari both in Bukit Permai Estate and Bukit Perak Estate. Pregnancy tests are performed using test pack by company midwife in corporation with Community Health Center (Puskesmas) of Kelapa District.</p> <p>Sample seen: Latest pregnancy test conducted on 18 May 2023. There were 23 sprayer workers participates in the pregnancy test, and the</p>	Complied

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		<p>result indicated that all female workers were negative. Evidence of pregnancy test result were available at Company Clinic.</p> <p>Based on interview with spraying and manuring workers in Bukit Perak Estate and Bukit Permata Estate, confirmed that there is no pregnant worker who working as spraying or manuring applicator.</p>	
<p><b>Note For 7.2.11</b>          Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p><b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>The unit of certification has develop waste management plan and documented in "Program dan Evaluasi Pengelolaan Limbah (F/SMART/LEMS-EHSD/SADV/002/002) period 2023.</p> <p>PT Bumi Permai Lestari has had Waste Management Procedure (SOP/SMART/LEMS-ESH/SADV/I/002), and work instruction for ex-pesticide containers handling (IK/SPO/SMART/LH- 09/01).</p> <p>Waste management plan consist of:</p> <ul style="list-style-type: none"> <li>- Hazardous waste manages by placed at permitted storage (TPS LB3).</li> <li>- Harvesting waste manages by frond stacking and placed at frond row on the block.</li> <li>- Domestic waste manages by dispose to allocated landfill.</li> <li>- Fertilizer sacks used manages by washing and placed at certain storage, reuse for loose fruit container.</li> <li>- Liquid domestic waste manages by provides septic tank and have obtained domestic waste permit.</li> </ul>	<p>Complied</p>

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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>Audit team has visited sampling of landfill at Bukit Permata Estate which located at Block J02, Div.2, landfill condition is good and maintained. Waste disposal was aligned with their procedure.</p> <p>Also, during interview in sample of activities at Bukit Perak Estate and Bukit Permata Estate, the workers understand waste disposal management.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Based on field visit and interview with sample of workers at Bukit Perak Estate and Bukit Permata Estate, there are no use of open fire for waste disposal.</p>	Complied
<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP/SMART/MCAR/IX/TA-PPK (Fertilizing).</p> <p>Fertilizer is applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis.</p> <p>Up to ASA-1.1, year 2023, there is no fertilizer application activity due to first Semester program has completed in Bukit Perak Estate. Whilst in Bukit Permata Estate is on a plan for replanting this year.</p> <p>Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage is avoided.</p>	Complied

<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>During ASA 1_1, PT Bumi Permai Lestari has shown the Report of Analysis of tissue samples (e.g., leaves) and soil.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>• Last periodical leaf sample analysis, no document: 07/RFC-VAVEL/SMARTI/Int/II/223 dated 6<sup>th</sup> April 2023 for preparing fertilizer recommendation 203. Sample seen Lab No. DUP20-PZ1; Sample code DUP20; Analysis Result: 2.31% water content; 2.49% N; 0.176% P; 1.07% K; 0.30% Mg; 0.12% Ca; 20 ppm B; 0.65 ppm Cl.</li> <li>• Soil Analysis Result, issued by Analytical Laboratory of SMART Research Institute, reference no. 100/TANH/AL/ANLZ/06/22 dated 6<sup>th</sup> June 2022; based on request no003/RFC-VABEL/SMARTI-Int/V/2022 receive date 20<sup>th</sup> May 2022, consist of 18 samples. Analyze method: Texture (hidrometri), pH (pHmeter), C.Org (tritrimetri W&amp;B), N total (kj+FIA), P, K, Mg Cad, ICP-OES, P Bray, FIA, exchange H-Al. Sample seen Lab No.8352 Sample code 0-15 PR, 3F-32; Analysis Result: 5.79% water content; 79.41% sand; 18.60% dust; 2.06% clay</li> </ul>	<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>During ASA 1_1, PT Bumi Permai Lestari has shown the record of EFB application and POME application to nutrient recycling strategy.</p> <ul style="list-style-type: none"> <li>• POME application in Bukit Perak Estate year 2023, there was recorded 90,376 M<sup>3</sup> location in Division 3, complex BPRE92D10, Block D53, D54, E46, E47, E48, E49, E50, F47, F48, F49 and F50</li> <li>• EFB application in Bukit Permata Estate recorded 2,379.19 tonnes covering 79.27 Ha at Division 1 and 2.</li> </ul>	<p>Complied</p>
<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has shown the document of fertilizer recommendation described type and volume of fertilizer need for each Block.</p>	<p>Complied</p>

		<p>Records of fertilizer inputs are available in "Data Rencana dan Realisasi Pemupukan Tahun 2023 – up to May 2023", such as:</p> <table border="1" data-bbox="1133 432 1951 983"> <thead> <tr> <th rowspan="2">Fertilizer Type</th> <th colspan="2">BPRE</th> <th>BPTE</th> </tr> <tr> <th>Plan (kg)</th> <th>Actual (kg)</th> <th>Actual (kg)</th> </tr> </thead> <tbody> <tr> <td>Kieserite Granular</td> <td>104,100</td> <td>45,551 (43%)</td> <td>53,850</td> </tr> <tr> <td>NPK 15</td> <td>156,795</td> <td>73,365 (46%)</td> <td>5,280</td> </tr> <tr> <td>NPK 12</td> <td>1,690</td> <td>493 (29%)</td> <td>-</td> </tr> <tr> <td>Urea</td> <td>395,806</td> <td>338,579 (85%)</td> <td>101,950</td> </tr> <tr> <td>HGFB</td> <td>29,701</td> <td>26,367 (88%)</td> <td>13,400</td> </tr> <tr> <td>MOP</td> <td>198,725</td> <td>0</td> <td>83,610</td> </tr> <tr> <td>TSP</td> <td>174,317</td> <td>4,098 (24%)</td> <td>-</td> </tr> <tr> <td>SP - 36</td> <td></td> <td></td> <td>154,960</td> </tr> <tr> <td>RP</td> <td></td> <td></td> <td>52,620</td> </tr> </tbody> </table>	Fertilizer Type	BPRE		BPTE	Plan (kg)	Actual (kg)	Actual (kg)	Kieserite Granular	104,100	45,551 (43%)	53,850	NPK 15	156,795	73,365 (46%)	5,280	NPK 12	1,690	493 (29%)	-	Urea	395,806	338,579 (85%)	101,950	HGFB	29,701	26,367 (88%)	13,400	MOP	198,725	0	83,610	TSP	174,317	4,098 (24%)	-	SP - 36			154,960	RP			52,620	
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<p><b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>																																														
<p>7.5.1</p>	<p><b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.            - Critical (Major) compliance -</p>	<p>During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of soil analysis to identify soil type, slope, topography and land suitability class on 27-27 June 2005, that the result is documented in Semi-detail soil survey. Maps that identify marginal and fragile soils, including steep sloped land are available for BPRE and BPTE. There is no marginal and fragile soil identified in both estates.            Based on Semi-detail Maps of Soil scale 1:50,000, soil characteristic in BPRE and BPTE were presented in table below:</p> <p>Bukit Perak Estate:</p>	<p>Complied</p>																																											

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Soil Type	Slope (°)	Area (Ha)	%
<i>Typic Dystropepts</i>	0-8	1.449,19	35,3
<i>Typic Dystropepts</i>	0-2		
<i>Aquic Dystropepts</i>	0-3		
<i>Typic Dystropepts</i>	8-15	704,04	17,1
<i>Typic Dystropepts</i>	8-15		
<i>Typic Tropopsamments</i>	0-8	1.855,39	45,1
<i>Aquic Tropopsamments</i>	0-3		
<i>Typic Tropaquepts</i>	0-3	102,78	2,5
<b>Total</b>		<b>4.111,50</b>	<b>100,0</b>

Bukit Permata Estate

Soil Type	Slope (°)	Area (Ha)	%
<i>Typic Dystropepts</i>	0-8	707,44	35,8
<i>Typic Dystropepts</i>	0-2		
<i>Aquic Dystropepts</i>	0-3		
<i>Typic Dystropepts</i>	8-15	68,37	3,5
<i>Typic Dystropepts</i>	8-15		
<i>Typic Tropopsamments</i>	0-8	1.109,38	56,2

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		<table border="1"> <tr> <td><i>Aquic Tropopsammments</i></td> <td>0-3</td> <td></td> <td></td> </tr> <tr> <td><i>Typic Tropaquepts</i></td> <td>0-3</td> <td>27,23</td> <td>1,4</td> </tr> <tr> <td><i>Typic Tropaquepts</i></td> <td>0-3</td> <td>61,03</td> <td>3,1</td> </tr> <tr> <td><b>Total</b></td> <td></td> <td><b>1.973,45</b></td> <td><b>100,0</b></td> </tr> </table>	<i>Aquic Tropopsammments</i>	0-3			<i>Typic Tropaquepts</i>	0-3	27,23	1,4	<i>Typic Tropaquepts</i>	0-3	61,03	3,1	<b>Total</b>		<b>1.973,45</b>	<b>100,0</b>	
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7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	PT Bumi Permai Lestari has performed replanting since 2018, based on field visit, there is no replanting performed on steep terrain. Based on maps of soil unit, there are no slopes above certain limit in BPRE and BPTe, maximum slopes in BPRE and BPTe was 15°.	Complied																
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	There is no new planting activity since November 2005.	Complied																
<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																			
7.6.1	<b>(C)</b> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	PT Bumi Permai Lestari has performed soil analysis to identify soil type, slope, topography, and land suitability class on 27-27 June 2005, that the result is documented in Semi-detail soil survey.  Based on Semi-detail Maps of Soil scale 1:50,000, there is no marginal or fragile soil present in BPRE and BPTe. There is marginal-suitable soil in PT BPL area, which is sandy soil 1,855.39 Ha in BPRE and 1,109.38 Ha in BPTe. The maps have described the sandy soil clearly with boundary.	Complied																
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	There is no extensification activity in PT BPL area. All activities carried out according to the best-practice soil management plan.	Complied																

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7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	PT Bumi Permai Lestari has performed soil analysis to identify soil type, slope, topography, and land suitability class on 27-27 June 2005, that the result is documented in Semi-detail soil survey.  The semi-detail soil survey result is used to guide the planning of drainage and irrigation systems, road, and other infrastructure.  All activities carried out according to the best-practice soil management plan. Road maintenances are consistently implemented. Based on field visit all road are accessible.	Complied
<b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	There is no new planting since November 2005.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable
<b>PROCEDURAL NOTE:</b> Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable
7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable

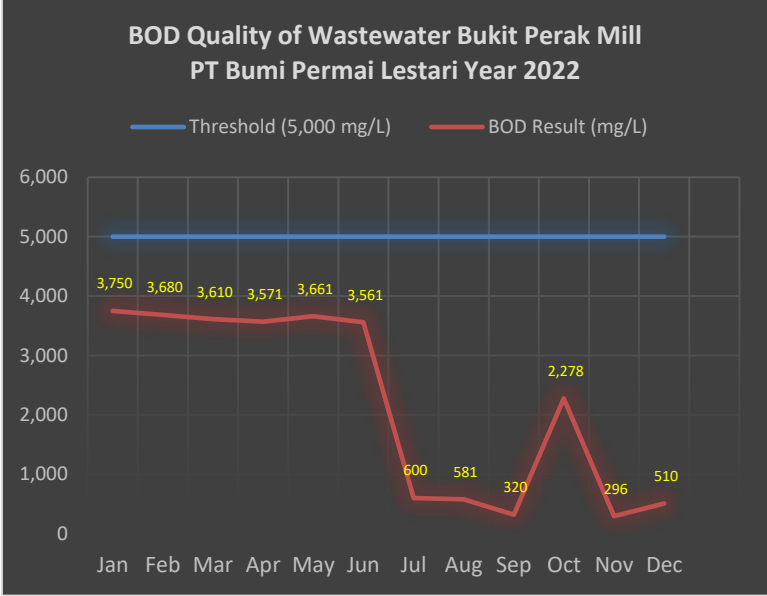


7.7.5	<p><b>(C)</b> Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.</p>	Not Applicable
<p><b>PROCEDURAL NOTE:</b> For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p><b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of semi detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.</p>	Not Applicable
7.7.7	<p><b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with</p>	<p>During ASA-1.1-year 2023, PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.</p>	Not Applicable

	<p>'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>		
<b>Criteria 7.8:</b> 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>No changes on water management plan at the unit of certification.</p> <p>Unit of Certification establish water management plan in form of "Program Efisiensi Penggunaan Air PT Bumi Permai Lestari Tahun 2022". The program for Estate unit consists of:</p> <ol style="list-style-type: none"> <li>1. Saving water from optimizing the use of pesticides. Description: reuse of rinsed water used for pesticide packaging for spraying activities. Timeline: routine (during the spray activity). Objective: Save water usage for spraying.</li> <li>2. Water savings in housing and public facilities. Description: using water used for ablution to flush roads and plants. Timeline: routine. Objective: employees and residents of housing.</li> <li>3. Socialization of water use savings for domestic needs. Description: socializing water use savings to all employees, placing warnings. Timeline: as needed. Objective: improvement of water-saving behavior.</li> <li>4. Monitoring water use. Description: water use monitoring (m3). Timeline: routine (recap every month). Objective: actual use of water as needed.</li> </ol> <p>Water management program for Mill, consists of:</p> <ol style="list-style-type: none"> <li>1. Recycle. Program: reuse of air condensate sterilizer for dilution 10% to FFB. Evaluation: The results of using condensate water have saved water use until December 2021 by 14,309 m3.</li> </ol>	Complied

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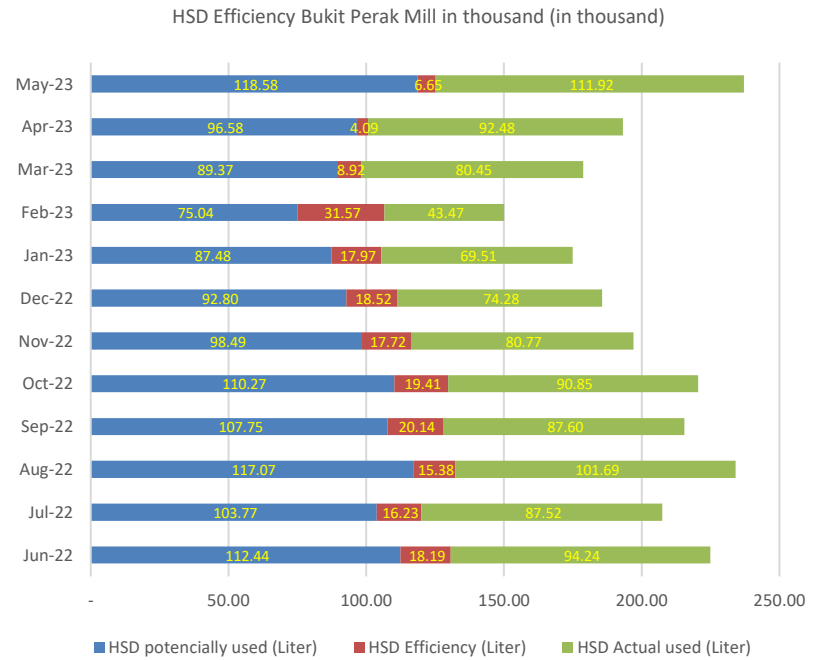
		<p>2. Recycle. Program: reuse of turbine cooling water to Raw Water for use as washing water. Evaluation: used turbine water is reused as washing water to minimize domestic water use.</p> <p>3. Water Use Efficiency. Program: reuse 80% of soxhlet cooling water for the same activity. Evaluation: reuse of soxhlet water reduces the burden of using Raw Water.</p> <p>The unit of certification does not limit access to clean water for workers and local community. Also, does not pollute the water and measure the surface water quality by tested in accredited laboratory periodically. The water management plan be reviewed once a year at the end of each year to see the actual plan for the current year</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Based on visit to employees housing complex at Division 1&amp;2 and Division 5 Bukit Perak Estate and Division 1&amp;2 Bukit Permata Estate, water source for bathing and washing are using ground water. While the water for consumption (drink and cooking), all employees buying bottled or gallon water.</p>	
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).          - Critical (Major) compliance -</p>	<p>Watercourses which available in unit of certification is stream and reservoir for Mill. Maintaining riparian areas is by planting with local woody species. Maintaining progress are documented within "<i>Rencana dan Rehabilitasi KBKT</i>".</p> <p>Auditor team conducting onsite visit to stream buffer zones at Sungai Lagok Block C47 Div.4, Block G55 Div.3 Bukit Perak Estate and conjunction stream of Sungai Medang Keranak and Sungai Duku at Block H37 Div.1 Bukit Permata, stream width is 3-5 meters. Actual buffer zones which is maintained is 15 meters or two lines of palm crops from edge waterways.</p>	<p>Complied</p>

		<p>The management of riparian areas which implemented by unit of certification is already following RSPO Manual on BMPs for the management and rehabilitation of riparian reserves (April 2017).</p>																																								
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Wastewater quality Bukit Perak Mill has been analysed by third party accredited laboratory "Laboratorium Dinas Lingkungan Hidup Provinsi"                      Result of wastewater quality year 2022 as below:</p>  <table border="1" data-bbox="1160 592 1924 1190"> <caption>BOD Quality of Wastewater Bukit Perak Mill PT Bumi Permai Lestari Year 2022</caption> <thead> <tr> <th>Month</th> <th>BOD Result (mg/L)</th> <th>Threshold (mg/L)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>3,750</td><td>5,000</td></tr> <tr><td>Feb</td><td>3,680</td><td>5,000</td></tr> <tr><td>Mar</td><td>3,610</td><td>5,000</td></tr> <tr><td>Apr</td><td>3,571</td><td>5,000</td></tr> <tr><td>May</td><td>3,661</td><td>5,000</td></tr> <tr><td>Jun</td><td>3,561</td><td>5,000</td></tr> <tr><td>Jul</td><td>600</td><td>5,000</td></tr> <tr><td>Aug</td><td>581</td><td>5,000</td></tr> <tr><td>Sep</td><td>320</td><td>5,000</td></tr> <tr><td>Oct</td><td>2,278</td><td>5,000</td></tr> <tr><td>Nov</td><td>296</td><td>5,000</td></tr> <tr><td>Dec</td><td>510</td><td>5,000</td></tr> </tbody> </table>	Month	BOD Result (mg/L)	Threshold (mg/L)	Jan	3,750	5,000	Feb	3,680	5,000	Mar	3,610	5,000	Apr	3,571	5,000	May	3,661	5,000	Jun	3,561	5,000	Jul	600	5,000	Aug	581	5,000	Sep	320	5,000	Oct	2,278	5,000	Nov	296	5,000	Dec	510	5,000	<p>Complied</p>
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<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Record of Mill water use per tonne of FFB Bukit Perak Mill period Jul 2022 – May 2023 as below:</p> <table border="1" data-bbox="1137 1321 1890 1369"> <thead> <tr> <th>Month</th> <th>FFB Process</th> <th>Water usage (m<sup>3</sup>)</th> <th>Ratio</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Month	FFB Process	Water usage (m <sup>3</sup> )	Ratio																					<p>Complied</p>															
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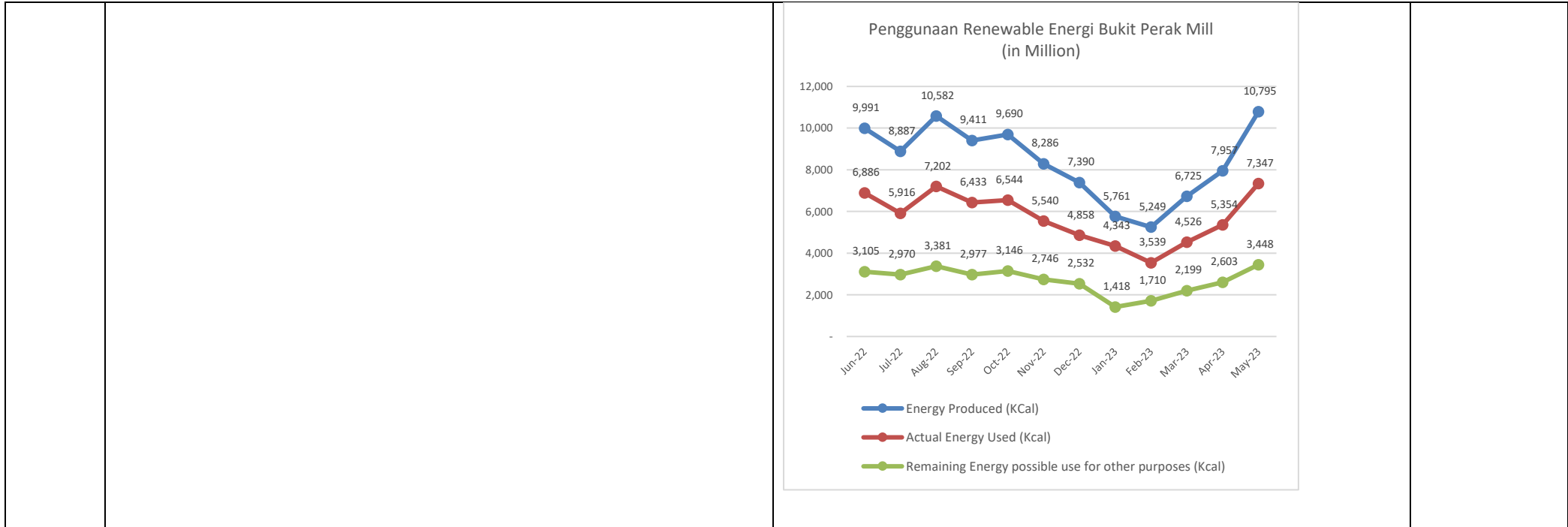
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		Jul 2022	15,710.15	15,978	1.02	
		Agu 2022	18,707.41	17,333	0.93	
		Sep 2022	16,636.40	15,775	0.95	
		Okt 2022	17,130.77	16,210	0.95	
		Nov 2022	14,647.81	14,785	1.01	
		Des 2022	13,064.10	13,990	1.07	
		Jan 2023	10,184.44	11,902	1.17	
		Feb 2023	9,279.22	8,829	0.95	
		Mar 2023	11,888.93	9,135	0.77	
		Apr 2023	14,066.83	10,790	0.77	
		Mei 2023	19,083.32	14,501	0.76	
<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	Unit of certification has developed program to increase the efficiency of fossil fuel use 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 boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.  Efficiency of fossil fuel use at Bukit Perak Mill:				Complied

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Renewable energy used from Fiber and Shell at Bukit Perak Mill period Jun 2022 – May 2023:



**Criteria 7.10:** Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p><b>(C)</b> GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring to reduce GHG emissions are recorded in PalmGHG Calculator as demonstrated in Appendix B in this report.</p> <p>The source of greenhouse gas emission has been identified on Environmental aspect and impact identification for mill and estates, as listed below:</p> <ul style="list-style-type: none"> <li>- Boiler stack emission including particulate and soot.</li> </ul>	Complied
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		<ul style="list-style-type: none"> <li>- Diesel electric generator emission</li> <li>- POME methane emission</li> <li>- Use of fertiliser</li> <li>- Vehicle and heavy equipment emission</li> </ul> <p>Several efforts to reduce GHG emissions are prepared as follows:</p> <ul style="list-style-type: none"> <li>- Zero burning</li> <li>- Utilization of waste fibre and shell as boiler fuel and electricity from turbines</li> <li>- Reduce chemical fertilizer using EFB composting.</li> </ul> <p>The source of pollution, type of pollution and its control are documented in list of environmental aspect and impact evaluation. Implementation records of each programme were sighted. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Bukit Perak 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</p>	
7.10.2	<p><b>(C)</b> Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Bumi Permai Lestari after November 2005.</p>	Complied
7.10.3	<p><b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>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</p>	Complied



		<p>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 Bukit Perak and Bukit Permata Estate.</p> <p>Management efforts to reduce or minimize those pollutant are such as implementation of zero burning, planting trees at the riparian, utilization EFB, reducing the use of diesel fuel with the use of fibres substitution and shells for boiler fuel, emissions test, routine engine maintenance and GHG calculation. Sample of management efforts to reduce pollutants are observed during audit, such as there is no burning activities, there are bamboo and waru planted at the riparian area, and the Mill uses fibers and shell as fuel.</p>	
<p><b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.</p>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.          - Critical (Major) compliance -</p>	<p>Bukit Perak Mill and its supply bases as unit of certification is existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations, therefore no new planting is occurring.</p> <p>Replanting activities have been done in Bukit Perak Estate at the end of year 2021. While for Bukit Permata Estate is planned for replanting activities start on July 2022.</p> <p>According to the result of replanting activities in Bukit Perak Estate, it is known that land preparation for replanting is using third party contractor. Land preparation is using mechanical (for felling and chipping palm crops).</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.          - Minor compliance -</p>	<p>Unit of certification establish fire prevention and control measures for land such as provides Fire Danger Index, Firefighting team and its equipment, erecting fire watch tower, conduct monitoring for hotspots</p>	Complied

		<p>and forming fire program by involving surrounding local communities namely Fire Alert Society of "Masyarakat Siaga Api".</p> <p>All the control measures are reported to relevant authority periodically, in example: "Laporan Perencanaan dan Pelaksanaan Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Membakar dan Sistem, Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan" period July – December 2022. This report submitted to Governor of Bangka Belitung Province on 10 January 2023.</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 forming fire program by involving surrounding local communities namely Fire Alert Society of "Masyarakat Siaga Api". The training and dissemination of this program conducted in 20 February 2020 and attended by representative of surrounding villagers (Kacung Village, Dendang village, Kelapa district, etc.)</p> <p>No fires or hotspot detected in last one year.</p>	Complied

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

**PROCEDURAL NOTE for 7.12:**

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

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

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

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

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC

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countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification is an existing plantation since 1992. HCV assessment conducted in 2012 by internal team which has been registered as RSPO-approved assessor.</p> <p>In 2018, first replanting activities started in Bukit Perak Estate. Implementation of replanting activities is referred to HCV Identification Assessment 2012. No expansion area or new planting was conducted in certificate holder.</p>	Complied
7.12.2	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p> <p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>Unit of certification is an existing plantation since 1992. HCV assessment conducted in 2012 by internal team which has been registered as RSPO-approved assessor.</p> <p>There is no new acquisition or expansion area within this unit of certification.</p> <p>There is no new acquisition or expansion area or new planting within this unit of certification.</p>	Complied
7.12.3	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>This indicator is not relevant to Indonesia.</p>	Not Applicable
<b>PROCEDURAL NOTE for 7.12.3:</b>			

Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Permai Lestari, 2012".</p> <p>HCV Assessment was conducted on 26 to 28 November 2010 internally using HCV Toolkit Indonesia 2008, where the assessor is registered as RSPO HCV approved assessor.</p> <p>Based on the assessment report, in Bukit Perak and Bukit Permata Estate there are three (3) types of HCV been identified such as HCV 1.2 (Endangered Species), HCV 4.1 (riparian area) and HCV 6 (cemetery) cover total area of 116.38 Ha.</p> <p>As refer to HCV Toolkit Indonesia (2008), unit of certification shall make integrated management plan which are developed, implemented and adapted (if necessary). Therefore, onsite verification of HCV area is conducted on 1-5 February 2021 by internal team where HCV assessor is involved namely Mr. Sandy Puspoyo (ALS license number: ALS19007SP). This onsite verification is aims to re-measurement of HCV area, particularly in riparian zone, prior to replanting activities as part of adaptive management plan.</p> <p>Based on document of "<i>Berita Acara Verifikasi Sempadan Area NKT</i>", dated 5 February 2021, there are list identification of riparian zone which categorized as HCV for all estates under PT Bumi Permai Lestari. The result of verification, it is known that HCV area (particularly riparian zone) are changes. Based on identification result, in Bukit Perak Estate known there are six (6) stream and one (1) reservoir; where in Bukit Permata Estate is five (5) stream was identified.</p> <p>On 21 April 2021, Sustainability Compliance Team propose several data to Top Management about result of desktop study related changes of riparian areas which refer to provincial regulation "<i>Peraturan Daerah Provinsi Kepulauan Bangka Belitung No.02 Tahun</i></p>	Complied

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		<p>2014". Minutes of this meeting is a baseline decision to conduct additional replanting in Bukit Perak Estate which started in July 2021 (some palm crops as reducing area of riparian zone).</p> <p>Due to some changes of riparian zone against streams identified, therefore HCV management area are reducing from 116.38 Ha to 81.21 Ha. This change of HCV area was determined by top management as per Memorandum from Sustainability and Strategic Project Director number 03/SSP/MEM/CAD/BPL/2022, dated 11 February 2022. This memorandum aims to replanting activity in Bukit Permata Estate which started in July 2022.</p> <p>Result of HCV verification determined as below:</p> <ol style="list-style-type: none"> <li>1. Bukit Perak Estate: 55.49 Ha (2012) to be 51.66 Ha (2022).</li> <li>2. Bukit Permata Estate: 60.89 Ha (2012) to be 29.55 Ha (2022)</li> </ol> <p>Changes of riparian zone width is referring to governor decree related provincial spatial plan "<i>Rencana Tata Ruang Wilayah Propinsi Bangka Belitung 2014 – 2034</i>" Number 02 Year 2014 and RSPO Manual on BMPs for the management and rehabilitation of riparian reserves (April 2017). All width streams were identified in certificate holder area is average 3-4 meters, previously determining of riparian zone is 25 meters. Currently, as refer to governor decree, the riparian zone that will maintain is minimum 10 meters from the edge of stream. Based on that, total HCV managed area is reduced.</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 existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations. Entire land compensation is accomplished since 1994.</p> <p>Land status of certificate holder prior to developed is State Land and have obtaining Location Permit from relevant authority. Community land which located within location permit already compensated for its</p>	Complied

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		<p>crops only and not for its land, due to as national land status is State Land.</p> <p>As a reciprocal, the company hires villagers/local communities as workers. This is form of benefit given by the plantation to surrounding communities.</p> <p>This information is obtained from direct interview with sample of previous landowner during stakeholder consultation.</p> <p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Permai Lestari, 2012".</p> <p>HCV Assessment was conducted on 26 to 28 November 2010 internally using HCV Toolkit Indonesia 2008, where the assessor is registered as RSPO HCV approved assessor.</p> <p>There is no rights of local communities have been identified in HCV area, also no peatland or other conservation area within the unit of certification.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Unit of certification has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through muster morning in each division by field assistant. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p>	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Unit of certification conduct monitoring of animal wildlife and HCV area since the HCV assessment conducted in 2012. Based on analysing of HCV area, there is no RTE species was found. Therefore, on 21 April 2021, Sustainability Compliance Team propose several data to Top Management about result of desktop study related changes of riparian areas which refer to provincial regulation "Peraturan Daerah Provinsi Kepulauan Bangka Belitung No.02 Tahun 2014". Minutes of this meeting is a baseline decision to conduct additional replanting in Bukit Perak Estate which started in July 2021 (some palm crops as reducing area of riparian zone).</p> <p>This is part of adaptive management and monitoring of HCV area outcome as fed back into management plan.</p> <ul style="list-style-type: none"> <li>Monitoring wildlife "Pemantauan jenis satwa/tumbuhan" dated 19 April 2023 at Block F25/26 Bukit Permata Estate, found Cekakak belukar (2 species), Kuntul Kerbau (2 species) at Block G33/34; Cangak abu (1 species) at Block H24/25.</li> <li>Monitoring wildlife "Pemantauan jenis satwa/tumbuhan" dated 13 Jan 2023 at Block H37 border 3 species Cekakak belukar, 1 species Biawak/monitoring lizard at Block F48 border, 1 species ular kayu at Block G33 border Bukit Perak Estate.</li> <li>Actual bamboo planting at riparian (HCV4) periode Jan-Jun 2023, dated 30 Jun 2023.</li> </ul> <p>Bukit Perak Estate: Rehabilitation in riparian 104.94 Ha, Actual planting bamboo: 24.14 Ha.</p> <p>Bukit Permata Estate: Rehabilitation in riparian 18.53 Ha, Actual planting bamboo: 2.6 Ha.</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15</p>	<p>Bukit Perak Estate and Bukit Permata Estate is long established oil palm company. The oldest planting year of palm crops was 1992 and no more expansion area afterwards. Current status of palm crops is</p>	Complied

	<p>November 2018, the Remediation and Compensation Procedures (RaCP) applies. - Critical (Major) compliance -</p>	<p>replanting activities since 2018 where HCV assessment was conducted in November 2010. Therefore, no land clearing for new planting since November 2005 or 15 November 2018 in the Unit of Certification.</p>	
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**Appendix B: GHG Reporting Executive Summary**

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

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

The summary of the Net GHG emitted in **2022** for **Bukit Perak Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.96
PKO	0.96

Extraction	%
OER	19.35
KER	5.59

Production	t/yr
FFB Process	185,960.53
CPO Produced	35,980
PKO Produced	10,393

Land Use	Ha
OP Planted Area	10,502.52
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	260.44
<b>Total</b>	<b>10,762.96</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0.00	0.00	6,612.45	0.08	0.00	0.00	6,612.45	0.00
CO <sub>2</sub> Emission from fertilizer	4,115.13	0.10	2,954.97	0.04	0.00	0.00	7,070.10	4,115.13
NO <sub>2</sub> Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	4,357.75	0.10	2,489.36	0.03	0.00	0.00	6,847.10	4,357.75
Peat Oxidation	582.90	0.01	182.59	0.00	0.00	0.00	765.49	5,82.90
<b>Sink</b>								
Crop Sequestration	0.00	0.00	-8,686.15	-0.11	0.00	0.00	-8,686.15	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>9,055.77</b>	<b>0.21</b>	<b>3,553.22</b>	<b>0.04</b>	<b>2,4471.32</b>	<b>0.00</b>	<b>3,7080.32</b>	<b>9055.77</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	6,889.32	0.04
Fuel Consumption	454.25	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>7,343.57</b>	<b>0.04</b>

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

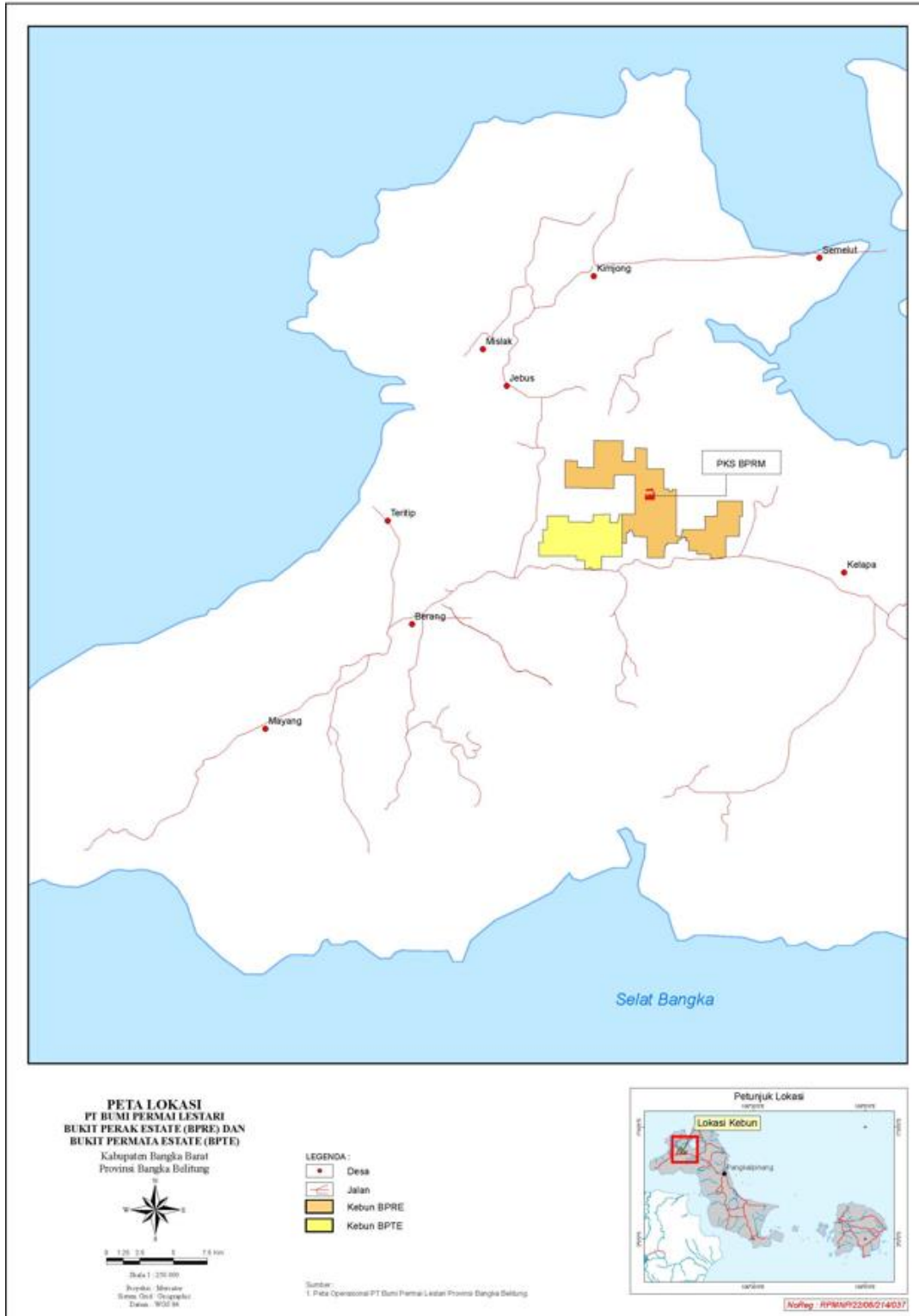
<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

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

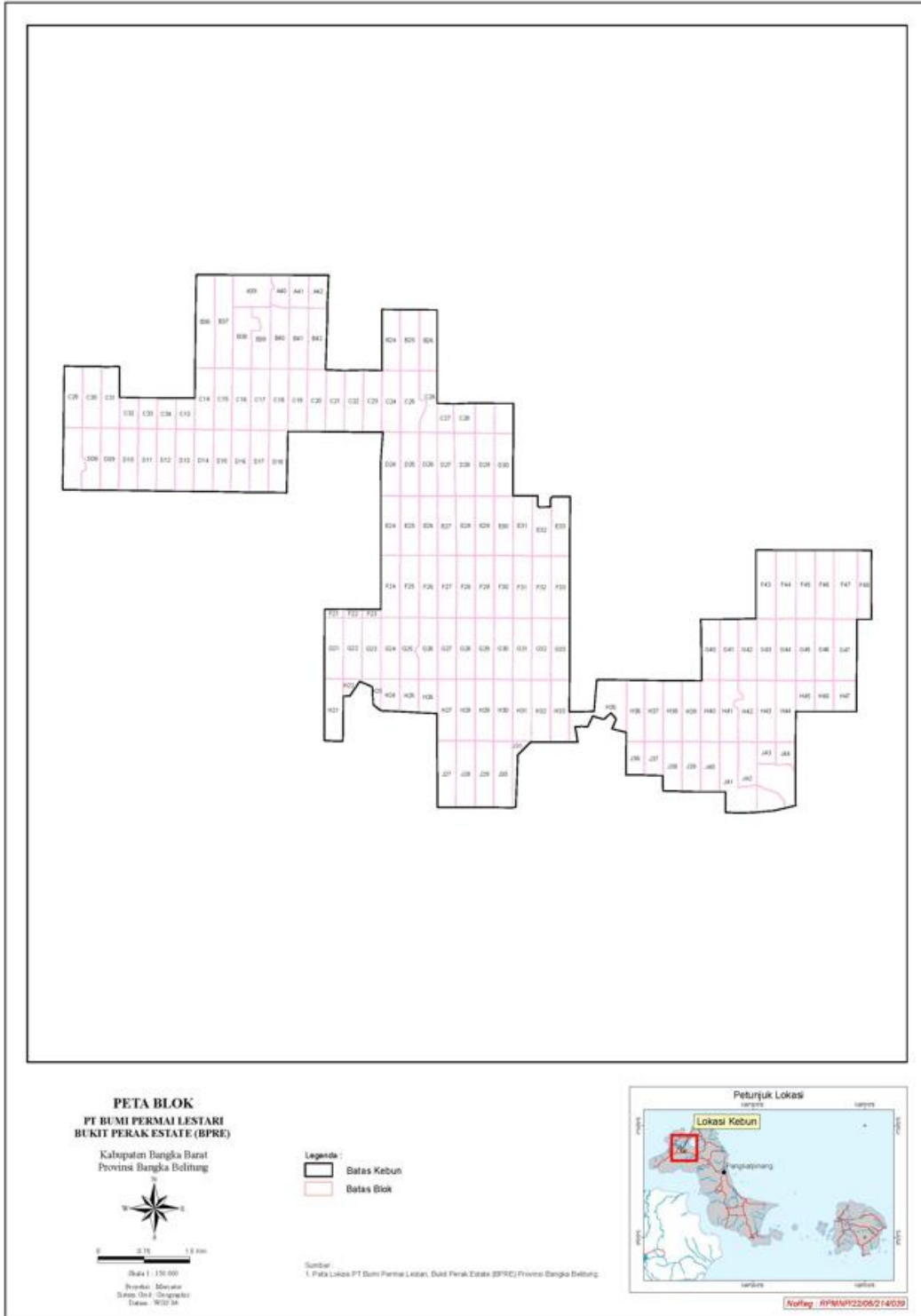
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

**Appendix C: Location Map of Certification Unit and Supply bases**





**Appendix D: Estate Field Map**



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

*Not Applicable*

## Appendix F: List of Abbreviations

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

SOP Standard Operating Procedure