

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment (RA 1)**
- 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: 08/09/2022

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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 District, 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 Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	The objective of the assessment was to conduct a recertification assessment and look for positive evidence to ensure that elements of the scope of certification and the audit criteria are met.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <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
<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		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ISCC	EU-ISCC-Cert- ID218-20210199	Intertek Utama Services	21 December 2022
ISPO	BSI-ISPO 750840	BSI	18 July 2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
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

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Perak	3,793.62	51.66	439.67	4,284.95	89%
Bukit Permata	1,601.93	29.55	168.52	1,800.00	89%
<b>Total</b>	<b>5,395.55</b>	<b>81.21</b>	<b>608.19</b>	<b>6,084.95</b>	<b>89%</b>

**Note:**

- The planted area is based on the latest Area Statement 2022 resulted from last re-measurement conducted in 2021. Re-measurement is not only carried out on HCV, but covers the entire area, including planting areas, nursery, buildings/mill, roads, ditches/swamps/rivers, other areas: electricity lines, rocky areas, quarries and reserved areas. Compare to previous report, Planted area of Bukit Perak seems increasing (from 3,666.76 Ha to 3,793.62 Ha) but Bukit Permata is decrease 195.30 Ha (from 1,797.23 Ha to 1,601.93 Ha). Total planted is decrease 68.44 Ha, from 5,463.99 Ha to 5,395.55 Ha, However the total area managed is still the same, 6,084.85 Ha.
- Compared to previous report, HCV area was reduced from 116.36 Ha to 81.21 Ha, this was due to a re-delineation during the 2021 HCV area verification, based on the SSP Director's Memorandum No. 02/SSP/MEM/CAD/BPL/II/2022 dated 11 February 2022, refer to indicator 7.12.4.
- HCV area was mostly riparian area that previously planted with oil palms prior HCV assessment. There are 70.14 Ha of oil palms that still being harvested inside the HCV area, consist of 16.75 Ha of YOP 1992; 34.79 Ha of YOP 1993; 17.02 of YOP 1994; and 1.58 Ha of YOP 1997. There is no chemical activity such as spraying and fertilizing in the riparian area, and the area will not be replanted.

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6. Plantings & Cycle						
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	-	-	-	1,601.93	1,601.93	-
<b>Total (ha)</b>	<b>1,873.30</b>	<b>1,920.32</b>	<b>-</b>	<b>1,601.93</b>	<b>3,522.25</b>	<b>1,873.30</b>

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

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2019 – Jun 2020)	Actual (Jul 2019 – May 2022)		Forecast (Sept 2022-Aug 2023)
		Previous license period (July 2019 – Dec 2019)	Current license period (Jan 2020 – May 2022)	
Bukit Perak	81,120.05	20,718.51	68,030.78	31,490.45
Bukit Permata	61,199.93	-	53,559.98	2,887.05
<b>Total</b>	<b>142,319.98</b>	<b>142,309.27</b>		<b>34,377.50</b>

**Note:**

- Based on previous license and volume extension in PamTrace:
  - Bukit Perak Estimate: 41,430.30 + 14,144.38 + 8641.24 + 6,060.72 + 10,843.40 = 81,120.05 MT
  - Bukit Permata Estimate: 37,164.44 + 8,565.62 + 5,233.00 + 3,670.28 + 6,566.60 = 61,199.93 MT
- FFB production of Bukit Permata Estate during July – Dec 2019 were delivered to another Palm Oil Mill, PT Leidong West Indonesia.
- Bukit Permata Estate will be replanted by 2022, the old oil palms are still exist during this assessment, therefore FFB forecast of 2022 is still available.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jul 2019 – Jun 2020)	Actual (Jul 2019 – May 2022)		Forecast (Sept 2022-Aug 2023)
		Previous license period (July 2019 – Dec 2019)	Current license period (Jan 2020 – May 2022)	
Nil		Nil	Nil	
<b>Total</b>		<b>Nil</b>		

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<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Jul 2019 – Jun 2020)</b>	<b>Actual (Jul 2019 – May 2022)</b>		<b>Forecast (Sept 2022-Aug 2023)</b>
		<b>Previous license period (July 2019 – Dec 2019)</b>	<b>Current license period (Jan 2020 – May 2022)</b>	
Outgrowers	190,169.80	94,058.83	347,257.91	172,016.00
<b>Total</b>	<b>190,169.80</b>	<b>441,316.74</b>		<b>172,016.00</b>

**Note:**

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Jul-19	3,917.50	15,754.77	19,672.27
2	Aug-19	3,663.43	17,396.44	21,059.87
3	Sep-19	3,562.49	13,549.32	17,111.81
4	Oct-19	3,329.45	14,159.96	17,489.41
5	Nov-19	3,049.21	16,326.73	19,375.94
6	Dec-19	3,196.43	16,871.61	20,068.04
7	Jan-20	2,673.60	13,803.71	16,477.31
8	Feb-20	3,217.58	13,594.06	16,811.64
9	Mar-20	3,873.18	10,363.67	14,236.85
10	Apr-20	2,107.95	12,330.22	14,438.17
11	May-20	2,966.44	11,506.58	14,473.02
12	Jun-20	3,591.68	11,459.01	15,050.69
13	Jul-20	4,964.16	10,003.51	14,967.67
14	Aug-20	4,381.29	10,912.74	15,294.03
15	Sep-20	4,048.64	12,094.78	16,143.42
16	Oct-20	3,753.64	14,211.27	17,964.91
17	Nov-20	4,354.67	19,202.77	23,557.44
18	Dec-20	4,609.79	19,743.53	24,353.32
19	Jan-21	4,764.48	15,947.54	20,712.02
20	Feb-21	4,442.98	14,205.81	18,648.79
21	Mar-21	4,721.14	12,671.18	17,392.32
22	Apr-21	4,475.69	11,303.05	15,778.74
23	May-21	4,426.06	14,206.74	18,632.80

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24	Jun-21	5,980.42	11,573.72	17,554.14
25	Jul-21	5,713.53	10,743.26	16,456.79
26	Aug-21	5,651.46	8,072.78	13,724.24
27	Sep-21	5,141.16	6,766.77	11,907.93
28	Oct-21	4,539.94	9,959.46	14,499.40
29	Nov-21	4,681.85	11,785.43	16,467.28
30	Dec-21	2,765.66	7,451.20	10,216.86
31	Jan-22	3,689.30	11,191.07	14,880.37
32	Feb-22	3,285.77	7,579.32	10,865.09
33	Mar-22	4,469.89	11,660.08	16,129.97
34	Apr-22	4,182.09	14,083.15	18,265.24
35	May-22	4,116.72	8,831.50	12,948.22
<b>TOTAL</b>		<b>142,309.27</b>	<b>441,316.74</b>	<b>583,626.01</b>

<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Jul 2019 – Jun 2020)</b>	<b>Actual (Jul 2019 – May 2022)</b>		<b>Forecast (Sept 2022-Aug 2023)</b>
	Previous license period (July 2019 – Dec 2019)	Current license period (Jan 2020 – May 2022)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
142,319.98 mt	20,718.51 mt	121,590.76 mt	34,377.50 mt
	142,309.27 mt		
<b>CPO (OER: 21.50%)</b>	<b>CPO (OER: 19.80%)</b>		<b>CPO (OER: 20.50 %)</b>
28,178.21 mt	4,298.34 mt	23,879.33 mt	7,047.38 mt
	28,177.67 mt		
<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.57%)</b>		<b>PK (KER: 5.50 %)</b>
7,927.90 mt	1,138.16 mt	6,785.18 mt	1,890.76 mt
	7,923.34 mt		
<b>Note:</b>			
Based on previous license and volume extension in PamTrace:			
<ul style="list-style-type: none"> <li>FFB: last license= 78,594.74 MT; extension= 22,710.00 MT + 13,874.24 MT + 9,731.00 MT + 17,410.00 MT</li> <li>CPO: last license= 16,701.38 MT; extension= 3,650.00 MT + 563.83 MT + 3,942.00 MT + 3,321.00 MT</li> <li>PK: last license= 4,322.71 MT; extension= 1,270.00 MT + 498.19 MT + 847.00 MT + 990.00 MT</li> </ul>			

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<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Jul-19	783.61	215.89
2	Aug-19	763.86	188.74
3	Sep-19	757.55	203.40
4	Oct-19	682.34	192.21
5	Nov-19	635.62	154.35
6	Dec-19	675.36	183.57
7	Jan-20	538.77	154.08
8	Feb-20	662.29	186.42
9	Mar-20	814.38	223.38
10	Apr-20	414.40	115.28
11	May-20	589.09	146.30
12	Jun-20	708.73	180.82
13	Jul-20	955.98	275.62
14	Aug-20	852.91	230.92
15	Sep-20	798.26	210.48
16	Oct-20	750.01	212.62
17	Nov-20	791.83	217.92
18	Dec-20	968.45	267.71
19	Jan-21	889.44	272.53
20	Feb-21	905.90	242.40
21	Mar-21	959.99	252.37
22	Apr-21	889.85	249.33
23	May-21	832.92	226.48
24	Jun-21	1,158.94	356.04
25	Jul-21	1,106.76	320.31
26	Aug-21	1,098.37	317.01
27	Sep-21	958.50	277.05
28	Oct-21	925.91	271.64
29	Nov-21	888.27	276.99
30	Dec-21	556.70	168.50
31	Jan-22	680.34	206.40
32	Feb-22	655.18	188.84
33	Mar-22	866.10	261.49

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34	Apr-22	847.28	247.46
35	May-22	813.81	228.81
<b>TOTAL</b>		<b>28,177.67</b>	<b>7,923.34</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Dec 2020 – May 2022)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	9,058.50	14,541.56	-	-	23,600.06
<b>PK (MT)</b>	6,680.00	-	-	-	6,680.00
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Jul 2019 – Dec 2019)</b>					
<b>CPO (MT)</b>	-	4,379.70	-	-	4,379.70
<b>PK (MT)</b>	100.00	-	-	-	100.00
<b>Credits</b>	-	-	-	-	-

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

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Company "A"	RSPO_PO1000003168	1,802.62	-
2	Company "A"	RSPO_PO1000006558	-	3,390.00
3	Company "B"	RSPO_PO1000000698	947.45	-
4	Company "C"	RSPO_PO1000002035	6,308.43	-
5	Company "C"	RSPO_PO1000006557	-	3,390.00
<b>TOTAL</b>			<b>9,058.50</b>	<b>6,780.00</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	18,921.26	-
<b>TOTAL</b>			<b>18,921.26</b>	<b>-</b>

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

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	Nil		
<b>TOTAL</b>			<b>N/A</b>

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

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>						

**Note:** 1 mt = 1 credit

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Not Applicable)</b>							
Credits							
Physical							
<b>Previous License period (Not Applicable)</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.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: 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 27 June 2022 to 1 July 2022. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 5 May 2022. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020. The remote audit was conducted on 17 – 18 September 2020.

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

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

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

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re- Certification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_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: June 5, 2023 - June 9, 2023**

**Total Number of Mandays: 10 mandays**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Eko Purwanto (EP)	Team Leader	<p><b>Education:</b> Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p><b>Work Experience:</b> Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p><b>Training attended:</b> Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&amp;C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&amp;C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&amp;C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&amp;C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p>

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		<p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> Economic management plan, estate and mill best practices including RSPO supply chain requirements, continuous improvement program.</p>
Pratama Agung Sedayu (PS)	Team Member	<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> <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.</p>
Imam Fakhrurozi (IF)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree majoring in Agriculture Technology from Gadjah Mada University.</p> <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> Environment management plans and implementation, Occupation Health Safety requirement, human resources, business ethical, waste and GHG management.</p>
Yudwi Wisnu Rahmanto (YWR)	Team Member	<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</p>

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

**Accompanying Persons:**

Name	Role
Nil	

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### 2.3 Assessment Plan

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

Date <i>Tanggal</i>	Time <i>Waktu</i>	Subjects <i>Subyek / Aktifitas</i>	EP	PS	IF	YWR
Monday, 27/06/2022	10.20-11.45	Flight Jakarta to Pangkal Pinang (GA 136) <i>Penerbangan Jakarta – Pangkal Pinang</i>	√	√	√	√
	11.45-13.00	Traveling from Pangkal Pinang Airport to PT Bumi Permai Lestari <i>Perjalanan darat dari Bandara Pangkal Pinang ke PT Bumi Permai Lestari</i>	√	√	√	√
	13.00-14.00	Break	√	√	√	√
	14.00-15.00	Opening Meeting: - Auditee Presentation (Introduction of PIC, Profile of Certified Management Unit) // <i>Presentasi Auditee (Perkenalan PIC, Profil Perusahaan)</i> - Auditor Team Presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) // <i>Presentasi Tim Auditor (Perkenalan, Penjelasan Tujuan Audit, Ruang Lingkup Audit, Pembahasan Rencana Audit, Penentuan Sampel Audit, Penyampaian Transparansi dan Kerahasiaan)</i>	√	√	√	√
	15.00-17.00	Document review // <i>Tinjauan dokumen</i> : <ul style="list-style-type: none"> <li>• Review of Basic Information Data, Time bound plan, partial certification verification // <i>Review Data Informasi Umum</i></li> <li>• Verification of Supply Chain Data // <i>Verifikasi Data Rantai Pasok</i></li> <li>• Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour) // <i>Verifikasi data RSPO P&amp;C (Pengolahan dan Proses Pabrik, K3, Lingkungan, Sosial dan Tenaga Kerja)</i></li> </ul>	√	√	√	√
Tuesday, 28/06/2022	08.00-12.00	<b>Bukit Perak Mill:</b> Document review // <i>Tinjauan dokumen</i> : <ul style="list-style-type: none"> <li>• Review of Basic Information Data, Time bound plan, partial certification verification // <i>Review Data Informasi Umum</i></li> <li>• Verification of Supply Chain Data // <i>Verifikasi Data Rantai Pasok</i></li> <li>• Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour) // <i>Verifikasi data RSPO P&amp;C (Pengolahan dan Proses Pabrik, K3, Lingkungan, Sosial dan Tenaga Kerja)</i></li> </ul>	√	√	√	
		Stakeholder Consultation with interested and affected parties by phone // <i>Konsultasi stakeholder dengan pihak berkepentingan dan terdampak melalui telepon</i> <ul style="list-style-type: none"> <li>- Dinas Lingkungan Hidup</li> <li>- Dinas Tenaga Kerja dan Transmigrasi</li> <li>- Dinas Perkebunan</li> <li>- Kantor Pertanahan</li> </ul>				√

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Date <i>Tanggal</i>	Time <i>Waktu</i>	Subjects <i>Subyek / Aktifitas</i>	EP	PS	IF	YWR
		- Kepala Desa, Ketua Koperasi, Tokoh Masyarakat, Kontraktor (Angkut TBS, Land Clearing, dll).				
	12.00-14.00	Break	√	√	√	√
	14.00-17.00	<b>Bukit Perak Mill:</b> Field Observation // <i>Observasi Lapangan:</i> <ul style="list-style-type: none"> <li>RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous &amp; Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond // <i>RSPO Supply Chain (Penerimaan TBS, Jembatan Timbang), Gudang Limbah B3, Gudang Bahan Kimia, Simulasi Sarana Prasarana Pengendalian Kebakaran, Kolam IPAL.</i></li> <li>Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop // <i>Stasiun Proses (Rebusan, Bantingan, Press, Klarifikasi, Ripple Mill), Ruang Genset, Bengkel.</i></li> </ul>	√	√	√	
		Interview at <b>Bukit Perak Mill:</b> Gender Committee, Worker Union, New mother, Sample of workers				√
Wednesday, 29/06/2022	08.00-12.00	Field Observation to <b>Bukit Perak Estate</b> Aspect to be verified // <i>Aspek yang akan diverifikasi:</i> <ul style="list-style-type: none"> <li>Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area// <i>Implementasi aspek legal (tata batas, lahan okupasi, sengketa lahan – jika ada) dan area HCV.</i></li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) // <i>Implementasi Aspek Agronomi (Panen &amp; Transportasi, Pemupukan, Aplikasi Pestisida, Perawatan Jalan, Monitoring Pengendali Hayati, Aplikasi Janjang Kosong)</i></li> <li>Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) // <i>Implementasi Aspek Lingkungan, Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Pengelolaan Sampah dan Limbah)</i></li> <li>Implementation of Occupational Health &amp; Safety Aspect // <i>Implementasi Keselamatan dan Kesehatan Kerja</i></li> <li>Implementation of Employment Procedure and Mechanism Aspect // <i>Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan</i></li> <li>Observation of Workers Facilities (Housing, School, Worship Place) // <i>Observasi Fasilitas Pekerja (Perumahan, Sekolah, Sarana Ibadah)</i></li> </ul> Interview at <b>Bukit Perak Estate:</b> <ul style="list-style-type: none"> <li>Gender Committee, Worker Union, New mother, Sample of workers</li> </ul>	√	√	√	√

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Date <i>Tanggal</i>	Time <i>Waktu</i>	Subjects <i>Subyek / Aktifitas</i>	EP	PS	IF	YWR
		<ul style="list-style-type: none"> <li>Interview with Previous landowner (if applicable) // <i>Wawancara dengan pemilik lahan sebelumnya (yang sudah di GRTT)</i></li> </ul>				
	12.00-14.00	Lunch break <i>Istirahat siang</i>	√	√	√	√
	14.00-17.00	Document review // <i>Tinjauan dokumen:</i> Aspect to be verified // <i>Aspek yang akan diverifikasi:</i> <ul style="list-style-type: none"> <li>Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area// <i>Implementasi aspek legal (tata batas, lahan okupasi, sengketa lahan – jika ada) dan area HCV.</i></li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) // <i>Implementasi Aspek Agronomi (Panen &amp; Transportasi, Pemupukan, Aplikasi Pestisida, Perawatan Jalan, Monitoring Pengendali Hayati, Aplikasi Janjang Kosong)</i></li> <li>Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) // <i>Implementasi Aspek Lingkungan, Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Pengelolaan Sampah dan Limbah)</i></li> <li>Implementation of Occupational Health &amp; Safety Aspect // <i>Implementasi Keselamatan dan Kesehatan Kerja</i></li> <li>Implementation of Employment Procedure and Mechanism Aspect // <i>Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan</i></li> </ul>	√	√	√	√
Thursday, 30/06/2022	08.00-12.00	Field Observation to <b>Bukit Permata Estate</b> Aspect to be verified // <i>Aspek yang akan diverifikasi:</i> <ul style="list-style-type: none"> <li>Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area// <i>Implementasi aspek legal (tata batas, lahan okupasi, sengketa lahan – jika ada) dan area HCV.</i></li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) // <i>Implementasi Aspek Agronomi (Panen &amp; Transportasi, Pemupukan, Aplikasi Pestisida, Perawatan Jalan, Monitoring Pengendali Hayati, Aplikasi Janjang Kosong)</i></li> <li>Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) // <i>Implementasi Aspek Lingkungan, Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Pengelolaan Sampah dan Limbah)</i></li> <li>Implementation of Occupational Health &amp; Safety Aspect // <i>Implementasi Keselamatan dan Kesehatan Kerja</i></li> </ul>	√	√	√	√

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Date <i>Tanggal</i>	Time <i>Waktu</i>	Subjects <i>Subyek / Aktifitas</i>	EP	PS	IF	YWR
		<ul style="list-style-type: none"> <li>Implementation of Employment Procedure and Mechanism Aspect // <i>Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan</i></li> <li>Observation of Workers Facilities (Housing, School, Worship Place) // <i>Observasi Fasilitas Pekerja (Perumahan, Sekolah, Sarana Ibadah)</i></li> </ul> <p>Interview at <b>Bukit Permata Estate</b>:</p> <ul style="list-style-type: none"> <li>Gender Committee, Worker Union, New mother, Sample of workers</li> <li>Interview with Previous landowner (if applicable) // <i>Wawancara dengan pemilik lahan sebelumnya (yang sudah di GRTT)</i></li> </ul>				
	12.00-14.00	Lunch break <i>Istirahat siang</i>	√	√	√	√
	14.00-17.00	<p>Document review // <i>Tinjauan dokumen</i>: Aspect to be verified // <i>Aspek yang akan diverifikasi</i>:</p> <ul style="list-style-type: none"> <li>Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area// <i>Implementasi aspek legal (tata batas, lahan okupasi, sengketa lahan – jika ada) dan area HCV.</i></li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) // <i>Implementasi Aspek Agronomi (Panen &amp; Transportasi, Pemupukan, Aplikasi Pestisida, Perawatan Jalan, Monitoring Pengendali Hayati, Aplikasi Janjang Kosong)</i></li> <li>Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) // <i>Implementasi Aspek Lingkungan, Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Pengelolaan Sampah dan Limbah)</i></li> <li>Implementation of Occupational Health &amp; Safety Aspect // <i>Implementasi Keselamatan dan Kesehatan Kerja</i></li> <li>Implementation of Employment Procedure and Mechanism Aspect // <i>Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan</i></li> </ul>	√	√	√	√
Friday, 01/07/2022	08.00-10.00	<p>Continue Document review // <i>Tinjauan dokumen</i> Aspect to be verified // <i>Aspek yang akan diverifikasi</i>:</p> <ul style="list-style-type: none"> <li>Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) // <i>Implementasi Aspek Lingkungan, Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Pengelolaan Sampah dan Limbah)</i></li> <li>Implementation of Occupational Health &amp; Safety Aspect // <i>Implementasi Keselamatan dan Kesehatan Kerja</i></li> </ul>	√	√	√	√

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<b>Date</b> <i>Tanggal</i>	<b>Time</b> <i>Waktu</i>	<b>Subjects</b> <i>Subyek / Aktifitas</i>	<b>EP</b>	<b>PS</b>	<b>IF</b>	<b>YWR</b>
		<ul style="list-style-type: none"> <li>Implementation of Employment Procedure and Mechanism Aspect // <i>Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan</i></li> <li>Implementation of Supply Chain System against FFB receiving from certified Estate // <i>Penerapan system Supply Chain terhadap penerimaan TBS dari certified Estate.</i></li> </ul>				
	10.00-11.00	<ul style="list-style-type: none"> <li>Auditor discussion and report preparation // <i>Diskusi auditor dan pembuatan laporan closing meeting</i></li> </ul>	√	√	√	√
	11.00-12.00	Closing Meeting <ul style="list-style-type: none"> <li>Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion) // <i>Penyampaian hasil audit (Catatan Komponen Positif, Ketidaksesuaian, OFI, Batas Waktu Perbaikan dan Kesimpulan)</i></li> <li>Comments, Responses and Questions // <i>Komentar, Tanggapan dan Diskusi</i></li> </ul>	√	√	√	√

### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Golden Agri-Resources Ltd.'s RSPO Timebound Plan 2022-2025 dated 19 May 2022. The timebound plan include name of all subsidiary companies, all estates and all mills under Golden Agri Resources Ltd.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No, there are numbers of estates and mills which has not been certified yet, due to reasons such as new acquisitions, RaCP in progress and land title in progress. The 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?	Yes, there has been a change to the time-bound plan. Golden Agri-Resources Ltd. Has submitted RSPO Timebound Plan 2022-2025 on 19 May 2022. RSPO Secretariat has approved the timebound plan on 14 Jun 2022. This change is consistent with ACOP reporting 2021.	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 isolated lapses according to the updated time-bound plan dated 19 May 2022. Golden Agri-Resources Ltd. submitted RSPO Timebound Plan 2022-2025 to RSPO Secretariat. RSPO Secretariat has approved the timebound plan on 14 Jun 2022.	Complied

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<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No, there is no fundamental failure according to the updated time-bound plan dated 19 May 2022. Golden Agri-Resources Ltd. submitted RSPO Timebound Plan 2022-2025 to RSPO Secretariat. RSPO Secretariat has approved the timebound plan on 14 Jun 2022.</p>	<p>Complied</p>
<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>Yes, in several management unit there are replacement of primary forest or any area required to maintain or enhance HCVs and HCS. GAR and it's subsidiary has made Remediation and Compensation Procedure (RaCP) started with reporting Disclosure and Zero Liability to RSPO through email on 29 Aug 2014.</p> <p>Of the 25 companies, 7 of them are certified units, the remaining 18 companies are uncertified units. The following is an update on the RaCP progress as of 11 Jan 2022 for uncertified units:</p> <ul style="list-style-type: none"> <li>a) 4 companies have received Concept Note approval from RSPO on 27 July 2020. 3 of them submitted revised Concept Note in collaboration with a third party PT Lestari Capital. The latest progress on the revised Concept Note was submitted on 14 Jan 2022 and is currently still being reviewed by the RSPO Compensation Panel. In addition, the company also made a Concept Note for Batu Menangis Project which was submitted on 16 Dec 2021 to the RSPO Compensation Panel.</li> <li>b) 2 units with LUCA (Land Use Change Analysis) report still in the RSPO review process.</li> <li>c) 12 units with LUCA (Land Use Change Analysis) report in the process of being revised and will soon be sent to the RSPO.</li> <li>d) 1 unit with LUCA report approved.</li> <li>e) There is also 1 unit with LUCA report that is proposed to be held/postponed until the Integrated HCV HCS Report obtains Satisfactory status from the HCVRN.</li> </ul>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>Yes, there are new plantings after 1 Jan 2010 conducted by GAR and its subsidiaries. There are 18 companies that have implemented the RSPO New Planting Procedure (NPP) and have gone through a 30-day public consultation process in April 2014. Those companies have</p>	<p>Complied</p>

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	been comply with the RSPO New Plantings Procedure.	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>Yes. In the RSPO Case Tracker, Audit team noted an active complaint related to land conflict and being progressed;</p> <ul style="list-style-type: none"> <li>- Complaint Ref.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. Current status: Investigation.</li> <li>- In the RSPO RaCP Tracker, Audit team noted 22 MUs with potential liability, 22 MU with LUCA submitted, 14 MU with LUCAs review completed, 21 MU with CN required, 5 MU with CN submitted, 5 MU with CN approved, 0 MU with CP submitted, 0 MU with CP endorsed, 17 MU with RP required, 0 MU with RP submitted, 0 MU with RP approved</li> </ul>	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	In the RSPO Case Tracker, Audit team noted there was no active complaint related to labour disputes.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	In the RSPO Case Tracker, Audit team noted there was no active complaint related to legal non-compliance.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	<p>Yes, Golden Agri-Resources Ltd. carried out internal audit for the uncertified estates and mills against RSPO P&amp;C Criterion.</p> <ul style="list-style-type: none"> <li>- Internal audit for PT. Agro Lestari Mandiri – Pekawai POM, Pekawai Estate, Kayung Estate, Sungai Kelik Estate, Nanga Tayap Estate, Kayung Plasma carried out 7-11 February 2022.</li> <li>- Internal audit for PT. Mitra Karya Agroindo – Tangar POM, Sulin Estate, Nahiyang Estate, Katayang Estate carried out 13-22 December 2021.</li> <li>- Internal audit for PT. Tapian Nadenggan – Bukit Kapur POM, Bukit Kapur Estate, Sungai Cantung Estate carried out 6-10 December 2021.</li> <li>- Internal audit for PT. Aditunggal Mahajaya – Sako POM and Sungai Ayawan Estate carried out on 15-26 November 2021.</li> <li>- Internal audit for PT. Kresna Duta Agroindo – Rantau Panjang POM and Rantau Panjang Estate carried out 25-29 October 2021.</li> </ul>	Complied

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	Audit checklist covers all RSPO P&C and RSPO Certification System requirement.	
<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.</p> <ul style="list-style-type: none"> <li>- Internal audit for PT. Agro Lestari Mandiri – Pekawai POM, Pekawai Estate, Kayung Estate, Sungai Kelik Estate, Nanga Tayap Estate, Kayung Plasma; Internal audit team issued NC related to 2.1.1, 7.12.8 management is preparing correction through LUCA and disclosure to RSPO, latest feedback 12 January 2022.</li> <li>- Internal audit for PT. Mitra Karya Agroindo – Tangar POM, Sulin Estate, Nahiyang Estate; Internal audit team issued NC related to 2.1.1, 7.12.8 management is preparing correction through LUCA review latest feedback 18 November 2021.</li> <li>- Internal audit on PT. SMART – Bukit Kapur POM, Bukit Kapur Estate, Sungai Cantung Estate; Internal audit team issued NC related to 2.1.1, 7.12.2 and 7.12.4, management is preparing correction and corrective action.</li> <li>- Internal audit on PT. Kresna Duta Agroindo – Rantau Panjang POM and Rantau Panjang Estate; Internal audit team issued NC related to 2.1.1, management is preparing correction and corrective action.</li> </ul>	Complied
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>In the RSPO Case Tracker, Audit team noted active complaint;</p> <ul style="list-style-type: none"> <li>- Complaint Ref.RSPO/2021/12/CRP, date filed 8 November 2021 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. Current status: Investigation. Latest progress in 25 May 2022 “Bilateral Engagement process ongoing”.</li> <li>- Complaint Ref.RSPO/2020/04/IR, dated filed 2 March 2020 addressed to Golden Agri Resources Ltd., by Forest People Programme &amp; Elk Hills Research. Current status: Investigation. Latest progress in 25 May 2022 “The Secretariat is in the midst of preparing the ToR &amp; identifying a Consultant with relevant background”.</li> </ul>	Complied

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	<p>- Complaint Ref.RSPO/2018/14/IR, dated filed 19 October 2018 addressed to Golden Agri Resources Ltd., by Forest People Programme &amp; Transformasi Untuk Keadilan Indonesia. Current status: Investigation. Latest progress in 25 May 2022 "The Service Agreement has been executed by the Consultant. Independent investigation to be commenced by the Consultant".</p> <p>Audit team sent email to Sawit Watch, Wetlands, Aid Environment and WALHI, until assessment ends, audit team did not received 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 or scheme outgrowers as supply base.</p>	<p>Complied</p>

**Approved Time Bound Plan**

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB
				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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				Latitude	Longitude					
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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				Latitude	Longitude					
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	2022	-	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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				Latitude	Longitude					
			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	2022	-	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	2022	-	
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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				Latitude	Longitude					
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	2022	-	-

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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	-	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	2022	-	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	-	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	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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	2022	-	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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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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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	-	-

### 3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were no Critical; no Minor nonconformities and 1 (one) Opportunity For Improvement raised.

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

Opportunity for Improvements	
OFI #	Description
OFI 1	Indicator 1.2.2 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.

Positive Findings	
PF #	Description
PF 1	The certificate holder has implemented continuous improvement, one of which is the mechanization of FFB transportation using a crane grabber, so that it can help overcome labour shortages and accelerate the FFB transportation process.
PF 2	Productive community empowerment program around plantations that utilizes the potential of resources (natural and human) as well as cooperation with third parties. in example: Gerakan Sekolah Menyenangkan and Youth Development, Program Madu Hutan Liar (coolaborate with Jaringan Madu Hutan Indonesia), Program Kerajinan Resam (collaborate with Krealogi).

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

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

Opportunity for Improvement	
OFI#	Description
OFI 1	<p><b>OFI Statement:</b> 6.7.2 - The company has conducted a work accident investigation for every accident that occurs. Evaluation related to details of the root causes of accidents and appropriate recommendations to prevent accidents from occurring need to be improved.</p> <p><b>Verification / Follow-up actions:</b>            Accident report is available as per "Laporan Kecelakaan Kerja". Reported in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate period June 2020 – May 2022 there was 1 accident occurred on 4 December 2020 with Lost Time Accident (LTA) is 2 man-days. Safety Officer has prepared Accident report (F/SMART/HESS-EHSD/SADV/005/002), with Chronology: While repairing the conduit, he had an accident on his head when he hit a conveyor restraint; recommendation base on investigation report: routine OHS briefing before work and repairing boiler fuel conduit. Verified during this recertification assessment that Unit of certification has analysed root cause and implemented recommendation to prevent recurring accidents.</p>

**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 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	<ul style="list-style-type: none"> <li>- Dinas Lingkungan Hidup, Kabupaten Bangka Barat.</li> <li>- Dinas Penanaman Modal, Perijinan Satu Pintu dan Tenaga Kerja, Kabupaten Bangka Barat.</li> <li>- Dinas Pertanian dan Pangan, Kabupaten Bangka Barat</li> <li>- Kantor Pertanahan ATR/BPN, Kabupaten Bangka Barat</li> </ul>	Phone interview
Communities	<ul style="list-style-type: none"> <li>- Desa Kacung, Kecamatan Kelapa, Kabupaten Bangka Barat.</li> <li>- Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka Barat.</li> </ul>	Phone interview Desa Dendang (contacted but not responded)
Worker Union	- DPC Federasi Serikat Pekerja Seluruh Indonesia (FSPSI) Propinsi Kepulauan Bangka Belitung.	Face to face interview
NGO	-	Invitation email to comment was sent to Wetlands, Sawit Watch, Aid Environment, Walhi, WWF, Forest Watch, WCS, Solidaridad and Links, however, no response was received.
Contractor	- PT Satrindo Jaya Agropalma	Face to face interview
Internal	<ul style="list-style-type: none"> <li>- Gender Committee Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill.</li> <li>- Employees Cooperative</li> <li>- New Mother</li> </ul>	Face to face interview
External	<ul style="list-style-type: none"> <li>- Enclave landowner</li> <li>- Previous landowner</li> <li>- Landowner</li> </ul>	Face to face interview

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks: Monitoring and Control Section, Environmental Department of Bangka Barat Regency (<i>Bidang Pengawasan Dinas Lingkungan Hidup, Kabupaten Bangka Barat</i>).</b></p> <ul style="list-style-type: none"> <li>- Environmental Document of PT Bumi Permai Lestari namely AMDAL. Latest information update was the company propose administrative adjustment related to hectarage refer to plantation permit (IUP), where in document AMDAL previously written 14,000 Ha managed area. But during surveillance visit on 8 June 2022 and refer to Plantation Permit, actual measurement of managed area PT Bumi Permai Lestari was 14,319.8 Ha. There is no expansion area or additional estate, it was just inaccuracy of</li> </ul>

	<p>measurement by Land Department during issuance of location permit as referred by AMDAL document comparing to current measurement.</p> <ul style="list-style-type: none"> <li>- As refer to new regulation on Environmental aspect (PP No. 22 Tahun 2021), if there any changes of environmental scope then adjustment shall follow the required stages. The stages are proposing all requirements for Environmental Approval (including all applicable permission within) and propose for changes of Plantation Permit afterward (where Environmental Approval is basic requirement to fulfilled).</li> <li>- There is no environmental issue raised against the PT Bumi Permai Lestari for the last three years behind from community or other stakeholders, including pollution, land fire or wastes.</li> <li>- Latest issued from Environmental Department is Domestic Waste Permit.</li> <li>- Environmental Monitoring and Management Report is regularly report to Environmental Department every six month.</li> </ul>
	<p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>- Evidence of completing administrative requirements of environmental document has seen and demonstrate during audit. This process are still ongoing, the latest license is technical recommendation of domestic wastewater.</li> <li>- No other critical issues against environment within the unit of certification.</li> </ul>
<p><b>2</b></p>	<p><b>Feedbacks: Industrial Relations Disputes Section, Manpower Department of Bangka Barat Regency (<i>Bidang Perselisihan Hubungan Industrial, Dinas Penanaman Modal, Perijinan Satu Pintu dan Tenaga Kerja, Kabupaten Bangka Barat</i>).</b></p> <ul style="list-style-type: none"> <li>- Periodic reporting of manpower status and its update from the company is cooperatively implemented.</li> <li>- Retirement of one worker from Bukit Permata Estate in 2021 has reported and accomplish with agreed manner.</li> <li>- Provincial Minimum wage has been implemented to all workers without any disputes.</li> </ul>
	<p><b>Audit Team verification and response:</b>          Manpower aspect has been verified by related auditor.</p>
<p><b>3</b></p>	<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>- Assessment of Plantation Classification has been conducted in 2020, where PT Bumi Permai Lestari achieve Class III for categorization.</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> </ul>
	<p><b>Audit Team verification and response:</b>          Verification on this issue has been follow up by related auditors during audit.</p>
<p><b>4</b></p>	<p><b>Feedbacks: Land Registration Section, National Land Department (<i>Bidang Pendaftaran Tanah, Kantor Pertanahan ATR/BPN, Kabupaten Bangka Barat</i>).</b>          Contacted but no response.</p>
	<p><b>Audit Team verification and response:</b>          No need to follow up</p>
<p><b>5</b></p>	<p><b>Feedbacks: Chief of Kacung Village (<i>Plt. Kepala Desa Kacung, Kecamatan Kelapa</i>).</b></p> <ul style="list-style-type: none"> <li>- The company are very helpful to support village program, particularly infrastructure development and empowerment assistance.</li> </ul>

	<ul style="list-style-type: none"> <li>- In 2019, the village requested assistance for organizing Independence Day activities. However, there was no response from the company to the submitted application.</li> <li>- The company provides Micro, Small and Medium Enterprises Program (UMKM) to the community with various program in April 2022.</li> <li>- No issues on environment or land conflict against the company.</li> </ul>
	<p><b>Audit Team verification and response:</b>          The company has responded to the request through the Chairperson of the Committee, which is the Village Youth Organization (Karang Taruna Desa) on 16 August 2019 through the letter "Surat Pengantar No: 140/424/PHBN/19.05.04.2006/2019.</p>
<p><b>6</b></p>	<p><b>Feedbacks: Dendang Village</b>          Contacted but not responded</p>
	<p><b>Audit Team verification and response:</b>          No follow up needed</p>
<p><b>7</b></p>	<p><b>Feedbacks: Branch Leadership Council of Indonesia Worker Union Federation (<i>DPC FSPSI Kabupaten Bangka Barat</i>)</b></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>- For the last three-year, worker union federation did not received any issues (complaint, grievance, unsatisfaction) related manpower in the company.</li> <li>- Workers' rights have been fulfilled by the company, including wages and other benefits.</li> </ul> <p><b>Audit Team verification and response:</b>          Positive comments, no need to follow up. Details for manpower aspects already describe and verified in relevant criteria.</p>
<p><b>8</b></p>	<p><b>Feedbacks: PT Satrindo Jaya Agropalma - CPO and FFB transporter (contractor)</b></p> <ul style="list-style-type: none"> <li>- Company policies already disseminated to the contractor by email. To remind the policies, the company deliver information every day during muster morning where the contractor also involved within.</li> <li>- Feeling comfort since working with the company.</li> <li>- PT BPL implementing strict rules to the contractor, sanction will apply if contractor does not comply with company rules and policies.</li> </ul> <p><b>Audit Team verification and response:</b>          Already verified by related auditor.</p>
<p><b>9</b></p>	<p><b>Feedbacks: Gender Committee, New Mother</b></p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- For new mother needs, appropriate facilities already provided by the company. Such as: breastfeeding room in creche, breastfeeding time during at work.</li> <li>- Identification of new mother needs conducted prior birth delivery.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>- Based on interview with sample of female workers, there is no harassment or domestic violence occurs in this company.</li> </ul>

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	- Verification on document " <i>Identifikasi, Absensi dan Daftar Kebutuhan H1, H2 dan Ibu Menyusui 2022</i> " for identification of pregnant and new mother needs.
<b>10</b>	<p><b>Feedbacks: Mr. Ka*an (Landowner within company land use rights which not compensated)</b></p> <ul style="list-style-type: none"> <li>- His land categorised as inherited land which obtained from grandparents. His parents and family does not agree to be compensated and released to the company, because its land is for family owned that shall be preserved.</li> <li>- The company give a respect to the landowner to managed independently and never disturb to each other's, including activities within that area. Therefore, no forced, conflict or disputes related the land, even though the landowner know that the land is categorise as State Land and located within company land use rights.</li> </ul> <p><b>Audit Team verification and response:</b> No need to follow up</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
Amat Abunawar	1992	1	Yes	Yes	Comply with FPIC, no forces during compensation.
Seran (represented by daughter)	unknown	3.5	Yes	Yes	Comply with FPIC, no forces during compensation.
Usman	1982	0.5	Yes	Yes	Comply with FPIC, no forces during compensation.

Previous land owner / user comment	
<b>1</b>	<p><b>Feedbacks: Mr. Amat Abunawar</b> Prev. crops: paddy field and rubber Compensation: land compensation in 1993. Compensation is only for crops or trees growth above the land, because the land status categorises as state land.</p> <p>FPIC Process: yes Compensated land size:0.5 Ha.</p> <p><b>Audit Team verification and response:</b> Documented evidence of compensation was verified and comply.</p>
<b>2</b>	<p><b>Feedbacks: Mr. Seran (represent by his daughter)</b> Prev. crops: paddy field, rubber, durians. Compensation: land compensation in 1993/1994. Compensation is only for crops or trees growth above the land, because the land status categorises as state land. Total land owned is 3.5 Ha, but compensated only 0.5 Ha, because the 3 Ha is shrubs.</p> <p>FPIC Process: yes</p>

	Compensated land size:0.5 Ha.
	<b>Audit Team verification and response:</b> Documented evidence of compensation was verified and comply.
<b>3</b>	<p><b>Feedbacks: Mr. Usman</b> Prev. crops: rubber more than 10 years. Compensation: land compensation in 1992. Compensation is only for crops or trees growth above the land, because the land status categorises as state land.</p> <p>FPIC Process: yes Compensated land size:0.5 Ha.</p>
	<b>Audit Team verification and response:</b> Documented evidence of compensation was verified and comply.

**3.5 Impartiality and conflict of interest**

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

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**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT 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 certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Yahya Mustakim
Company Name: PT BSI Group Indonesia on behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT Bumi Permai Lestari
Title: Lead Assessor	Title: Sustainability Management System and Certification
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 3 August 2022	Date: 4 August 2022

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b></p>			
<p>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>All the management documents specified in RSPO P&amp;C listed by PT. Bumi Permai Lestari under "Daftar Informasi untuk Stakeholder" last update 2 February 2022.</p> <ul style="list-style-type: none"> <li>- Certificate 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> <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> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <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> </ul> <p>General information: "Akta pendirian, data areal dan produksi, data aplikasi pupuk"/Deed of establishment, hectare statement and production data, fertilizer application, "Jumlah Karyawan dan Daftar Upah Pokok Karyawan", "Data Nomor Pokok Wajib Pajak"/tax payer number;</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Based on stakeholder interview with Environmental Service, they said company was open with the information such as environmental management and monitoring plan (RKL-RPL), including pollution prevention plan. Audit team verified all information available in Bahasa Indonesia.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>PT. Bumi Permai Lestari maintain records for information and responses title "Buku Catatan Permintaan dan Tanggapan Informasi". For period 2020-2022, 17 incoming and outgoing information recorded.</p> <ul style="list-style-type: none"> <li>- Incoming information from Manpower service letter "Surat Dinas Tenaga Kerja Provinsi Kepulauan Bangka Belitung No.188.4/034/P2K3/DISNAKER/2020 Perihal Pengesahan Perubahan Struktur Organisasi P2K3 dan Team Tanggap Darurat atau Unit Penanggulangan Kebakaran Bukit Permata Estate" dated 11 November 2020 related to Safety Committee approval. It was response from company application No.001/MGR/SMK3/BPTE/3/2020. Completed.</li> </ul>	Complied

		<p>- Incoming information from Manpower service letter "Surat Dinas Tenaga Kerja Provinsi Kepulauan Bangka Belitung No.006/PKWT/DPMNAKERTRANS/2021 Perihal Tanda Bukti Pencatatan PKWT Bukit Permata Estate" dated 10 February 2021 related to Contract Worker approval. It was response from company application No.001/EM/BPTE/3/2020 dated 10 February 2021. Completed.</p> <p>- Incoming information request from Environmental service letter "Surat Dinas Lingkungan Hidup Provinsi Kepulauan Bangka Belitung No.09/162/ST/DLH/2022 Perihal Kunjungan DLH" dated 6 June 2022 related to Environmental Service plan for site visit in relation to environmental monitoring. It was responded by company through letter No.001/DLH/BPRM/06/2022 dated 7 June 2022. Completed.</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>PT. Bumi Permai Lestari refers to communication and consultation procedure under "SOP Komunkasi dan Konsultasi No.SOP/SMART/UMUM/SADV/I/004" dated 1 July 2014. The document stipulates type of communication: aspiration and suggestion, information for stakeholders, incident report, consultation with internal and external parties. The procedure stipulates upon receiving aspiration/incoming letter, unit head inform related Department max.1 week after correspondence received; Unit Head prepare response plan max.3 weeks after correspondence received; Unit Head send for Top management max. 1 week to obtain guidance and approval.</p> <p>PT. Bumi Permai Lestari has appointed management official to consult and communicate with stakeholders:</p> <p>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 10 January 2022. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community,</p>	<p>Complied</p>

		<p>cultural leader, religious leader, social organization and government officials.</p> <p>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.</p> <p>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.</p> <p>This document has been communicated to stakeholders:</p> <ul style="list-style-type: none"> <li>- Minutes of company SOPs and policies socialization to village communities: Dendang village, Air Bulin village, Kacung village, Pangkal Beras village, Terentang village, Ibul village, Berang village, Tugang village, Tumbak Petar village, Mislak village, Ranggi Asam village on 17-22 December 2020. The Communication and Consultation SOP, Grievance and Conflict Resolution SOP, Information SOP, Code of Ethical Conduct Policy was disseminated during the process.</li> <li>- Minutes of company SOPs and policies socialization to village communities: Tugang village, Dendang village, Kacung village, Terentang village, Pangkal Beras village, Air Bulin village, Ibul village, Berang village, Tumbak Petar village, Mislak village, Jebus village, Ranggi Asam village on 16-17 December 2021. The</li> </ul>	
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		<p>Communication and Consultation SOP, Grievance and Conflict Resolution SOP, Information SOP, Code of Ethical Conduct Policy was disseminated during the process.</p> <ul style="list-style-type: none"> <li>- Meeting between Bukit Perak POM and third party FFB suppliers; CV Dua Serangkai, Koperasi Tugang Jaya, CV Multi Nusa Pratama, etc. on 24 June 2022. During the meeting, company communicating RSPO standards, Communication and Consultation SOP, Code of Ethical Conduct Policy (fair business, fair competition, prohibit bribery and corruption, comply to laws and legal), Human Rights Policy, etc.</li> </ul> <p>Sample of communication and consultation process verified, related to planning for seedling credit program:</p> <ul style="list-style-type: none"> <li>- 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.</li> <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. 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.</li> <li>- 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> </ul>	
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1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>PT. Bumi Permai Lestari demonstrated contact and detailed stakeholder information, latest update 13 June 2022. The list comprise of</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>- 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</li> <li>- Third-party FFB Supplier: CV Dua Serangkai, PT. Putra Bangka, BUMDes Bulin Berteras, BUMDes Sinar Harapan, BUMDes Jaya Bersatu, Koperasi Pertanian Tugang Jaya, CV Gunung Mas Lestari, BUMDes Bunga Desa, CV Multi Nusa Pratama</li> <li>- Cooperative: Koperasi Setia Mandiri Chairman</li> <li>- Academy: Universitas Bangka Belitung</li> <li>- NGO: The NGO who gave complaint Forest People Programme and Transformasi Untuk Keadilan was not on the list for PT. Bumi Permai Lestari, which located in Kepulauan Bangka Belitung Province</li> </ul>	Complied
<p><b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
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> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>PT Bumi Permai Lestari referring to "Kode Etik Golden Agri Resources" signed by Chairman, June 2021. The content of the code of ethical</p>	Complied

		<p>conduct is applicable in upholding integrity for employee, company, business partner, shareholder and community.</p> <ul style="list-style-type: none"> <li>- Upholding integrity for employee covers respecting diversity, avoid discrimination, avoid harassment and violence, respect employee privacy, creating safe workplace environment, zero tolerance on illegal substance, and fair industrial relation practices including recruitment.</li> <li>- Upholding integrity for company covers protection of company assets, correct use of technology, responsible use of social media, confidential information, and intellectual asset protection, avoid conflict of interest, working outside and business affiliate activity, financial interest, gift and hospitality regulation.</li> <li>- Upholding integrity for business partner covers provision of safe and high quality product and service, fair treatment of business partner through fair deal with customer, fair treatment for supplier, government customer, fair competition through antitrust law, ethical sales and marketing, competitor information, prevent bribery and corruption, anti-money laundering, international business activity in dealing with import and export, reviewing economic sanction and boycotting.</li> <li>- Upholding integrity for shareholder covers accurate accounting book-keeping and recording, disclosure of financial report and fraud, management note, stock exchange transaction, insider trading, good corporate governance, communication with shareholders.</li> <li>- Upholding integrity for community explains upholding environmental and social sustainability, political activity, external communication.</li> </ul> <p>The document code of ethical conduct including raising concerns through email and telephone number.</p>	
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		<p>PT. Bumi Permai Lestari is communicating the policy on code of ethical conduct to worker, village communities and contractors:</p> <ul style="list-style-type: none"> <li>- 12 Harvesters and 13 Loose Fruit Collectors Division II Bukit Permata Estate; 20 Upkeep workers Division II Bukit Permata Estate dated 9 March 2020.</li> <li>- Communication code of ethical conduct policy to 7 compound workers, 5 FFB graders, 34 operators and graders, 7 Laboratory workers, 10 POM staffs in Bukit Perak POM dated 20 February 2020.</li> <li>- Minutes of company SOPs and policies socialization to village communities: Dendang village, Air Bulin village, Kacung village, Pangkal Beras village, Terentang village, Ibul village, Berang village, Tugang village, Tumbak Petar village, Mislak village, Ranggi Asam village on 17-22 December 2020. The Code of Ethical Conduct Policy was disseminated during the process.</li> <li>- Meeting between Bukit Perak POM and third party FFB suppliers; Koptan Tugang Jaya, Bumdes Sinar Harapan, CV Dua Serangkai, Bumdes Desa Tugang, etc. on 18 April 2020. During the meeting, company communicating RSPO standards, Code of Ethical Conduct Policy.</li> <li>- 23 Upkeep workers including sprayer Division I Bukit Permata Estate dated 15 April 2021. Audit team interviewed sample upkeep worker in Division I and they understood.</li> <li>- 20 Harvesters in Division I, Bukit Perak Estate dated 9 April 2021.</li> <li>- Communication to 34 operators and graders, 7 Laboratory workers, 10 POM staffs in Bukit Perak POM dated 19 April 2021.</li> <li>- Minutes of company SOPs and policies socialization to village communities: Tugang village, Dendang village, Kacung village, Terentang village, Pangkal Beras village, Air Bulin village, Ibul village, Berang village, Tumbak Petar village, Mislak village, Jebus</li> </ul>	
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		<p>village, Ranggi Asam village on 16-17 December 2021. Code of Ethical Conduct Policy was disseminated during the process.</p> <ul style="list-style-type: none"> <li>- Meeting between Bukit Perak POM and third party FFB suppliers and FFB transporter; EMKL Tiga Berdikari, Koptan Tugang Jaya, Bumdes Sinar Harapan, etc. on 19 April 2021. During the meeting, company communicating RSPO standards, Code of Ethical Conduct Policy.</li> <li>- Communication to 18 harvesters, 23 upkeep workers, 2 mandors in Bukit Perak Estate, Division I dated 23 May 2022.</li> <li>- Communication to 28 POM operators, 3 Laboratory workers, 6 Grading workers, 11 POM staffs in Bukit Perak POM dated 11 June 2022.</li> <li>- Meeting between Bukit Perak POM and third party FFB suppliers; CV Dua Serangkai, Koperasi Tugang Jaya, etc. on 24 June 2022. During the meeting, company communicating RSPO standards, Code of Ethical Conduct Policy.</li> </ul>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>PT. Bumi Permai Lestari 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>- Company carried out internal audit year 2022 on 28 March-4 April 2022, for indicator 1.2.2 contractor compliance CPO transporter PT. Satrindo Jaya Agropalma evident.</li> <li>- Company carried out contractor inspection to review contractor readiness and implementation/understanding. Sampled for "Formulir Inspeksi Kontraktor PT. Jaya Lestari Perkasa" for land clearing in replanting area dated 13 December 2021. The Safety officer checked on work environment condition, PPE use, emergency situation readiness, working tool condition, contractor competence, business ethics understanding incl. integrity, avoid bribery and corruption, avoid money-laundering, fair competition.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>- Company carried out contractor inspection to review contractor readiness and implementation/understanding. Sampled for "Formulir Inspeksi Kontraktor PT. Satrindo Jaya Agropalma" dated 26 April 2022. The Safety officer checked on work environment condition, PPE use, emergency situation readiness, working tool condition, contractor competence, business ethics understanding incl. integrity, avoid bribery and corruption, avoid money-laundering, fair competition.</li> </ul> <p>Controlled through contractual agreement:</p> <ul style="list-style-type: none"> <li>- Contract "Surat Pernyataan DO CV Dua Serangkai" dated 1 January 2020. Point 4 stated the FFB coming from legally owned land, obtained all permit managed in line with laws and regulation and does not harvested illegally. Point 8 stated the contractor will accept the cooperation termination if proven conducting fraud behaviour/bribing POM employee.</li> <li>- Contract and "Surat Pernyataan H. Mirwan CV Multi Nusa Pratama"             <ul style="list-style-type: none"> <li>- Point 4 stated the FFB coming from legally owned land, obtained all permit managed in line with laws and regulation and does not harvested illegally. Point 8 stated the contractor will accept the cooperation termination if proven conducting fraud behaviour/bribing POM employee.</li> </ul> </li> <li>- Contract and "Surat Pernyataan H. Mirwan CV Multi Nusa Pratama"             <ul style="list-style-type: none"> <li>- point 1 will not perform any action leads to corruption, bribery and fraud; dated 22 June 2022.</li> </ul> </li> <li>- Contract and statement "Surat Pernyataan Samrin Tugang Jaya" dated 1 January 2020 – Point 4 stated the FFB coming from legally owned land, obtained all permit managed in line with laws and regulation and does not harvested illegally. Point 8 stated the contractor will accept the cooperation termination if proven</li> </ul>	
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		<p>conducting fraud behaviour/bribing POM employee dated 1 Januari 2020.</p> <p>Controlled through due diligence for sampled contractor:</p> <ul style="list-style-type: none"> <li>- Statement signed by PK transporter contractor "Surat Pernyataan PT. EMKL Tiga Berdikari dated 24 June 2022. The statement letter including complying to relevant laws and regulation, including industrial relation, health and safety and environment; comply to PT. Bumi Permai Lestari's code of ethic policy; prohibit hiring underage worker, forced labour, and worker from trafficked labour; and be open for certification audit.</li> <li>- Company checked 8 employees of PT. EMKL Tiga Berdikari and no worker under 18 years old. Youngest worker Doni Suranto born 24 July 1983.</li> <li>- Company checked payment from PT. EMKL Tiga Berdikari to its worker. Sampled May 2022 for Doni Suranto paid Rp.3,800,000; for Iswandi paid Rp.3,700,000; Eliandi paid Rp.3,500,000; Andi paid Rp.3,500,000.</li> <li>- Company checked insurance provision for PT. EMKL Tiga Berdikari worker. Andi, Doni Suranto, Iswandi, Eliandi holds "BPJS Ketenagakerjaan &amp; BPJS Kesehatan".</li> <li>- Company checked insurance levy provision by PT. EMKL Tiga Berdikasi for its worker. Sampled payment for period June 2022 – on 15 June 2022 of Rp.2,037,000.</li> </ul> <p>Sampled ontime payment to contractor/FFB transporter. Payment for FFB supplier:</p> <ul style="list-style-type: none"> <li>- Grading record "Data Grading Penerimaan TBS Luar Bumdes Sinar Harapan" period 28 April 2022 – Total FFB 19,320 kg; deduction 579.60 kg; Nett FFB 18,740 kg.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Goods receipt "Berita Acara Serah Terima Barang" dated 28 April 2022; FFB received 19,320 kg; deduction 579.60 kg; FFB nett paid 18,740.40 kg from Bumdes Sinar Harapan.</li> <li>- Invoice Bumdes Sinar Harapan dated 30 April 2022 for 18,740.40 kg x Rp.2,160; total Rp.40,378,066.</li> <li>- Debit Advice for Bumdes Sinar Harapan of Rp.40,78,066 dated 11 May 2022.</li> </ul> <p>Payment for Replanting contractor:</p> <ul style="list-style-type: none"> <li>- Goods/Service receipt "Berita Acara Pemeriksaan Pekerjaan" dated 22 February 2022 for Land Preparation Replanting Bukit Perak Estate. Chipping live palm 1,287.18 Ha; Chipping dead palm 1,287.18 Ha; Drainage cleaning and preparation 1x0.75x1m of 14,576.79 m; Drainage cleaning and preparation 2x1.50x2m of 11,761.27 m; Drainage cleaning and preparation 4x3x4m of 4,095.20 m; planting hole of 157,991 units; Rorak 28,355.81 meters. Checked and signed by Regional Controller, Estate Manager, Assistant Estate, Administration Head and Contractor.</li> <li>- Invoice PT. Jaya Lestari Perkasa No.022/JLP/II/2022 dated 22 February 2022 for sum total Rp.550,567,790.</li> <li>- Payment to PT. Jaya Lestari Perkasa dated 22 February 2022.</li> </ul>	
<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>			
<p>2.1.1</p>	<p><b>(C)</b> The unit of certification complies to relevant regulations.          - Critical (Major) compliance -</p>	<p>PT. Bumi Permai Lestari demonstrates compliance to relevant laws and regulations.</p> <ul style="list-style-type: none"> <li>- Environmental permit "Persetujuan Persetujuan Kerangka Acuan Analisis Mengenai Dampak Lingkungan PT. Bumi Permai Lestari No.1431/ANDAL/III/94" dated 9 March 1994 and "Persetujuan</li> </ul>	<p>Complied</p>

		<p>Menteri Pertanian atas Analisis Dampak Lingkungan (ANDAL), Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL) Perkebunan Kelapa Sawit dan Pabrik Pengolahannya PT. Bumi Permai Lestari No.046/ANDAL/RKL-RPL/BA/II/1996” dated 16 February 1996.</p> <ul style="list-style-type: none"> <li>- Plantation permit “Surat Pendaftaran usaha Perkebunan No.HK.350/183/BUN.5/III/2021” dated 16 March 2001. Area of permit for oil palm plantation 12,992.55 Ha; located in Kelapa and Mentok Ditrick, Bangka Regency, Sumatera Selatan Province; palm oil mill capacity 60 tons FFB/hour. With the revision on the land title on 2013, the operation area changes and exceeds the hectarage in permit. HGU decree “Keputusan Kepala Badan Pertanahan Nasional Republik Indonesia No.1/RIt/HGU/BPN RI/2013 tentang Ralat Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional Tanggal 25 Agustus 1995 Nomor 58/HGU/BPN/95 Tentang Pemberian Hak Guna Usaha Atas Nama PT. Bumi Permai Lestari dan Surat Keputusan Kepala Badan Pertanahan Nasional Tanggal 28 Oktober 2004 Nomor 128/HGU/BPN/2004 Tentang Pemberian Perpanjangan Jangka Waktu dan Pembaharuan Hak Guna Usaha Atas Tanah Terletak di Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung”, dated 9 September 2013. Land title covers area of 14,319.08 Ha.</li> </ul> <p>The company sent application letter to Regent of Bangka Barat through letter “Surat PT. Bumi Permai Lestari No.53/D&amp;L-BPL/VI/2016 Perihal Permohonan Revisi Luas dalam Surat Pendaftaran Usaha Perkebunan (SPUP)/Izin Usaha Perkebunan (IUP) atas nama PT. Bumi Permai Lestari”, dated 8 June 2016. The letter applied for revision on plantation permit with total hectarage 14,319.08 Ha.</p> <p>The plantation service responded on “Surat Dinas Pertanian Perkebunan dan Peternakan No.525/0468/2.01.02/2016 Perihal</p>	
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		<p>Permintaan Kelengkapan Persyaratan Izin Usaha Perkebunan PT. Bumi Permai Lestari" dated 28 June 2016. It was stated the company need to comply with "Peraturan Menteri Pertanian No.98 Tahun 2013".</p> <p>Company PT. Bumi Permai Lestari and Plantation Service had a meeting on 11 Augsut 2016, with minutes of meeting stated PT. Bumi Permai Lestari needs to revise AMDAL to revise the "Izin Usaha"/Plantation Permit.</p> <p>Governor issued "Rekomendasi Kesesuaian dengan Perencanaan Pembangunan Perkebunan Provinsi Kepulauan Bangka Belitung No.525/473/PERTANIAN/2017" dated 11 April 2017. This recommendation serves as requirement under "Peraturan Menteri Pertanian No.98 Tahun 2013 tentang Pedoman Perizinan Usaha Perkebunan".</p> <ul style="list-style-type: none"> <li>- Land Title/HGU see 4.4.1</li> <li>- Payment of lands and building tax 2021: "Surat Pemberitahuan Pajak Terutang Perkebunan PT. Bumi Permai Lestari dated 30 March 2021. The company demonstrated payment "Bukti Penerimaan Negara" payment from PT. Bumi Permai Lestari to "Kantor Kas Negara" dated 24 September 2021 of Rp.3,3xx,xxx,xxx.</li> <li>- Payment of lands and building tax 2020: "Surat Perintah Membayar Kelebihan Pajak Kementerian Keuangan Republik Indonesia Direktorat Jenderal Pajak Kantor Pelayanan Pajak Madya Jakarta Pusat No.0779A" allocation of tax payment from PT. Bumi Permai Lestari date 13 August 2020 of Rp.3,82x,xxx,xxx.</li> <li>- Competence certificate for welding operator "Sertifikat Kompetensi No.28900721205000639072021 atas nama Pusp Riyanto" dated 23 December 2021. Competence for welding 2G, and valid for 3 years.</li> </ul> <p>Mill machinery permit:</p>	
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		<ul style="list-style-type: none"> <li>- Sterilizer No.4 Permit "Kantor Wilayah Departemen Tenaga Kerja Provinsi Sumatera Selatan Akte Izin No.07/H0019A/1998 – Sterilizer No.IV" dated 28 December 1998.</li> <li>- Steam Boiler No.1 Maxiterm Permit "Kantor Wilayah Departemen Tenaga Kerja Provinsi Sumatera Selatan Akte Izin No.06/H.0014A/1995 – Ketel Uap Maxiterm 24kg/cm<sup>2</sup>" dated 20 October 1995. Latest inspection reported on 26 December 2020.</li> <li>- Diesel Genset No.5 Permit "Pemerintah Kabupaten Bangka Barat Dinas Sosial Tenaga Kerja dan Transmigrasi Pengesahan No.MD.03/1.13.01/NK3/2013 untuk Pemakaian Motor Diesel (Genset) Cummins NTA-855-G4 S/No.25348046 2010" dated January 2013. Latest inspection 8 December 2021.</li> <li>- Steam Turbine No.1 Permit "Pemerintah Kabupaten Bangka Barat Dinas Sosial Tenaga Kerja dan Transmigrasi Pengesahan No.TU.02/1.13.01/NK3/2013 untuk Pemakaian Turbin Genset Shinko RB4 S/No.109774 1999" dated January 2013. Latest inspection 8 December 2021.</li> <li>- Lightning Arrester Permit "Kepala Kantor Wilayah Departemen Tenaga Kerja Propinsi Sumatera Selatan Sertifikat Instalasi Penyalur Petir No.PP-WG/H.0001" dated 13 November 1995. Latest inspection 27 November 2020.</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> <p>- Minor compliance -</p>	<p>PT. Bumi Permai Lestari implementing legal compliance and evaluation refers to "SOP SMART Pemenuhan Peraturan dan Persyaratan Lainnya" dated 1 July 2014. The identification and register of applicable legal and other requirement under form "Daftar Peraturan dan Persyaratan Lainnya".</p> <p>The compliance evaluation of applicable legal and other requirement carried out minimum once per annum. The compliance evaluation recorded under form "Evaluasi Pemenuhan Peraturan dan Persyaratan Lainnya". Update on 31 January 2022.</p>	Complied

		<p>Evaluation and review in 2019, Ex: "Peraturan Menteri Agraria No.17 tahun 2019 tentang Izin Lokasi" – Ministry regulation on Location Permit. Comply through presence of "Izin Operasi" through Location permit "Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.218/SK/I/1993 tentang Pembatalan Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.878/SK/I/1990 tanggal 24 November 1990 tentang Pembatalan Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.222/SK/I/1990 tanggal 22 Maret 1990 dan Pencadangan Tanah Seluas ±25.000 Hektar yang Terletak di Kecamatan Kelapa, Kabupaten Daerah Tingkat II Bangka untuk Keperluan Perkebunan Kelapa Sawit, Kakao dan Karet, Serta Pemberian Izin Lokasi Kembali untuk Keperluan Perkebunan Kelapa Sawit Seluas ±14.000 Hektar yang Terletak di Perwakilan Kecamatan Simpang Teritip Kecamatan Kelapa Kabupaten Daerah Tingkat II Bangka A/N PT. Bumi Permai Lestari" dated 20 March 1993.</p> <p>Evaluation and review in 2020, Ex:</p> <ol style="list-style-type: none"> <li>a. "Undang-undang No.11 Tahun 2020 tentang Cipta Kerja" – Laws on Omnibus Law. Comply through "Perjanjian Kerja Bersama antara PT. Bumi Permai Lestari &amp; PT. MP Leidong West Indonesia dengan PUK SPPP SPSI PT. BPL – PT. LWI 2021-2023" dated 21 June 2021 and valid for 2 years.</li> <li>b. "Peraturan Menteri Tenaga Kerja No.8 Tahun 2020 tentang Kesehatan dan Keselamatan Kerja Pesawat Angkat Angkut" – Minister decree on health and safety for lift and carry tools. Company demonstrate compliance through annual inspection "Surat Keterangan No.560/322/PAA-WL/DISNAKER/2022" dated 4 March 2022 for Wheel Loader Kawasaki/60ZV, inspected on 8 December 2021.</li> </ol>	
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		<p>Evaluation and review applicable regulation year 2021, Ex:</p> <p>a. "Peraturan Pemerintah Republik Indonesia No.18 tahun 2021 tentang Hak Pengelolaan, Hak Atas Tanah, Satuan Rumah Susun, dan Pendaftaran Tanah" – Government Regulation on Legal ownership of the land. Comply through demonstration of land title</p> <ul style="list-style-type: none"> <li>- Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.80.02.2.00001, Desa Berang, Ibul, Rajek Belai, Terentang, Kacung, Pangkal Beras, Kecamatan Simpang Teritip dan Kecamatan Kelapa, Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung, PT. Bumi Permai Lestari, Valid 35 tahun, Berakhir Hak 8 August 2031 dan Gambar Situasi No.1427/1996 of 8,234.13 Ha" dated 8 August 1996.</li> <li>- Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.03.2.00001, Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, Lamanya Hak 35 Tahun, Berakhir Hak 31 Desember 2030; Gambar Situasi No.1471/1996 of 3,418.52 Ha" dated 3 August 1996.</li> </ul> <p>b. "Peraturan Pemerintah No.34 Tahun 2021 tentang Penggunaan Tenaga Kerja Asing" – Ministry regulation on use of foreign worker in PT. Bumi Permai Lestari. Document presented by company "Keputusan Direktur Jenderal Pembinaan Penempatan Tenaga Kerja dan perluasan kesempatan Kerja No.B.3/079702/PK.04.01/X/2021 tentang Pengesahan Rencana Penggunaan Tenaga Kerja Asing Perpanjangan Pada PT. Bumi Permai Lestari" dated 22 October 2021.</p> <p>To ensure update with relevant parties/regulatory body, PIC listed in form "Daftar Kontak Person Updating Peraturan dan Persyaratan</p>	
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		<p>Lainnya”, Contact person list consist of 23 organizations, among others: “Kecamatan Kelapa, Kepala Polisi Sektor Kelapa, Komandan Rayon Militer Kelapa, Pusat Kesehatan Masyarakat Kelapa, Dinas Tenaga Kerja Kabupaten Bangka Barat, Dinas Perkebunan Kabupaten Bangka Barat, Badan Lingkungan Hidup Kabupaten Bangka Barat, Badan Pertanahan Nasional Kabupaten Bangka Barat”, etc. Latest update 13 June 2022.</p>	
<p>2.1.3</p>	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>PT. Bumi Permai Lestari performs monitoring of the HGU boundary stones based on procedure “SOP Pemeliharaan Patok HGU/HGB No.SOP/SMART/CERS-EHSD/SADV/I/004” dated 1 July 2014. Total 142 HGU boundary stones in Bukit Perak Estate monitored every 3 months.</p> <p>Audit team checked the Bukit Perak Estate HGU boundary onsite vs HGU map, “Peta Posisi Patok PT. Bumi Permai Lestari – Bukit Perak Estate” scale 1:55,000:</p> <ul style="list-style-type: none"> <li>- Poles No.BPN-39 (1<sup>0</sup> 49’ 1.24”S &amp; 105<sup>0</sup> 32’ 30.95”E) Division III, block D24. Condition good, neighbouring with local community Kacung village.</li> <li>- Poles No.BPN-118 (1<sup>0</sup> 48’ 43.53”S &amp; 105<sup>0</sup> 32’ 30.78”E) Division III, block D24. Condition good, neighbouring with local community land from Kacung village.</li> <li>- Poles No.BPN-117 (1<sup>0</sup> 48’ 27.25”S &amp; 105<sup>0</sup> 32’ 30.82”E) Division III, block C24/D24. Condition good, neighbouring with local community’s oil palm plant from Kacung village.</li> <li>- Poles No.BPN-116 (1<sup>0</sup> 48’ 26.72”S &amp; 105<sup>0</sup> 32’ 5.63”E) Division III, block 21. Condition good, neighbouring with local community rubber plant from Kacung village.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Poles No.BPN-115 (1° 48' 26.46"S &amp; 105° 31' 41.86"E) Division V, block C19. Condition good, neighbouring with local community oil palm plantation from Kacung village.</li> <li>- Poles No.BPN-114 (1° 48' 59.21"S &amp; 105° 31' 41.35"E) Division V, block D18. Condition good, neighbouring with local community in boundary between Kacung village and Tugang village.</li> <li>- Poles No.BPN-113 (1° 48' 58.83"S &amp; 105° 31' 21.39"E) Division V, block D17. Condition good, neighbouring with local community Tugang village.</li> </ul> <p>Audit team reviewed the program and implementation of HGU boundary stone maintenance/upkeep program and implementation record period January 2020 – May 2022 for Bukit Perak Estate</p> <table border="1" data-bbox="1131 821 1955 1061"> <thead> <tr> <th>Month</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>January &amp; April</td> <td>92 HGU boundary stones. Ex: BPN-01, BPN-02</td> <td>92 HGU boundary stones. Ex: BPN-05, BPN-06</td> <td>92 HGU boundary stones. Ex: BPN-117, BPN-118</td> </tr> <tr> <td>July &amp; October</td> <td>92 HGU boundary stones. Ex: BPN-03, BPN-04</td> <td>92 HGU boundary stones. Ex: BPN-07, BPN-08</td> <td>Not yet</td> </tr> </tbody> </table> <p>Audit team checked the Bukit Permata Estate HGU boundary onsite vs HGU map, "Peta Posisi Patok PT. Bumi Permai Lestari – Bukit Permata Estate" scale 1:30,000:</p> <ul style="list-style-type: none"> <li>- Poles No.BPN-131 (1° 50' 38.93"S &amp; 105° 28' 59.70"E) Division II, block H24. Condition good, visible from collection road, neighbouring with Sungkai hamlet, Tugang village.</li> <li>- Poles No.BPN-132 (1° 50' 38.85"S &amp; 105° 28' 50.00"E) Division II, block H24. Condition good, visible but submerged in water,</li> </ul>	Month	2020	2021	2022	January & April	92 HGU boundary stones. Ex: BPN-01, BPN-02	92 HGU boundary stones. Ex: BPN-05, BPN-06	92 HGU boundary stones. Ex: BPN-117, BPN-118	July & October	92 HGU boundary stones. Ex: BPN-03, BPN-04	92 HGU boundary stones. Ex: BPN-07, BPN-08	Not yet	
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		<p>located in boundary with neighbouring Sungkai hamlet, Tugang village.</p> <ul style="list-style-type: none"> <li>- Poles No.BPN-133 (1° 50' 9.60"S &amp; 105° 28' 50.07"E) Division II, block H24/J24. Condition good, neighbouring with oil palm plantation belong to community from Sungkai hamlet, Tugang village.</li> <li>- Poles No.BPN-52 (1° 51' 9.50"S &amp; 105° 28' 40.31"E) Division II, block J23. Condition good, neighbouring with oil palm plantation belong to community from Sungkai hamlet, Tugang village.</li> <li>- Poles No.BPN-53 (1° 51' 42.82"S &amp; 105° 28' 39.92"E) Division II, block j23. Condition good, located in the corner neighbouring with Terentang village.</li> </ul> <p>Audit team confirmed no oil palm planting beyond this HGU boundary poles.</p> <p>Audit team reviewed the program and implementation of HGU boundary stone maintenance/upkeep program and implementation record period January 2020 – May 2022 for Bukit Permata Estate</p> <table border="1" data-bbox="1133 1002 1966 1235"> <thead> <tr> <th></th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>January &amp; April</td> <td>50 HGU boundary stones. Ex: BPN-041, BPN-123</td> <td>50 HGU boundary stones. Ex: BPN-046, BPN-046a</td> <td>50 HGU boundary stones. Ex: BPN-065, BPN-056</td> </tr> <tr> <td>July &amp; October</td> <td>50 HGU boundary stones. Ex: BPN-122, BPN-121</td> <td>50 HGU boundary stones. Ex: BPN-120, BPN-044</td> <td>Not yet</td> </tr> </tbody> </table> <p>Several HGU boundary poles sampled in Bukit Permata Estate was found submerged in water because located in lowland area. However, PT. Bumi Permai Lestari has issued "Instruksi Kerja Pemeliharaan</p>		2020	2021	2022	January & April	50 HGU boundary stones. Ex: BPN-041, BPN-123	50 HGU boundary stones. Ex: BPN-046, BPN-046a	50 HGU boundary stones. Ex: BPN-065, BPN-056	July & October	50 HGU boundary stones. Ex: BPN-122, BPN-121	50 HGU boundary stones. Ex: BPN-120, BPN-044	Not yet	
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		Patok HGU No.PT BPL-BPTE/IK/48” where in the procedure stipulates identification of submerged HGU boundary poles with PVC pipe 1 meter height, painted red.	
<b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available. - Minor compliance -	PT. Bumi Permai Lestari can demonstrate list of contractors, including FFB suppliers. The list comprise of 9 third party FFB suppliers and 2 company-owned estates, 2 sister company estates, 2 transporter contractors – updated 11 June 2022.	Complied
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party. - Minor compliance -	For direct sourced FFB coming from outgrower, information from sampled contractor taken: - FFB supplier CV Dua Serangkai, Contract under “Surat Pernyataan DO CV Dua Serangkai” dated 1 January 2020 – Point 4 stated comply with legal requirement. - FFB supplier CV Multi Nusa Pratama, contract under “Surat Pernyataan H. Mirwan CV Multi Nusa Pratama” dated 22 June 2022 – point 5 to obey all laws and regulations. - FFB supplier Koptan Tugang Jaya, contract “Surat Pernyataan Samrin Tugang Jaya” dated 22 June 2022 – point 5 to obey all laws and regulations.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. - Minor compliance -	PT. Bumi Permai Lestari has communicated the policy to disallowing child, forced and trafficked labour. Meeting between Bukit Perak POM and third party FFB suppliers; CV Dua Serangkai, Koperasi Tugang Jaya, etc. on 24 June 2022. During the meeting, company communicating RSPO standards, prohibit child, forced and trafficked labour.  For direct sourced FFB coming from outgrower, information from sampled contractor taken:	Complied

		<ul style="list-style-type: none"> <li>- FFB supplier CV Multi Nusa Pratama, contract under "Surat Pernyataan H. Mirwan CV Multi Nusa Pratama" dated 22 June 2022 – point 4 to respect human rights and avoid discrimination, avoid force labor, prohibit employing underage worker and employing worker from human trafficking.</li> <li>- FFB supplier Koptan Tugang Jaya, contract "Surat Pernyataan Samrin Tugang Jaya" dated 22 June 2022 – point 4 to respect human rights and avoid discrimination, avoid force labour, prohibit employing underage worker and employing worker from human trafficking.</li> </ul>	
<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>• Information regarding the geolocation of FFB origins;</li> <li>• Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>• If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Permai Lestari – Bukit Perak POM reviewed all information on geolocation of FFB origins, legal ownership of the land, operational license for buying and selling of FFB. The document titled "Data Supplier TBS Bukit Perak Mill", updated 11 June 2022. The document listed 13 FFB supplier, both company-owned and outgrower.</p> <p>For direct sourced FFB coming from company-owned plantation, see 2.1 and 4.4.1.</p> <p>Direct sourced FFB supplier's status</p> <ul style="list-style-type: none"> <li>- Koptan Tugang Jaya, out of 11 contractors were selected for the audit: address Tugang village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province. Geolocation of FFB origins 01° 48' 28.7"S &amp; 105° 28' 43.4"E. Legal ownership "Sertifikat Hak Milik No.00654, Desa Tugang, of 7,773 m<sup>2</sup>" dated 25 November 2011 based on "Surat Ukur No.0655/Tugang/2021" dated 24 November 2021.</li> <li>- Business permit "Surat Izin Usaha Perdagangan No.517/2/4.1.8.1/II/2018 Koptan Tugang Jaya – 46202 Perdagangan Hasil Pertanian – Jual Beli Tandan Buah Segar" dated</li> </ul>	Complied

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		<p>27 February 2018 and "Nomor Induk Berusaha No.0246010162335 Koperasi Pertanian Tugang Jaya – KBLI 47763 Perdagangan Eceran Pupuk dan Pemberantas Hama" dated 23 November 2020.</p>	
<p>2.3.2</p>	<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>For indirect sourced FFB coming from outgrower, information from sampled contractor taken:</p> <ul style="list-style-type: none"> <li>- CV Dua Serangkai, address Dendang village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province. Geolocation of FFB origins 02° 03' 43.9"S &amp; 105° 14' 24.2"E. Legal ownership in form of "Surat Keterangan Kepala Desa Tugang No.593/Ket/19.05.04.2012/2021 untuk Rusmin, of 5,625 m<sup>2</sup>" dated 26 July 2021. Business permit "Tanda Daftar Perusahaan Persekutuan Komanditer No. 310330000003 – Jual Beli Tandan Buah Segar Kelapa Sawit dan Pengadaan Barang" dated 15 January 2018 valid until 15 January 2023.</li> <li>Contract "Surat Pernyataan DO CV Dua Serangkai" dated 1 January 2020. Point 2 and 3 explains FFB criteria, FFB grading, FFB delivery, FFB price, FFB price payment.</li> <li>- CV Multi Nusa Pratama, address Jl. Bahari, Kuto Panji village, Kelapa District, Bangka Regency, Kepulauan Bangka Belitung Province. Geolocation of FFB origins 01° 52' 31.9"S &amp; 105° 40' 15.7"E. Legal ownership "Sertifikat Hak Milik No.01674, Desa Dendang, of 10,774 m<sup>2</sup>" dated 22 August 2018 based on "Surat Ukur No.581/Dendang/2018" dated 15 August 2018.</li> <li>Business permit "Surat Izin Usaha Perdagangan No.517/24/SIUP/PK/BP2TM/I/2016" dated 23 January 2016.</li> <li>Business Permit "Tanda Daftar Perusahaan Persekutuan Komanditer (CV) No.310337001793 CV Multi Nusa Pratama" dated 18 January 2016.</li> </ul>	<p>Complied</p>

		<p>Business Permit "Nomor Induk Berusaha No.0220006670281 CV Multi Nusa Pratama" dated 19 January 2022.</p> <p>PT. Bumi Permai Lestari monitors and record the location of supplying smallholder (family member) to each CV/indirect FFB supplier, verified the legal ownership, but the business permit follows the CV Dua Serangkai and CV Multi Nusa Pratama.</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>																																																								
3.1.1	<p><b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has had a 5 years profitability analysis document (period 2022 – 2026) that signed by CFO PSM 2 dated 5 March 2022. 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. Through the document obtain information that CH has had projected to produce FFB, CPO and PK as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Year</th> </tr> <tr> <th>2022</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td colspan="6">FFB production (Tonnes)</td> </tr> <tr> <td>BPRE</td> <td>28,527</td> <td>34,569</td> <td>61,036</td> <td>83,042</td> <td>94,972</td> </tr> <tr> <td>BPTE</td> <td>15,945</td> <td>-</td> <td>-</td> <td>764</td> <td>1.374</td> </tr> <tr> <td>Sub Total</td> <td>44,472</td> <td>34,569</td> <td>61,036</td> <td>83,805</td> <td>96,347</td> </tr> <tr> <td colspan="6">Outgrowers (Tonnes)</td> </tr> <tr> <td>3<sup>rd</sup> party</td> <td>61,251</td> <td>67,376</td> <td>74,113</td> <td>81,525</td> <td>89,667</td> </tr> <tr> <td colspan="6">Production (MT)</td> </tr> </tbody> </table>	Estate	Year					2022	2022	2023	2024	2025	FFB production (Tonnes)						BPRE	28,527	34,569	61,036	83,042	94,972	BPTE	15,945	-	-	764	1.374	Sub Total	44,472	34,569	61,036	83,805	96,347	Outgrowers (Tonnes)						3 <sup>rd</sup> party	61,251	67,376	74,113	81,525	89,667	Production (MT)						Complied
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		<table border="1"> <tr> <td>CPO</td> <td>21,673</td> <td>20,889</td> <td>27,706</td> <td>33,893</td> <td>38,135</td> </tr> <tr> <td>PK</td> <td>5,815</td> <td>5,607</td> <td>7,433</td> <td>9,093</td> <td>10,231</td> </tr> <tr> <td colspan="6">Extraction Rate (%)</td> </tr> <tr> <td>OER</td> <td>20.50</td> <td>20.50</td> <td>20.50</td> <td>20.50</td> <td>20.50</td> </tr> <tr> <td>KER</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> </tr> </table> <p>Until this recertification audit, PT Bumi Permai Lestari did not have engagement with smallholder. However, Bukit Perak mill received FFB from independent supplier/outgrowers.</p> <p>Certificate holder has been audited by certified public accountant Tanubrata Sutanto Fahmi Bambang &amp; Rekan (Licence No. 622/KM.1/2016). Based on the report number 00471/2.1068/AU.1/01/1245-6/1/V/2022 dated 31 May 2022 obtained information related to auditor opinions as follows: "In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of PT Bumi Permai Lestari as of 31 December 2021, as well as its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards".</p> <p>Based on document verification, certificate holder has shown the tax receipt (land and building tax, income tax etc). All the record is available and attached with payment receipt from bank and tax office.</p> <p>Refer to the summary of long-term financial plan period 2022 – 2026 concluded that certificate holder business will sustain until the next five year.</p>	CPO	21,673	20,889	27,706	33,893	38,135	PK	5,815	5,607	7,433	9,093	10,231	Extraction Rate (%)						OER	20.50	20.50	20.50	20.50	20.50	KER	5.50	5.50	5.50	5.50	5.50	
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The certificate holder has established replanting program, which has been implemented since 2018. Annual review has been conducted to evaluate performance. Below is annual replanting program of PT Bumi Permai Lestari:</p>	Complied																														

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		Year	BPRE (Ha)		BPTe (Ha)		Total (Ha)			
			Plan	Actual	Plan	Actual	Plan	Actual		
		2018	242	242	-	-	242	242		
		2019	1,652	1,652	-	-	1,652	1,652		
		2020	581	581	-	-	581	581		
		2021	1,308	1,308	-	-	1,308	1,308		
		2022	-	-	1,607	-	1,607	-		
		Replanting 2022 is on progress.								
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -	<p>Certificate holder has had a regular internal audit schedule. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV. Internal audit conducted on 28 Mar 2022 to 4 Apr 2022.</p> <p>Management review conducted on 15 April 2022, attended by RC, PC, EM, FM and all key personels. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement.</p>								Complied
<p><b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>										
3.2.1	<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. - Critical (Major) compliance -	<p>The certificate holder established, maintained and implemented the 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</p>								Complied

		<p>Lestari issued by Sustainability Compliance – OSDV. Internal audit conducted on 28 Mar 2022 to 4 Apr 2022.</p> <p>The outcomes of the internal audits and all actions taken to correct non-conformities subject to annual management review. Management review conducted on 15 April 2022, attended by RC, PC, EM, FM and all key personels. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement.</p> <p>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 document 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. Participatory with affected parties was conducted during Environment Impact Assessment (EIA) through Economic and Social Questionnaire "Pedoman Wawancara Untuk Sampel Penduduk" with adjacent communities of certification unit.</p> <p>Unit of certification has implement identification of 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>	
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		<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, annually;</li> <li>- Monitoring of 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> <p>There was environmental management plan year 2021, some program has been implemented such as reused of condensate sterilizer as per December 2021 save water as much as 14,309 m<sup>3</sup>.</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>The CH has reported Annual report using RSPO metric template and submitted to CB. Based on the report, Annual Production Palm Oil and Palm Kernel in 2020 and 2022 reported are as follows:</p> <table border="1" data-bbox="1131 1002 1955 1201"> <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>2020</td> <td>8,845.08</td> <td>31,523.45</td> <td>2,421.54</td> <td>8,636.93</td> </tr> <tr> <td>2021</td> <td>11,171.55</td> <td>26,289.50</td> <td>10,575.26</td> <td>24,208.45</td> </tr> </tbody> </table>	Year	CPO		PK		Certified	Non-certified	Certified	Non-certified	2020	8,845.08	31,523.45	2,421.54	8,636.93	2021	11,171.55	26,289.50	10,575.26	24,208.45	<p>Complied</p>
Year	CPO			PK																		
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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.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has had operational procedure in estate and mill as follows:</p> <p><b>Oil Palm Agronomy Procedure</b></p>	<p>Complied</p>																			

		<p>Procedure of Agronomy is arranged by Management Committee Agronomy and Research (MCAR) revised on 1 September 2012. Procedures were includes 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. 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> <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> </ul>	
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		<ul style="list-style-type: none"> <li>• Procedure No. SOP No. SOP/SMART/MCAR/XIII/TA-PNN about harvesting.</li> <li>• Procedure No. SOP/SMART/MCAR/XIV/TA-PPT about FFB transportation and delivery.</li> <li>• Procedure No. SOP/SMART/MCAR/XV/TA-PCH about rainfall measurement.</li> </ul> <p>Hardcopy of procedure are available and controlled. SOPs made were available at the point of use (in all section and division of estate). Copy of the procedure was available on site and is it documented in <i>Bahasa Indonesia</i>. SOP distribution to all section and division were well documented in the Form F/SMART/UMUM/SADV/001/002 (document distribution register).</p> <p>Procedure have been disseminated to all related employee (harvesting, loose fruit pickers and upkeep employee). Every morning, there is morning musters performed, basically to disseminate working procedure and instruction, and to monitor employee attendance as well.</p> <p><b>Palm Oil Mill:</b></p> <p>Procedure regarding best manufacturing practice operation in 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.06, Standard Operational Procedure of Palm Oil Process in SMART Group including PT Bumi Permai Lestaeri – Bukit Perak POM, revision 6 issued by Head Office Jakarta dated 1 Nov 2012. The procedure describes operation instruction from FFB receiving through production, processing</p>	
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		<p>(grading, sterilization, threshing, pressing, clarification, nut and kernel processing) and dispatch of CPO and PK.</p> <p>The Organization has also developed work instruction for each processes 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).</p> <p>SOP for RSPO Supply Chain has been established in "SOP Supply Chain Certification Standard Mass Balance" (PT.BPL.BPRM/SOP/SCCS-MB/17) dated 24 March 2022). The procedures cover job and responsibility, work flow, 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> <p><b>Safety Aspect</b></p> <p>During this pandemic situation, certificate holder also release procedure related to COVID-19 in all Golden Agri Resources unit. The procedure signed by Head of Upstream dated 26 June 2020. Those procedure covered guidance for all employee since they traveling to office, workplace activity in office/estate/mill/workshop/school/creche/worship place/sport facility/mess/onsite visit/on leave. It also covered the rights and obligation of employee during self-isolation, guest received procedure and suspect handling. During onsite audit, all auditor are tested for COVID-19 Swab Antigen prior to entering the site. All the results are negative therefore audit team can enter the site. Auditors and auditees wear masks during the audit in the closed room.</p>	
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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor compliance -</p>	<p>Certificate holder has had a regular internal audit schedule. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV. Internal audit conducted on 28 Mar 2022 to 4 Apr 2022.</p> <p>The company has also audit system to check operational performance which is Regional Controller (RC) visit and Production Controller (PC) visit. Visit report contains visit result and action plan to follow up.</p>	<p>Complied</p>
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.          - Minor compliance -</p>	<p>Certificate holder has had a regular internal audit refer to procedure SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the CH conforms to the requirements in the RSPO P&amp;C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of PT Bumi Permai Lestari issued by Sustainability Compliance – OSDV. Internal audit conducted on 28 Mar 2022 to 4 Apr 2022.</p> <p>The outcomes of the internal audits and all actions taken to correct non-conformities subject to annual management review. Management review conducted on 15 April 2022, 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.</p> <p>The company has also audit system to check operational performance which is VPA, VPM, Regional Controller (RC) visit and Production Controller (PC) visit. Visit report contains visit result and action plan to follow up. There are field visit report conducted by Regional Controller (RC), Estate Manager, Field Assistant dated 4 April 2022. Issue raised are about un-cut fruit and working hour discipline of spraying operators; Action plan have been established and implemented by Field Assistant, closed on 6 April 2022.</p>	<p>Complied</p>

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		<p>Available VPM visit report that conducted on 13 – 15 September 2021. Issues raised are about weighing and grading of outgrowers FFB; TDS meter reading; loose bait is not continuous (piles up on the bottom cross); and pile of scrap metal. Action plan have been established and implemented by related personals, under responsibility of Mill 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. - Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari as unit of certification established Environment Impact Assessment document known as AMDAL, consist of:</p> <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 refer to location permit ("<i>Persetujuan Prinsip</i> No.Hk.350/E4.226/03.90 dan <i>Surat Panitia-B</i> No. 540.1/5665/26) 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</i></p>	<p>Complied</p>

		<i>Wawancara Untuk Sampel Penduduk</i> ” with adjacent communities of certification unit.	
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> <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 - 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>	Complied
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 was environmental management plan year 2021, some program has been implemented such as reused of condensate sterilizer as per December 2021 save water as much as 14,309 m<sup>3</sup>.</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</p>	Complied

		of Environmental and Forestry (KLHK), and "Pusat Pengendalian Pembangunan Ekoregion Sumatera".	
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation. - Minor compliance -	PT Bumi Permai Lestari has defined the procedure related to new employment recruitment. <ul style="list-style-type: none"> <li>• Recruitment: according to "SOP Rekrutmen dan Seleksi Karyawan" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications.</li> <li>• Promotion: according to "SOP Promosi dan Mutasi" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade.</li> <li>• Retirement, and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination.</li> </ul>	Complied
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	Implementation records on employment procedures are available during this recertification audit, such as: <ul style="list-style-type: none"> <li>• Recruitment: <ul style="list-style-type: none"> <li>○ Recruitment announcement No. 001/PT BPL-BPRM/10/2021, position: Administration staff for Personalia and Weighbridge operator, dated 13 October 2021.</li> <li>○ Application letter of Ms. Siti Kafsiah (weighbridge operator), dated 18 October 2021. Attachment: Medical test result, Curriculum vitae, related certificated.</li> <li>○ Application letter Ms. Rindiani (HR Administration Staff), dated 18 October 2021. Attachment: Medical test result, Curriculum vitae, related certificated.</li> </ul> </li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>○ Record of selection dated 27 October 2021 – was attended by 39 participants</li> <li>○ Interview record of Ms. Siti Kafsiah and Ms. Rindiani, dated 20 October 2021. Result: Good.</li> <li>○ Temporary Work Letter Agreement (PKWT), No. 068/BPRM/PKWT-A2/11/2021, namely Mrs Rindiani (Administration staff for Personalia), dated 1<sup>st</sup> November 2021. Extension letter No: 020/BPRM/PKWT-A2/05/2022, valid until 31<sup>st</sup> October 2022.</li> <li>○ Work Letter Agreement (temporary – PKWT), no: 069/BPRM/PKWT-A2/11/2021, namely Mrs Siti Kafsiah (weighbridge operator), dated 1<sup>st</sup> November 2021. Extension letter based on Surat Keputusan No. 002/SK/BPRM/01/2022, valid until 31 October 2022.</li> <li>● Promotion and rotation:             <ul style="list-style-type: none"> <li>○ Records of Employee Assessment dated 1 March 2022, total of promotion (Grade increment is 134 workers), e.g: Temporary workers to permanent workers, PT (permanent worker) 1 to PT 2, etc.</li> <li>○ Assessment record, e.g: Mr. Sarmedi (date of join 8 May 2019, division: Administration, the result: recommended for promotion, approved by Mill Manager.</li> <li>○ Worker Letter Agreement (Increment Letter), No. 001/SK-PT/BPRM/I/2022 of Mr. Sarmedi, date of join 8 May 2019, division: Administration, dated 1 May 2022.</li> <li>○ Promotion Letter (003/SK-PT/BPRM/03/2022) of Mr. Rusli Anam (ID number: 14002), date of join: 17 January 1995. Promotion from grade E1 to E2, effective date 23 March 2022.</li> </ul> </li> <li>● Retirement:</li> </ul>	
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		<ul style="list-style-type: none"> <li>○ Letter Agreement No: 003/BPTE-EM/SPB/004/2022, dated 28 April 2022 between PT BPL – Bukit Permata Estate and Mr. Marsono (worker number: 07008), related to retirement</li> <li>○ Slip payment on retirement dated 19 May 2022 – completed with stamp. Status: received.</li> </ul>	
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has prepared 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/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-EHSD/SADV/I/08)</li> <li>• Lock Out Tag Out (SOP/SMART/HESS-EHSD/SADV/I/009)</li> <li>• PPE Management (SOP/SMART/HESS-EHSD/SADV/I/010)</li> <li>• First Aid (SOP/SMART/HESS-EHSD/SADV/I/011)</li> <li>• Health Measurement (SOP/SMART/HESS-EHSD/SADV/I/012)</li> <li>• Fire Extinguisher (SOP/SMART/HESS-EHSD/SADV/I/013)</li> </ul>	Complied

		<ul style="list-style-type: none"> <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>Verified risk assessment record:</p> <ul style="list-style-type: none"> <li>• Bukit Perak POM – has defined risk assessment (ISBPPR) year 2022, last review on 17 January 2022 cover processes and activities related to production of CPO, such as: weighbridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, CPO dispatch, firefighting simulation, water treatment, chemical warehouse.</li> <li>• Bukit Perak Estate and Bukit Permata Estate – has defined risk assessment (ISBPPR) last review on 21 March 2022, the document covers processes and activities such as: spraying, fertilizing, weeding, replanting, road maintenance, firefighting simulation harvesting, transportation, warehouse, workshop, infrastructure, policlinic, etc. It also covered all the risk attached to the products.</li> <li>• The risk assessment has been communicated to all employee, as evident below:             <ul style="list-style-type: none"> <li>○ Records of dissemination dated 11 June 2022, located at Bukit Perak Mill, attended by 24 workers. Data verified: Training material, attendance list and photograph.</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>○ Records of dissemination dated 15 March 2022, located at Bukit Permata Estate, attended by 105 workers. Data verified: Training material, attendance list and photograph.</li> <li>○ Records of dissemination dated 16 May 2022, located at Bukit Perak Estate was attended by 162 workers. Data verified: Training material, attendance list and photograph.</li> </ul>	
<p>3.6.2</p>	<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>PT Bumi Permai Lestari has prepared OHS plan to address health and safety as per "Program Kerja" updated on 7 January 2022, consisted:</p> <ul style="list-style-type: none"> <li>● Review on Risk Assessment (ISBPR) -&gt; planned in January 2022</li> <li>● Evaluation of law, legal and others applicable requirement -&gt; planned in January 2022</li> <li>● OHS Meeting -&gt; monthly</li> <li>● PPE program (providing, monitoring and inspection of PPE usage) -&gt; monthly</li> <li>● First aid (monitoring on first aid kit and training for first aider)</li> <li>● Monitoring on OHS program</li> <li>● MCU (general and special)</li> <li>● Emergency response preparedness</li> <li>● OHS inspection for contractor</li> <li>● OHS Internal Audit</li> <li>● Report of OHS committee (P2K3) -&gt; three monthly basis</li> <li>● Review on OHS management system</li> </ul> <p>The safety committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program. Notes of Safety</p>	<p>Complied</p>

		<p>Committee Regular Meeting (mill and estate), among others discussed as follows:</p> <ul style="list-style-type: none"> <li>• Personal Protective Equipment (PPE),</li> <li>• Hazard from animal,</li> <li>• Safety notes,</li> <li>• Accident review and report.</li> </ul> <p>Sample reports reviewed for meeting during January – June 2022. The actions implemented were monitored and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, internal audit result and incident investigation.</p> <p>Emergency Response and Preparedness drill has been implemented as per document "<i>Simulasi Tanggap Darurat 2022</i>", conducted on 5 February 2022, attended 25 participants. Attendance list, photograph, scenario and evaluation report were available.</p>	
<p><b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&amp;C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has demonstrated a documented programme that provides training, which covers applicable aspects of RSPO Principles &amp; Criteria. Available training program as per "Program Training – 2022", such as:</p> <ul style="list-style-type: none"> <li>○ Emergency Response and Preparedness training/drill/simulation, planned in February 2022;</li> <li>○ Training on fertilizer application, planned in February 2022;</li> <li>○ Environments &amp; Sustainability and special certifications;</li> <li>○ PPE training at Mill;</li> <li>○ OHS Policy training.</li> </ul>	<p>Complied</p>

		<p>Training records:</p> <ul style="list-style-type: none"> <li>• Record of refreshment training for first aider, dated 11 February 2022 – attended by 37 participants. Training was delivered by Company Doctor. Data verified: Attendance list, photograph and training material.</li> <li>• Record of training/drill/simulation emergency response and preparedness as per document of "<i>Simulasi Tanggap Darurat 2022</i>", was conducted on 5 February 2022, attended 25 participants. Available attendance list, photograph, scenario and evaluation report.</li> <li>• Risk assessment has been communicated to all employee, as per evidence:             <ul style="list-style-type: none"> <li>○ Dissemination dated 11 June 2022, located at Bukit Perak Mill, attended by 24 participants. Available training material, attendance list and photograph.</li> <li>○ Dissemination dated 15 March 2022, located at Bukit Permata Estate, attended by 105 participants. Available training material, attendance list and photograph.</li> <li>○ Dissemination dated 16 May 2022, located at Bukit Perak Estate, attended by 162 participants. Available training material, attendance list and photograph.</li> </ul> </li> <li>• Dissemination of company policies to all related workers, example on 23 May 2022 – located at each Division of Bukit Perak Estate, e.g. at Division 1 attended by 48 workers, at Division 2 attended by 47 workers and at Division 3 and 6 attended by 43 workers.</li> </ul>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Record of training for each employee are properly maintained in Training History for each employee. For example: employee named Yulisti (ID 8406), Mus Mulyadi (ID 20204) and Chairudin (ID 07039)</p>	Complied

		have been participated and completed training on company policies on 23 May 2022, training/drill/simulation emergency response and preparedness on 5 February 2022, and refreshment training for first aider dated 11 February 2022.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor compliance -	Appropriate training has been provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS), such as receiving station, weighing station, administration (record keeper). Training is specific and relevant to the task(s) performed. The latest training of RSPO Supply Chain Certification conducted on 11 June 2022 and 30 June 2022. Attendance list, training material and photograph are available.	Complied
<p><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)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Bukit Perak Palm Oil Mill is implementing RSPO Supply Chain Module Mass Balance. No change in the supply chain module since last assessment.</p> <p>This indicator is not Applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can</p>	<p>Bukit Perak Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance. Certified FFB are coming from Bukit Perak Estate and Bukit Permata Estate, whilst non-certified FFB are coming from sister company and third party suppliers.</p>	Complied

	claim only the volume of oil palm products produced from processing of the certified FFB as MB.	No change in the supply chain module since last assessment.	
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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>PT Bumi Permai Lestari – Bukit Perak Mill is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Bukit Permata Estate, Bukit Perak Estate and Non-certified FFB from third party supplier, Extraction rates, Processing capacity, CPO &amp; PK production. The actual tonnage produced are recorded in each annual surveillance report.</p> <p>Below are the projected CPO and PK production by Bukit Perak Mill based on FFB received:</p> <table border="1" data-bbox="1131 678 1825 1332"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Year</th> </tr> <tr> <th>2022</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td colspan="6">Certified FFB (Tonnes)</td> </tr> <tr> <td>BPRE</td> <td>28,527</td> <td>34,569</td> <td>61,036</td> <td>83,042</td> <td>94,972</td> </tr> <tr> <td>BPTE</td> <td>15,945</td> <td>-</td> <td>-</td> <td>764</td> <td>1,374</td> </tr> <tr> <td>Sub Total</td> <td>44,472</td> <td>34,569</td> <td>61,036</td> <td>83,805</td> <td>96,347</td> </tr> <tr> <td colspan="6">Non-Certified (Tonnes)</td> </tr> <tr> <td>Outgrowers</td> <td>61,251</td> <td>67,376</td> <td>74,113</td> <td>81,525</td> <td>89,667</td> </tr> <tr> <td colspan="6">Production (MT)</td> </tr> <tr> <td>CPO</td> <td>21,673</td> <td>20,889</td> <td>27,706</td> <td>33,893</td> <td>38,135</td> </tr> <tr> <td>PK</td> <td>5,815</td> <td>5,607</td> <td>7,433</td> <td>9,093</td> <td>10,231</td> </tr> <tr> <td colspan="6">Extraction Rate (%)</td> </tr> <tr> <td>OER</td> <td>20.50</td> <td>20.50</td> <td>20.50</td> <td>20.50</td> <td>20.50</td> </tr> <tr> <td>KER</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> </tr> </tbody> </table>	Estate	Year					2022	2022	2023	2024	2025	Certified FFB (Tonnes)						BPRE	28,527	34,569	61,036	83,042	94,972	BPTE	15,945	-	-	764	1,374	Sub Total	44,472	34,569	61,036	83,805	96,347	Non-Certified (Tonnes)						Outgrowers	61,251	67,376	74,113	81,525	89,667	Production (MT)						CPO	21,673	20,889	27,706	33,893	38,135	PK	5,815	5,607	7,433	9,093	10,231	Extraction Rate (%)						OER	20.50	20.50	20.50	20.50	20.50	KER	5.50	5.50	5.50	5.50	5.50	<p>Complied</p>
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3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT Bumi Permai Lestari – Bukit Perak Mill is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000001761.	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 CH has written procedure and work instruction to ensure the implementation of all elements specified in these requirements, e.g:</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). The procedure was available in the site office.</li> <li>• Standard Operational Procedure of Palm Oil Process PT Bumi Permai Lestari 6<sup>th</sup> revision, 2013 which is included: <ul style="list-style-type: none"> <li>a. Grading</li> <li>b. Loading Ramp</li> <li>c. Weighing Bridge</li> <li>d. Sterilisation Station</li> <li>e. Threshing Station</li> <li>f. Pressing Station</li> <li>g. Clarification Station</li> <li>h. Recycling CPO</li> <li>i. Nut and Kernel</li> <li>j. Engine Room</li> <li>k. Boiler</li> <li>l. Water Treatment</li> <li>m. Final Effluent</li> <li>n. Laboratories, etc.</li> </ul> </li> <li>• Work Instructions of Palm Oil Process PT SMART</li> </ul>	Complied

		<p>PT Bumi Permai Lestari – Bukit perak Mill is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records. Sample seen: training record RSPO SCC dated 11 June 2022 and 30 June 2022 attended by personals involved in RSPO Supply Chain Certification implementation.</p> <p>As per Procedure Supply Chain Certification Standard Mass Balanced (PT.BPL.BPRM/SOP/SCCS-MB/17) dated 24/03/2022 and Organization Structure of Traceability management system, the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. Mill manager also has appoint the PIC as traceability Officer, namely Darmansyah (Kepala Tata Usaha).</p> <p>The procedure PT.BPL.BPRM/SOP/SCCS-MB/17, Stasiun Penerimaan TBS (FFB Receiving Station) has include mechanism of receiving of certified and non-certified FFB. The mill uses supply chain Model Mass Balance, contamination are allowed.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b) Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management</li> </ul>	<p>The CH established, maintained and implemented the documented procedures to conduct annual internal audit as per procedure SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the mill conforms to the requirements in the RSPO Supply Chain Certification Standard 2020 and RSPO Market Communications and Claims Documents 2019; Effectively implements and maintains the standard requirements within organisation.</p> <p>Latest internal audit conducted on 28 March 2022 to 4 April 2022 integrated with RSPO internal audit against RSPO P&amp;C Generic 2018, INA NI 2020. Internal audit report were sighted, all issue raised during audit has been followed up by correction and corrective action. The</p>	Complied

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	<p>review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>outcomes of the internal audits and all actions taken to correct non-conformities subject to annual management review. Latest management review conducted on 15 April 2022, 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 effect management system, and recommendation for improvement.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>PT Bumi Permai Lestari – Bukit Perak Mill has ensured that certified FFB received are RSPO certified based on the source of FFB. These certified FFB source are under PT Bumi Permai Lestari (RSPO 733239). Based on interview with weighbridge clerk and FFB receiving station, Bukit Perak Mill received certified and non-certified FFB. Based on Mill Daily Production Report dated 31 May 2022, certified FFB are coming from Bukit Perak Estate and Bukit Permata Estate, whilst non-certified FFB coming from PT Agro Lestari Hijau Sentosa (Bukit Lestari Estate), PT Agro Lestari Subur Sejahtera (Bukit Permai Estate), CV Gunung Mas Lestari (GMLX), Koptan Tugang Jaya (KTJX), Bumdes Sinar Harpan (BSHX), CV Multi Nusa Pratama (MNPX).</p> <p>The unit of certification has demonstrated Procedure of Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17). Chapter 6.2 of the procedure indicates the Weighbridge Clerk has responsibility to check delivery note from FFB source and print "Receiving Slip" based on FFB Delivery Note, covering information e.g. FFB source name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>Chapter 6.6. (Three Monthly Calculation) of the procedure mentioned that CH will inform CB if there is projected overproduction of certified</p>	<p>Complied</p>

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		<p>tonnage. During this recertification assessment, Bukit Perak Mill was not over sold the CPO and PK production.</p> <p>Chapter 6.3 (Raw Material Checking) of the procedure explains control of incoming material (FFB), the non-conforming material can be rejected according to guidance of FFB grading (LAMP/SMART/MCMD/I/TM-PMKS/01).</p> <p>Records of purchasing goods in available:</p> <ul style="list-style-type: none"> <li>- Delivery of FFB from Field "SPB" No.2622/TBS/01/22/04/E059 dated 28 April 2022 from Bukit Perak Estate, Division 01, Complex 262219D30, Block J39 (405 bunches); H40 (177 bunches); J42 (69 bunches); J41 (426 bunches); H39 (317 bunches); J40 (377 bunches); H41 (31 bunches), total 1802 bunches. Receiving slip/weighbridge ticket No.A005298-009533; from Bukit Perak Estate; dated 28 April 2022; Delivery Note No.2622/TBS/01/22/04/E059; block ID 19D30; planting year 2019; total bunches 1,802; nett weight 9,400 kg. Stamp Certified Product; Transporter PT Satrindo Jaya Agropalma; driver Pairan; clerk Nalupiza.</li> <li>- Delivery of FFB from Field "SPB" No.2623/TBS/02/22/05/L062 dated 25 May 2022 from Bukit Permata Estate, Division 02, Complex 262393D09 and 262397D11, Block G29 (278 bunches) and F29 (92 bunches); total 370 bunches. Receiving slip/weighbridge ticket No.A006527-011276; from Bukit Permata Estate dated 25 May 2022; Division 02; total bunches 370; nett weight 7,320 kg. Stamp Certified Product; Transporter PT Satrindo Jaya Agropalma; driver Rahmadi; clerk Nova Susina Bakara.</li> </ul>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single</p>	<p>The Procedure Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17) dated 24/03/2022 regulated that several information required by the standard have to be available in</p>	Complied

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	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p><b>CSPO:</b></p> <ul style="list-style-type: none"> <li>- Sales Contract No.DIC/2650/100522/0001 dated 10 May 2022; between Seller: PT Bumi Permai Lestari (address Gedung Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia Menteng, Jakarta Pusat, DKI Jakarta 10350) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 280,000 kg Crude Palm Oil RSPO MB; Certificate ID RSPO 733239.</li> <li>- Sales Contract No.DIC/2650/190122/0001 dated 19 January 2022; between Seller: PT Bumi Permai Lestari (address Gedung Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia Menteng, Jakarta Pusat, DKI Jakarta 10350) and Buyer: PT Sumber Indah Perkasa (address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 300,000 kg Crude Palm Oil RSPO MB; Certificate ID RSPO 733239.</li> <li>- Bill of Lading No.01/140522/HSA dated 14 May 2022: Shipper PT Bumi Permai Lestari; Consignee PT Ivo Mas Tunggal; Vessel TB Kelinci Mas Satu, TK Bumi Elaeis Satu; Port of Loading Pangkalbalam-Bangka; Port of Discharge Lubuk Gaung, Indonesia; Description of Goods Crude Palm Oil; Total certified product 280,000 kg; Shipping Instruction No.044/IP/2650/05/2022 - DIC/2650/100522/0001; RSPO certificate ID: RSPO 733239-22051020/RSPO MB; Clean on Board 14 May 2022.</li> <li>- Bill of Lading No.01/210122/HSA dated 21 Jan 2022: Shipper PT Bumi Permai Lestari; Consignee PT Sumber Indah Perkasa; Vessel</li> </ul>	
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		<p>TB Kelinci Mas Enam, TK Bumi Elaeis Enam; Port of Loading Pangkalbalam-Bangka; Port of Discharge Tarahan, Lampung, Indonesia; Description of Goods Crude Palm Oil; Total certified product 300,000 kg; Shipping Instruction No.008/IP/2650/01/2022 - DIC/2650/190122/0001; RSPO certificate ID: RSPO 733239-22011014/RSPO MB; Clean on Board 21 Jan 2022.</p> <p><b>Detail Information available:</b></p> <ul style="list-style-type: none"> <li>- The name and address of the buyer: PT Ivo Mas Tunggal, address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat, and PT Sumber Indah Perkasa, address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat.</li> <li>- The name and address of the seller: PT Bumi Permai Lestari, address Gedung Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia Menteng, Jakarta Pusat, DKI Jakarta 10350.</li> <li>- The loading or shipment / delivery date: 14 May 2022 and 21 Jan 2022 based on Bill of Lading.</li> <li>- The date on which the documents were issued: Contract on 10 May 2022 and 19 Jan 2022.</li> <li>- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) RSPO certified Mass Balance.</li> <li>- The quantity of the products delivered: 280 MT and 300 MT based on each Bill of Lading.</li> <li>- Any related transport documentation: Bill of Lading No.01/140522/ HSA and No.01/210122/HSA.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Supply chain certificate number of the seller: RSPO 733239.</li> <li>- A unique identification number: Contract No.DIC/2650/100522/0001 and No.DIC/2650/190122/0001 (verified on all record).</li> </ul> <p><b>PK:</b></p> <ul style="list-style-type: none"> <li>- Sales Contract No.DIC/2650/200422/0002 dated 20 April 2022; between Seller: PT Bumi Permai Lestari (address Gedung Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia Menteng, Jakarta Pusat, DKI Jakarta 10350) and Buyer: PT Sumber Indah Perkasa (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 150,000 kg Crude Sustainable Palm Kernel – RSPO MB. Certificate ID RSPO 733239.</li> <li>- Sales Contract No. DIC/2650/241121/0002, dated 24 Nov 2021; between Seller: PT Bumi Permai Lestari (address Gedung Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia Menteng, Jakarta Pusat, DKI Jakarta 10350) and Buyer: PT Sumber Indah Perkasa (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 220,000 kg Crude Sustainable Palm Kernel – RSPO MB. Certificate ID RSPO 733239.</li> <li>- Bill of Lading No.03/3000422/UMP dated 30 April 2022: Shipper PT Bumi Permai Lestari; Consignee PT Sumber Indah Perkasa; Vessel KM Bunsho; Port of Loading Pangkalbalam-Bangka; Port of Discharge Lampung, Indonesia; Description of Goods Palm Kernel; Total certified product 150,000 kg; Shipping Instruction No.042/IP/2650/04/2022 - DIC/2650/200422/0001; D/O 2650/KER/2650/22/T009; RSPO certificate ID: RSPO 733239-22040028/RSPO MB; Clean on Board 30 April 2022.</li> <li>- Bill of Lading No.02/201221/UMP dated 20 Dec 2021: Shipper PT Bumi Permai Lestari; Consignee PT Sumber Indah Perkasa; Vessel</li> </ul>	
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		<p>KM Vidi No.1; Port of Loading Pangkalbalam-Bangka; Port of Discharge Lampung, Indonesia; Description of Goods Palm Kernel; Total certified product 220,000 kg; Shipping Instruction No.150/IP/2650/12/2021 - DIC/2650/241121/0002; RSPO certificate ID: RSPO 733239-21120023/RSPO MB; Clean on Board 20 Dec 2021.</p> <p><b>Detail Information available:</b></p> <ul style="list-style-type: none"> <li>- The name and address of the buyer: PT Sumber Indah Perkasa (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat)</li> <li>- The name and address of the seller: PT Bumi Permai Lestari (address Gedung Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia Menteng, Jakarta Pusat, DKI Jakarta 10350).</li> <li>- The loading or shipment / delivery date: 30 April 2022 and 20 Dec 2021 based on Bill of Lading.</li> <li>- The date on which the documents were issued: Contract on 20 April 2022 and 24 Nov 2021</li> <li>- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Palm Kernel (PK) RSPO certified Mass Balance.</li> <li>- The quantity of the products delivered: from sampled dispatch slip: 150,000 kg and 220,000 kg based on Bill of Lading.</li> <li>- Any related transport documentation: Bill of Lading No.03/3000422/ UMP and No.02/201221/UMP.</li> <li>- Supply chain certificate number of the seller: RSPO 733239.</li> <li>- A unique identification number: Sales Contract No.DIC/2650/200422/0002 and No.DIC/2650/241121/0002</li> </ul>	
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<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Bukit Perak Mill is not outsourcing its milling activities to any independent third parties. The mill only outsourcing transport activity of CPO and PK to contractors. The unit of certification ensures through contractual agreements that the contractors are complies to RSPO Supply Chain requirement.</p> <p>Based on sales contract, deliveries of CPO and PK are using transport contractors that appointed, contracted and instructed by the unit of certification. During transport of certified CPO and PK, legal ownership is under PT Bumi Permai Lestari.</p> <p>Bukit Perak Mill has an agreement covering the transport process with each contractor; therefore, the CB has access to the transport contractor or operation if an audit is deemed necessary.</p> <p>Contract available:</p> <p>a. "Surat Perjanjian Kerja" (Contract) No.001/BPL/BPRM/01/2020-CPO dated 2 January 2020 between PT Bumi Permai Lestari and PT Satrindo Jaya Agropalma for CPO transport. PT Satrindo Jaya Agropalma issued a statement letter signed by Mr. Yosi Fardiman, dated 1 February 2022. The statement is that the contractor is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary.</p> <p>b. "Surat Perjanjian Kerja" (Contract) No.001/BPL/BPRM/12/2021-PK dated 9 December 2021 between PT Bumi Permai Lestari and PT EMKL Tiga Berdikari for PK Transport. PT EMKL Tiga Berdikari issued a statement letter signed by Mr. Nopianto, dated 24 June 2022. The statement is that the contractor is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary.</p> <p>All contracts are perpetual, as long as the parties need.</p> <p>Bukit Perak Mill has demonstrated Procedure of Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-</p>	<p>Complied</p>
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		<p>MB/17); procedure of CPO and PK delivery (PT.BPL-BPRM/SOP/07) and contractors statement letter. The documents stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>Means of control by Bukit Perak Mill: "Surat Ijin Masuk Kendaraan", "Berita Acara Penimbangan", "Surat Ijin Keluar". Sample: CPO truck No. BN 8462 RB from PT SJA; inspected to carry certified CPO from Bukit Perak Mill to Bangka Bulking Station at Pangkalbalam, dated 23 March 2021. Sample: CPO truck No. BN 8276 RA from PT SJA; inspected to carry certified CPO from Bukit Perak Mill to Bangka Bulking Station at Pangkalbalam, dated 11 May 2022.</p>										
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>Bukit Perak Mill has recorded the names and contact details of all contractors used for transport of certified CPO and PK, as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e1f5fe;"> <th style="text-align: center;">Contractor</th> <th style="text-align: center;">Contact Person</th> <th style="text-align: center;">Address</th> </tr> </thead> <tbody> <tr> <td>PT Satrindo Jaya Agropalma</td> <td>Mr. Yosi Fardiman</td> <td>Pangkalpinang, Bangka</td> </tr> <tr> <td>PT EMKL Tiga Berdikari</td> <td>Mr. Nopianto</td> <td>Jakarta Pusat</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	PT Satrindo Jaya Agropalma	Mr. Yosi Fardiman	Pangkalpinang, Bangka	PT EMKL Tiga Berdikari	Mr. Nopianto	Jakarta Pusat	Complied
Contractor	Contact Person	Address										
PT Satrindo Jaya Agropalma	Mr. Yosi Fardiman	Pangkalpinang, Bangka										
PT EMKL Tiga Berdikari	Mr. Nopianto	Jakarta Pusat										
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The unit of certification inform the audit team in case there is changes in the list of CPO and PK transporter through the RSPO P&C Pre Audit Information checklist.	Complied									
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	Bukit Perak Mill has implemented RSPO Supply Chain Certification Standard based on Procedure Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17) dated 24/03/2022. The procedure explains all aspects of supply chain and traceability scope in PT Bumi Permai Lestari: consist of FFB receiving, weighing, FFB quality checking, processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and	Complied									

	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>receiving in storage tank for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping; document control.</p> <p>Bukit Perak Mill maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>Daily Production report 31 December 2021: FFB received month todate is 10,210.86 MT; CPO produced month todate is 1,961.77 MT; PK produced month todate is 593.78 MT; OER month todate is 18.86%; KER month todate is 5.71%; CPO dispatched month todate is 1,436.86 MT; PK dispatched month todate is 800.00 MT.</p> <p>The procedure of Supply Chain Section 7 (Documentation) stipulates storage and control of recording related to product sales, transportation until product delivery must be stored according to procedure of document and record control (SOP/SMART/UMUM/SADV/I/001) with minimum retention period of 10 years.</p> <p>Bukit Perak Mill is able to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>For period January to December 2019, FFB processed is 225,766.59 MT (certified 43,797.14 MT and non-certified 181,969.45 MT); CPO produced is 45,330.18 MT (certified 8,796.34 MT and non-certified 36,533.84 MT); PK produced is 12,360.95 MT (certified 2,411.01 MT and non-certified 9,949,94 MT); OER is 20.08%; KER is 5.48%; CPO dispatched is 45,962.83 MT (certified 9,150.88 MT and non-certified 36,811.95 MT); PK dispatched is 12,300.00 MT (certified 2,500.00 MT and non-certified 9,800.00 MT).</p> <p>For period January to December 2020, FFB processed is 203,953.67 MT (certified 44,727.82 MT and non-certified 159,225.85 MT); CPO</p>	
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		<p>produced is 40,368.53 MT (certified 8,845.08 MT and non-certified 31,523.45 MT); PK produced is 11,058.47 MT (certified 2,421.54 MT and non-certified 8,636.93 MT); OER is 19.79%; KER is 5.42%; CPO dispatched is 40,300.77 MT (certified 8,861.76 MT and non-certified 31,439.01 MT); PK dispatched is 11,347.54 MT (certified 2,390.00 MT and non-certified 8,957.54 MT).</p> <p>For period January to December 2021, FFB processed is 191,991.31 MT (certified 57,304.37 MT and non-certified 134,686.94 MT); CPO produced is 37,461.05 MT (certified 11,171.55 MT and non-certified 26,289.50 MT); PK produced is 10,808.19 MT (certified 3,230.63 MT and non-certified 7,577.56 MT); OER is 19.51%; KER is 5.63%; CPO dispatched is 37,122.48 MT (certified 11,113.67 MT and non-certified 26,008.81 MT); PK dispatched is 10,764.93 MT (certified 3,320.00 MT and non-certified 7,444.93 MT).</p> <p>For period January to May 2022, FFB processed is 72,909.93 MT (certified 19,564.81 MT and non-certified 53,345.12 MT); CPO produced is 14,360.80 MT (certified 3,862.70 MT and non-certified 10,498.10 MT); PK produced is 4,220.48 MT (certified 1,133.00 MT and non-certified 3,087.48 MT); OER is 19.70%; KER is 5.79%; CPO dispatched is 13,789.86 MT (certified 3,702.17 MT and non-certified 10,087.69 MT); PK dispatched is 3,888.33 MT (certified 970.00 MT and non-certified 2,918.33 MT).</p> <p>Based on review to mass balance record, the mill has never implementing sell short.</p>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2022, the estimated extraction rate from FFB into CPO is 20.50%, whilst from FFB to PK is 5.50%. Based on Daily Production Report dated 31 December 2021, actual extraction rate ratios from FFB into CPO is 18.86% (average 12 months), whilst from FFB to PK is 5.71% (average 12 months).</p>	Complied

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Report. Based on Daily Production Report dated 31 May 2022 for period January to May 2022, actual OER is 20.43% and KER is 5.74%.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Bukit Perak Mill receive certified and non-certified FFB, therefore applicable supply chain model is Mass Balance (MB), contamination between certified and non-certified product is allowed. Bukit Perak Mill have 3 storage tanks, with 2000 MT capacity of each.</p> <p>There are two weighbridges used in Bukit Perak Mill, both have been calibrated based on:</p> <ul style="list-style-type: none"> <li>- "Surat Keterangan Hasil Pengujian Dinas Koperasi, Usaha Kecil Menengah dan Perindustrian Pemerintah Kabupaten Bangka Barat No.5/SKHP-SMBP/DKUP.BABAR/VII/BM/2021 for weighbridge Avery Weigh Tronix E1005; Serial Number 124750938; Capacity 300 kg; verified on 3 July 2021.</li> <li>- "Surat Keterangan Hasil Pengujian Dinas Koperasi, Usaha Kecil Menengah dan Perindustrian Pemerintah Kabupaten Bangka Barat No.6/SKHP-SMBP/DKUP.BABAR/VII/BM/2021 for weighbridge Avery Weigh Tronix E1005; Serial Number 171050154; Capacity 40,000 kg; verified on 3 July 2021.</li> </ul> <p>Bukit Perak Mill have 3 storage tanks that regularly cleaned twice a year, evidence seen: Notes of CPO Stock Recycling No.BA-CPO/ST2/06/2022 dated 21 June 2022.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after</p>	PT Bumi Permai Lestari – Bukit Perak Mill is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000001761.	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>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, Bukit Perak Mill has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ol style="list-style-type: none"> <li>a. Shipping Announcement, with transaction ID No.TR-f46b6c57-e76e for 280 MT CSPO MB; from PT Bumi Permai Lestari – Bukit Perak Mill (RSPO_PO1000001761) as Seller to PT IVO MAS TUNGGAL – Lubuk Gaung Refinery (RSPO_PO1000003168) as Buyer. Shipping date 14-05-2022; Contract DIC/2650/100522/0001; Confirmation date 31-05-2022.</li> <li>b. Shipping Announcement, with transaction ID No.TR-6e19a6e7-d49c for 300 MT CSPO MB; from PT Bumi Permai Lestari – Bukit Perak Mill (RSPO_PO1000001761) as Seller to PT SUMBER INDAHPERKASA (RSPO_PO1000002035) as Buyer. Shipping date 21-01-2022; Contract DIC/2650/190122/0001; Confirmation date 02-02-2022.</li> <li>c. Shipping Announcement, with transaction ID No.TR-11489131-c1bb for 220 MT CSPK MB; from PT Bumi Permai Lestari – Bukit Perak Mill (RSPO_PO1000001761) as Seller to PT SUMBER INDAHPERKASA (RSPO_PO1000006557) as Buyer. Shipping date 22-12-2021; Contract DIC/2650/241121/0002; Confirmation date 30-12-2021.</li> <li>d. Shipping Announcement, with transaction ID No. TR-635b003b-0f57 for 200 MT CSPK MB; from PT Bumi Permai Lestari – Bukit Perak Mill (RSPO_PO1000001761) as Seller to PT IVO MAS TUNGGAL – Lubuk Gaung Refinery (RSPO_PO1000006558) as Buyer. Shipping date 12-04-2021; Contract DIC/2650/240321/0001; Confirmation date 30-04-2021.</li> </ol>	
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		<p>During this assessment period, Bukit Perak Mill sold several volumes of certified CPO as another certification scheme. Therefore, Bukit Perak Mill performed "Remove" in the RSPO IT Platform as well as for CSPO withdrawn from transport deduction, for examples:</p> <p>a. Transaction ID: ST-TR-a91be248-1337; dated 06-08-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1,211.21 MT; Reason: Sold as ISCC.</p> <p>b. Transaction ID: ST-TR-701507ba-f0a7; dated 09-02-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 599.58 MT; Reason: Sold as ISCC.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The procedure for claims is stated in Procedure of Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17) dated 24/03/2022. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified Mass Balance are only stated in sales documents of RSPO certified product.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>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>.</p>	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.rsपो.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>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.</p>	Complied

	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.		
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
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	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	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However,	PT Bumi Permai Lestari – Bukit Perak Mill is not a distributor or wholesaler.	Not Applicable

	<p>in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Bumi Permai Lestari – Bukit Perak Mill is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Not Applicable
<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>		
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <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>	<p>PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.</p> <p>Not Applicable</p>
<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> </ul>	<p>PT Bumi Permai Lestari – Bukit Perak Mill is implementing Mass Balance. Not applicable.</p> <p>Not Applicable</p>

	<ul style="list-style-type: none"> <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>		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
<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</li> </ul>	Not applicable	Not Applicable

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> <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>		
<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> <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>There is no product partial claims. So, it is not applicable</p>	<p>Not Applicable</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.			
<b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and	Unit of Certification has had a corporate policy set on 12 December 2019 in Jakarta which has been ratified by the Head of Policy and	Complied

	<p>communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Compliance Division (Mr. Haskarlianus Pasang). The policy relating to human rights, there are 11 statement related to the human right. 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 company's policy is also published to use posters at any strategic places in the plantations (Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill. Corporate policy has been socialized/dissemination to all levels of PT BPL employees on 3-4 December 2019 (list of participants can be shown) and on stakeholders (including local contractors) on 5-6 December 2019 which was attended by 25 stakeholders.</p> <p>According to interview with sample of workers during audit, it is 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>During onsite visit to Estate and Mill, auditor team have not seen any use of paramilitaries or mercenaries in their operations. Security officer is permanent employees and placed in several gate surrounding the plantation and main office.</p> <p>RAV:</p> <p>According to interview with 15 workers at BPRE, 14 workers at BPTE, 14 workers at BPRM and representative of internal stakeholders (Gender Committee, Cooperative and New Mother), clearly inform that since they are working with the company, no violence occurs.</p>	Complied
<p><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.</p>			
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</p>	<p>Unit of Certification established procedure "<i>SOP Penanganan Keluhan dan Ketidakpuasan (SOP/SMART/GIMS-SCMD/USDV/I/001, R.2, dated</i></p>	Complied

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	<p>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>11 April 2017)". Scope of the procedure covering complaints and dissatisfaction records, classification, communication, planning, resolution, monitoring and reporting of complaint and dissatisfaction handling, including form of any sexual harassment to workers nor children sourced from internal and external parties.</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 deliver 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> <li>- 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.</li> </ul>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>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. The procedure describes that the process of delivering and handling complaints and grievances internally and externally. In the SOP also mentioned that the company guarantees the anonymity of the whistle-blower. Head clerk is responsible for record all complaints and grievances that exist both orally and in writing from the external. Responses to the complaint and dissatisfaction is given as soon as</p>	<p>Complied</p>

		possible and not later than 14 working days after the issue received. Based on interviews with management, if there is no solution in the complaint mechanism, can be brought to the RSPO Complaint System.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and dissatisfaction document number: F/SMART/SIGSCSRD/SADV/003/001. According to interviews with sample of workers and communities there are no complaints or dissatisfaction with the company.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	During interview with stakeholders, there was no complaints occurs for the last five years. However, if the complaints or grievance occurs, can be used phone call directly to hotline number which installed at the office.	Complied
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated. - Minor compliance -	There are several programs for developing local communities through Community Economic Empowerment, containing: <ul style="list-style-type: none"> <li>- <i>"Program Gerakan Sekolah Menyenangkan &amp; Youth Development"</i>.</li> <li>- Cookies and Palm Sugar production located at Desa Dendang. Start production: year 2020. Two persons.</li> <li>- <i>"Anyaman Resam"</i> (Resam handcraft) located at Desa Dendang, start production year 2020. Handcrafter 6 villagers, production capacity 10 craft/day.</li> <li>- Wild forest bees Honey program. Location: Dendang village. Participant: 10 villagers, program start July 2022.</li> <li>- Resam Handy Craft. Location: Kacung village. Participant: 8 villagers, program not started due to waiting for other villagers.</li> </ul>	Complied

		<p>This program are based on identification of small business profile and social livelihood assessment baseline on 15-19 November 2021. Villages covers Desa Rangi Asam, Desa Berang, Desa Dendang, Desa Kacung and SMKN 1 Kelapa.</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>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.</p> <p>a. Hak Guna Usaha/HGU No.58/HGU/BPN/95 based on</p> <ul style="list-style-type: none"> <li>- Location permit "Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.218/SK/I/1993 tentang Pembatalan Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.878/SK/I/1990 tanggal 24 November 1990 tentang Pembatalan Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.222/SK/I/1990 tanggal 22 Maret 1990 dan Pencadangan Tanah Seluas ±25.000 Hektar yang Terletak di Kecamatan Kelapa, Kabupaten Daerah Tingkat II Bangka untuk Keperluan Perkebunan Kelapa Sawit, Kakao dan Karet, Serta Pemberian Izin Lokasi Kembali untuk Keperluan Perkebunan Kelapa Sawit Seluas ±14.000 Hektar yang Terletak di Perwakilan Kecamatan Simpang Teritip Kecamatan Kelapa Kabupaten Daerah Tingkat II Bangka A/N PT. Bumi Permai Lestari" dated 20 March 1993. The decree complemented with map of the location permit as per decree with scale 1:250,000.</li> <li>- Summary of survey planning "Risalah Pemeriksaan Tanah B Propinsi Sumatera Selatan" dated 3 September 1994. Summary stated the application for the land of HGU can be approved.</li> <li>- Letter from Forestry Service "Surat Kepala Kantor Wilayah Departemen Kehutanan No.1997/kwl-6.3/94" dated 7 September 1994 stated based on operation map against "Peta Tata Guna</li> </ul>	<p>Complied</p>

		<p>Hutan Kesepakatan Propinsi Sumatera Selatan” the area designated as “Area Penggunaan Lain/APL” and was not forest area.</p> <ul style="list-style-type: none"> <li>- HGU decree “Keputusan Menteri negara Agraria/Kepala Badan Pertanahan Nasional No.58/HGU/BPN/95 tentang Pemberian Hak Guna Usaha atas Nama PT. Bumi Permai Lestari, Atas Tanah di Kabupaten Bangka”, dated 25 August 1995. Granting HGU for PT. Bumi Permai Lestari on state land of 9,574.03 Ha located in Kelapa District and Simpang Teritip District, Bangka Regency, Sumatera Selatan Province, with situation map No.15/1994 dated 17 September 1994. The HGU valid until 31 December 2030 and can be extend for max. 25 years.</li> <li>- Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.80.02.2.00001, Desa Berang Ibul, Kecamatan Mentok, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, Berakhir Hak 8 August 2031; Gambar Situasi No.1427/1996 of 6,907.60 Ha” dated 8 August 1996. Completed with map of boundary stone scale 1:50,000.</li> <li>- Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.04.2.00001, Desa Kacung, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, berakhir hak Maret 2032; Gambar Situasi No.413/1997 of 2,666.43 Ha” dated 5 March 1997. Completed with map of boundary stone scale 1:40,000.</li> <li>- Re-measurement of the land title as per HGU decree based on “Berita Acara Penilaian Lapangan (Pengukuran ulang) Atas Hak Guna Usaha No.01 Berang Ibul, Kecamatan Mentok, Kabupaten Bangka, Provinsi Sumatera Selatan sekarang Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung” dated 21 December</li> </ul>	
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		<p>2012 – with the cadastral map “Peta Bidang Tanah No.129-29.06-2012” dated 21 December 2012.</p> <ul style="list-style-type: none"> <li>- Revision on the land title HGU decree “Keputusan Kepala Badan Pertanahan Nasional Republik Indonesia No.1/RIt/HGU/BPN RI/2013 tentang Ralat Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional Tanggal 25 Agustus 1995 Nomor 58/HGU/BPN/95 Tentang Pemberian Hak Guna Usaha Atas Nama PT. Bumi Permai Lestari dan Surat Keputusan Kepala Badan Pertanahan Nasional Tanggal 28 Oktober 2004 Nomor 128/HGU/BPN/2004 Tentang Pemberian Perpanjangan Jangka Waktu dan Pembaharuan Hak Guna Usaha Atas Tanah Terletak di Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung”, dated 9 September 2013.</li> <li>- Revision on Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.80.02.2.00001, Desa Berang, Ibul, Rajek Belai, Terentang, Kacung, Pangkal Beras, Kecamatan Simpang Teritip dan Kecamatan Kelapa, Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung, PT. Bumi Permai Lestari, Valid 35 tahun, Berakhir Hak 8 August 2031 dan Gambar Situasi No.1427/1996 of 8,234.13 Ha” dated 8 August 1996. Completed with map of boundary stone scale 1:50,000.</li> </ul> <p>b. Hak Guna Usaha/HGU No.26/HGU/BPN/95 based on</p> <ul style="list-style-type: none"> <li>- Location permit “Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.218/SK/I/1993 tentang Pembatalan Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.878/SK/I/1990 tanggal 24 November 1990 tentang Pembatalan Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.222/SK/I/1990 tanggal 22 Maret 1990 dan Pencadangan Tanah Seluas ±25.000 Hektar yang</li> </ul>	
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		<p>Terletak di Kecamatan Kelapa, Kabupaten Daerah Tingkat II Bangka untuk Keperluan Perkebunan Kelapa Sawit, Kakao dan Karet, Serta Pemberian Izin Lokasi Kembali untuk Keperluan Perkebunan Kelapa Sawit Seluas ±14.000 Hektar yang Terletak di Perwakilan Kecamatan Simpang Teritip Kecamatan Kelapa Kabupaten Daerah Tingkat II Bangka A/N PT. Bumi Permai Lestari” dated 20 March 1993. The decree complemented with map of the location permit as per decree with scale 1:250,000.</p> <ul style="list-style-type: none"> <li>- Summary of survey planning “Risalah Pemeriksaan Tanah B Propinsi Sumatera Selatan” dated 20 June 1992. The area of 3,418.52 Ha including community land of 122.27 Ha has been compensated. Summary stated the application for the state land of HGU can be approved.</li> <li>- Letter from Forestry Service “Surat Kepala Kantor Wilayah Departemen Kehutanan No.343/KWL-6.3/92” dated 15 February 1992 stated the area of 3,425.07 Ha was designated as “Area Penggunaan Lain/APL” and was not forest area.</li> <li>- HGU decree “Keputusan Menteri negara Agraria/Kepala Badan Pertanahan Nasional Republik Indonesia No.26/HGU/BPN95 tentang Pemberian Hak Guna Usaha Atas Nama PT. Bumi Permai Lestari, Atas Tanah di Kabupaten Bangkat”, dated 12 April 1995. Granting HGU for PT. Bumi Permai on state land of 3,418.52 Ha located in Bangka Regency, Sumatera Selatan Province, with situation map No.16/1994 dated 17 September 1994. The HGU valid for 35 years, and ends on 31 December 2030.</li> <li>- Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.03.2.00001, Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, Lamanya Hak 35 Tahun, Berakhir Hak 31 Desember 2030; Gambar Situasi No.1471/1996 of 3,418.52 Ha” dated 3</li> </ul>	
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		<p>August 1996. Completed with map of boundary stone scale 1:50,000.</p> <p>Total land title covers area of 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> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>PT Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>PT. Bumi Permai Lestari refers to FPIC procedure "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, etc.</p>	Complied
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>PT. Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that they can decide to gave consent/approval for company to open plantation or not. There was no coercive or use of force by company in getting community/individual landowner approval.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p>	

	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>PT. Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that they were given explanation related to legal aspect, economic aspect, environmental aspect and social aspect and all document in Bahasa Indonesia and they understood.</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).</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>PT Bumi Permai Lestari obtained the HGU and can demonstrate map of legal ownership of the land through HGU maps:</p> <ul style="list-style-type: none"> <li>- Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.80.02.2.00001, Desa Berang, Ibul, Rajek Belai, Terentang, Kacung, Pangkal Beras, Kecamatan Simpang Teritip dan Kecamatan Kelapa, Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung, PT. Bumi Permai Lestari, Valid 35 tahun, Berakhir Hak 8 August 2031 dan Gambar Situasi No.1427/1996 of 8,234.13 Ha" dated 8 August 1996. Completed with map of boundary stone scale 1:50,000.</li> <li>- Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.04.2.00001, Desa Kacung, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, berakhir hak Maret 2032; Gambar Situasi No.413/1997 of 2,666.43 Ha" dated 5 March 1997. Completed with map of boundary stone scale 1:40,000.</li> <li>- Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.03.2.00001, Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai</li> </ul>	<p>Complied</p>

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		<p>Lestari, Lamanya Hak 35 Tahun, Berakhir Hak 31 Desember 2030; Gambar Situasi No.1471/1996 of 3,418.52 Ha” dated 3 August 1996. Completed with map of boundary stone scale 1:50,000.</p> <p>PT. Bumi Permai Lestari identified areas within the land title whereby the owner does not want to be compensated and categorized as “Area cadangan”. The “Area cadangan” identified and mapped with the individual owner, list updated since July 2021. In Bukit Permata, identified 13 land parcels. In Bukit Perak identified 24 land parcels. Sample interviewed and document reviewed for</p> <ul style="list-style-type: none"> <li>- “Pak Kaman” his land in Bukit Permata Estate, identified block G37, identified with GPS coordinates and measured area of 2.53 Ha, current vegetation rubber plantation and shrub.</li> <li>- “Pak Kaman” his land in Bukit Permata Estate, identified block G39, identified with GPS coordinates and measured area of 0.68 Ha, current vegetation rubber plantation and shrub.</li> <li>- “Pak Kaman” his land in Bukit Permata Estate, identified block H38, identified with GPS coordinates and measured area of 0.19 Ha, current vegetation rubber plantation and shrub.</li> <li>- “Pak Kaman” his land in Bukit Permata Estate, identified block H39, identified with GPS coordinates and measured area of 1.26 Ha, current vegetation rubber plantation and shrub.</li> </ul>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that they were given explanation and all document in Bahasa Indonesia and they understood.</p>	Complied

4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that they can decide to do the negotiation themselves or be represented. There was no coercive or use of force by company in processing the compensation.</p> <p>Each individual landowner can decide their own, with regards to vegetation and area planned for compensation. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</p>	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>PT Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994. There was no more compensation process afterward.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that they can negotiate prior to compensation process. The negotiation based on vegetation on the areas identified owned by each landowners.</p> <p>There was no coercive or use of force by company in negotiation process. Each individual landowner can decide their own, with regards negotiation progress to company offers. As a proof, there are several landowners whose never release their land parcel and company respect the decision.</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>PT. Bumi Permai Lestari obtained the HGU and can demonstrate the document completed with map of legal ownership of the land:</p> <p>- Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.80.02.2.00001, Desa Berang, Ibul, Rajek Belai, Terentang,</p>	Complied

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		<p>Kacung, Pangkal Beras, Kecamatan Simpang Teritip dan Kecamatan Kelapa, Kabupaten Bangka Barat, Provinsi Kepulauan Bangka Belitung, PT. Bumi Permai Lestari, Valid 35 tahun, Berakhir Hak 8 August 2031 dan Gambar Situasi No.1427/1996 of 8,234.13 Ha” dated 8 August 1996. Completed with map of boundary stone scale 1:50,000.</p> <ul style="list-style-type: none"> <li>- Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.04.2.00001, Desa Kacung, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, berakhir hak Maret 2032; Gambar Situasi No.413/1997 of 2,666.43 Ha” dated 5 March 1997. Completed with map of boundary stone scale 1:40,000.</li> <li>- Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.01 No.04.04.77.03.2.00001, Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka, Provinsi Sumatera Selatan, PT. Bumi Permai Lestari, Lamanya Hak 35 Tahun, Berakhir Hak 31 Desember 2030; Gambar Situasi No.1471/1996 of 3,418.52 Ha” dated 3 August 1996. Completed with map of boundary stone scale 1:50,000.</li> </ul> <p>PT. Bumi Permai Lestari identified areas within the land title whereby the owner does not want to be compensated and categorized as “Area cadangan”. The “Area cadangan” identified and mapped with the individual owner, list updated since July 2021. In Bukit Permata, identified 13 land parcels. In Bukit Perak identified 24 land parcels. Sample interviewed and document reviewed for</p> <ul style="list-style-type: none"> <li>- “Pak Kaman” his land in Bukit Permata Estate, identified block G37, identified with GPS coordinates and measured area of 2.53 Ha, current vegetation rubber plantation and shrub.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- "Pak Kaman" his land in Bukit Permata Estate, identified block G39, identified with GPS coordinates and measured area of 0.68 Ha, current vegetation rubber plantation and shrub.</li> <li>- "Pak Kaman" his land in Bukit Permata Estate, identified block H38, identified with GPS coordinates and measured area of 0.19 Ha, current vegetation rubber plantation and shrub.</li> <li>- "Pak Kaman" his land in Bukit Permata Estate, identified block H39, identified with GPS coordinates and measured area of 1.26 Ha, current vegetation rubber plantation and shrub.</li> </ul>	
<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>PT. Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994; specific for compensation for Bukit Perak Estate and Bukit Permata Estate was carried out for area of 32.301 Ha.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that CH PT. Bumi Permai Lestari has explained their purpose with the area that will be compensated. All communication, explanation and negotiation were done in Bahasa Indonesia and was understood by them.</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>PT. Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994; in Bukit Perak Estate and Bukit Permata Estate in particular 32.301 Ha. PT. Bumi Permai Lestari kept the summary of vegetation compensation, indicating the name of previous landowner, date of compensation/payment, address of the previous landowner, location of area (block) compensated, hectarage of area compensated, valuation.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that CH PT. Bumi Permai Lestari never use force or coercive approach in obtaining the area. As a proof,</p>	<p>Complied</p>

		<p>there are several landowners whose never release their land parcel and company respect the decision.</p> <p>Sampled compensation data:</p> <ul style="list-style-type: none"> <li>- Register: name landowner Barudin, compensation date 25 September 1993, Kacung Village, identified area in Division I Block J44, 0.5 Ha, compensation value Rp.50,000 by PT. Bumi Permai Lestari. Statement letter "Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.5 Ha dan Petani atas nama Barudin Telah Menerima Penggantian Rp.50,000" dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Barudin vegetation over land 0.5 Ha with valuation Rp.50,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</li> <li>- Register: name landowner Amat Abunawar, compensation date 19 October 1993, Tugang Hamlet, Kacung Village, identified area in Division IVB Block C/D19, 0.2 Ha, compensation value Rp.35,000 by PT. Bumi Permai Lestari. Statement letter "Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.2 Ha dan Petani atas nama Amat Abunawar Telah Menerima Penggantian Rp.35,000" dated 19 October 1993. Informing PT. Bumi Permai Lestari has compensating Amat Abunawar tamarind vegetation over land 0.2 Ha with valuation Rp.35,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/07/KIP/93.</li> <li>- Register: name landowner Rusman, compensation date 25 September 1993, Kacung Village, identified area in Division I Block H22, 0.106 Ha, compensation value Rp.160,000 by PT. Bumi Permai Lestari. Statement letter "Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.106 Ha dan Petani atas nama Rusman Telah Menerima Penggantian</li> </ul>	
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		<p>Rp.160,000” dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Rusman’ pepper and rubber vegetation over land 0.106 Ha with valuation Rp.35,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</p> <ul style="list-style-type: none"> <li>- Register: name landowner Harun Senen, compensation date 25 September 1993, Kacung Hamlet, Kacung Village, identified area in Division I Block H, 1 Ha, compensation value Rp.1,200,000 by PT. Bumi Permai Lestari. Statement letter “Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 1 Ha dan Petani atas nama Harun Senen Telah Menerima Penggantian Rp.1,200,000” dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Harun Senen’ rubber and jackfruit vegetation over land 1 Ha with valuation Rp.1,200,0000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</li> <li>- Register: name landowner Lihin, compensation date 25 September 1993, Kacung Hamlet, Kacung Village, identified area in Division I Block F23, 0.35 Ha, compensation value Rp.500,000 by PT. Bumi Permai Lestari. Statement letter “Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.35 Ha dan Petani atas nama Lihin Telah Menerima Penggantian Rp.500,000” dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Lihin’ rubber and durian vegetation over land 0.35 Ha with valuation Rp.500,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</li> <li>- Register: name landowner Bakar, compensation date 29 June 1993, Terentang Hamlet, Kacung Village, identified area in Division IB Block D29, 0.1 Ha, compensation value Rp.70,000 by PT. Bumi Permai Lestari. Statement letter “Surat Keterangan PT. Bumi</li> </ul>	
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		<p>Permai Lestari Telah Mengganti Tanam Tumbuh 0.1 Ha dan Petani atas nama Bakar Telah Menerima Penggantian Rp.70,000” dated 29 June 1993. Informing PT. Bumi Permai Lestari has compensating Bakar’ rubber and bamboo vegetation over land 0.1 Ha with valuation Rp.70,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/03/KIP/93.</p> <ul style="list-style-type: none"> <li>- Register: name landowner Seran, compensation date 29 June 1993, Terentang Hamlet, Kacung Village, identified area in Division IVA Block H11, 0.5 Ha, compensation value Rp.150,000 by PT. Bumi Permai Lestari. Statement letter “Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.5 Ha dan Petani atas nama Seran Telah Menerima Penggantian Rp.150,000” dated 29 June 1993. Informing PT. Bumi Permai Lestari has compensating Seran’ 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 Hamlet, Village Head, District Head, registered number 593.83/03/KIP/93.</li> <li>- Register: name landowner Usman, compensation date 29 June 1993, Terentang Hamlet, 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 0.5 Ha dan Petani atas nama Usman Telah Menerima Penggantian Rp.125,000” 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 Hamlet, Village Head, District Head, registered number 593.83/03/KIP/93.</li> </ul>	
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples,	PT Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994; specific for compensation for	Complied

	<p>the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>Bukit Perak Estate and Bukit Permata Estate was carried out for area of 32.301 Ha.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that CH PT. Bumi Permai Lestari has explained their purpose with the land being compensated. The previous landowner stated their land for food and access to water was not disturbed.</p>	
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>PT. Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994; specific for compensation for Bukit Perak Estate and Bukit Permata Estate was carried out for area of 32.301 Ha.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that CH PT. Bumi Permai Lestari has explained and communicated the legal consequences, economic benefit, environmental impact, social impact to them. It was up to the previous landowner to review the information. They can ask representative and cross check information with other parties, even there was discussion among village community prior to individual landowner decision to sell their land/getting compensation.</p> <p>Evidence verified, there are several landowners never release their land and company respect the decision.</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>PT. Bumi Permai Lestari has completed the compensation process of total 209.261Ha in September 1994; specific for compensation for Bukit Perak Estate and Bukit Permata Estate was carried out for area of 32.301 Ha.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that CH PT. Bumi Permai Lestari has explained and communicated the legal consequences, economic benefit, environmental impact, social impact to them. It was up to the previous landowner to review the information. They can ask</p>	Complied

		<p>representative and cross check information with other parties, even there was discussion among village community prior to individual landowner decision to sell their land/getting compensation.</p> <p>Evidence verified, there are several landowners never release their land and company respect the decision.</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>Unit of certification is existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations. However, some area within plantation are still not develop where that area owned by local communities. Unit of certification does not forced to the land owner to release their land. This area is categorized as preserved land.</p> <p>During interview with landowner in Block H39-H40 Bukit Permata Estate, declare that the land is inherited land from his grandparents. The landowner will not release or sell the land forever.</p>	Complied
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new lands or expansion area within unit of certification. Some area with status reserves area (categorised as inherited land) are isolated from palm crops and not develop by the certificate holder. Communities are lived outside the plantations managed area boundary.</p>	Complied
<p><b>Criteria 4.6:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Perak POM and its supply bases is subsidiary of RSPO membership Golden Agri Resources (GAR). All procedures are developed by group and applicable to its subsidiaries. Procedure for identifying legal, customary or user rights, identifying entitled to compensation, calculating and distributing fair and gender-equal compensation are covers within "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 Jul 2010)".</p> <p>Procedure for identifying land as follow:</p>	Complied

		<ol style="list-style-type: none"> <li>1. Identifying legal: determined by government in form of permit (location permit).</li> <li>2. Identifying customary or user right: conducted during pre-inventory land (company, village and district team).</li> <li>3. Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company.</li> </ol> <p>The procedure is in place and due to the unit of certification have no expansion area and or land compensation, therefore for current re-certification assessment is not applicable.</p>	
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Within “<i>SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 Jul 2010)</i>”, procedure for calculating and distributing fair compensation conducted in participatory way, as follow:</p> <ol style="list-style-type: none"> <li>1. After Location Permit obtained from relevant authority, the Team (representative of company, villages and sub-district) conduct dissemination to communities.</li> <li>2. The Team (representative of company, villages and sub-district) conducting pre-inventory against the land.</li> <li>3. Field verification of land is carried out by landowners, local government, boundary markers, adjacent landowner, sub-district officials and the company team.</li> <li>4. Participatory mapping of ground verification shall be signed by the company and local government official.</li> <li>5. Consultation and coordination to determine price agreements with the village team, sub-district team, regency team (if needed) and company team.</li> <li>6. After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company.</li> </ol>	Complied

		<p>7. The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company.</p> <p>8. Application for compensation with complete requirements, submitted to the company. Then verified by the company team.</p> <p>9. If the verification of the request for compensation is complete and agreed upon by the company team, the payment of compensation shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</p> <p>Unit of certification have no expansion area and or land compensation, therefore for current re-certification assessment is not applicable.</p>	
<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>Unit of certification is existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations.</p> <p>Due to plantation permit is obtain prior year 2007, as per national regulation (Permentan No.26 Tahun 2007) there is no obligation for company to develop smallholders scheme.</p> <p>Entire land compensation is accomplished since 1994.</p>	<p>Complied</p>
<p>4.6.4</p>	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>Unit of certification is existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations.</p> <p>Entire land compensation is accomplished since 1994.</p> <p>Sample of negotiated agreement, compensation and payments of previous landowner are documented. Total landowner have been compensated within Bukit Perak Estate and Bukit Permata Estate are 65 landowner, auditor team took a sample of 8 previous landowner. Document verification of compensation agreement are:</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> <li>1. Mr. Usman. Agreement dated 29/6/1993 for area 0.5 Ha. Location: IVA, Block H11. Witnesses: Sub-village Terentang, company, Kelapa District Head, Kacung Village Head.</li> <li>2. Mr. Barudin. Agreement dated 25/9/1993 for area 0.5 Ha. Location: I, Block J44. Witnesses: Sub-village Kacung, company, Kelapa District Head, Kacung Village Head.</li> <li>3. Mr. Amat Abunawar. Agreement dated 19/10/1993 for area 0.2 Ha. Location: IVB, Block C/D19. Witnesses: Sub-village Tugang, company, Kelapa District Head, Kacung Village Head.</li> <li>4. Mr. Rusman. Agreement dated 25/9/1993 for area 0.106 Ha. Location: I, Block H22. Witnesses: Sub-village Kacung, company, Kelapa District Head, Kacung Village Head.</li> <li>5. Mr. Harun Senen. Agreement dated 25/9/1993 for area 1 Ha. Location: I, Block H. Witnesses: Sub-village Kacung, company, Kelapa District Head, Kacung Village Head.</li> <li>6. Mr. Lihin. Agreement dated 25/9/1993 for area 0.35 Ha. Location: I, Block F23. Witnesses: Sub-village Kacung, company, Kelapa District Head, Kacung Village Head.</li> <li>7. Mr. Bakar. Agreement dated 29/6/1993 for area 0.10 Ha. Location: IB, Block D29. Witnesses: Sub-village Terentang, company, Kelapa District Head, Kacung Village Head.</li> <li>8. Mr. Seran. Agreement dated 29/6/1993 for area 0.5 Ha. Location: IVA, Block H11. Witnesses: Sub-village Terentang, company, Kelapa District Head, Kacung Village Head.</li> </ol> <p>PT Bumi Permai Lestari has completed the land compensation process of total 209.261Ha in September 1994; in Bukit Perak Estate and Bukit Permata Estate in particular 32.301 Ha. PT. Bumi Permai Lestari kept the summary of vegetation compensation, indicating the name of previous landowner, date of compensation/payment, address of the</p>	
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		<p>previous landowner, location of area (block) compensated, hectarage of land compensated, valuation.</p> <p>Interview with sampled previous landowner Amat Abunawar, Seran, Usman audit team getting statement that CH PT. Bumi Permai Lestari go together with landowner to identify the area and its vegetation prior to compensating the vegetation.</p> <p>Sampled compensation data:</p> <ul style="list-style-type: none"> <li>- Register: name landowner Barudin, compensation date 25 September 1993, Kacung Village, identified area in Division I Block J44, 0.5 Ha, compensation value Rp.50,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.5 Ha dan Petani atas nama Barudin Telah Menerima Penggantian Rp.50,000</i>" dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Barudin vegetation over land 0.5 Ha with valuation Rp.50,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</li> <li>- Register: name landowner Amat Abunawar, compensation date 19 October 1993, Tugang Hamlet, Kacung Village, identified area in Division IVB Block C/D19, 0.2 Ha, compensation value Rp.35,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.2 Ha dan Petani atas nama Amat Abunawar Telah Menerima Penggantian Rp.35,000</i>" dated 19 October 1993. Informing PT. Bumi Permai Lestari has compensating Amat Abunawar tamarind vegetation over land 0.2 Ha with valuation Rp.35,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/07/KIP/93.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Register: name landowner Rusman, compensation date 25 September 1993, Kacung Village, identified area in Division I Block H22, 0.106 Ha, compensation value Rp.160,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.106 Ha dan Petani atas nama Rusman Telah Menerima Penggantian Rp.160,000</i>" dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Rusman' pepper and rubber vegetation over land 0.106 Ha with valuation Rp.35,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</li> <li>- Register: name landowner Harun Senen, compensation date 25 September 1993, Kacung Hamlet, Kacung Village, identified area in Division I Block H, 1 Ha, compensation value Rp.1,200,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 1 Ha dan Petani atas nama Harun Senen Telah Menerima Penggantian Rp.1,200,000</i>" dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Harun Senen' rubber and jackfruit vegetation over land 1 Ha with valuation Rp.1,200,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</li> <li>- Register: name landowner Lihin, compensation date 25 September 1993, Kacung Hamlet, Kacung Village, identified area in Division I Block F23, 0.35 Ha, compensation value Rp.500,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.35 Ha dan Petani atas nama Lihin Telah Menerima Penggantian Rp.500,000</i>" dated 25 September 1993. Informing PT. Bumi Permai Lestari has compensating Lihin' rubber and durian vegetation over land 0.35 Ha with valuation Rp.500,000. It has been signed by all parties</li> </ul>	
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		<p>including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/06/KIP/93.</p> <ul style="list-style-type: none"> <li>- Register: name landowner Bakar, compensation date 29 June 1993, Terentang Hamlet, Kacung Village, identified area in Division IB Block D29, 0.1 Ha, compensation value Rp.70,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.1 Ha dan Petani atas nama Bakar Telah Menerima Penggantian Rp.70,000</i>" dated 29 June 1993. Informing PT. Bumi Permai Lestari has compensating Bakar' rubber and bamboo vegetation over land 0.1 Ha with valuation Rp.70,000. It has been signed by all parties including witnesses; Head of Hamlet, Village Head, District Head, registered number 593.83/03/KIP/93.</li> <li>- Register: name landowner Seran, compensation date 29 June 1993, Terentang Hamlet, Kacung Village, identified area in Division IVA Block H11, 0.5 Ha, compensation value Rp.150,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.5 Ha dan Petani atas nama Seran Telah Menerima Penggantian Rp.150,000</i>" dated 29 June 1993. Informing PT. Bumi Permai Lestari has compensating Seran' 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 Hamlet, Village Head, District Head, registered number 593.83/03/KIP/93.</li> <li>- Register: name landowner Usman, compensation date 29 June 1993, Terentang Hamlet, Kacung Village, identified area in Division IVA Block H11, 0.5 Ha, compensation value Rp.125,000 by PT. Bumi Permai Lestari. Statement letter "<i>Surat Keterangan PT. Bumi Permai Lestari Telah Mengganti Tanam Tumbuh 0.5 Ha dan Petani atas nama Usman Telah Menerima Penggantian Rp.125,000</i>" dated 29 June 1993. Informing PT. Bumi Permai Lestari has</li> </ul>	
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		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 Hamlet, Village Head, District Head, registered number 593.83/03/KIP/93.	
<p><b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Refer to indicator 4.6.1</p> <p>Bukit Perak POM and its supply bases is subsidiary of RSPO membership Golden Agri Resources (GAR). All procedures are developed by group and applicable to its subsidiaries. Procedure for identifying legal, customary or user rights, identifying entitled to compensation, calculating and distributing fair and gender-equal compensation are covers within "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 Jul 2010)".</p> <p>Procedure for identifying land as follow:</p> <ol style="list-style-type: none"> <li>1. Identifying legal: determined by government in form of permit (location permit).</li> <li>2. Identifying customary or user right: conducted during pre-inventory land (company, village and district team).</li> <li>3. Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company.</li> </ol> <p>The procedure is in place and due to the unit of certification have no expansion area and or land compensation, therefore for current re-certification assessment is not applicable.</p>	Complied
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>	Refer to indicator 4.6.2	Complied

	<p>- Critical (Major) compliance -</p>	<p>Within "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&amp;L002, R.1, dated 1 Jul 2010)", procedure for calculating and distributing fair compensation conducted in participatory way, as follow:</p> <ol style="list-style-type: none"> <li>1. After Location Permit obtained from relevant authority, the Team (representative of company, villages and sub-district) conduct dissemination to communities.</li> <li>2. The Team (representative of company, villages and sub-district) conducting pre-inventory against the land.</li> <li>3. Field verification of land is carried out by landowners, local government, boundary markers, adjacent landowner, sub-district officials and the company team.</li> <li>4. Participatory mapping of ground verification shall be signed by the company and local government official.</li> <li>5. Consultation and coordination to determine price agreements with the village team, sub-district team, regency team (if needed) and company team.</li> <li>6. After the price fixing is agreed upon, socialization is carried out to the community with the village team, sub-district team and company.</li> <li>7. The land compensation process is carried out according to the agreed price. If it has not been agreed, then negotiations are carried out until there is an agreement. However, if the landowner does not agree to the price negotiation, then the area will be enclave/isolated and not managed by the company.</li> <li>8. Application for compensation with complete requirements, submitted to the company. Then verified by the company team.</li> <li>9. If the verification of the request for compensation is complete and agreed upon by the company team, the payment of</li> </ol>	
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		<p>compensation shall be carried out openly and witnessed by the relevant parties. The entire process is documented and stored.</p> <p>Unit of certification have no expansion area and or land compensation, therefore for current re-certification assessment is not applicable.</p>	
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>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 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>	Complied
<p><b>Criteria 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>According to interview with previous landowner, enclave area landowner and communities of Kacung village and Dendang village, since the company develop and operates the plantation activities, there is no land disputes or land conflict occurs. Land compensation process formerly conducted with FPIC mechanism.</p>	Complied
4.8.2	<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>According to interview with previous landowner, enclave area landowner and communities of Kacung village and Dendang village, since the company develop and operates the plantation activities,</p>	Complied

	addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	there is no land disputes or land conflict occurs. Land compensation process formerly conducted with FPIC mechanism.	
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 -	PT Bumi Permai Lestari as unit of certification is an existing plantation company since 1992. During that time, no acquisition against new area/land was occurs. The land status previously is categorised as State Land which given Land Use Rights from Land Authority. According to interview with previous landowner, enclave area landowner and communities of Kacung village and Dendang village, the entire plantation company area were not customary land. But in some area where occupied by local people already agreed to compensated and some of them still exist and not agreed to be compensated. This is due to inherited land status and the company respect with the landowner decision.	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 -	According to interview with previous landowner, enclave area landowner and communities of Kacung village and Dendang village, since the company develop and operates the plantation activities, there is no land disputes or land conflict occurs. Land compensation process formerly conducted with FPIC mechanism.	Complied
<p><b>Principle 5: Support smallholder inclusion</b>            Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	Company PT. Bumi Permai Lestari refer to Provincial Decree "Peraturan Gubernur Kepulauan Bangka Belitung No.14 Tahun 2019 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa Sawit dari Pekebun Provinsi Kepulauan Bangka Belitung" – Governor regulation on determining FFB purchase price. Year 2020	Complied

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Month	Oil Palm Age	FFB price/kg	Month	Oil Palm Age	FFB Price/kg
Jan	10-20 years	Rp.1,694	Jul	10-20 years	Rp.1,337
Feb	10-20 years	Rp.1,899	Aug	10-20 years	Rp.1,482
Mar	10-20 years	Rp.1,671	Sept	10-20 years	Rp.1,705
Apr	10-20 years	Rp.1,515	Oct	10-20 years	Rp.1,811
May	10-20 years	Rp.1,544	Nov	10-20 years	Rp.1,859
Jun	10-20 years	Rp.1,309	Dec	10-20 years	Rp.1,947

Year 2021

Month	Oil Palm Age	FFB price/kg	Month	Oil Palm Age	FFB Price/kg
Jan	10-20 years	Rp.1,974	Jul	10-20 years	Rp.1,932
Feb	10-20 years	Rp.2,019	Aug	10-20 years	Rp.2,285
Mar	10-20 years	Rp.2,034	Sept	10-20 years	Rp.2,527
Apr	10-20 years	Rp.2,158	Oct	10-20 years	Rp.2,585
May	10-20 years	Rp.2,210	Nov	10-20 years	Rp.2,811
Jun	10-20 years	Rp.2,343	Dec	10-20 years	Rp.3,138

Year 2022

Month	Oil Palm Age	FFB price/kg
Jan	10-20 years	Rp.3,146
Feb	10-20 years	Rp.3,236

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		<table border="1"> <tr> <td>Mar</td> <td>10-20 years</td> <td>Rp.3,422</td> </tr> <tr> <td>Apr</td> <td>10-20 years</td> <td>Rp.3,617</td> </tr> <tr> <td>May</td> <td>10-20 years</td> <td>Rp.3,622</td> </tr> <tr> <td>Jun</td> <td>10-20 years</td> <td>Rp.2,976</td> </tr> </table> <p>Based on field visit to Bukit Perak Mill, the FFB price of period is stated on announcement board. Based on interview with Mr. Samrin from FFB supplier Koptan Tugang Jaya, he informed that PT. Bumi Permai Lestari informed the FFB price on regular basis through whatsapp chat. Confirm in the report that data of FFB prices in current and previous period of time e.g. year 2020-2021 are accessible by smallholder.</p>	Mar	10-20 years	Rp.3,422	Apr	10-20 years	Rp.3,617	May	10-20 years	Rp.3,622	Jun	10-20 years	Rp.2,976	
Mar	10-20 years	Rp.3,422													
Apr	10-20 years	Rp.3,617													
May	10-20 years	Rp.3,622													
Jun	10-20 years	Rp.2,976													
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>Based on interview with Mr. Samrin from FFB supplier Koptan Tugang Jaya, he informed that PT. Bumi Permai Lestari informed the FFB price on regular basis through whatsapp chat. Sampled whatsapp chat verified:</p> <ul style="list-style-type: none"> <li>- On 23 October 2020 informed FFB purchase price at Bukit Perak POM at Rp.1,820/kg – government FFB price for 10-20 years October 2020 at Rp.1,811.</li> <li>- On 21 January 2021 informed FFB purchase price at Bukit Perak POM at Rp.1,830/kg – government FFB price for 10-20 years January 2021 at Rp.1,974.</li> <li>- On 21 January 2022 informed FFB purchase price at Bukit Perak POM at Rp.1,750/kg – government FFB price June 2022 for 10-20 years at Rp.2,976.</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>Company PT Bumi Permai Lestari refer to Provincial Decree "<i>Peraturan Gubernur Kepulauan Bangka Belitung No.14 Tahun 2019 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa</i></p>	Complied												

		<i>Sawit dari Pekebun Provinsi Kepulauan Bangka Belitung</i> – Governor regulation on determining FFB purchase price.	
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>	Company PT Bumi Permai Lestari refer to Provincial Decree " <i>Peraturan Gubernur Kepulauan Bangka Belitung No.14 Tahun 2019 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa Sawit dari Pekebun Provinsi Kepulauan Bangka Belitung</i> " – Governor regulation on determining FFB purchase price.	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contractual agreement:</p> <ul style="list-style-type: none"> <li>- Contract "Surat Pernyataan DO CV Dua Serangkai" dated 1 January 2020. Describes timeframe and signed by both parties.</li> <li>- Contract and "Surat Pernyataan H. Mirwan CV Multi Nusa Pratama" – indicate timeframe and signed by both parties.</li> <li>- Contract and "Surat Pernyataan H. Mirwan CV Multi Nusa Pratama" dated 22 June 2022 – indicate timeframe and signed by both parties.</li> <li>- Contract and statement "Surat Pernyataan Tugang Jaya" dated 1 January 2020 – indicate timeframe and signed by both parties, Tugang Jaya represented by Samrin.</li> </ul>	Complied
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>Payment for FFB supplier:</p> <ul style="list-style-type: none"> <li>- Goods receipt "<i>Berita Acara Serah Terima Barang</i>" dated 20 April 2020; FFB received 327,170 kg; deduction 6,376 kg; FFB nett paid 345,796 kg from CV Gunung Mas Lestari. Invoice CV Gunung Mas Lestari dated 20 April 2020 for 345,796 kg x Rp.1,600; total Rp.607,217,776. Bank Transfer Document for CV Gunung Mas Lestari of Rp.607,217,776 dated 27 April 2020.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Goods receipt "<i>Berita Acara Serah Terima Barang</i>" dated 8 February 2021; FFB received 468,980 kg; deduction 11,042 kg; FFB nett paid 457,938 kg from CV Gunung Mas Lestari. Invoice CV Gunung Mas Lestari dated 8 February 2021 for 56,472 kg x Rp.1,920 and 401,466 kg x Rp.1,940; total Rp.887,270,280. Bank Transfer Document for CV Gunung Mas Lestari of Rp. 887,270,280 dated 15 February 2021.</li> <li>- Grading record "<i>Data Grading Penerimaan TBS Luar Bumdes Sinar Harapan</i>" period 28 April 2022 – Total FFB 19,320 kg; deduction 579.60 kg; Nett FFB 18,740 kg. Goods receipt "<i>Berita Acara Serah Terima Barang</i>" dated 28 April 2022; FFB received 19,320 kg; deduction 579.60 kg; FFB nett paid 18,740.40 kg from Bumdes Sinar Harapan. Invoice Bumdes Sinar Harapan dated 30 April 2022 for 18,740.40 kg x Rp.2,160; total Rp.40,378,066. Debit Advice for Bumdes Sinar Harapan of Rp.40,378,066 dated 11 May 2022.</li> </ul> <p>Deduction in kg are based on sortation result, caused by water content, dirt, sand, long stalk and empty bunch. Confirm that all outgrowers and FFB supplier are agreed with this deduction.</p>	
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 weighbridge calibration by government body.</p> <p><i>"Surat Keterangan Hasil Pengujian Dinas Koperasi, Usaha Kecil Menengah dan Perindustrian Kabupaten Bangka Barat No.1/SKHP-SMBP/DKUP.BABAR/VI/BM/2020"</i> dated 29 June 2020. For weighbridge Avery Weight Tronix S/No.ZM510/190250025 capacity 40,000 kg which tested on 22 June 2020. Result: Legally re-calibrated according to Law No.2 year 1981 concerning Legal Metrology, for year 2020, should be recalibrate on 22 June 2021.</p> <p><i>"Surat Keterangan Hasil Pengujian Dinas Koperasi, Usaha Kecil Menengah dan Perindustrian Kabupaten Bangka Barat No.7/SKHP-SMBP/DKUP.BABAR/VII/BM/2021"</i> dated 3 July 2021. For weighbridge Avery Weight Tronix S/No.ZM510/190250025 capacity 40,000 kg</p>	Complied

		<p>which tested on 1 July 2021. Result: Legally re-calibrated according to Law No.2 year 1981 concerning Legal Metrology, for year 2021, should be recalibrate on 1 July 2022.</p> <p>For calibration year 2022, the government office has not performed the calibration. But the government office sent letter "<i>Surat Dinas Koperasi, Usaha Kecil Menengah dan Perindustrian Kabupaten Bangka Barat No.510/DKUP/VI/2022</i>" dated 29 June 2022 for schedule re-calibration year 2022 on 18-19 July 2022.</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</p>	<p>Complied</p>

		<p>Tugang Jaya, BumDes Sinar Harapan. 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>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</p>	
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		<p>recommendation from UPTD BPMB planned May-June 2022; Obtaining 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> <li>- Draft for credit agreement sighted “Draft Perjanjian Kemitraan Dalam Rangka Fasilitasi Sarana Produksi Kredit Bibit” informing the definition of agreement, purpose, timeframe, cost, type of partnership, supporting document, land legality, FFB sales and credit accrual, payment and net income, right and obligation, tax, sanction, force majeure, dispute settlement, etc.</li> </ul>	
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>PT 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>	Complied
<p><b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>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>Sampled document from female community member interested in the program and being consulted with was Jumiati and Jamainah from Terentang village. They asked for seedling credit each 100 seedlings to plant in their land.</p>	Complied

<p>5.2.2</p>	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has received aspiration and application from community interested in oil palm seedling credit program.</p> <p>PT Bumi Permai Lestari prepared plan for seedling credit scheme for smallholders. For year 2022, the timeline:</p> <ul style="list-style-type: none"> <li>- Coordination with Agriculture Service Kepulauan Bangka Belitung Province planned March-July 2022;</li> <li>- 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;</li> <li>- Fulfilment of legal ownership of the land document planned March-August 2022;</li> <li>- Mapping and coordinate recording planned July-October 2022;</li> <li>- Establishment Smallholder Group, smallholder database planned July-August 2022;</li> <li>- Application for seed producer permit planned March-April 2022;</li> <li>- Technical recommendation from UPTD BPMB planned May-June 2022;</li> <li>- Obtaining seed production permit "Surat Izin Produksi Benih Tanaman Perkebunan" planned June-July 2022;</li> <li>- Obtaining distribution permit "Surat Izin Penyaluran Benih Kelapa Sawit" planned August-October 2022;</li> <li>- Obtaining seed certificate planned November-December 2022;</li> <li>- Credit application from each smallholder group to company planned August-October 2022;</li> <li>- Proposed area mapping planned August-October 2022; Establishment of potential farmer and their land by Government planned September-October 2022;</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>- Cooperation agreement and acknowledgement by Government planned November-December 2022;</li> <li>- Handover of oil palm seedling to smallholder and supervision planned to begin January 2023 onward.</li> </ul> <p>PT Bumi Permai Lestari provides information related to RSPO certification to the third party FFB suppliers.</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 2021. The training performed by Mill Manager to Koptan Tugang Jaya, BumDes Sinar Harapan. 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 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,</p>	
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		legal ownership of the land as basis for traceability, production of FFB and transparency, oil palm plantation business permit.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	<p>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. In the questionnaire PT. Bumi Permai Lestari has tried to identify the current status of legal ownership of the land for each community member as per Indonesia regulation "Sertifikat Hak Milik/SHM, Surat Keterangan Tanah/SKT, Surat Hibah", etc.</p> <p>PT Bumi Permai Lestari provides training to third party FFB suppliers on 19 April 2021. The training performed by Mill Manager to Koptan Tugang Jaya, BumDes Sinar Harapan. The training covers 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 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 information of legality covers land legality type, legal ownership of the land as basis for traceability, production of FFB and transparency, oil palm plantation business permit.</p>	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	PT Bumi Permai Lestari does not have scheme smallholders. However, PT. Bumi Permai Lestari provide training on use of PPE and responsible FFB production to third party FFB suppliers.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Year 2020: Evaluation on third party FFB suppliers CV Dua Serangkai, Koptan Tugang Jaya, BumDes Sinar Harapan on 20 April 2020 through review	Complied

		<p>on OHS understanding, risk analysis, PPE use by worker; complaint/grievance conveying mechanism, code of ethic understanding – status not understanding; Certification implementation, FFB traceability; Legal ownership obtained, business permit obtained, law and regulation understanding – status OK, signed by mill manager</p> <p>Year 2021:</p> <p>Evaluation on third party FFB suppliers CV Multi Nusa Permata, Bumdes Sinar Harapan, Koptan Tugang Jaya, CV Gunung Mas Lestari on 21 April 2021 through review on OHS understanding, risk analysis, PPE use by worker; complaint/grievance conveying mechanism, code of ethic understanding – status 2 suppliers not yet understand; Certification implementation, FFB traceability; Legal ownership obtained, business permit obtained, law and regulation understanding – 2 suppliers status OK, signed by mill manager.</p> <p>The result communicated back to FFB suppliers.</p>	
<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.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established the policies on non-discrimination and equal opportunity as per document "<i>Kebijakan Hubungan Industrial – Perlindungan Pekerja /Buruh dari Diskriminasi</i>" (KHI-SMART/011-00), means Industrial Relations Policy – Protection of Workers/Labour from Discrimination". The policy explained that the company is implementing harmonious industrial relations, dynamic and fair.</p> <p>Circular letter No.268/CEO2/HR PSM 2/10/2015, dated 1 October 2015 is revising Circular letter No.096/CEO2-SE/12/2010, stated that "in order to implement harmonious, dynamic and fair industrial relations, each operational unit operated without discrimination of race, religion, ethnic, physical condition, gender, sexual orientation, membership of union, political affiliation and age in all types of work". This policy is publicly available, and stakeholder can access it upon request.</p> <p>Dissemination of company policies to all related workers, example on 23 May 2022 – located at each Division of Bukit Perak Estate, e.g. at Division 1 attended by 48 workers, at Division 2 attended by 47 workers and at Division 3 and 6 attended by 43 workers.</p> <p>Available employee list updated June 2022 demonstrated that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin or gender:</p> <p>Below is summary of employee list of Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill:</p> <table border="1" data-bbox="1131 1185 1771 1369"> <thead> <tr> <th>No</th> <th>Origin/ethnic</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bangka</td> <td>580 (79%)</td> </tr> <tr> <td>2</td> <td>Batak</td> <td>20 (2%)</td> </tr> <tr> <td>3</td> <td>Jawa</td> <td>89 (12%)</td> </tr> </tbody> </table>	No	Origin/ethnic	Amount	1	Bangka	580 (79%)	2	Batak	20 (2%)	3	Jawa	89 (12%)	<p>Complied</p>
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1	Bangka	580 (79%)													
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		4	Lampung	5 (1%)		
		5	Melayu	29 (4%)		
		6	Lombok	8 (2%)		
		7	Palembang	4 (0.5%)		
		<b>Total</b>		<b>735</b>		
		<b>No</b>	<b>Local / Non-local</b>	<b>Amount</b>		
		1	Local	580 (79%)		
		2	Non-local	155 (21%)		
		<b>Total</b>		<b>735</b>		
		<b>No</b>	<b>Gender</b>	<b>Amount</b>		
		1	Male	610 (83)		
		2	Female	125 (17%)		
		<b>Total</b>		<b>735</b>		
		<b>No</b>	<b>Religion</b>	<b>Amount</b>		
		1	Islam	696 (95%)		
		2	Christian	36 (4.5%)		
		3	Catholic	3 (0.5%)		
		<b>Total</b>		<b>735</b>		

<p>6.1.2</p>	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has demonstrated Worker list of Mill and Estates updated June 2022, as evidence that all workers came from different backgrounds (race, ethnic, origin, religion, gender).</p> <p>Below is summary of employee list of Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill:</p> <table border="1" data-bbox="1131 547 1771 967"> <thead> <tr> <th>No</th> <th>Origin/ethnic</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bangka</td> <td>580 (79%)</td> </tr> <tr> <td>2</td> <td>Batak</td> <td>20 (2%)</td> </tr> <tr> <td>3</td> <td>Jawa</td> <td>89 (12%)</td> </tr> <tr> <td>4</td> <td>Lampung</td> <td>5 (1%)</td> </tr> <tr> <td>5</td> <td>Melayu</td> <td>29 (4%)</td> </tr> <tr> <td>6</td> <td>Lombok</td> <td>8 (2%)</td> </tr> <tr> <td>7</td> <td>Palembang</td> <td>4 (0.5%)</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>735</b></td> </tr> </tbody> </table> <table border="1" data-bbox="1131 1013 1771 1200"> <thead> <tr> <th>No</th> <th>Local / Non-local</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Local</td> <td>580 (79%)</td> </tr> <tr> <td>2</td> <td>Non-local</td> <td>155 (21%)</td> </tr> <tr> <td colspan="2"><b>Total</b></td> <td><b>735</b></td> </tr> </tbody> </table> <table border="1" data-bbox="1131 1246 1771 1383"> <thead> <tr> <th>No</th> <th>Gender</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Male</td> <td>610 (83)</td> </tr> <tr> <td>2</td> <td>Female</td> <td>125 (17%)</td> </tr> </tbody> </table>	No	Origin/ethnic	Amount	1	Bangka	580 (79%)	2	Batak	20 (2%)	3	Jawa	89 (12%)	4	Lampung	5 (1%)	5	Melayu	29 (4%)	6	Lombok	8 (2%)	7	Palembang	4 (0.5%)	<b>Total</b>		<b>735</b>	No	Local / Non-local	Amount	1	Local	580 (79%)	2	Non-local	155 (21%)	<b>Total</b>		<b>735</b>	No	Gender	Amount	1	Male	610 (83)	2	Female	125 (17%)	<p>Complied</p>
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<b>Total</b>		<b>735</b>																			
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has defined the procedure related to new employment recruitment.</p> <ul style="list-style-type: none"> <li>• Recruitment: according to "SOP Rekrutmen dan Seleksi Karyawan" (AA-HR-305.2-R0) dated 1 February 2009 regarding employee recruitment and selection, the company recruits new employee based on their capabilities and qualifications.</li> <li>• Promotion: according to "SOP Promosi dan Mutasi" (KHI-SMART/010-00) dated 1 August 2017. The procedure regulated employee promotion related position and grade.</li> <li>• Retirement and termination: according to Collective Labour Agreement (KEP.4/HI.00.01/19.1905.210621001/B/X/2021) dated 29 October 2021. Article 39 described related to retirement and Article 40 related to termination.</li> </ul>	Complied																		

		<p>Implementation records on employment procedures are available during this recertification audit, such as:</p> <ul style="list-style-type: none"> <li>• Recruitment: <ul style="list-style-type: none"> <li>○ Recruitment announcement No. 001/PT BPL-BPRM/10/2021, position: Administration staff for Personalia and Weighbridge operator, dated 13 October 2021.</li> <li>○ Application letter of Ms. Siti Kafsiah (weighbridge operator), dated 18 October 2021. Attachment: Medical test result, Curriculum vitae, related certificated.</li> <li>○ Application letter Ms. Rindiani (HR Administration Staff), dated 18 October 2021. Attachment: Medical test result, Curriculum vitae, related certificated.</li> <li>○ Record of selection dated 27 October 2021 – was attended by 39 participants</li> <li>○ Interview record of Ms. Siti Kafsiah and Ms. Rindiani, dated 20 October 2021. Result: Good.</li> <li>○ Temporary Work Letter Agreement (PKWT), No. 068/BPRM/PKWT-A2/11/2021, namely Mrs Rindiani (Administration staff for Personalia), dated 1<sup>st</sup> November 2021. Extension letter No: 020/BPRM/PKWT-A2/05/2022, valid until 31<sup>st</sup> October 2022.</li> <li>○ Work Letter Agreement (temporary – PKWT), no: 069/BPRM/PKWT-A2/11/2021, namely Mrs Siti Kafsiah (weighbridge operator), dated 1<sup>st</sup> November 2021. Extension letter based on Surat Keputusan No. 002/SK/BPRM/01/2022, valid until 31 October 2022.</li> </ul> </li> <li>• Promotion and rotation: <ul style="list-style-type: none"> <li>○ Records of Employee Assessment dated 1 March 2022, total of promotion (Grade increment is 134 workers), e.g: Temporary</li> </ul> </li> </ul>	
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		<p>workers to permanent workers, PT (permanent worker) 1 to PT 2, etc.</p> <ul style="list-style-type: none"> <li>○ Assessment record, e.g: Mr. Sarmedi (date of join 8 May 2019, division: Administration, the result: recommended for promotion, approved by Mill Manager.</li> <li>○ Worker Letter Agreement (Increment Letter), No. 001/SK-PT/BPRM/I/2022 of Mr. Sarmedi, date of join 8 May 2019, division: Administration, dated 1 May 2022.</li> <li>○ Promotion Letter (003/SK-PT/BPRM/03/2022) of Mr. Rusli Anam (ID number: 14002), date of join: 17 January 1995. Promotion from grade E1 to E2, effective date 23 Match 2022.</li> </ul> <ul style="list-style-type: none"> <li>● Retirement: <ul style="list-style-type: none"> <li>○ Letter Agreement No: 003/BPTE-EM/SPB/004/2022, dated 28 April 2022 between PT BPL – Bukit Permata Estate and Mr. Marsono (worker number: 07008), related to retirement</li> <li>○ Payslip on retirement dated 19 May 2022 – completed with stamp. Status: received.</li> </ul> </li> </ul>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy test is only conducted to check whether female worker, especially spraying and manuring worker, pregnant or not. In case of female worker’s pregnancy test is positive, then she will be rotated to other types of work for temporary. For example, Mrs. Ani Mufida (Bukit Perak Estate), she was transferred to the Child Care Center after her pregnancy test indicates positive.</p> <p>Pregnancy test are performed using test pack by company clinic in corporation with Community Health Center (Puskesmas) of Kelapa District. Latest pregnancy test conducted on 11 June 2022, there were 18 sprayer workers participates in the pregnancy test, and the result indicated that all female workers were negative. Evidence of pregnancy test result were available at Company Clinic.</p>	Complied

		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.	
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has formed Gender Committee. Each estate and mill have appointed representative for gender committee, specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The committee consider matters such as: dissemination on women’s rights, child-care facilities to be provided by the organization, female workers to be allowed to breastfeed up to nine months before resuming chemical spraying or manuring, and to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about breastfeed up to nine months before resuming chemical spraying or manuring. It was observed that has been assembled on main access road and crowd locations such as: division office and housing area.</p> <p>Based on interview with workers and stakeholders during this recertification audit, they all understood that sexual and all other form of harassment and violence is prohibited. Verified that female worker already understood who to report if there is any harassment or if there are issues related to reproductive rights.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on verification of salary documents for period April and May 2022 at Bukit Perak Estate, Bukit Permata Estate and Bukti Perak Mill, shows that workers at the same level and year of work, get same basic salary, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree.</p>	Complied
<p><b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			

<p>6.2.1</p>	<p><b>(C)</b> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established work agreement for permanent employees through Collective Labor Agreement (<i>PKB-Perjanjian Kerja Bersama</i>) valid for 2 year. The Collective Labor Agreement (PKB) period 2021 – 2023 has been registered in Manpower agency of Bangka Barat Regency No.KEP.4/HI.00.01/19.1905.210621001/B/X/2021, dated 29 October 2021.</p> <p>PT Bumi Permai Lestari has set employment provisions in accordance to the regulation and legal requirement. The PKB describes work relations, such as:</p> <ul style="list-style-type: none"> <li>• in Chapter III, Chapter IV related to working days and working hours, exemption from the obligation to work (leave);</li> <li>• in Chapter V, wage systems;</li> <li>• in Chapter VI, care, and medication as well as work safety and health.</li> </ul> <p>The PKB has described employment contract on Chapter IV, article 11-12 related to works days and hours, the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) including over time.</p> <p>Regulation related minimum wage for year 2022 is based on Governor Decree of Kepulauan Bangka Belitung Province No. 188.44/1009/DISNAKER/2021 concerning "<i>Penetapan Upah Minimum Provinsi Kepulauan Bangka Belitung Tahun 2022</i>", dated 15 December 2021. Minimum wage for year 2022 is IDR 3,264,884 per month.</p> <p>Pay and working conditions stated on PKWT - Perjanjian Kerja Waktu Tertentu (specific-time work agreement) as well. Verified sample of worker who have accepted PKWT: on behalf of Ardiansah (worker in Nursery), Agreement number: 126/BPL-BPRE/PKWT/I/2022 dated 1 February 2022 valid for 5 months.</p>	<p>Complied</p>
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		<p>Pay and working conditions in PKB and the specific-time work agreement (PKWT) were presented in Bahasa Indonesia, so all employees can understand it.</p>	
<p>6.2.2</p>	<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 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>Unit of certification has set employment provisions in accordance with regulation and legal requirement. It stated in employment contract off temporary worker (PKWT) in Article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday). Salary was provided based on minimum wage regulation from Governor Decree of Kepulauan Bangka Belitung Province No.188.44/1009/DISNAKER/2021 concerning "Penetapan Upah Minimum Provinsi Kepulauan Bangka Belitung Tahun 2022" – minimum wage for year 2022, dated 15 December 2021. Minimum wage set at IDR 3,264,884 per month.</p> <p>Determination of salary (including regular and other benefit), working hours (including overtime) and working days have been regulated in the Collective Labor Agreement (PKB) period 2021 – 2023, Chapter VI, Article 18-19; regarding wages, which explains:</p> <ul style="list-style-type: none"> <li>a) Permanent workers are given salary, determined by the employer that it is not lower than government regulations.</li> <li>b) Certain permanent workers are given wages (Basic Salary and Rice allowance) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations</li> <li>c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions.</li> </ul> <p>Provisions of holidays and leave (including maternity leave and menstruation leave) have been regulated in Chapter IV, Article 11-12</p>	<p>Complied</p>

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		<p>regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others. Payroll documents give accurate information on compensation for all work performed, sample verified – payslip document 2022:</p> <table border="1"> <tr> <td data-bbox="1120 507 1966 801"> <p>Month April 2022 Name: Mr A***** (employee number: 2203) Basic salary: IDR 3,264,884 BPJS allowance: IDR 213,524 Deduction for BPJS: IDR 311,471 Social donation: IDR 10,000 Take home pay is IDR 3,156,937</p> </td> </tr> <tr> <td data-bbox="1120 801 1966 1337"> <p>Month May 2022 Name: Mr S***** (employee number: 20048) Basic salary: IDR 3,445,884 Overtime: IDR 2,081,280 Premi: IDR 62,307 BPJS allowance (TK): IDR 237,491 BPJS allowance (Kes): IDR 137,875 PPH21: IDR 2,459 Deduction for BPJS (TK): IDR 340,898 Deduction for BPJs (Kes): IDR 172,344 Cooperative fee: IDR 145,000 Social donation: IDR 4,000 Take home pay is IDR 5,567,136</p> </td> </tr> <tr> <td data-bbox="1120 1337 1966 1382"> <p>Month April 2022</p> </td> </tr> </table>	<p>Month April 2022 Name: Mr A***** (employee number: 2203) Basic salary: IDR 3,264,884 BPJS allowance: IDR 213,524 Deduction for BPJS: IDR 311,471 Social donation: IDR 10,000 Take home pay is IDR 3,156,937</p>	<p>Month May 2022 Name: Mr S***** (employee number: 20048) Basic salary: IDR 3,445,884 Overtime: IDR 2,081,280 Premi: IDR 62,307 BPJS allowance (TK): IDR 237,491 BPJS allowance (Kes): IDR 137,875 PPH21: IDR 2,459 Deduction for BPJS (TK): IDR 340,898 Deduction for BPJs (Kes): IDR 172,344 Cooperative fee: IDR 145,000 Social donation: IDR 4,000 Take home pay is IDR 5,567,136</p>	<p>Month April 2022</p>	
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<p>Month April 2022</p>						

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		<p>Name: Mr S***** (employee number: 96260)          Basic salary: IDR 3,420,884          BPJS allowance (TK): IDR 223,727          BPJS allowance (Kes): IDR 136,835          Family allowance: IDR 276,000          Deduction for BPJS (TK): IDR 326,354          Deduction for BPJS (Kes): IDR 171,044          Social donation: IDR 2,000          Take home pay is IDR 3,558,048</p>	
<p>6.2.3</p>	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.          - Critical (Major) compliance -</p>	<p>The implementation of regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labor requirements have been complied to the regulations and legal requirement.</p> <p>Working hours is set for maximum 40 hours per week and working from Monday to Saturday, salary provided referring to Governor of Kepulauan Bangka Belitung Province Decree No.188.44/1009/DISNAKER/2021, dated 15 December 2021. Permanent workers are given salary, determined by the employer that it is not lower than government regulations. Certain permanent workers are given wages (Basic Salary and Rice allowance) in accordance with the status of the group/level which value is determined by the employer with provisions not lower than government regulations.</p> <p>Rice allowance for employee is given include in basic salary, for spouse is 9 kg, and for children (maximum 3 children) is 7.5 kg per month. Rice allowance is given monthly in form of money.</p> <p>Based on interview with worker representatives, they all admit have received monthly salary including allowance, annual leave,</p>	<p>Complied</p>

		menstruation and maternity leave for female worker, adequate housing, electricity, clean water, access for food and education for children, and there are free to resign from the company with one month notice. There is no document in hold, debt bondage or withholding of wages. There is no complaint from the employees regarding employments.	
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>The unit of certification has provided adequate housing. Public facilities were provided by the organization and covered residential facilities, day care, kindergarten, building for prayers, sports facility e.g. volley ball, badminton, football, etc. Housing for workers and medical facilities (clinics) were provided by the organization with basic facilities.</p> <p>The uses of water for employees daily needs of are met by utilizing rainwater catchment ponds. In the event of not enough water in the ponds, then it can use water from the mill. Clean water provided for employees housing sourced from palm oil mill water treatment. Water analysis/testing have been done based on the laboratory analysis report of clean water.</p> <p>Electricity provided to employees through provision of electricity generator and PLN (National Electricity Company).</p> <p>Based on interview with worker representatives, they all admit have received adequate housing, electricity, clean water, access for food and education for children. There is no complaint from the employees regarding facilities.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The unit of certification has allowed the employee to open several stores around employee housing, that provide daily basic necessary.</p> <p>Markets located in Kelapa District with the range of +/- 3 Km, every payday trader will come to estate location to trade basic needs of</p>	Complied

		<p>employees. Access to the market is always maintained using graders and compactors regularly, therefore it can be passed at all season.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>The unit of certification has calculated the decent living wage (<i>Upah Hidup Layak</i>) for year 2022 given to all workers according to regulations including workers who work on a piece / quota basis, whose wage calculation is based on a quota that can be reached during regular working hours.</p> <p>The unit of certification calculates a living wage year 2022 using the benefit approach that the company has provided to workers, including working tools, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health), etc, with the following calculations:</p> <p>Monthly payments for workers were determined according to daily attendance. Daily attendance for workers were recorded and managed by Assistant through manual records and fingerprint system for mill and estate office. Whilst attendance for field employee in estate such as harvesters and upkeep workers were recorded manually by each foreman using attendance form. It was evident that the wage was paid according working hours and daily attendance. According to pay list of employee and interview result with worker, it was indicated that wage received by the workers was complied with the determined regulations.</p> <p>Unit of certification calculates decent living wage for year 2022 using the benefit approach that company provided to workers, including working allowance, rice allowances, facilities (such as schools-including school transportation, housing, clean water, clinics (health), etc., with the following consideration:</p> <ul style="list-style-type: none"> <li>• Basic salary</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• THR allowance per month</li> <li>• Rice allowance</li> <li>• Electrical allowance</li> <li>• Housing facilities</li> <li>• Water facilities</li> <li>• School</li> <li>• Medical facilities (Clinic)</li> <li>• Kindergarten</li> </ul> <p>Based on the calculation, DLW paid by the company to employees was IDR 4,321,575. Compared to the 2022 standard minimum wage of IDR 3,264,884, the unit of certification has provided IDR 1,056,691 higher monthly income.</p>	
<p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> <li>1. Payment of minimum wages in accordance with applicable regulations</li> <li>2. Assessment of wages paid (prevailing wages) and in-kind benefits.</li> </ol> <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on verification during onsite visit, Certificate Holder using permanent worker for all core work and specified contracted worker (PKWT) for maintenance work.</p> <p>Unit of certification has established policies and mechanisms related to Work Agreements/Contracts (Work Environment and Industrial</p>	Complied

		<p>Relations) Policy No. KHI-smart/002-00 dated 1 August 2017, this policy describes:</p> <ul style="list-style-type: none"> <li>• An employment agreement or contract</li> <li>• Position or type of work</li> <li>• Workplace</li> <li>• Amount wages and the method of payment</li> <li>• Conditions of work that contain the rights and obligations of entrepreneurs and workers / laborers</li> <li>• Starting and validity period of the work agreement. Furthermore, there was also explained a Specific Time Work Agreement (PKWT) based on a certain period can be differentiated for a maximum of 2 (two) years and can only be extended once for a maximum period of 1 (one) year.</li> </ul> <p>Sample seen:</p> <ul style="list-style-type: none"> <li>○ Temporary Work Agreement (PKWT), No: 068/BPRM/PKWT-A2/11/2021, namely Mrs Rindiani (Administration staff for Personalia), dated 1 Nov 2021. Extension letter No: 020/BPRM/PKWT-A2/05/2022, valid until 31 Oct 2022.</li> <li>○ Temporary Work Agreement (PKWT), No: 069/BPRM/PKWT-A2/11/2021, namely Mrs Siti Kafsiah (weighbridge operator), dated 1 Nov 2021. Extension letter based on Decree Letter No. 002/SK/BPRM/01/2022, valid until 31 Oct 2022.</li> </ul> <p>Both types of work are considered as core works. The reason why they are contracted as Temporary worker is because they are new recruits. According to the statement above, the maximum period of PKWT is 2 years. If the results of the employee assessment are satisfactory, the two workers are appointed as permanent employees in accordance with the provisions.</p>	
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<p><b>Criteria 6.3:</b> The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p><b>(C)</b> A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established policy regarding freedom of association and right to collective bargaining in national languages as per "<i>Kebijakan Hubungan Industrial – Kebebasan Berserikat</i>", nomor: KHI-SMART/018-00.</p> <p>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 (<i>pemutusan hubungan kerja</i>), 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> <p>The unit of certification already has a worker union namely <i>PUK SPPP – Serikat Pekerja Seluruh Indonesia PT BPL</i> 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.</p>	<p>Complied</p>
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Based on the information from the chairman, worker union meeting conducted in accordance with the requirements of temporary and existing issues. Records of meeting with workers union were available</p>	<p>Complied</p>

	- Minor compliance -	<p>in form of attendance list and minutes of meeting. Latest meeting conducted on 12 March 2022.</p> <p>Periodic meeting was also held to discuss any issues as necessary and recorded in minutes of meeting. Several issues discussed at meetings were not limited to labour issues. Meetings also discussed cleanliness, safety of housing areas and work equipment. All employees are represented by unions have agreed on a cooperation agreement on the document of PKB, the agreement renewed every two years.</p> <p>Based on data verification and interviews with several employees during Recertification assessment – June 2022, the unit of certification has facilitated space/rooms for workers union to carry out their activities and conduct monthly meetings.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on data verification and interviews with several employees and Chairman of <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.</p>	Complied
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Unit of certification has policy for minimum age for worker and mentioned in "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00), stated Acknowledge, Respect, and Strengthen workers right. The policy is publicly available, and stakeholder can access it upon request. Unit of certification prohibited child labour, forced labour, provide work contract in language that understood by workers and ensure payment given to workers in simple ways, on time and clear.</p>	Complied

		<p>Based on field visit and interview, there was no child labour in Bukit Perak Estate, Bukit Permata Estate and Bukit Perak Mill.</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> <p>In the cooperation contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... ”.</p> <p>Article 7: The second party (Contractor) is obliged to comply with the applicable labor regulations, especially with regard to the payment of wages and the age of workers, which have to be 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labor and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>Based on interview with the contractors, there are no child labour in their operation.</p>	
6.4.2	<p><b>(C)</b> Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has policy for minimum age of worker and mentioned in "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00), stated Acknowledge, Respect, and Strengthen workers right. The policy is publicly available, and stakeholder can access it upon request. Unit of certification prohibited child labour, forced labour, provide work contract in language that understood by workers and ensure payment given to workers in simple ways, on time and clear. Minimum age for worker is 18 years old. Based on list of</p>	Complied

		<p>employees and related document, verified that there is no worker under 18 years old at present or during recruitment.</p> <p>Based on interview with workers, field observation and stakeholder consultation during this recertification audit – June 2022, demonstrated that there is no workers under 18 years old.</p> <p>As example, based on employee list of Bukit Perak Mill updated in June 2022, observed that the youngest worker is Ms. Rindiani (Administration Officer in Bukit Perak Mill), employee number: 21005, birth date 18 January 1999, joined date 1 November 2021 – 21 years and 10 month old; and Mr. Denny Ardiansyah Hartanto, employee number: 22001, birth date 23 May 2001, joined date 1 April 2022 – 20 years and 11 months old.</p>	
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification straight to the policy that minimum age for worker is 18 years old. Based on list of employees and related document, verified that there is no worker under 18 years old at present or during recruitment. Based on interview with workers, field observation and stakeholder consultation during this recertification audit – June 2022, demonstrated that there is no young workers (under 18 years old) working at the unit of certification.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The policy "<i>Kebijakan Hubungan Industrial – Pekerja / Buruh Anak</i>", (KHI-SMART/003-00), stated Acknowledge, Respect, and Strengthen workers right. The policy is publicly available, and stakeholder can access it upon request. Unit of certification prohibited child labour, forced labour, provide work contract in language that understood by workers and ensure payment given to workers in simple ways, on time and clear.</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

		<p>Based on interview with workers, field observation and stakeholder consultation during this recertification audit – June 2022, demonstrated that they all understood child labour is prohibited, they all understood the negative effects of child labour, and promotes child protection to all level of workers and stakeholders.</p>	
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<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>Policy to prevent sexual and all other form of harassment and violence was determined at "<i>Kebijakan Hubungan Industrial – Pelecehan Seksual</i>" (KHI-SMART/016-00). This policy is publicly available, and stakeholder can access it upon request.</p> <p>Dissemination of 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> <p>Unit of certification established Gender Committee. Each estate and mill have appointed representative for gender committee. The committee consider matters such as: dissemination on women’s rights, child-care facilities to be provided by the organization, female workers to be allowed to breastfeed up to nine months before resuming chemical spraying or manuring, and to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about breastfeed up to nine months before resuming chemical spraying or manuring. It was observed that it has been assembled on main access road and crowd locations such as: division office and housing area.</p> <p>Based on interview with workers and stakeholders during this recertification audit, they all understood that sexual and all other form of harassment and violence is prohibited. Verified that there was no sexual and all other form harassment and violence occur within the unit of certification.</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.</p> <p>- Critical (Major) compliance -</p>	<p>A policy to protect the reproductive rights of all, especially of women, is documented under "<i>Kebijakan Hubungan Industrial – Pekerja Perempuan</i>" (KHI-SMART/005-00). In point 2.5, mentioned that menstruation leave are given to female worker for 2 days-off without any salary deduction.</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> <p>Pregnancy test performed by test pack which provided by company clinic in corporation with Community Health Center (Puskesmas) of Kelapa District. Latest pregnancy test conducted on 11 June 2022, there were 18 sprayer workers participates in the pregnancy test, and the result indicated that all female workers were negative. Evidence of pregnancy test result were available at Company Clinic.</p> <p>In case of female worker’s pregnancy test is positive, then she will be rotated to other types of work for temporary. For example, Mrs. Ani Mufida (Bukit Perak Estate), she was transferred to the Child Care Center after her pregnancy test indicates positive.</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>Unit of certification established Gender Committee. Each estate and mill have appointed representative for gender committee. The committee consider matters such as: dissemination on women’s rights, child-care facilities to be provided by the organization, female workers to be allowed to breastfeed up to nine months before resuming chemical spraying or manuring, and to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about breastfeed up to nine months before resuming</p>	<p>Complied</p>
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		<p>chemical spraying or manuring. It was observed that has been assembled on main access road and crowd locations such as: division office and housing area.</p> <p>Based on interview with workers and stakeholders during this recertification audit, they all understood that the company has implemented protection to the reproductive rights.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>Unit of certification has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs in accordance with applicable regulations in Indonesia.</p> <p>Unit of certification and workers union has agreed on breastfeeding time, as stipulated in Collective Labour Agreement (PKB) – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p>Consultation conducted via questionnaire “Formulir Interview dengan Ibu Baru Bersalin/Menyusui”. The questionnaire: status of work? presence of children needing breastfeeding? exclusive breastfeeding? breastfeeding frequency? breastfeeding timeframe? permission from company for breastfeeding time? breastfeeding frequency during working hour? breastfeeding time adequate? provision of specific place for breastfeeding? pay deduction for time used during breastfeeding time? Provision of access to information related to breastfeeding consultation, baby health and vaccination?</p> <p>For breastfeeding mothers and had children under 5 years, the company has provided child-care (<i>Balai Penitipan Anak - BPA</i>) which located at each division. Based on field observation to child-care unit, on 29 June 2022 (Bukit Perak Estate) and on 30 June 2022 (Bukit Permata Estate), the facility and children condition were good.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with</p>	<p>Unit of certification has defined A grievance mechanism, which respects anonymity and protects complainants, where requested as per “<i>Kebijakan Hubungan Industrial – Penanganan Keluhan</i>” (KHI-</p>	Complied

	<p>adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>SMART/019-000). All complaints can be issued verbal and or written and informed whether to Gender Committee or Estate / Mill Manger.</p> <p>Based on review the document of "<i>Pencatatan Keluhan dan Ketidak Puasan 2022</i>" – complaints logbook as well as interview with workers representatives, there was no grievance reported up to June 2022 in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate.</p>	
<p><b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker’s consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has established and documented policy about prohibition of force or trafficked labour in Social and Environment Policy article 3.1 stated Acknowledge, Respect, and Strengthen workers right.</p> <p>All work is voluntary, and retention of identity documents or passports; payment of recruitment fees; contract substitution without worker’s consent; Involuntary overtime; lack of freedom of workers to resign; penalty for termination of employment; debt bondage and withholding of wages are prohibited.</p> <p>Based on document review and interview with worker representatives during this recertification assessment, there are no practices of identity document or passport retention; contract substitution without worker’s consent; involuntary overtime. There was no fees during recruitment process. Workers are free to resign, there is no penalty for termination, debt bondage or withholding of wages.</p>	<p>Complied</p>
<p>6.6.2</p>	<p><b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>Temporary workers using Specified-Time Work Agreement (PKWT) are used for probation time of recruitment process. If appraisal of candidate is good then she/he will be promoted to permanent worker. Available program related to PKWT workers that has been appointed as Permanent Worker (PT) since 2018.</p> <p>Unit of certification has established policies and mechanisms related to Work Agreements/Contracts as per Work Environment and</p>	<p>Complied</p>

		<p>Industrial Relations Policy (KHI-SMART/002-00 dated 1 August 2017, this policy describes:</p> <ul style="list-style-type: none"> <li>• An employment agreement or contract;</li> <li>• Position or type of work;</li> <li>• Workplace;</li> <li>• Amount of wages and the method of payment;</li> <li>• Conditions of work that contain the rights and obligations of the company and workers;</li> <li>• Starting and validity period of the work agreement. Furthermore, there was also explained a Specific Time Work Agreement (PKWT) based on a certain period can be differentiated for a maximum of 2 (two) years and can only be extended 1 (one) time for a maximum period of 1 (one) year.</li> </ul>	
<p><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.</p>			
<p>6.7.1</p>	<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.          - Critical (Major) compliance -</p>	<p>Unit of certification has appointed responsible person for Health and Safety as per P2K3 (Safety Committee). P2K3 has been validated by Manpower Office of Kepulauan Bangka Belitung Province.</p> <p>Data verified:  <u>Bukit Perak Mill:</u></p> <ul style="list-style-type: none"> <li>• 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. OHS Committee is led by Pirma Hutagaol (Mill Manager) and Hanif Gigih Tri Utama as the secretary</li> </ul>	<p>Complied</p>

		<p>concurrently as OHS expert.</p> <p><u>Bukit Perak Estate:</u></p> <ul style="list-style-type: none"> <li>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>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> </ul> <p><u>Bukit Permata Estate:</u></p> <ul style="list-style-type: none"> <li>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</li> </ul>	
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		<p>concurrently as OHS expert.</p> <ul style="list-style-type: none"> <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 - "Keputusan Menteri Ketenagakerjaan RI" No.5/17758/AS.02.04/XII/2021 regarding "Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum" - 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 reports reviewed were for meeting during January – June 2022. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed during the meeting such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Unit of certification has defined the procedure for emergency response preparedness under "SOP Kesiapsiagaan Tanggap Darurat" (SOP/SMART/UMUMSADV/I/2005) dated 30 May 2014, and also 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 the roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health center. Emergency contact number of each internal emergency team and</p>	Complied

		<p>external related parties were evident. Evacuation route and muster point are available and made known to the employee.</p> <p>Accident and investigation reports described accident chronology, cause and impacts of the accident, analyzing root causes of the accident and determine correction and corrective action. Records of all accidents were kept and periodically reviewed for continuous improvement.</p> <p>Bukit Perak Mil has assigned the first aider as per Mill Manager decree letter No.001/SK-P2K3/BPRM/2020 dated 16 January 2020. The appointed person have certificate and license of first aider:</p> <ul style="list-style-type: none"> <li>• Manogar Sirait, Certificate No. Ser 560/34-P3K/Disnaker/2020 dated 5 January 2017, license number No. 560/34-P3K/Disnaker/2020 dated 15 June 2020 valid until 15 June 2023.</li> <li>• S. Zul Alwi Certificate No. Ser 560/32-P3K/Disnaker/2020 dated 5 January 2017, license number No. 560/32-P3K/Disnaker/2020 dated 15 June 2020 valid until 15 June 2023.</li> </ul> <p>Based on field observation to harvesting, spraying and upkeep activities in estates and to FFB processing activities at mill as well, first aid equipment are available and sufficient. At field, first aid kit brought by the Mandor (supervisor), whilst at mill, first aid kit located at office and processing station.</p> <p>Training and emergency drill records:</p> <ul style="list-style-type: none"> <li>• Record of refreshment training for first aider, dated 11 February 2022 – attended by 37 participants. Training was delivered by Company Doctor. Attendance list, photograph and training material were available.</li> <li>• Record of emergency response and preparedness drill/simulation as per document of "<i>Simulasi Tanggap Darurat 2022</i>", conducted on 5 February 2022, attended 25 participants. Attendance list,</li> </ul>	
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		<p>photograph, drill scenario and evaluation report were available.</p> <p>Accident report available as per "Laporan Kecelakaan Kerja". Reported in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate period June 2020 – May 2022 there was 1 accident occurred on 4 December 2020 with Lost Time Accident (LTA) is 2 man-days. OHS expert has been prepared the following:</p> <ul style="list-style-type: none"> <li>○ Accident report (F/SMART/HESS-EHSD/SADV/005/002), namely Eri Kando Sinaga (Boiler Station). Chronology: While repairing the conduit, he had an accident on his head when he hit a conveyor restraint.</li> <li>○ Correction base on investigation report: routine OHS briefing before work and repairing boiler fuel conduit.</li> <li>○ Verified: record of OHS briefing dated 8 December 2020.</li> </ul>	
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari – Bukit Perak Mill, Bukit Permata Estate and Bukit Perak Estate has demonstrated that workers uses 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>Data verified:</p> <ul style="list-style-type: none"> <li>○ PPE monitoring – "<i>Inspeksi Kedisiplinan Pemakaian APD</i>" dated 3 May 2022, located at Division 3, Bukit Perak Estate; reported OK (all workers using PPE as required at risk assessment)</li> <li>○ PPE monitoring – "<i>Inspeksi Kedisiplinan Pemakaian APD</i>" dated 21 April 2022, located at Division 2, Bukit Permata Estate; reported that there was a harvester not using sickle cover. Correction has been made by sickle cover to all harvester.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>○ Handover of PPE – “Berita Acara Serah Terima APD”, dated 4 January 2022, for pesticides applicator of Bukit Perak Estate. PPE consisted of mask, apron, hand gloves, helmet, face shield and rubber boots.</li> <li>○ Handover of PPE – “Berita Acara Serah Terima APD”, dated 12 February 2022, for harvesters of Bukit Permata Estate. PPE consisted of helmet, sickle cover and rubber boots.</li> </ul>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>All workers in mill and estates have been covered by Medical and Social Insurance (BPJS), as required by applicable regulation. Records of insurance payment available in:</p> <ul style="list-style-type: none"> <li>• BPJS registration number</li> <li>• Monthly BPJS insurance 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 January – May 2022.</p> <p>Unit of certification has prepared Medical Check Up program as presented in “Formulir Program Pemeriksaan Kesehatan” (F/SMART/HESS-EHSD/SADV/012/001) dated 3 January 2022, consist of:</p> <ul style="list-style-type: none"> <li>• Physical examination for all workers (blood pressure, heart rate, respiration, height and general physical examination), has been done on 3 February 2022 and 17 March 2022, all workers checked are in normal health condition, consist 415 workers of Bukit Perak Estates, 184 workers of Bukit Permata Estate, and 131 workers of Bukit Perak Mill. MCU performed by Company doctor.</li> <li>• Cholinesterase check conducted for sprayers (twice a year), warehouse and manuring workers (annually). Latest check has been done on 24-25 March 2022 to 28 workers – carried out by Company Doctor (dr. Riswan), all workers checked indicated in</li> </ul>	Complied

		<p>normal health condition - with choline content 75% - 100% (normal).</p> <ul style="list-style-type: none"> <li>• Spirometry checked conducted for sprayer workers (twice a year), warehouse workers, manuring workers, grader operator and welder (annually). Due to pandemic COVID-19 situation, spirometry test are still not yet conducted as per Company Doctor Letter, No.045/ POLIKLINIK/SK/BINE/X/2022 – referring Decree Letter by Ministry of Manpower of Republic Indonesia, No.5/151/AS.02/XI/2020 regarding "Pedoman Keselamatan dan Kesehatan Kerja (K3) Pelaksanaan Pemeriksaan Kesehatan Tenaga Kerja pada Masa Pandemi COVID-19" - "OHS Guidelines for Occupational Health Checks during COVID-19 Pandemic"</li> <li>• Audiometry checked for genset operator and mechanic, has been done on 23 March 2022 for 5 workers. All workers checked indicated normal condition.</li> </ul> <p>Payment record of Medical and Accident Insurance (<i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i>):</p> <ul style="list-style-type: none"> <li>• Billing statement; amount due to payment IDR **,145,956. Number of employees is 336 workers, number of dependent 525. Status PAID on 10 May 2022. (<i>BPJS Kesehatan</i>)</li> <li>• Payment slip number: 2206 0291 6769, total due to payment is IDR ***,248,426. Status: PAID for May 2022 (<i>BPJS Ketenagakerjaan</i>).</li> </ul>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Accident report available as per "Laporan Kecelakaan Kerja". Reported in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate period June 2020 – May 2022 there was 1 accident occurred on 4 December 2020 with Lost Time Accident (LTA) is 2 man-days. OHS expert has been prepared the following:</p> <ul style="list-style-type: none"> <li>○ Accident report (F/SMART/HESS-EHSD/SADV/005/002), namely Eri Kando Sinaga (Boiler Station). Chronology: While repairing the</li> </ul>	Complied

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		<p>conduit, he had an accident on his head when he hit a conveyor restraint.</p> <ul style="list-style-type: none"> <li>○ Correction base on investigation report: routine OHS briefing before work and repairing boiler fuel conduit.</li> <li>○ Verified: record of OHS briefing dated 8 December 2020.</li> </ul> <p>Accident and investigation reports described the accident chronology, cause and impacts of the accident and has also to find the root causes of the accident happened and establish the corrective and preventive action. Records of all accidents were kept and periodically reviewed for continuous improvement.</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.          - Critical (Major) compliance -</p>	<p>Certificate holder 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>Complied</p>

		<p>The details of P&amp;D control have presented in several work instruction (WI), for example as follows:</p> <ul style="list-style-type: none"> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/01 about leaf eating caterpillar detection.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/02 about leaf eating caterpillar census.</li> <li>- WI No. IK No. IK/SMART/MCAR/VII/TA-HPT/03 about leaf eating caterpillar control.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/04 about census and management of <i>Oryctes rhinoceros</i>.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/05 about census and management of termites.</li> <li>- WI No. IK/SMART/MCAR/VII/TA-HPT/07 about census and management of rats.</li> </ul> <p>Based on document verification, estates have had IPM program for 2022 as follows:</p> <ul style="list-style-type: none"> <li>• Pest and disease census: programmed monthly.</li> <li>• Planting and upkeep beneficial plant: programmed monthly.</li> <li>• Animal infestation census: programmed every two months.</li> <li>• Barn owl box census: programmed monthly.</li> </ul> <p>Evident of monitoring and control are available under document pest and disease census, planting and upkeep beneficial plant, census of animal attack and <i>Tyto alba</i> reproduction monitoring.</p> <p>Based on field verification and document review of "Rekapitulasi Deteksi UPDKS" (leaf eater caterpillar census) period January –</p>	
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		December 2020 there is no caterpillar attack in BPRE and BPTE, as well as for period January – December 2021, and January to May 2022. Monitoring of Barn-owl <i>Tyto alba</i> performed monthly, monitoring records are available for period January-December 2020, January to December 2021 and January to May 2022. Based on last monitoring record of May 2022, there are 495 barn-owl boxes, containing 329 active barn-owl boxes. There are 259 adult barn-owl, 193 child and 65 eggs.													
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	The unit of certification has a list of Global Invasive Species, and evaluate the status of existence in Bukit Perak and Bukit Permata Estate on 18 June 2022. Some species are naturally exist in the area and the spreading are controlled manually and herbicides spraying, e.g. Monitoring: <i>Casia tora</i> , <i>Urea lobata</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 leniaris</i> . There are no species in the list that used to managed areas in unit of certification.	Complied												
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on field visit and document review, there is no use of fire for pest control in whole area of Bukit Perak Estate and Bukit Permata Estate.	Complied												
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.															
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The unit of certification has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date. <table border="1" data-bbox="1131 1264 1944 1329"> <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> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date							Complied
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7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Document “Rekapitulasi Penggunaan Pestisida” recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in PT Bumi Permai Lestari in 2020:</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>UoM</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Trademark	UoM	Volume				Complied																																				
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			BPRE	BPTE
	Roll Up 480 SL	Ltr	5,871.70	1,258.48
	Starane 480 EC	Ltr	482.33	46.94
	Rolifos 150 SL	Ltr	1,136.80	-
	Erkafuron 20 WG	Kg	224.89	78.98
	Garlon Mix 333/17	Ltr	147.61	126.74
	Decis 25 EC (deltamethrin)	Ltr	55.72	-
	Dithane M-45 80 WP (mancozeb)	Kg	84.40	-
	Samithe 135 (pyridaben)	Ltr	11.88	-
	Benstar 50 WP (benomyl)	Kg	36.70	-
Pesticide use in PT Bumi Permai Lestari in 2021:				
	Trademark	UoM	Volume	
			BPRE	BPTE
	Roll Up 480 SL	Ltr	10,185.51	1,390.38
	Starane 480 EC	Ltr	671.92	59.14
	Rolifos 150 SL	Ltr	85.00	-
	Erkafuron 20 WG	Kg	242.92	107.72
	Garlon Mix 333/17	Ltr	139.37	97.24

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		<table border="1"> <tr> <td>Decis 25 EC (deltamethrin)</td> <td>Ltr</td> <td>3.86</td> <td>-</td> </tr> <tr> <td>Dithane M-45 80 WP (mancozeb)</td> <td>Kg</td> <td>5.90</td> <td>-</td> </tr> <tr> <td>Samithe 135 (pyridaben)</td> <td>Ltr</td> <td>2.00</td> <td>-</td> </tr> </table>	Decis 25 EC (deltamethrin)	Ltr	3.86	-	Dithane M-45 80 WP (mancozeb)	Kg	5.90	-	Samithe 135 (pyridaben)	Ltr	2.00	-												
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		<p>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 Dec 2021, as follows:          BPRE:</p> <ul style="list-style-type: none"> <li>• Pesticide: Roll Up 480 SL; Active ingredient: Isopropilamina glifosat; LD50: 5000; application volume: 778.00 L; active ingredient amount: 318.98 kg; area treated: 3,112.00 Ha.</li> <li>• Pesticide: Starane 480 EC; Active ingredient: Fluroxypyr Methylheptyl Ester 48%; LD50: 2000; application volume: 35.00 L; active ingredient amount: 16.8 kg; area treated: 1,093.75 Ha.</li> </ul>																								

		<ul style="list-style-type: none"> <li>• Pesticide: Erkafuron 20 WG; Active ingredient: Metil metsulfuron 20%; LD50: 5000; application volume: 63.00 kg; active ingredient amount: 37.8 kg; area treated: 5,040.00 Ha.</li> <li>• Pesticide: Garlon Mix 133/17 EW; Active ingredient: Triklorpir butoksi etil ester 333 g/l; Aminopropalid potassium 17 g/l; LD50: 2574; application volume: 23.00 L; active ingredient amount: 11.04 kg; area treated: 23.00 Ha.</li> </ul> <p>BPTE:</p> <ul style="list-style-type: none"> <li>• Pesticide: Roll Up 480 SL; Active ingredient: Isopropilamina glifosat; LD50: 5000; application volume: 2.30 L; active ingredient amount: 0.94 kg; area treated: 9.20 Ha.</li> <li>• Pesticide: Erkafuron 20 WG; Active ingredient: Metil metsulfuron 20%; LD50: 5000; application volume: 0.07 kg; active ingredient amount: 0.01 kg; area treated: 5.60 Ha.</li> </ul>	
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.</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>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides throughout Bukit Perak Estate and Bukit Permata Estate. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.</p>	Complied

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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> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2015. CH has policy on safe use of chemical including pesticides which stated 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. Based on report of pesticide use in 2020 to 2022 – there were no paraquat noted in the report.</p>	Complied
	7.2.5b Why there is no other alternative which can be used.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of CH.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of CH.	
	7.2.5d Process to limit the negative impacts of the application.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of CH.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of CH.	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion</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>	Complied

	<p>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>Standard PPE for sprayer: helmet, face shield, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: face shield, masker, apron, rubber glove, safety boot.</p> <p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> <li>- Attendance list and material for training of IPM, Fertilizer and Pesticides application dated 22 February 2022, location at BPRE Long House, was attended by 33 workers from BPRE and BPTTE.</li> <li>- Personal training record as evidence that workers has received basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training. Sample of personal record, BPRE: Derina, Yulisti, Ratih, Suhardi; BPTTE: Ali, Saiful, Safarudin, Darman and Remo.</li> </ul>	
<p>7.2.7</p>	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has demonstrated that the storage of all pesticides are in accordance with recognized best practices.</p> <p>Based on site visit to Bukit Perak Estate (29 June 2022) and Bukit Permata Estate (30 June 2022) there was found that:</p> <ul style="list-style-type: none"> <li>o Pesticides are stored in the determined area separated from fertilizer and other chemicals.</li> <li>o Pesticide storage is provided in Divisions as well as in central storage.</li> <li>o Agrochemical storage is locked areas with limited access. The storage is ventilated.</li> <li>o MSDS and hazard symbol label are provided nearby of pesticides.</li> <li>o Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling.</li> <li>o PPE for handling of pesticides was provided including boots, apron, safety glass, respiratory mask, and hand gloves.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>○ The possible spill is managed.</li> <li>○ Secondary containment is provided around the pesticide storage area.</li> <li>○ Spill kit is also provided in the area.</li> </ul> <p>Unit of certification has also 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>All the workers have used the personal protective equipment meet with the safety rules and work instruction such as: Aprons, safety goggles, chemical mask, hand gloves (2 type: cotton inside and rubber outside) and safety shoes. All precautions attached to the products properly observed, applied, and understood by workers. All applications of agrochemicals were in accordance with the product label and storage instruction. MSDS of all product was understood by workers.</p>	
<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>Unit of certification has had 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>The procedure explained:</p> <ul style="list-style-type: none"> <li>○ Pesticides are stored in the determined area separated from fertilizer and other chemicals.</li> <li>○ Pesticide storage is provided in Divisions as well as in central storage.</li> <li>○ Agrochemical storage is locked areas with limited access. The storage is ventilated.</li> </ul>	<p>Complied</p>

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		<p>vehicle: BN 8144 **, driver: Mr. Darwin, delivered to PT Valten Cahaya Anugerah.</p> <p>Report of hazardous waste management and monitoring has regularly reported to Environmental Agency in Bangka Barat Regency. Last report was sent for period January – March 2022. Reported on 11 April 2022 was received by Mr. Hendry.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification and interview with estate manager obtain information that there is no aerial spraying of pesticides.</p> <p>Not Applicable</p>	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>Unit of certification 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) dated 3 January 2022, consist of:</p> <ul style="list-style-type: none"> <li>Physical examination for all workers (blood pressure, heart rate, respiration, height and general physical examination), has been done on 3 February 2022 and 17 March 2022, all workers checked are in normal health condition, consist 415 workers of Bukit Perak Estates, 184 workers of Bukit Permata Estate, and 131 workers of Bukit Perak Mill. MCU performed by Company doctor.</li> <li>Cholinesterase check conducted for sprayers (twice a year). Latest check has been done on 24-25 March 2022 to 28 workers – carried out by Company Doctor (dr. Riswan), all workers checked indicated in normal health condition - with choline content 75% - 100% (normal).</li> <li>Spirometry checked conducted for sprayer workers (twice a year). Due to pandemic COVID-19 situation, spirometry test are still not</li> </ul>	Complied

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		<p>yet conducted as per Company Doctor Letter, No.045/POLIKLINIK/SK/BINE/X/2022 – referring Decree Letter by Ministry of Manpower of Republic Indonesia, No.5/151/AS.02/XI/2020 regarding "Pedoman Keselamatan dan Kesehatan Kerja (K3) Pelaksanaan Pemeriksaan Kesehatan Tenaga Kerja pada Masa Pandemi COVID-19" - "OHS Guidelines for Occupational Health Checks during COVID-19 Pandemic"</p>	
<p>7.2.11</p>	<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.          - Critical (Major) compliance -</p>	<p>Unit of certification has established policy to prohibit pregnant and breastfeeding worker to work as a sprayer worker, fertilizer workers and other working related to agrochemical. This is according to a policy KHI-SMART/005-000 dated 1 August 2017 regarding female workers. The Policy has been disseminated to all related workers, example on 23 May 2022 – located at Bukit Perak Estate, attended by 48 workers from Division 2, 47 workers from Division 2 and 43 workers from Division 3 and 6.</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 Permata Estate and Bukit Perak Estate. Pregnancy test are performed using test pack by company midwife in corporation with Community Health Center (Puskesmas) of Kelapa District. Latest pregnancy test conducted on 11 June 2022. There were 18 sprayer workers participates in the pregnancy test, and the 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>Complied</p>
<p><b>Note For 7.2.11</b></p>			

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.

**Criteria 7.3:** Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has had Waste Management Procedure (SOP/SMART/LEMS-ESHD/SADV/I/002), and work instruction for ex-pesticide containers handling (IK/SPO/SMART/LH- 09/01).</p> <p>Hazardous and medical waste are disposed to the licensed collector, whilst domestic waste disposed to the landfill. Organic and inorganic waste is separated in line site. Organic waste are composted then used as fertilizer for housing plants. Inorganic waste are sent to the landfill and some of it collected for re-cycle. Landfill location is far enough from the employee housing, around ± 2 km distance. Audit team has visited landfill of Bukit Perak Estate which located at Block F67 and landfill of Bukit Permata Estate which located at Block G36, landfill condition is good and maintained.</p> <p>Toxic and hazardous waste are handled according to applicable regulation. Permit of hazardous waste temporary storage (TPS LB3) from Bangka Barat Regent No.188.45/287/2.12.1.1/2017 date 20 June 2017 and valid for 5 years. Information letter by Environmental Office of Bangka Barat Regency was available based on letter No. 103/BA/DLH/III/2021 regarding extension of permit is still in process. Record of hazardous waste handover, dated 7 February 2022, that has been sent to PT Valten Cahaya Amanah, consisted of:</p> <ul style="list-style-type: none"> <li>• Used battery (0.0704 MT ~ 3 pcs)</li> <li>• Filter oil used (0.2094 MT ~ 4 drums)</li> <li>• Lamp used (0.014 M ~ 1 drum)</li> <li>• Medical waste (0.0058 MT ~ 4 bags)</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• Chemical (pesticides) empty container (0.208 Kg).</li> </ul> <p>Manifest of hazardous waste No.KLHK-1646084597 for Chemical (pesticides) empty container (0.208 tonne), dated 7 February 2022, vehicle: BN 8144 **, driver: Mr. Darwin, delivered to PT Valten Cahaya Anugerah. Activities of recycling and reusing are conducted by the third party, PT Valten Cahaya Anugerah.</p> <p>Report of hazardous waste management and monitoring has regularly reported to Environmental Agency in Bangka Barat Regency. Last report was sent for period January – March 2022. Reported on 11 April 2022 was received by Mr. Hendry.</p> <p>Sample of reuse and recycle in estates are reusing the fertilizer sack for loose fruit base, which previously triple rinsed; and recycle of 20 L ex-pesticides container, which triple rinsed, label removed, painted red recycled in the field. Reducing waste and recycling by Bukir Perak Mill are performed by reusing byproduct, fiber and shell as fuel of the boiler. Detail of Shell and Fiber usage for period June 2020 – May 2022 are described in indicator 7.9.1.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview with workers and managers, demonstrated that they are understood proper disposal of waste material, according to procedures. Hazardous and medical waste are disposed to the licensed collector, whilst domestic waste disposed to the landfill. Organic and inorganic waste is separated in line site. Organic waste are composted then used as fertilizer for housing plants. Inorganic waste are sent to the landfill and some of it collected for re-cycle.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview with workers and stakeholders, there are no use of open fire for waste disposal.</p>	Complied
<p><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.</p>			

<p>7.4.1</p>	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP/SMART/MCAR/IX/TA-PPK (Fertilizing).</p> <p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis.</p> <p>During onsite audit, 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. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</p>	<p>Complied</p>
<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>Last periodical leaf sample analysis in Bukit Perak Estate conducted in March 2021 for preparing fertilizer recommendation 2022. Leaf Analysis Report 2021 and 2022 were evident. Leaf Analysis Report 2021 was issued by Analytical Laboratory of SMART Research Institute, reference no. 163/DAUN/LAB-SMARTRI/III/2021 dated 26 March 2021; based on request no.02/RFC-BABEL/SMARTRI/Int/II/2021, analyze date 16 March 2021, consist of 26 samples (Lab No. 21010931 - 21010956). Sample seen Lab No. 21010931; Sample code 1/BPRE1F-46/1; Analysis Result: 1.11% water content; 2.74% N; 0.156% P; 0.97% K; 0.48% Mg; 0.76% Ca; 19.4 ppm B; 0.68 ppm Cl.</p> <p>Leaf Analysis report 2022 of Bukit Perak Estate was evident based on reference no. 167/DAUN/LAB-SMARTRI/IV/2022 dated 21 April 2022; based on request no.01/RFC-BABEL/SMARTRI/Int/III/2022, analyze date 14 April 2022, consist of 47 samples (Lab No. 22015855 - 22015901). Sample seen Lab No. 22015901; Sample code 47/BPRE5D-</p>	<p>Complied</p>

		<p>18/47; Analysis Result: 2.38% water content; 2.10% N; 0.152% P; 0.99% K; 0.47% Mg; 0.71% Ca; 19.0 ppm B; 0.70 ppm Cl.</p> <p>Soil analysis in Bukit Perak Estate evident in Lab Analysis Result, issued by Analytical Laboratory of SMART Research Institute, reference no. 222/TANAH/AL/ANLZ/05/21 dated 28 May 2021; based on request no.012/RFC-BABEL/SMARTRI/Int/III/21, receive date 19 March 2021, consist of 156 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.10369; Sample code 0-15 PR, 1F-46; Analysis Result: 2.60% water content; 78.1% sand; 14.0% dust; 7.97% clay; pH 4.77; 2.02% C; 0.08% N; 127% P; 83.3% K; 18.0% Mg; 54.2 ppm P available; KTK 10.8; 0.49 Ca; 0.18 K; 0.18 Mg' 0.02 Na (in me/100gr).</p> <p>There is no leaf and analysis conducted in Bukit Permata Estate in 2021 and 2022, due to the estate is on program for replanting this year.</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>There are no fertilizer application in Bukit Permata Estate since 2019 due to the estate programmed for replanting this year. However there is EFB application in BPTE in 2020 as much as 1,219.46 tonnes covering 40.65 Ha at Block G42 and J42.</p> <p>EFB application in BPRE 2020 recorded 43,144.25 tonnes covering 1,438.14 Ha at Division 1, 2, 3 and 4 in various blocks. EFB application in BPRE 2021 recorded 47,981.36 tonnes covering 1,599.38 Ha at Division 1, 2, 3 and 4 in various blocks.</p> <p>POME application in BPRE 2020 recorded 202,913 m<sup>3</sup>, and in 2021 recorded 250,359 m<sup>3</sup> at Division 3, complex BP92D10, Block D53, D54, E46, E47, E48, E49, E50, F47, F48, F49 and F50. POME application permit expires on 10 June 2021, CH has applied for an Land Application permit extension to the Environmental Service of West Bangka Regency through the Letter of PT Bumi Permai Lestari</p>	<p>Complied</p>

		<p>Director No. 01/D&amp;LBPL/I/2021 dated 5 January 2021. Environmental Services verification team (consisting of 5 people: Head of Environmental Impact Assessment and Licensing, staff and legal staff) has carried out field verification and inspection of administrative and technical completeness on 26/02/2021 and has issued Minutes No.103/BA/DLH/ III/2021 which states that Environmental Services of West Bangka Regency will continue the licensing process by verifying the conformity of administrative and technical completeness with the data that has been submitted; With regard to the issuance of PP No.22 of 2021 concerning the Implementation of Environmental Protection and Management, the Environmental Services will consult with the Ministry of Environment and Forestry regarding the PPLH (Land Application) permit related to the technical/licensing format. Based on letter from Environmental Services No.660/304/DLH/2022 dated 16 June 2022, the permit is still on progress for approval.</p>																																													
<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained.          - Minor compliance -</p>	<p>Fertilizer recommendation described type and volume of fertilizer need for each Block. Records of fertilizer inputs are available in "Data Rencana dan Realisasi Pemupukan".</p> <p>Record of fertilizer input in PT BPL in 2020 are as follow:</p> <table border="1" data-bbox="1131 1010 1921 1399"> <thead> <tr> <th rowspan="2">Fertilizer Type</th> <th colspan="2">BPRE</th> <th colspan="2">BPTe</th> </tr> <tr> <th>Plan (kg)</th> <th>Actual (kg)</th> <th>Plan (kg)</th> <th>Actual (kg)</th> </tr> </thead> <tbody> <tr> <td>Kieserite Granular</td> <td>123,465.81</td> <td>123,465.81</td> <td>-</td> <td>-</td> </tr> <tr> <td>RP</td> <td>218,260.65</td> <td>218,260.65</td> <td>-</td> <td>-</td> </tr> <tr> <td>NPK 15</td> <td>32,687.10</td> <td>32,687.10</td> <td>-</td> <td>-</td> </tr> <tr> <td>NPK 12</td> <td>63,405.78</td> <td>63,405.78</td> <td>-</td> <td>-</td> </tr> <tr> <td>Urea</td> <td>335,275.38</td> <td>335,275.38</td> <td>-</td> <td>-</td> </tr> <tr> <td>HGFB</td> <td>29,378.95</td> <td>29,378.95</td> <td>-</td> <td>-</td> </tr> <tr> <td>MOP</td> <td>280,750.40</td> <td>280,750.40</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Fertilizer Type	BPRE		BPTe		Plan (kg)	Actual (kg)	Plan (kg)	Actual (kg)	Kieserite Granular	123,465.81	123,465.81	-	-	RP	218,260.65	218,260.65	-	-	NPK 15	32,687.10	32,687.10	-	-	NPK 12	63,405.78	63,405.78	-	-	Urea	335,275.38	335,275.38	-	-	HGFB	29,378.95	29,378.95	-	-	MOP	280,750.40	280,750.40	-	-	<p>Complied</p>
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		TSP	306,206.00	306,206.00	-	-
		Bayfolan	152.35	152.35	-	-
		Agroblen	847.78	847.78	-	-
		Record of fertilizer input in PT BPL in 2021 are as follow:				
		Fertilizer Type	BPRE		BPTE	
			Plan (kg)	Actual (kg)	Plan (kg)	Actual (kg)
		Kieserite	38,724.95	38,724.95	-	-
		Kieserite Granular	104,700.00	104,496.04	-	-
		RP	52,664.10	52,664.10	-	-
		NPK 15	3,213.61	3,213.61	-	-
		NPK 12	60,197.19	60,197.19	-	-
		Urea	449,685.07	449,685.07	-	-
		HGFB	46,126.68	46,126.68	-	-
		MOP	649,200.65	648,200.65	-	-
		TSP	480,200.00	476,102.84	-	-
		Bayfolan	26.30	26.00	-	-
		Record of fertilizer input in PT BPL in 2022 are as follow:				
		Fertilizer Type	BPRE		BPTE	
			Plan (kg)	Actual (kg)	Plan (kg)	Actual (kg)
		Kieserite Granular	78,230	59,482.80	-	-
		RP	34,800	19,951.00	-	-
		NPK 15	11,590	5,958.00	-	-
		Urea	694,900	420,862.15	-	-

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		<table border="1"> <tr> <td>HGFB</td> <td>36,250</td> <td>28,844.50</td> <td>-</td> <td>-</td> </tr> <tr> <td>MOP</td> <td>955,300</td> <td>249,569.65</td> <td>-</td> <td>-</td> </tr> <tr> <td>TSP</td> <td>606,200</td> <td>80,484.65</td> <td>-</td> <td>-</td> </tr> <tr> <td>S. Dolomite</td> <td>18,250</td> <td>-</td> <td>-</td> <td>-</td> </tr> </table> <p>There are no fertilizer application in Bukit Permata Estate since 2019 due to the estate programmed for replanting this year. However there is EFB application in BPTE in 2020 as much as 1,219.46 tonnes covering 40.65 Ha at Block G42 and J42.</p>	HGFB	36,250	28,844.50	-	-	MOP	955,300	249,569.65	-	-	TSP	606,200	80,484.65	-	-	S. Dolomite	18,250	-	-	-	
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**Criteria 7.5: Practices minimise and control erosion and degradation of soils.**

7.5.1	<p><b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>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. 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 estate.</p> <p>Based on Semi-detail Maps of Soil scale 1:50,000, soil characteristic in BPRE and BPTE were presented in table below:</p> <p>BPTE:</p> <table border="1"> <thead> <tr> <th>Soil Type</th> <th>Slope (°)</th> <th>Area (Ha)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td><i>Typic Dystropepts</i></td> <td>0-8</td> <td rowspan="3">1.449,19</td> <td rowspan="3">35,3</td> </tr> <tr> <td><i>Typic Dystropepts</i></td> <td>0-2</td> </tr> <tr> <td><i>Aquic Dystropepts</i></td> <td>0-3</td> </tr> <tr> <td><i>Typic Dystropepts</i></td> <td>8-15</td> <td rowspan="2">704,04</td> <td rowspan="2">17,1</td> </tr> <tr> <td><i>Typic Dystropepts</i></td> <td>8-15</td> </tr> </tbody> </table>	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	Complied
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7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>CH 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 BPTE and BPTE, maximum slopes in BPTE and BPTE was 15°.</p>	Complied																																																		

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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 are 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
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 maintenance 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

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7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	Based on 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 -	Based on 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 -	Based on 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	<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. - Critical (Major) compliance -	Based on 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

**PROCEDURAL NOTE:** For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020.

The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.			
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>	Based on 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
7.7.7	<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 '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>	Based on 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>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>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> </ol>	Complied

		<p>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.</p> <p>4. Monitoring water use. Description: water use monitoring (m3). Timeline: routine (recap every month). Objective: actual use of water as needed.</p> <p>Water management program for Mill, consists of:</p> <ol style="list-style-type: none"> <li>1. Recycle. Program: reuse of air condensate sterilizer for dilution 10% to FFB. Evaluation: The results of using condensate water have saved water use until December 2021 by 14,309 m3.</li> <li>2. Recycle. Program: reuse of turbine cooling water to Raw Water for use as washing water. Evaluation: used turbine water is reused as washing water to minimize domestic water use.</li> </ol> <p>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>7.8.1b Workers have adequate access to clean water.</p>	<p>Based on visit to employees housing complex at 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</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>Complied</p>

	<p>Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</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>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>POME from Bukit Perak Mill was processed through a series of wastewater treatment ponds: four anaerobic ponds. POME is monitored monthly as required by permit. The results of POME monitoring were reviewed including measurement of BOD, COD, pH, N Total, TSS, oil and fat for period June 2020 – May 2022.</p> <p>The Environment Ministry Decree No. 28/2003 requires that BOD of POME is less than 5,000 mg/liter, pH 6 – 9. The result of POME quality during this period was under 5,000 mg/liter (average 2,650 mg/L) for BOD and pH average 7.7. Quality of wastewater effluent is monitored monthly by third party, Environmental Laboratories of Environmental Agency of Sumatera Selatan Province.</p> <p>Extension permit of wastewater for land application (LA) was available based on Decree of Bangka Barat Regent No.188.45/293/2.12.1.1/2019 dated 10 June 2019. Valid for 2 years.</p> <p>Quality monitoring of mill effluent discharged, especially BOD (Biochemical Oxygen Demand), quality standard for BOB is maximum 5,000 mg/liter, period July 2020 – April 2022, are as follows:</p> <table border="1" data-bbox="1133 1262 1774 1366"> <thead> <tr> <th>Month</th> <th>BOD (mg/liter)</th> <th>pH</th> </tr> </thead> <tbody> <tr> <td>Jun-20</td> <td>2,490</td> <td>8.7</td> </tr> </tbody> </table>	Month	BOD (mg/liter)	pH	Jun-20	2,490	8.7	<p>Complied</p>
Month	BOD (mg/liter)	pH							
Jun-20	2,490	8.7							

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		Jul-20	2,333	7.54		
		Aug-20	2,293	7.08		
		Sep-20	2,598	7.37		
		Oct-20	3,370	7.71		
		Nov-20	3,880	7.4		
		Dec-20	2,163	7.9		
		Jan-21	3,775	7.5		
		Feb-21	3,320	7.8		
		Mar-21	3,375	7.24		
		Apr-21	3,400	7.41		
		May-21	3,420	7.6		
		Jun-21	3,855	7.6		
		Jul-21	3,500	7.67		
		Aug-21	3,620	7.4		
		Sep-21	3,715	7.7		
		Oct-21	3,770	7.6		
		Nov-21	3,340	7.41		
		Dec-21	3,680	7.1		
		Jan-22	3,750	7.1		
		Feb-22	3,680	7.87		

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		<table border="1"> <tr> <td>Mar-22</td> <td>3,610</td> <td>7.46</td> </tr> <tr> <td>Apr-22</td> <td>3,571</td> <td>7.07</td> </tr> <tr> <td>May-22</td> <td>3,661</td> <td>7.6</td> </tr> </table> <p>Based on above monitoring result table, BOD value has been complied with the regulation.</p>	Mar-22	3,610	7.46	Apr-22	3,571	7.07	May-22	3,661	7.6																				
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Apr-22	3,571	7.07																													
May-22	3,661	7.6																													
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Raw water was utilized for mill operations (include boilers, processes, and domestics usage) that through the water treatment plant (using physicals and chemicals method) and for estate operations (include housing, pesticides mixings and office operations).</p> <p>Flow meters were installed to monitor water usage. The monitoring of water volume utilization was conducted in document "<i>Rekapitulasi Pemakaian dan Distribusi Air tahun 2022</i>" while budget of water consumption sighted in document namely Water Supply Running Account 2020.</p> <p>According to the record of water consumption during July 2020 to May 2022 the water consumption still under the budget.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Processing (ton)</th> <th>Water use (m<sup>3</sup>)</th> <th>Mill water use per tonne of FFB</th> </tr> </thead> <tbody> <tr> <td>Jun-20</td> <td>15,080.49</td> <td>18,260.00</td> <td>1.21</td> </tr> <tr> <td>Jul-20</td> <td>14,990.77</td> <td>18,052.00</td> <td>1.20</td> </tr> <tr> <td>Aug-20</td> <td>15,202.13</td> <td>17,751.00</td> <td>1.17</td> </tr> <tr> <td>Sep-20</td> <td>12,097.48</td> <td>16,953.00</td> <td>1.40</td> </tr> <tr> <td>Oct-20</td> <td>13,862.77</td> <td>17,800.00</td> <td>1.28</td> </tr> <tr> <td>Nov-20</td> <td>19,539.29</td> <td>20,311.00</td> <td>1.04</td> </tr> </tbody> </table>	Month	FFB Processing (ton)	Water use (m <sup>3</sup> )	Mill water use per tonne of FFB	Jun-20	15,080.49	18,260.00	1.21	Jul-20	14,990.77	18,052.00	1.20	Aug-20	15,202.13	17,751.00	1.17	Sep-20	12,097.48	16,953.00	1.40	Oct-20	13,862.77	17,800.00	1.28	Nov-20	19,539.29	20,311.00	1.04	Complied
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		Dec-20	19,755.51	20,463.00	1.04	
		Jan-21	20,576.70	19,853.30	0.96	
		Feb-21	18,595.17	18,928.60	1.02	
		Mar-21	17,434.11	19,195.00	1.10	
		Apr-21	15,823.77	18,289.00	1.16	
		May-21	18,575.64	19,169.00	1.03	
		Jun-21	17,503.56	18,454.00	1.05	
		Jul-21	16,528.40	16,714.00	1.01	
		Aug-21	13,682.69	15,263.00	1.12	
		Sep-21	11,645.43	12,434.50	1.07	
		Oct-21	14,544.70	14,248.00	0.98	
		Nov-21	16,677.70	16,473.00	0.99	
		Dec-21	10,403.44	10,210.00	0.98	
		Jan-22	14,754.35	15,410.00	1.04	
		Feb-22	10,852.67	11,684.00	1.08	
		Mar-22	16,046.49	16,093.00	1.00	
		Apr-22	18,441.61	17,935.30	0.97	
		May-22	12,814.81	13,863.40	1.08	

<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.	Unit of certification has prepared program for improving efficiency of fossil fuels uses and to optimize renewable energy. Fossil fuel records				Complied

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<p>- Minor compliance -</p>	<p>and trends are maintained and available during audit. Energy use are recorded include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Below are records of fossil fuel usage for Diesel Genset (DG-03, DG-04, DG-05 and DG-06, year 2022:</p> <table border="1" data-bbox="1131 646 1937 997"> <thead> <tr> <th>Month</th> <th>Kwh</th> <th>Liter of fossil fuel usage</th> <th>Kwh/liter</th> </tr> </thead> <tbody> <tr> <td>Jan-22</td> <td>40,956</td> <td>13,494</td> <td>3.04</td> </tr> <tr> <td>Feb-22</td> <td>39,264</td> <td>11,097</td> <td>4.54</td> </tr> <tr> <td>Mar-22</td> <td>42,264</td> <td>15,703</td> <td>2.69</td> </tr> <tr> <td>Apr-22</td> <td>43,356</td> <td>14,750</td> <td>2.94</td> </tr> <tr> <td>May-22</td> <td>43,672</td> <td>15,434</td> <td>2.83</td> </tr> <tr> <td><b>Total</b></td> <td><b>209,512</b></td> <td><b>70,478</b></td> <td><b>2.97</b></td> </tr> </tbody> </table> <p>Below are Shell and Fiber usage for efficiency of fossil fuel usage per ton of CPO produce period June 2020 – May 2022:</p> <table border="1" data-bbox="1131 1117 1937 1356"> <thead> <tr> <th rowspan="2">Month</th> <th rowspan="2">Shell Usage (MT)</th> <th rowspan="2">Fiber Usage (MT)</th> <th rowspan="2">CPO Produce (MT)</th> <th colspan="2">Efficiency of fossil fuel usage per ton CPO</th> </tr> <tr> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>Jun-20</td> <td>867.13</td> <td>1,885.06</td> <td>2,951.29</td> <td>30.28</td> <td>28.83</td> </tr> <tr> <td>Jul-20</td> <td>664.94</td> <td>1,873.85</td> <td>2,873.50</td> <td>32.89</td> <td>30.14</td> </tr> <tr> <td>Aug-20</td> <td>621.05</td> <td>1,900.27</td> <td>3,020.91</td> <td>32.29</td> <td>29.01</td> </tr> </tbody> </table>	Month	Kwh	Liter of fossil fuel usage	Kwh/liter	Jan-22	40,956	13,494	3.04	Feb-22	39,264	11,097	4.54	Mar-22	42,264	15,703	2.69	Apr-22	43,356	14,750	2.94	May-22	43,672	15,434	2.83	<b>Total</b>	<b>209,512</b>	<b>70,478</b>	<b>2.97</b>	Month	Shell Usage (MT)	Fiber Usage (MT)	CPO Produce (MT)	Efficiency of fossil fuel usage per ton CPO		Plan	Actual	Jun-20	867.13	1,885.06	2,951.29	30.28	28.83	Jul-20	664.94	1,873.85	2,873.50	32.89	30.14	Aug-20	621.05	1,900.27	3,020.91	32.29	29.01		
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Sep-20	149.22	1,512.19	3,229.03	30.08	27.32
Oct-20	243.15	1,732.85	3,452.86	30.37	27.47
Nov-20	254.52	2,442.41	4,598.42	29.94	26.47
Dec-20	148.87	2,469.44	4,729.17	31.26	27.22
Jan-21	1,183.16	2,572.09	3,953.58	29.42	27.39
Feb-21	358.58	2,324.40	3,837.78	29.36	25.34
Mar-21	273.62	2,179.26	3,513.93	30.06	31.69
Apr-21	909.87	1,977.97	3,114.71	29.02	45.20
May-21	668.10	2,321.96	3,541.40	31.02	36.18
Jun-21	627.36	2,187.95	3,420.93	27.90	27.06
Jul-21	562.06	2,066.05	3,162.06	28.86	28.93
Aug-21	453.35	1,710.34	2,678.94	29.12	33.16
Sep-21	425.84	1,455.68	2,254.51	29.02	31.62
Oct-21	836.32	1,818.09	2,811.49	29.83	27.66
Nov-21	958.97	2,084.71	3,209.95	29.35	26.29
Dec-21	598.20	1,300.43	1,961.77	30.67	40.81
Jan-22	299.25	1,844.29	2,817.04	31.86	31.00
Feb-22	280.82	1,356.58	2,172.22	30.82	31.22
Mar-22	701.11	2,005.81	3,168.38	31.27	29.08
Apr-22	756.12	2,305.20	3,585.02	30.41	27.30
May-22	736.85	1,601.85	2,618.14	32.06	30.49

Based on records, actual efficiency of fossil fuel usage per ton CPO are accordance to the plan.

<p><b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p><b>(C)</b> GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>The source of greenhouse gas emission has been identified on Environmental aspect and impact identification, updated on 5 January 2022 for mill and estates, as listed below:</p> <ul style="list-style-type: none"> <li>- Boiler stack emission including particulate and soot.</li> <li>- Diesel electric generator emission</li> <li>- POME methane emission</li> <li>- Use of fertiliser</li> <li>- Vehicle and heave equipment emission</li> </ul> <p>Several efforts to reduce GHG emissions are prepared as follows:</p> <ul style="list-style-type: none"> <li>- 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 waste water was processed through a series of waste water treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and</p>	<p>Complied</p>

		fat, N total result of discharge effluent conforms to the limits for parameters. Quality of wastewater effluent is monitored monthly by third party, Environmental Laboratories of Environmental Agency of Sumatera Selatan Province.	
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>	There is no new planting within certified area of PT Bumi Permai Lestari after November 2005.	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 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 <i>waru</i> planted at the riparian area, and the Mill uses fibers and shell as fuel.</p>	Complied
<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 Firefighting team and its equipment, erecting fire watch tower, conduct monitoring for hotspots and forming fire program by involving surrounding local communities namely Fire Alert Society of "<i>Masyarakat Siaga Api</i>".</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 2021. This report submitted to Governor of Bangka Belitung Province on 14 January 2022.</p>	Complied
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.          - Minor compliance -</p>	<p>Unit of certification forming fire program by involving surrounding local communities namely Fire Alert Society of "<i>Masyarakat Siaga Api</i>". 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>	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 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>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>	Complied

	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.	There is no new acquisition or expansion area or new planting within this unit of certification.	
7.12.3	<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. - Critical (Major) compliance -	This indicator is not relevant to Indonesia.	Not Applicable
<p><b>PROCEDURAL NOTE for 7.12.3:</b>  Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<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). - Critical (Major) compliance -	<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</p>	Complied

		<p>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 2014</i>". 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</p>	
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		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.	
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 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>	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly	Unit of certification has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also	Complied

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

## Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Bukit Perak Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Bukit Perak Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.40
PKO	0.00

Extraction	%
OER	19.79
KER	5.42

Production	t/yr
FFB Process	203,953.67
CPO Produced	40,365.53
PKO Produced	11,058.47

Land Use	Ha
OP Planted Area	5,463.99
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	116.38
<b>Total</b>	<b>5,580.37</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	16,708.79	0.37	0.00	0.00	0.00	0.00	16,708.79	0.81
CO <sub>2</sub> Emission from fertilizer	1,897.60	0.04	0.00	0.00	0.00	0.00	1,897.60	0.009
NO <sub>2</sub> Emission	2,409.82	0.05	0.00	0.00	0.00	0.00	2,409.82	0.01
Fuel Consumption	616.42	0.01	0.00	0.00	0.00	0.00	616.42	0.003
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-20,430.81	-0.46	0.00	0.00	0.00	0.00	-20,430.81	-0.1
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>1,201.82</b>	<b>0.03</b>	0.00	0.00	<b>30,252.91</b>	<b>0.00</b>	<b>31,454.73</b>	<b>0.729</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	39,978.37	0.20
Fuel Consumption	488.42	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>40,466.79</b>	<b>0.20</b>

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

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

\*This mill has no kernel crusher operation.

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

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The summary of the Net GHG emitted in **2021** for **Bukit Perak Palm Oil Mill** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.97
PKO	1.97

Extraction	%
OER	19.51
KER	5.63

Production	t/yr
FFB Process	191,991.31
CPO Produced	37,461.00
PKO Produced	10,807.60

Land Use	Ha
OP Planted Area	9,281.03
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	81.21
<b>Total</b>	<b>9,362,24</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	26,401.52	0.46	17,038.08	0.22	0.00	0.00	43,439.60	0.22
CO <sub>2</sub> Emission from fertilizer	2,265.55	0.04	32,620.11	0.00	0.00	0.00	34,885.65	0.18
NO <sub>2</sub> Emission	2,800.47	0.05	7,175.58	0.09	0.00	0.00	9,976.05	0.05
Fuel Consumption	748.93	0.01	465.10	0.01	0.00	0.00	1,214.03	0.006
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-34,191.43	-0.60	0.00	-0.11	0.00	0.00	-42,972.30	-0.22
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>-1,974.97</b>	<b>-0.03</b>	<b>48,518.00</b>	<b>0.61</b>	<b>0.00</b>	<b>0.00</b>	<b>56,565.87</b>	<b>0.29</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	37,633.55	0.20
Fuel Consumption	687.04	0.00
Grid Electricity Utilization	0.00	0.00

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<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>48,320.59</b>	<b>0.20</b>

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

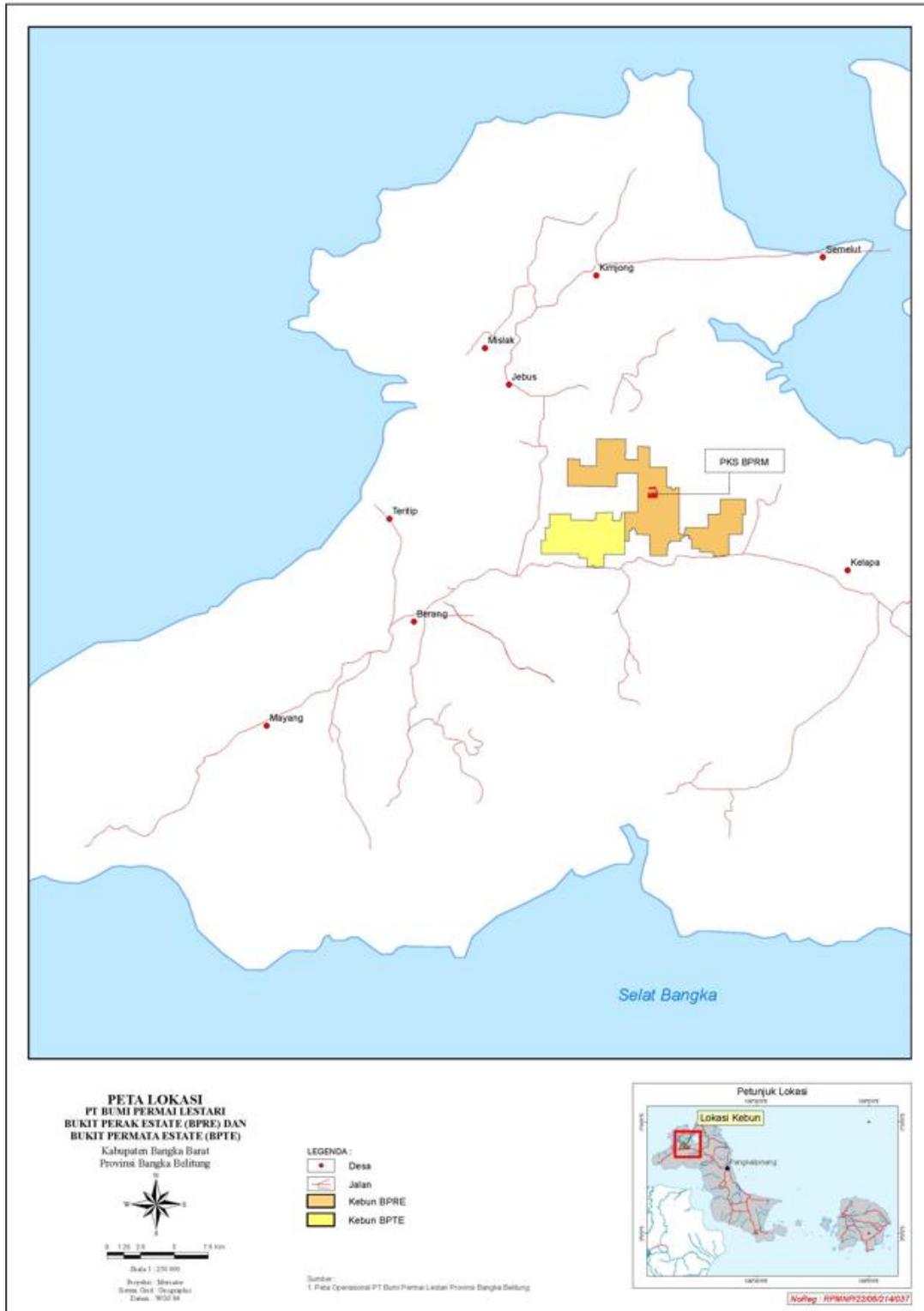
<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

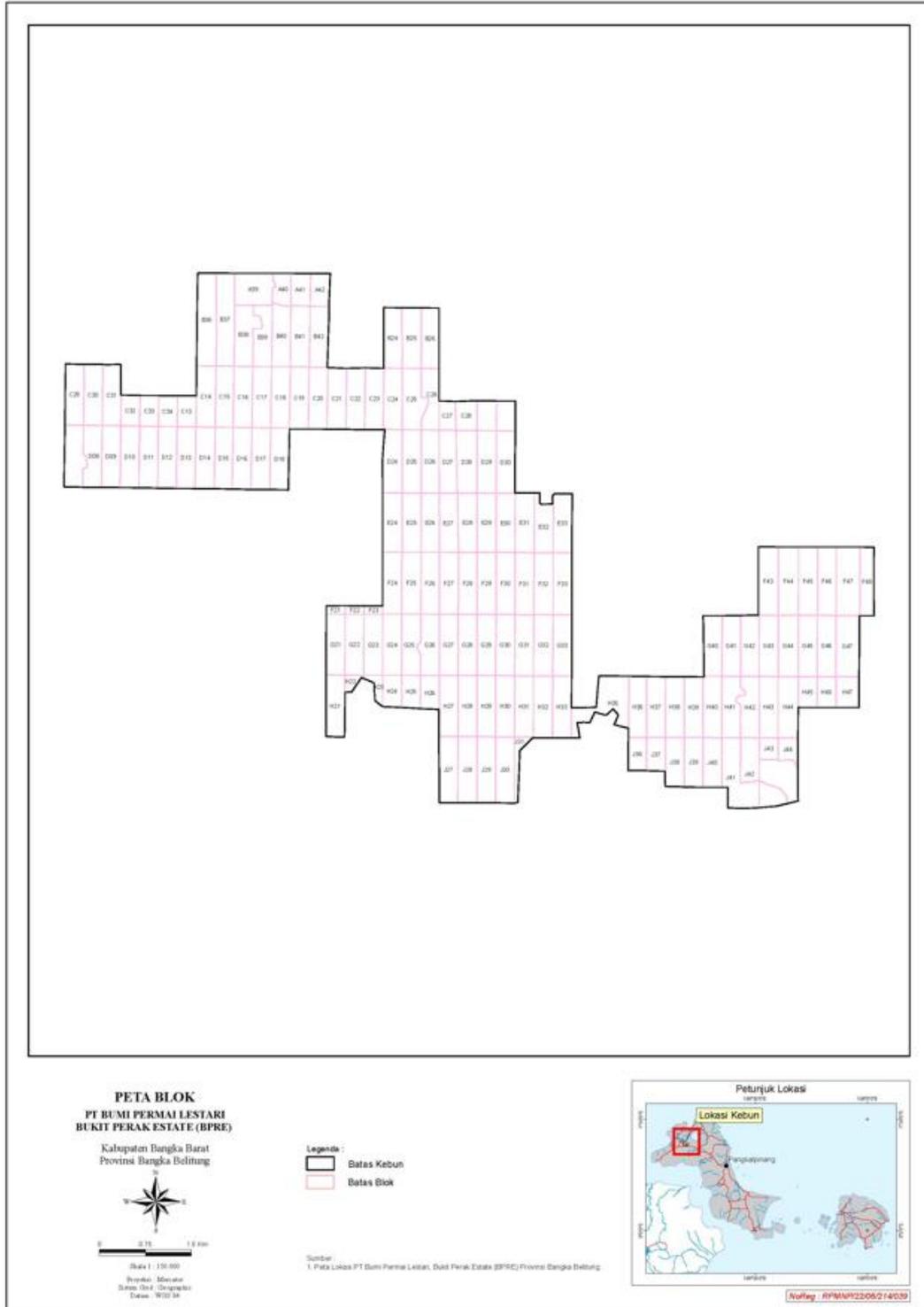
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic digestion (%)	100

<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

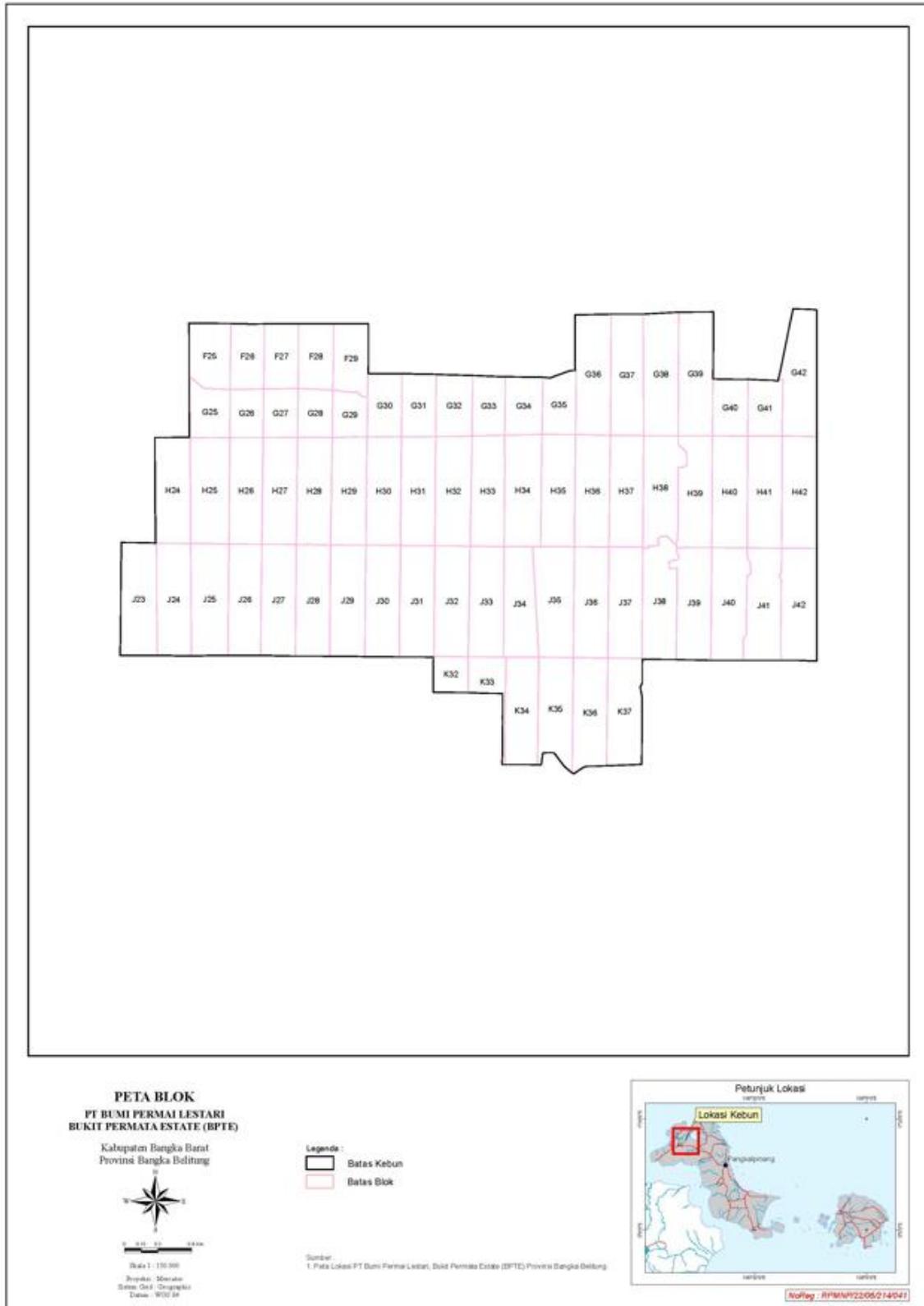
**Appendix C: Location Map of Certification Unit and Supply bases**



**Appendix D: Estate Field Map**



*Bukit Perak Estate*



*Bukit Permata Estate*

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

Not Applicable

## Appendix F: List of Abbreviations

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