

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: PT Bumi Sawit Permai / Golden Agri Resources Ltd
Client Company / Parent Company Address: Plaza Sinar Mas Land, Menara II, Lantai 30. Jl. MH Thamrin No 51, Jakarta, Indonesia
Certification Unit: PT Bumi Sawit Permai - Bumi Sawit Mill
Location of Certification Unit: Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, 30869, Province Sumatera Selatan, Indonesia
Date of Final Report: 19/09/2022

TABLE of CONTENTS	Page No
Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	4
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	5
10. Summary of Certified Tonnage (MT) (not applicable for ISS)	7
11. Summary of Actual Volume sold	8
12. Independent Smallholders Certified Tonnage (MT) / Volume	10
13. Independent Smallholders Actual Sold Tonnage / Volume	10
Section 2: Assessment Process	12
2.1 Assessment Methodology, Programme, Site Visits.....	12
2.2 BSI Assessment Team	13
2.3 Assessment Plan.....	15
Section 3: Assessment Findings	18
3.1 Multiple Management Units and Time Bound Plan.....	18
3.2 Progress of scheme smallholders and/or outgrowers	21
3.3 Details of Nonconformities	30
3.3.1 Status of Nonconformities Previously Identified and Observations.....	31
3.3.2 Summary of the Nonconformities and Status	33
3.4 Stakeholders and previous land owner / user consultation.....	33
3.5 Impartiality and conflict of interest	38
Formal Signing-off of Assessment Conclusion and Recommendation	38
Appendix A: Summary of Findings	39
Appendix B: GHG Reporting Executive Summary	186
Appendix C: Location Map of Certification Unit and Supply bases.....	190
Appendix D: Estate Field Map.....	191
Appendix E: List of Smallholder Registered and/or sampled	192
Appendix F: List of Abbreviations.....	193

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Golden Agri Resources Ltd		
RSPO Membership Number	1-0096-11-000-00	Membership Approval Date	30/01/2005
Address	Plaza Sinar Mas Land, Menara II, Lantai 30. Jl. MH Thamrin No 51, 10350, Jakarta, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Bumi Sawit Permai Bumi Sawit Mill		
Location / Address	Bumi Sawit Mill and Bumi Sawit Estate : Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, 30869 Province Sumatera Selatan, Indonesia		
Website	www.goldenagri.com.sg		
Management Representative	Yahya Mustakim	E-mail	yahya.mustakim@sinarmas-agri.com
Telephone	+62 (21)-5033889 ext.6314	Facsimile	+62 (21)-3181389

2. Certification Information			
Certificate Number	RSPO 733461	Certificate Start Date	19/09/2022
Date of First Certification	09/10/2015	Certificate Expiry Date	18/09/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. Conduct recertification audit Audit method using RSPO Scenario 4 – combining year 2020 onsite audit with year 2021 where it is not possible to conduct onsite using scenario 1, 2 or 3 and increase of sampling size 		
Assessment Cycle	<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		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	30 tonnes per hour

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BSI-ISPO 740250	Permentan No. 19/Permentan/OT.140/3/2011	11/Permentan/OT.140/3/2015	3/12/2026
EU-ISCC-Cert- ID 215-23211287	ISCC EU (International Sustainability and Carbon Certification)	PT. Mutu Agung Lestari	28/12/2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bumi Sawit Estate	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, Province of Sumatera Selatan, Indonesia	3° 30' 39.00" S	104° 20' 05.00" E
Bumi Sawit POM	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, Province of Sumatera Selatan, Indonesia	3° 31' 32.52" S	104° 20' 39.48" 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
Bumi Sawit Estate	4,489.42	335.43	4,334.48	8,823.90	49.12
Total	4,489.42	335.43	4,334.48	8,823.90	49.12

Note: HCV area = 335.43 Ha is included in planted area of 4,489.42 Ha

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bumi Sawit Estate	0.00	173.54	542.68	3,773.20	4,489.42	0.00
Total (ha)	0.00	173.54	542.68	3,773.20	4,489.42	0.00

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (September 2020 – August 2022)	Actual (September 2019 – May 2022)		Forecast (June 2022 – May 2023)
		Previous license period (Sept – Oct 2019)	Current license period (Nov 2019 – May 2022)	
Bumi Sawit Estate	178,046.52*	18,764.66	188,012.61	106,147.90
Total	178,046.52	206,777.27		106,147.90

Note :

- * Estimated certified FFB in September 2019 – August 2020 : 87,580.93 MT (from ASA4 Audit report with previous CB)
 - o FFB = 87,580.93 MT; CPO = 20,006.83 MT; PK = 5,129.70 MT
- * PalmTrace volume extension from September 2020 – September 2022
 - FFB – 90,465.59 MT; CPO – 15,665.09 MT; PK – 5,438.05 MT
- * Palmtrace volume extension, approved by TP on 10-06-2022
 - FFB – 28,730,757 MT; CPO – 5,441,366 MT; PK – 1,961,754 MT

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (September 2020 – August 2022)	Actual (September 2019 – May 2022)		Forecast (June 2022 – May 2023)
		Previous license period (Sept – Oct 2019)	Current license period (Nov 2019 – May 2022)	
Nil		Nil	Nil	
Total		Nil		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (September 2020 – August 2022)	Actual (September 2019 – May 2022)		Forecast (June 2022 – May 2023)
		Previous license period (Sept – Oct 2019)	Current license period (Nov 2019 – May 2022)	
3 rd parties	Nil	4,853.14	61,744.06	25,030.00
Total	Nil	66,597.20		25,030.00

Note: None

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month – Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	September 2019	8,337.38	2,175.87	10,513.25
2	October 2019	10,427.28	2,677.27	13,104.55
3	November 2019	9,491.57	2,386.67	11,878.24
4	December 2019	7,766.80	2,285.00	10,051.80
5	January 2020	5,011.97	1,361.98	6,373.95
6	February 2020	3,942.97	1,129.59	5,072.56
7	March 2020	3,618.74	1,015.06	4,633.80
8	April 2020	4,718.33	1,249.89	5,968.22
9	May 2020	4,979.53	998.87	5,978.40
10	June 2020	5,936.12	1,455.54	7,391.66
11	July 2020	4,140.68	1,207.14	5,347.82
12	August 2020	5,282.47	1,474.74	6,757.21
13	September 2020	9,106.30	2,993.57	12,099.87
14	October 2020	11,659.43	3,358.54	15,017.97
15	November 2020	11,831.49	3,537.75	15,369.24
16	December 2020	10,023.76	3,327.79	13,351.55
17	January 2021	6,689.51	2,537.12	9,226.63
18	February 2021	5,584.37	2,120.71	7,705.08
19	March 2021	4,820.20	2,029.06	6,849.26
20	April 2021	4,803.06	1,932.65	6,735.71
21	May 2021	5,184.02	2,210.18	7,394.20
22	June 2021	5,743.05	2,383.04	8,126.09
23	July 2021	5,191.51	1,907.80	7,099.31
24	August 2021	5,728.53	2,157.15	7,885.68
25	September 2021	6,866.86	2,400.07	9,266.93
26	October 2021	7,220.50	2,390.78	9,611.28
27	November 2021	8,333.81	2,555.84	10,889.65
28	December 2021	6,523.05	2,202.94	8,725.99
29	January 2022	3,952.69	1,351.11	5,303.80
30	February 2022	2,719.57	1,090.01	3,809.58
31	March 2022	3,239.57	1,440.15	4,679.73
32	April 2022	3,336.58	1,492.54	4,829.12
33	May 2022	4,565.57	1,760.78	6,326.35

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

TOTAL	206,777.27	66,597.20	273,374.48
Note:			

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

Estimated last year (September 2020 – August 2022)	Actual (September 2019 – May 2022)		Forecast (June 2022 – May 2023)
	Previous license period (Sept – Oct 2019)	Current license period (Nov 2019 – May 2022)	
FFB	FFB		FFB
207,777.28*mt	18,764.66 mt	188,012.61 mt	106,147.90 mt
	206,777.27 mt		
CPO (OER: 20.04 %)	CPO (OER: 15.04 %)		CPO (OER: 16.97 %)
41,113.29 mt	3,865.44 mt	37,247.70 mt	18,011.37 mt
	41,113.14 mt		
PK (KER: 5.94 %)	PK (KER: 4.58 %)		PK (KER: 4.25 %)
12,529.50 mt	1,275.31 mt	11,254.11	4,513.81 mt
	12,529.42 mt		

Note:

- * Estimated certified FFB in September 2019 – August 2020 : 87,580.93 MT (from ASA4 Audit report with previous CB)
 - o FFB = 87,580.93 MT; CPO = 20,006.83 MT; PK = 5,129.70 MT
- * PalmTrace volume extension from September 2020 – Apr 2022
 - FFB – 90,465.59 MT; CPO – 15,665.09 MT; PK – 5,438.05 MT
- * Palmtrace volume extension, approved by TP on 10-06-2022
 - FFB – 28,730.76 MT; CPO – 5,441.37 MT; PK – 1,961.75 MT

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

No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	September 2019	1,712.58	550.13
2	October 2019	2,152.86	725.18
3	November 2019	1,941.32	610.04
4	December 2019	1,606.54	465.91
5	January 2020	1,049.02	280.61
6	February 2020	814.92	223.91
7	March 2020	732.24	207.95
8	April 2020	947.10	321.72
9	May 2020	957.01	291.45
10	June 2020	1,122.10	342.27

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
11	July 2020	747.19	270.57
12	August 2020	984.61	288.18
13	September 2020	1,640.14	530.51
14	October 2020	2,173.16	707.17
15	November 2020	2,183.97	664.05
16	December 2020	1,986.27	590.60
17	January 2021	1,324.31	397.36
18	February 2021	1,119.17	346.50
19	March 2021	906.22	291.54
20	April 2021	881.02	299.03
21	May 2021	1,024.95	305.17
22	June 2021	1,200.70	340.44
23	July 2021	1,064.73	306.90
24	August 2021	1,208.65	329.93
25	September 2021	1,430.94	418.12
26	October 2021	1,552.17	436.59
27	November 2021	1,736.18	509.08
28	December 2021	1,339.21	420.57
29	January 2022	782.76	217.47
30	February 2022	544.87	158.80
31	March 2022	641.18	197.25
32	April 2022	654.79	206.80
33	May 2022	950.26	277.62
TOTAL		41,113.28	12,529.50
Note: None			

11. Summary of Actual Volume sold					
Current License period (November 2019 – May 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	6,107.61	21,608.51	0	0	27,716.12
PK (MT)	9,152.70	0	0	0	9,152.70
Credits	-	-	-	-	-

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

11. Summary of Actual Volume sold					
Current License period (November 2019 – May 2022)					
Previous License period (September - October 2019)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-

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

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sumber IndahPerkasa	RSPO_AC1000002052	6,107.61	9,152.70
TOTAL			6,107.61	9,152.70

Note: None

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sumber IndahPerkasa	ISCC	21,608.51	0
TOTAL			21,608.51	0

Note: None

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	None	None	None
TOTAL		None	None

Note: None

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
	None	None	None
TOTAL			None

Note: None

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			None			None			None
IS-CSPO	None	None		None	None		None	None	
IS-CSPKO	None	None		None	None		None	None	
IS-CSPKE	None	None		None	None		None	None	
CSPK	None	None		None	None		None	None	

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)
1	-	-	-	-	-	-
2	-	-	-	-	-	-
3	-	-	-	-	-	-
TOTAL		-	-	-	-	-

Note: None

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				None	None	None	None
Physical	None	None	None	None	None	None	None
Previous License period (key in period)							
Credits				None	None	None	None
Physical	None	None	None				

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

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)
	-	-	-	-	-	-	-
TOTAL				-	-	-	-

Section 2: Assessment Process

Certification Body:

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **6 – 11 June 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 **22 April 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 24th March 2020. The remote audit was conducted on **14 – 15 December 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.

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Bumi Sawit POM	X	X	X	X	X
Bumi Sawit Estate	X	X	X	X	X

Tentative Date of Next Visit: May 9, 2023 - May 12, 2023

Total Number of Mandays: 9

2.2 BSI Assessment Team

Name	Role	Competency
Eko Prastio Ramadhan (EPr)	Team Leader	<p>Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).</p> <p>Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.</p> <p>Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course and Identification of HCV Areas Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Continuous Improvement and Commitment, Long term management plan, Best Management Practices for Oil Palm Plantation and Mill, Waste & GHG management, Water & energy resources, HCV management and monitoring, conservation policies.</p>
Arif Faisal Simatupang (AF)	Team Member	<p>Education: Holds a Bachelor Degree in Agriculture, Majoring Agronomy, Gadjah Mada University</p> <p>Work Experience: Over 3 years of working experience in palm oil estate as Land Acquisition Officer and later as Division Manager with PT PP London</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Sumatera Indonesia Tbk. 8 years working experience as auditor since 2014 covering RSPO P&C and ISPO.</p> <p>Training attended: Completed ISO9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training and SA8000 Auditor training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p>Worker welfare, Consultation with worker, Human Rights, Consultation with Stakeholders, Occupational health and safety aspect, Social impact assessment.</p>
<p>Pratama Agung Sedayu (PS)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.</p> <p>Work Experience: 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001 and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program..</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISPO Lead Auditor endorsed Course and Endorsed RSPO P&C Lead Auditor Course and Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p>Legal compliance, Lands issues, RSPO SCCS, Business ethical, and Contribution to local development and Timebound Plan.</p>
<p>Dr. Suhaili Bin Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience:</p> <p>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</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health & Safety 3. ISO 14001:2015 Standard 4. RSPO Standards: RSPO P&C 2018 MY-NI 2019 5. MSPO Standards: MS 2530:2013 part 1, 2 , 3 and 4 6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7. HACCP MS 1480:2019 8. GAP Standard: Global GAP, Euro GAP 9. ASI Peer Reviewer training
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Accompanying Persons:

Name	Role
None	None

2.3 Assessment Plan

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

Date	Time	Subjects	EPr	PS	AF
Monday, 06/06/2022	07.35 – 08.45	Flight Jakarta – Palembang (GA 102)	√	√	√
	09.00 – 12.00	Travel to site	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.00	<p>Opening Meeting</p> <ul style="list-style-type: none"> - Presentation by PT. Bumi Sawit Permai – Bumi Sawit POM - Presentation by BSI Indonesia <p>Document Review Bumi Sawit Estate :</p> <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment - Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, - Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continous improvement, long term business plan. 	√	√	√
	16.00 – 17.00	Report Preparation	√	√	√

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

Date	Time	Subjects	EPr	PS	AF
Tuesday 07/06/2022	08.00 – 12.00	Field Visit to Bumi Sawit Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc.	√	√	
	08.00 – 12.00	Stakeholder consultation: Local government of Ogan Ilir Regency (DLH, Disbun, Disnakertrans & BPN), Village head, surrounding community, previous land owner (if any) and NGO.			√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.00	Field Visit to Bumi Sawit Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc.	√	√	
	14.00 – 17.00	Stakeholder consultation: Local government of Ogan Ilir Regency (DLH, Disbun, Disnakertrans & BPN), Village head, surrounding community, previous land owner (if any) and NGO.			√
	16.00 – 17.00	Report Preparation	√	√	
Wednesday 08/06/2022	08.00 – 12.00	Document Review Bumi Sawit Estate - Occupational Health and Safety - HCV, Environment and GHG - Time bound plan. - Social Aspect and workers welfare, worker consultation, - Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continous improvement, long term business plan.	√	√	√
	12.00 – 14.00	Break	√	√	√

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

Date	Time	Subjects	EPr	PS	AF
	14.00 – 16.00	Field Visit to Bumi Sawit POM Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. - Interview with Labour Union and Gender Committee.	√	√	√
	16.00 – 17.00	Report Preparation	√	√	√
Thursday 09/06/2022	08.00 – 12.00	Document Review Bumi Sawit Estate - Occupational Health and Safety - HCV, Environment and GHG - Time bound plan. - Social Aspect and workers welfare, worker consultation, - Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.00	Document Review Bumi Sawit POM : - Occupational Health and Safety - Environment and GHG - Time bound plan. - Social Aspect and workers welfare, worker consultation, - Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√
	16.00 – 17.00	Report Preparation	√	√	√
Friday, 10/06/2022	08.00 – 11.30	Document Review Bumi Sawit Estate and Bumi Sawit POM	√	√	√
	11.30 – 14.00	Break	√	√	√
	14.00 – 15.00	Auditor team meeting / preparation for closing meeting	√	√	√
	15.00 – 17.00	Closing Meeting	√	√	√
Saturday, 11/06/2022	08.00 – 12.00	Travel to Palembang	√	√	√

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' RSPO Timebound Plan 2022-2025 dated 19 May 2022 include names 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. The RSPO Membership for Golden Agri Resources dated 30 January 2005. Golden Agri Resources submitted RSPO Timebound Plan 2022-2025 to RSPO Secretariat. RSPO approved the timebound plan for GAR on 14 June 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. Golden Agri Resources reported new acquisition in RSPO Timebound Plan 2022-2025. RSPO approved the timebound plan for GAR on 14 June 2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes. There was deviation to the time-bound plan compared to 2021. Golden Agri Resources reported new time bound plan that is more than 5 or 3 years since membership date in RSPO Timebound Plan 2022-2025. RSPO approved the timebound plan for GAR on 14 June 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 was changes to the time-bound plan compared to 2021. Golden Agri Resources reported new acquisition in RSPO Timebound Plan 2022-2025. RSPO approved the timebound plan for GAR on 14 June 2022.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No. Golden Agri Resources submitted RSPO Timebound Plan 2022-2025 to RSPO Secretariat. RSPO approved the timebound plan for GAR on 14 June 2022.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No. The RSPO Membership for Golden Agri Resources dated 30 January 2005. Golden Agri Resources submitted RSPO Timebound Plan 2022-2025 to RSPO Secretariat. RSPO approved the timebound plan for GAR on 14 June 2022.	Complied
Un-Certified Units or Holdings		

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Golden Agri Resources has reported all replacement of primary forest to maintain HCV and HCS through submission of LUCA.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>Golden Agri Resources has reported all new planting in its subsidiary since 1st January 2010 into RSPO New Plantings Procedure.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>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"> - 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 & Sawit Watch. Current status: Investigation. <p>In the RSPO RaCP Tracker, Audit team noted 22 MUs with potential liability, 22 MU with LUCA submitted, 13 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</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>In the RSPO Case Tracker, Audit team noted there was not active complaint related to labour disputes.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>In the RSPO Case Tracker, Audit team noted there was not active complaint related to legal non-compliance.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes, Golden Agri Resources Ltd carried out internal audit for the uncertified estates and mills against RSPO P&C Criterion.</p> <ul style="list-style-type: none"> - Internal audit for PT. Kresna Duta Agroindo – Rantau Panjang POM and Rantau Panjang Estate carried out 25-29 October 2021. - Internal audit for PT. Aditunggal Mahajaya – Sako POM and Sungai Ayawan Estate carried out on 15-26 November 2021. - Internal audit for PT. Tapian Nadenggan – Bukit Kapur POM, Bukit Kapur Estate, Sungai Cantung Estate carried out 6-10 December 2021. - Internal audit for PT. Mitra Karya Agroindo – Tangar POM, Sulin Estate, Nahiyang 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>Estate, Katayang Estate carried out 13-22 December 2021.</p> <ul style="list-style-type: none"> - 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. <p>Audit checklist covers all RSPO P&C and RSPO Certification System requirement. Positive assurance statement stated in the internal audit reports reviewed.</p>	
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Yes, there are critical non-compliance raised during internal audits to uncertified management units.</p> <ul style="list-style-type: none"> - 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. - 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. - 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. - 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. 	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Audit team checked on internal audit reports and verified the stakeholder consultation carried out; Internal audit on PT. Kresna Duta Agroindo – Rantau Panjang POM and Rantau Panjang Estate stakeholder consultation made to “Biro Hukum, Sekretariat Jenderal Kementerian Lingkungan Hidup dan Kehutanan, Direktorat Kesatuan Pengelolaan Hutan Produksi, Dirjen Pengelolaan Hutan Produksi</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>Lestari, Dinas Kehutanan Provinsi Kalimantan Timur”. Internal audit on PT. Agro Lestari Mandiri – Pekawai POM, Pekawai Estate, Kayung Estate, Sungai Kelik Estate, Nanga Tayap Estate, Kayung Plasma – the stakeholder consultation made with “Dinas Perkebunan Kabupaten Ketapang, Dinas Perkebunan Provinsi Kalimantan Barat”.</p> <p>In the RSPO Case Tracker, Audit team noted active complaint;</p> <ul style="list-style-type: none"> - 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 & Sawit Watch. Current status: Investigation. Latest progress in 29 April 2022 “Bilateral Engagement process between parties ongoing with the Secretariat as an observer” - Complaint Ref.RSPO/2020/04/IR, dated filed 2 March 2020 addressed to Golden Agri Resources Ltd., by Forest People Programme & Elk Hills Research. Current status: Investigation. Latest progress in 29 April 2022 “The Secretariat is in the midst of reviewing the ToR for the independent investigation as well as in the process of identifying a suitable Consultant for the investigation process”. - Complaint Ref.RSPO/2018/14/IR, dated filed 19 October 2018 addressed to Golden Agri Resources Ltd., by Forest People Programme & Transformasi Untuk Keadilan Indonesia. Current status: Investigation. Latest progress in 29 April 2022 “The Secretariat is in the midst of reviewing the Terms of Reference for the independent investigation and preparation of a Service Agreement” <p>Audit team sent email to Sawit Watch, until assessment ends, audit team did not received response.</p>	
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>There is no scheme smallholder for PT. Bumi Sawit Permai.</p>	<p>Complied</p>

Approved Time Bound Plan

There were revision in the company time bound plan, has been sent to RSPO for review and approval on 20th May 2022. The revised Time Bound Plan has been approved by RSPO Secretariat on 14 June 2022.

NO	COMPANY	LOCATION	MILL / ESTATE	PLANTED AREA (Ha)	PREVIOUS TIMEBOUND	NEW TIMEBOUND	JUSTIFICATION	
SUPPLY BASE OF NON CERTIFIED MILLS								
1	PT PARAMITRA INTERNUSA PRATAMA	KALIMANTAN BARAT	BLNM	BELIAN MILL		2021	2022	RaCP in progress
1.1	PT PARAMITRA INTERNUSA PRATAMA	KALIMANTAN BARAT	BLNE	BELIAN ESTATE	1,949	2021	2022	
1.2	PT PARAMITRA INTERNUSA PRATAMA	KALIMANTAN BARAT	TNKE	TENGKAWANG ESTATE	3,467	2021	2022	
1.3	PT PERSADA GRAHA MANDIRI	KALIMANTAN BARAT	KHLE	KAPUAS HULU ESTATE	2,703	2021	2022	
1.4	PT PERSADA GRAHA MANDIRI	KALIMANTAN BARAT	SBRE	SUNGAI BERAN ESTATE	2,811	2021	2022	
1.5	PT KARTIKA PRIMA CIPTA	KALIMANTAN BARAT	MTNE	MUARA TAWANG ESTATE	2,377	2021	2022	
1.6	PT PARAMITRA INTERNUSA PRATAMA (PLASMA)	KALIMANTAN BARAT	BLNA	BELIAN KKPA	1,798	2022	2024	
1.7	PT KARTIKA PRIMA CIPTA (PLASMA)	KALIMANTAN BARAT	MTNA	MUARA TAWANG KKPA	1,052	2022	2024	
1.8	PT PERSADA GRAHA MANDIRI (PLASMA)	KALIMANTAN BARAT	KHLA	KAPUAS HULU KKPA	1,188	2022	2024	
2	PT AGROLESTARI MANDIRI	KALIMANTAN BARAT	PKWM	PEKAWAI MILL		2021	2022	RaCP in progress
2.1	PT AGROLESTARI MANDIRI	KALIMANTAN BARAT	KYNE	KAYUNG ESTATE	2,210	2021	2022	
2.2	PT AGROLESTARI MANDIRI	KALIMANTAN BARAT	PKWE	PEKAWAI ESTATE	2,868	2021	2022	
2.3	PT AGROLESTARI MANDIRI	KALIMANTAN BARAT	SKKE	SUNGAI KELIK ESTATE	2,467	2021	2022	
2.4	PT AGROLESTARI MANDIRI	KALIMANTAN BARAT	NTYE	NANGA TAYAP ESTATE	2,008	2021	2022	
2.5	PT AGROLESTARI MANDIRI (PLASMA)	KALIMANTAN BARAT	KYNA	KAYUNG KEMITRAAN	2,651	2022	2024	Land title (SHM) in progress, RaCP in progress
3	PT SAWITAKARYA MANUNGGUL	KALIMANTAN SELATAN	SWTM	SAWITA MILL		2021	2022	RaCP in progress

3.1	PT SAWITAKARYA MANUNGGUL	KALIMANTAN SELATAN	SWTE	SAWITA ESTATE	3,810	2021	2022	
3.2	PT SAWITAKARYA MANUNGGUL	KALIMANTAN SELATAN	PMKE	PAMUKAN ESTATE	2,972	2021	2022	
3.3	PT SAWITAKARYA MANUNGGUL (PLASMA)	KALIMANTAN SELATAN	SWTA	SAWITA KKPA	1,154	2023	2024	
4	PT KRESNA DUTA AGROINDO	KALIMANTAN TIMUR	RPNM	RANTAU PANJANG MILL		2022	2023	RaCP in progress
4.1	PT KRESNA DUTA AGROINDO	KALIMANTAN TIMUR	RPNE	RANTAU PANJANG ESTATE	4,689	2022	2023	
4.2	PT KRESNA DUTA AGROINDO (PLASMA)	KALIMANTAN TIMUR	RPNA	RANTAU PANJANG KKPA	982	2023	2024	
5	PT SAWIT MAS SEJAHTERA	SUMATERA SELATAN	SKMM	SUNGAI KIKIM		2022	2023	RaCP in progress
5.1	PT SAWIT MAS SEJAHTERA	SUMATERA SELATAN	SKME	SUNGAI KIKIM ESTATE	1,845	2022	2023	
5.2	PT SAWIT MAS SEJAHTERA	SUMATERA SELATAN	SPGE	SUNGAI PANGI ESTATE	3,119	2022	2023	
5.3	PT SAWIT MAS SEJAHTERA	SUMATERA SELATAN	SMIE	SUNGAI MUSI ESTATE	1,736	2022	2023	
5.4	PT SAWIT MAS SEJAHTERA	SUMATERA SELATAN	SSLE	SUNGAI SALING ESTATE	2,161	2022	2023	
5.5	PT BUMI SAWIT PERMAI	SUMATERA SELATAN	SENE	SUNGAI ENIM ESTATE	1,725	2022	2023	
5.6	PT BUMI SAWIT PERMAI	SUMATERA SELATAN	SLME	SUNGAI LEMATANG ESTATE	2,081	2022	2023	
5.7	PT PRIMA CIPTA MANDIRI	SUMATERA SELATAN	SBGE	SUNGAI BUNGUR ESTATE	2,323	2022	2023	
5.8	PT PRIMA CIPTA MANDIRI	SUMATERA SELATAN	SLGE	SUNGAI LINGSING ESTATE	1,025	2022	2023	
6	PT SINAR KENCANA INTI PERKASA	KALIMANTAN SELATAN	SMGM	SUNGAI MAGALAU MILL		2023	2023	RaCP in progress
6.1	PT SINAR KENCANA INTI PERKASA	KALIMANTAN SELATAN	SNKE	SENAKIN ESTATE	2,787	2023	2023	
6.2	PT SINAR KENCANA INTI PERKASA	KALIMANTAN SELATAN	SMUE	SUNGAI MAGALAU ESTATE	1,707	2023	2023	
7	PT KRESNA DUTA AGROINDO	KALIMANTAN TIMUR	GKMM	GUNUNG KOMBENG MILL		2023	2024	Land title (SHM) in progress
7.1	PT KRESNA DUTA AGROINDO (PLASMA)	KALIMANTAN TIMUR	GKMA	GUNUNG KOMBENG KKPA	2,214	2023	2024	
8	PT SINAR KENCANA INTI PERKASA	PAPUA	KSRM	KASUARI MILL		2023	2024	
8.1	PT SINAR KENCANA INTI PERKASA	PAPUA	CNDE	CENDRAWASIH ESTATE	2,691	2023	2024	

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

8.2	PT SINAR KENCANA INTI PERKASA	PAPUA	NURE	NURI ESTATE	2,532	2023	2024	RaCP in progress, Environmental permit in progress
8.3	PT SINAR KENCANA INTI PERKASA	PAPUA	RJWE	RAJAWALI ESTATE	3,675	2023	2024	
8.4	PT SUMBER INDAH PERKASA	PAPUA	MMBE	MAMBRUK ESTATE	3,473	2023	2024	
9	PT BAHANA KARYA SEMESTA	JAMBI	SAJM	SUNGAI AIR JERNIH MILL		2023	2024	RaCP in progress
9.1	PT BAHANA KARYA SEMESTA	JAMBI	SAJE	SUNGAI AIR JERNIH ESTATE	2,963	2023	2024	
9.2	PT BAHANA KARYA SEMESTA	JAMBI	SMTE	SUNGAI MENTAWAK ESTATE	2,754	2023	2024	
9.3	PT PRIMATAMA KREASI MAS	JAMBI	SMKE	SUNGAI MERAK ESTATE	3,969	2023	2024	
9.4	PT PRIMATAMA KREASI MAS	JAMBI	SBKE	SUNGAI BADAK ESTATE	1,576	2023	2024	
9.5	PT BAHANA KARYA SEMESTA (PLASMA)	JAMBI	SMTA	SUNGAI MENTAWAK KKPA	922	2023	2024	
10	PT SMART TBK	KALIMANTAN SELATAN	BKPM	BUKIT KAPUR MILL		2023	2025	HGU in progress, HCV/HCS Study in progress
10.1	PT SMART TBK	KALIMANTAN SELATAN	SCNE	SUNGAI CANTUNG ESTATE	3,473	2023	2025	
10.2	PT SMART TBK	KALIMANTAN SELATAN	BKPE	BUKIT KAPUR ESTATE	2,950	2023	2025	
11	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	PRDM	PERDANA MILL		2023	2025	HGU in progress
11.1	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	PRDE	PERDANA ESTATE	4,007	2023	2025	
11.2	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	LGGE	LENGGANA ESTATE	2,275	2023	2025	
11.3	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	SMNE	SEMANDAU ESTATE	3,789	2023	2025	
11.4	PT BINASAWIT ABADI PRATAMA	KALIMANTAN TENGAH	MDUE	MUARA DUA ESTATE	4,116	2023	2025	
12	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	KUYM	KUAYAN MILL		2023	2025	HGU in progress, RaCP in progress
12.1	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	BSTE	BUKIT SANTUHAI ESTATE	3,635	2023	2025	
12.2	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	TBSE	TAJUR BERAS ESTATE	3,667	2023	2025	
12.3	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	SRAE	SERANAU ESTATE	3,654	2023	2025	
12.4	PT AGROKARYA PRIMALESTARI (PLASMA)	KALIMANTAN TENGAH	SSBA	SUNGAI SAMBON PLASMA	470	2023	2025	

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

12.5	PT BUANA ADHITHAMA	KALIMANTAN TENGAH	SPRE	SAPIRI ESTATE	2,392	2023	2025	
12.6	PT BUANA ADHITAMA (PLASMA)	KALIMANTAN TENGAH	SPRA	SAPIRI PLASMA	435	2023	2025	
12.7	PT BUANA ADHITHAMA	KALIMANTAN TENGAH	BDUE	BUKIT DUA ESTATE	1,805	2023	2025	
13	PT MITRAKARYA AGROINDO	KALIMANTAN TENGAH	TNGM	TANGAR MILL		2023	2025	HGU in progress, RaCP in progress
13.1	PT MITRA KARYA AGROINDO	KALIMANTAN TENGAH	SLNE	SULIN ESTATE	4,173	2023	2025	
13.2	PT MITRA KARYA AGROINDO	KALIMANTAN TENGAH	NHYE	NAHIYANG ESTATE	3,723	2023	2025	
13.3	PT MITRA KARYA AGROINDO	KALIMANTAN TENGAH	KTYE	KATAYANG ESTATE	3,443	2023	2025	
13.4	PT MITRAKARYA AGROINDO (PLASMA)	KALIMANTAN TENGAH	SLNA	SULIN PLASMA	1,677	2023	2025	
14	PT ADITUNGGAL MAHAJAYA	KALIMANTAN TENGAH	SKOM	SAKO MILL		2023	2025	
14.1	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	MNTE	MENTAYA ESTATE	3,342	2023	2025	
14.2	PT AGROKARYA PRIMA LESTARI	KALIMANTAN TENGAH	KUYE	KUAYAN ESTATE	3,520	2023	2025	
14.3	PT MITRA KARYA AGROINDO	KALIMANTAN TENGAH	SNSE	SUNGAI NUSA ESTATE	3,219	2023	2025	
14.4	PT ADITUNGGAL MAHAJAYA	KALIMANTAN TENGAH	SAYE	SUNGAI AYAWAN ESTATE	3,733	2023	2025	
14.5	PT ADITUNGGAL MAHAJAYA (PLASMA)	KALIMANTAN TENGAH	SKOA	SAKO PLASMA	1,014	2023	2025	
15	PT AGROLESTARI SENTOSA	KALIMANTAN TENGAH	JLMM	JALEMO MILL		2023	2025	HGU in progress, RaCP in progress
15.1	PT AGROLESTARI SENTOSA	KALIMANTAN TENGAH	MNHE	MANUHING ESTATE	2,121	2023	2025	
15.2	PT AGROLESTARI SENTOSA	KALIMANTAN TENGAH	KJUE	KAJUI ESTATE	3,571	2023	2025	
15.3	PT AGROLESTARI SENTOSA	KALIMANTAN TENGAH	JLME	JALEMO ESTATE	3,351	2023	2025	
15.4	PT AGROLESTARI SENTOSA (PLASMA)	KALIMANTAN TENGAH	MNHA	MANUHING PLASMA	65	2023	2025	
16	PT BANGUN NUSA MANDIRI	KALIMANTAN BARAT	KNRM	KENARI MILL		2023	2025	HGU in progress, RaCP in progress
16.1	PT BANGUN NUSA MANDIRI	KALIMANTAN BARAT	GHRE	GAHARU ESTATE	1,886	2023	2025	
16.2	PT BANGUN NUSA MANDIRI	KALIMANTAN BARAT	KNRE	KENARI ESTATE	3,132	2023	2025	
16.3	PT BANGUN NUSA MANDIRI - (PLASMA)	KALIMANTAN BARAT	GHRA	GAHARU PLASMA	557	2023	2025	

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

16.4	PT BANGUN NUSA MANDIRI - (PLASMA)	KALIMANTAN BARAT	KNRA	KENARI PLASMA	52	2023	2025	Land title (SHM/HGU) in progress, RaCP in progress
17	PT KRUIING LESTARI JAYA	KALIMANTAN TIMUR	SPKM	SUNGAI PERAK MILL		-	2024	HCV/HCS Study in progress, RaCP in progress
17.1	PT KRUIING LESTARI JAYA	KALIMANTAN TIMUR	SPKE	SUNGAI PERAK ESTATE	2,810	-	2024	
17.2	PT KRUIING LESTARI JAYA	KALIMANTAN TIMUR	SBAE	SUNGAI BASUNG ESTATE	2,810	-	2024	
17.3	PT KRUIING LESTARI JAYA	KALIMANTAN TIMUR	SPIE	SUNGAI PIKAN ESTATE	2,351	-	2024	
17.4	PT KRUIING LESTARI JAYA	KALIMANTAN TIMUR	SPLE	SUNGAI PILOS ESTATE	3,361	-	2024	
17.5	PT KRUIING LESTARI JAYA	KALIMANTAN TIMUR	SPIA	SUNGAI PIKAN PLASMA	2,266		2024	
17.6	PT HARAPAN RIMBA RAYA	KALIMANTAN TIMUR	STHA	SUNGAI TOHAN PLASMA	1,773		2024	
18	PT HARAPAN RIMBA RAYA	KALIMANTAN TIMUR	SKDM	SUNGAI KEDANG MILL		-	2024	HCV/HCS Study in progress, RaCP in progress
18.1	PT HARAPAN RIMBA RAYA	KALIMANTAN TIMUR	SKDE	SUNGAI KEDANG ESTATE	3,338	-	2024	
18.2	PT HARAPAN RIMBA RAYA	KALIMANTAN TIMUR	STHE	SUNGAI TOHAN ESTATE	3,597	-	2024	
18.3	PT HARAPAN RIMBA RAYA	KALIMANTAN TIMUR	KPHE	KEDANG PAHU ESTATE	1,928	-	2024	
18.4	PT RIMBARAYA TAMAJAYA	KALIMANTAN TIMUR	SPAE	SUNGAI PAHU ESTATE	2,803	-	2024	
18.5	PT RIMBARAYA TAMAJAYA	KALIMANTAN TIMUR	SPAA	SUNGAI PAHU PLASMA	568	-	2024	
SUPPLY BASE OF CERTIFIED MILLS								
1	PT CAHAYA NUSA GEMILANG	KALIMANTAN BARAT	KNNE	KENANGA ESTATE	2,618	2021	2023	RaCP in progress
2	PT KENCANA GRAHA PERMAI	KALIMANTAN BARAT	DLME	DELIMA ESTATE	1,857	2021	2023	RaCP in progress
3	PT SATYA KISMA USAHA	JAMBI	BGDE	BATANG GADING ESTATE	1,917	2022	2023	HGU in progress, RaCP in progress
4	PT FORESTA LESTARI DWIKARYA (PLASMA)	BANGKA BELITUNG	TRSA	TANJUNG RUSA KKPA	497	2022	2024	RaCP in progress
5	PT DJUANDA SAWIT LESTARI (PLASMA)	SUMATERA SELATAN	PNDA	PANDAWA KKPA	1,796	2022	2024	RaCP in progress

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

6	PT CAHAYA NUSA GEMILANG (PLASMA)	KALIMANTAN BARAT	KNCA	KENCANA KEMITRAAN	1,108	2022	2024	HGU Plasma in progress, RaCP in progress
7	PT CAHAYA NUSA GEMILANG (PLASMA)	KALIMANTAN BARAT	KNNA	KENANGA KEMITRAAN	439	2022	2024	HGU Plasma in progress, RaCP in progress
8	PT SATYA KISMA USAHA	KALIMANTAN TENGAH	MSAE	MEDANG SARI ESTATE	2,436	2022	2025	HGU in progress, RaCP in progress
9	PT SATYA KISMA USAHA (PLASMA)	JAMBI	KILA	KILIS KKPA	939	2023	2024	HGU in progress, RaCP in progress
10	PT PALMINDO BILITON BERJAYA	BANGKA BELITUNG	TSWE	TANJUNG SAWIT ESTATE	2,634	2023	2023	HCV/HCS Study in progress
11	PT PALMINDO BILITON BERJAYA (PLASMA)	BANGKA BELITUNG	TSWA	TANJUNG SAWIT PLASMA	676	2023	2023	HCV/HCS Study in progress
12	PT RAMAJAYA PRAMUKTI (PLASMA)	RIAU	RRMA	RAMARAMA KKPA	760	2023	2023	Land title (SHM) in progress
13	PT SAWITAKARYA MANUNGGUL (PLASMA)	KALIMANTAN SELATAN	SKPA	SUNGAI KUPANG KKPA	3,859	2023	2023	Land title (SHM) in progress
14	PT TAPIAN NADENGGAN (PLASMA)	KALIMANTAN TIMUR	JLYA	JAK LUAY KKPA	2,980	2023	2023	RaCP in progress
15	PT TAPIAN NADENGGAN (PLASMA)	KALIMANTAN TIMUR	BSRA	BUKIT SUBUR KKPA	712	2023	2023	RaCP in progress
16	PT MEGANUSA INTI SAWIT (PLASMA)	RIAU	KSJA	MANDIAN JAYA PLASMA	405	-	2022	ready for certification
17	PT BUANA WIRALESTARI MAS (PLASMA)	RIAU	BRDA	BERKAT RIDHO KKPA	740	-	2023	Land title (SHM) in progress
18	PT IVO MAS TUNGGAL (PLASMA)	RIAU	SKJA	KANDIS SEJAHTERA KKPA	418	-	2023	Land title (SHM) in progress
19	PT IVO MAS TUNGGAL (PLASMA)	RIAU	KSBA	SWADAYA MAS BERSAMA KKPA	451	-	2023	Land title (SHM) in progress
20	PT RAMAJAYA PRAMUKTI (PLASMA)	RIAU	PRSA	PRODUSEN RAMA SAWIT KKPA	175	-	2023	Land title (SHM) in progress

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

21	PT AGROLESTARI SUBUR SEJAHTERA	BANGKA BELITUNG	BPAE	BUKIT PERMAI ESTATE	3,151	-	2024	HCV/HCS Study in progress
22	PT AGROLESTARI HIJAU SENTOSA	BANGKA BELITUNG	BLSE	BUKIT LESTARI ESTATE	664	-	2024	HCV/HCS Study in progress
23	PT MITRA NUSA PERMATA	KALIMANTAN SELATAN	SMGE	SUNGAI MANUNGGUL ESTATE	1,175	-	2024	HGU in progress, RaCP in progress
24	PT KHARISMA RIAU SENTOSA PRIMA	RIAU	KHRE	KHARISMA ESTATE	345	-	2024	HGU in progress, RaCP in progress
25	PT KHARISMA RIAU SENTOSA PRIMA (PLASMA)	RIAU	KHRA	KHARISMA PLASMA	381	-	2024	Land title (SHM) in progress
26	PT KRESNA DUTA AGROINDO (PLASMA)	JAMBI	TSRA	TIGA SERUMPUN KKPA	2,788	-	2024	Land title (SHM) in progress
27	PT SATYA KISMA USAHA (PLASMA)	JAMBI	BGDA	BATANG GADING KKPA	1,494	-	2024	Land title (SHM) in progress

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 non-conformities identified. No Corrective Action Plans is required.

Non-conformity			
NCR Ref #	-	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	#2211500-202206-I1 – Clause 4.5.5 CH has begin providing information on land acquisition plan, including information on legal aspect, economic aspect, sustainability aspect. Comprehensive information access to review environmental aspect and social aspect is expected.
OFI 2	#2211500-202206-I2 – Clause 7.3.1 Monitor and follow up the extention process of Hazardous Waste Storage License

Positive Findings	
PF #	Description
PF 1	a. Commitment to RSPO Audit from workers until top management b. Records/data and information was given quickly c. Internal audit has bee conducted very well

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2001889-202012-M1	Issued Date	15 December 2020
Due Date	15 March 2021	Closure Date	10 March 2021
Indicator & Category (Critical / Minor)	Critical		
Statement of Nonconformity:	During RAV, Unit of Certification (Bumi Sawit Mill and its supply bases) unable to demonstrate that Remediation and Compensation Procedure (RaCP) against oil palm crops planted after November 2005 without prior HCV assessment already applied.		
Requirement Reference:	7.12.8 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.		
Objective Evidence:	<p>Based on Areal Statement 2019, Bumi Sawit Estate as Unit of Certification had oil palm crops planted after November 2005. Those are:</p> <ul style="list-style-type: none"> • YoP 2008 = 108.61 Ha • YoP 2010 = 18.37 Ha • YoP 2011 = 46.56 Ha <p>Total =173.54 Ha</p> <p>According to this, Unit of Certification shall follow the Remediation and Compensation Procedure (RaCP) and started with Land Use Change Analysis (LUCA). Golden Agri Resources (GAR) as parent company of PT Bumi Sawit Permai – Bumi Sawit Mill already submit LUCA to the RSPO in May 2018 (2nd clarification) and has been responded by RSPO.</p> <p>Historical communication related RaCP process as below:</p> <ul style="list-style-type: none"> • Dated 7th May 2018 – GAR submitted 2nd clarification to RSPO • Dated 11th November 2019 – RSPO send feedback 3rd to GAR • Dated 29th July 2020 – GAR sent 3rd clarification to RSPO • Dated 1st September 2020 – RSPO send feedback 4th to GAR • Dated 22nd September 2020 – GAR sent 4th clarification to RSPO (this is latest updated) <p>During RAV audit, RaCP progress of Bumi Sawit Mill and its supply bases are not completed yet as required within Remediation and Compensation Procedures.</p>		
Corrections:	To follow up on the findings of the RSPO RAV (remote audit), the company through its Sustainability Implementation Division (SIDV) has communicated again with the RSPO. The LUCA Report is still under examination / review by the consultant and has requested a completion date from the reviewer		
Root Cause Analysis:	<p>The straighten several points from the historical communication explained in Objective Evidence and focus on the RaCP process of PT Bumi Sawit Permai - Bumi Sawit POM. This is due to some email correspondence discussing the RaCP process for the entire company under GAR.</p> <p>The historical start from 7 May 2018 up to our last communication with the RSPO:</p> <ul style="list-style-type: none"> • Dated 11 November 2019: RSPO sends the LUCA Review Report to PT Bumi Sawit Permai - Bumi Sawit POM 		

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<ul style="list-style-type: none"> • Dated 29 July 2020: PT Bumi Sawit Permai – Bumi Sawit POM provides clarification to the RSPO regarding the review conducted by the RSPO • Dated 1 September 2020: RSPO provides feedback back to the PT Bumi Sawit Permai - Bumi Sawit POM • Dated 22 September 2020: The company provides clarification to the RSPO regarding the review conducted by the RSPO. This is the latest communication records between RPSO and PT Bumi Sawit Permai - Bumi Sawit POM <p>Based on correspondence above, GAR can conclude that the root of the problem occurred, that GAR has shown the efforts and communicated with the RSPO, however until the RSPO recertification process there was no feedback from the RSPO regarding the status of the LUCA Report of PT Bumi Sawit Permai - Bumi Sawit POM.</p>
Corrective Actions:	<p>The company through the Sustainability Implementation Division (SIDV) will communicate regularly (once a month) with the RSPO to monitor the progress of the RaCP and before the re-certification audit (RAV) is carried out an official statement has been obtained from the RSPO regarding the RaCP status of PT Bumi Sawit Permai - Bumi Sawit POM which can be a reference for CB.</p>
Assessment Conclusion:	<p>Based on email of RSPO Secretariat to CB (PT BSI Group Indonesia), dated 26th August 2020, stated that, "As for the unit of certification with liability, as communicated earlier, recertification can be done by excluding area with liability from the certification scope. The area can be added back later once the compensation plan has been endorsed by the Compensation Panel".</p> <p>Updated on 25 March 2021</p> <p>In accordance with RSPO Advisory Note No: 0003/21 Assurance – Integrity on 25 March 2021, the RaCP status of 132.36 Ha (Bumi Sawit Estate) was approved to continue with certification. The NC that is raised will be allowed to be open until the next surveillance/recertification audits.</p> <p>For any unit that is at the initial certification stage, issuance of a certificate can only be done after the compensation plan has been approved.</p> <p>Updated on 18 February 2022</p> <p>Based on email from RSPO Secretariat on 18 February 2022 stated "We take consideration to provide a Conditional Approval as referring to the previous Advisory Note that we had provided to you before. This considering that the Advisory Note was given for the first case that came to us, and when the continuation of the previous approval for the similar case, we only give you the conditional approval.</p> <p>Now, this Conditional Approval would only be given for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification. And this will only be valid until the next 6 months from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the particular certified management units, and we may revoke this conditional approval if any issues happen that may heavily threaten the integrity of RSPO standard requirements.</p> <p>While for the uncertified management units, The Initial Certification audit may be conducted, but the Certificates can only be issued when the completion of the RaCP Process (i.e approval of Compensation and Remediation Plans) is approved by the Compensation Panel".</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

Effectiveness Closure (for previous audit closed Critical NC):	Based on email and Conditional Approval from RSPO Secretariat dated 25 March 2021, for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification.
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Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: None Verification / Follow-up actions: None

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2001889-202012-M1	Critical	7.12.8	15 December 2020	Closed, 10 March 2021

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 Sawit Permai – Bumi Sawit POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
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	Environmental Agency of Ogan Ilir Regency	Face to face interview
Governmental	Permit Agency (PTSP) of Ogan Ilir Regency	<i>Note: Public consultation letter has been submitted and receipt of acceptance is available. However, during the audit,</i>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<i>there is no personnel available/willing to be interviewed.</i>
Governmental	Manpower Agency of Ogan Ilir Regency	<i>Note: Public consultation letter has been submitted and receipt of acceptance is available. However, during the audit, there is no personnel available/willing to be interviewed.</i>
Governmental	Agrarian/Land Agency of Ogan Ilir Regency	Face to face interview
Governmental	Plantation Agency of Ogan Ilir Regency	Face to face interview
Governmental	Manpower Agency of South Sumatera Province	Phone interview
Governmental	BKSDA of South Sumatera	<i>Note: Public consultation letter has been submitted and receipt of acceptance is available. However, during the audit, there is no personnel available/willing to be interviewed.</i>
Academia	Sriwijaya University – no response	<i>Note: Public consultation letter has been submitted and receipt of acceptance is available. However, during the audit, there is no personnel available/willing to be interviewed.</i>
Governmental	Sub-District Head of Rambang Kuang	Face to face interview
Governmental/communities	Village Head of Tanjung Miring	Face to face interview
Contractor	Contractor: FFB Transporter PT Satrindo Jaya Agropalma	Face to face interview
Internal/Union	Labor Union: SPSI	Face to face interview
Internal	Gender Committee	Face to face interview

Stakeholders comment

1	<p>Feedbacks:</p> <p>Environmental Agency of Ogan Ilir Regency</p> <p>The environmental agency has conducted regular field monitoring about twice per year, and there is no negative issue concerning waste/environmental management. Waste-water treatment, hazardous waste storage have had permits. Mandatory environment management reports have been submitted regularly, there is no significant testing result that beyond the threshold.</p>
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	<p>The company is suggested to submit the regular CSR report to Environmental Agency even though there no legal requirement, because social engagement is one factor that need to be reviewed by the Environmental Agency.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need for further verification. Based on document review of environmental permits and reports, and field observations, the company has demonstrated legal compliance related environmental, and no indications of environmental pollution, that described in more detail in related indicators.</p> <p>Auditor has delivered the agency's suggestion to submit CSR report, and the company will committed to submit the CSR report to Environmental Agency.</p>
<p>2</p>	<p>Feedbacks:</p> <p>Agrarian/Land Agency of Ogan Ilir Regency</p> <p>The has complied land legality in the form of Location Permit and Land Title (HGU). The annual report of HGU usage has been submitted regularly. Land Agency only has an authority to give information based on that has been written on official notes in attachment of HGU Sertifikat (<i>lembaran buku tanah</i>). Based on the record, there is no a negative issue such as land conflict (reduction), abandoned land (<i>tanah terlantar</i>), etc.</p> <p>The HGU validity is currently expired, the extension process is undergoing. The obstacle is the current regulation to develop Plasma (scheme smallholder) amount of 20% of proposed HGU area.</p> <p>Audit Team verification and response:</p> <p>Based on area statement, there are 3,889.40 ha area occupied by local community. Also, there are 773.39 ha area that did not has HGU yet. This area has been included in time bound plan. Concerning the HGU extension and Plasma progress, it has been verified by auditor and has been described in more detail in indicator 4.4.1.</p>
<p>3</p>	<p>Feedbacks:</p> <p>Plantation Agency of Ogan Ilir Regency</p> <p>The company has complied the regulation of plantation permit, such as has had a Plantation Business Permit (<i>Izin Usaha Perkebunan / IUP</i>), and has had sufficient fire fighting equipment. The land preparation did not conducted by land burning. Mandatory reports also have been submitted regularly. There is a record of aspiration from Tanjung Miring Village to get water supply from company (mill). It is due to the village is lacking fresh water supply, because the ground water is too deep.</p> <p>Audit Team verification and response:</p> <p>The auditor has verified the compliance of legal requirement such as Plantation Business Permit and mandatory report. Field verification also has been conducted to verify that there is no burning activities in the field, and fire fighting facilities and team has conducted simulation during the audit.</p> <p>Concerning Tanjung Miring Village aspiration to get water supply from company, it has been verified based on interview with Tanjung Miring Village Head and company's management, that the Tanjung Miring Village Head has submitted proposal to get access (pipeline infrastructure) from Mill to Tanjung Miring Village. However, the management has sent the response on 30 July 2021, that the company can not approve yet the proposal, due to feasibility matter (too much cost for pipeline and pump, the distance is around 3 km).</p>
<p>4</p>	<p>Feedbacks:</p> <p>Manpower Agency of South Sumatera Province</p> <p>There is no negative issue related to employment (payment, contractual agreement, worker status)and OHS based on regular monitoring and report from stakeholder. The mandarotry report (employment, OHS Committee) has been submitted regularly.</p>

	<p>Audit Team verification and response:</p> <p>There are no negative issues that need further verification. It has been verified and described that the company has complied the requirement such as recruitment (criterion 3.5), OHS (criterion 3.6), payment and work condition (criterion 6.2).</p>
5	<p>Feedbacks:</p> <p>Sub-District Head of Rambang Kuang</p> <p>There is no issue related employment, OHS, and environmental. However, the company's HGU is in extension process and currently in the phase of Plasma land identification, as a new requirement in HGU extension.</p> <p>There is a record of aspiration from Tanjung Miring Village to get water supply from company (mill). It was due to issue the village is lacking fresh water supply, because the ground water is too deep.</p> <p>Audit Team verification and response:</p> <p>Concerning the HGU extension and Plasma progress, it has been verified by auditor and has been described in more detail in indicator 4.4.1.</p> <p>Concerning Tanjung Miring Village aspiration to get water supply from company, it has been verified based on interview with Tanjung Miring Village Head and company's management, that the Tanjung Miring Village Head has submitted proposal to get access (pipeline infrastructure) from Mill to Tanjung Miring Village. However, the management has sent the response on 30 July 2021, that the company cannot approve yet the proposal, due to feasibility matter (too much cost for pipeline and pump, the distance is around 3 km).</p>
6	<p>Feedbacks:</p> <p>Village Head of Tanjung Miring</p> <ul style="list-style-type: none"> - There is a record of aspiration from Tanjung Miring Village to get water supply from company (mill). It is due to the village is lacking fresh water supply, because the ground water is too deep. - It is about only 30 workers that originally came from Tanjung Miring Village, the rest probably outsider that just have ID card that addressed in Tanjung Miring. - There is a worker in Mill's (water intake operator) that only casual worker and not promoted yet. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Concerning Tanjung Miring Village aspiration to get water supply from company, it has been verified based on interview with Tanjung Miring Village Head and company's management, that the Tanjung Miring Village Head has submitted proposal to get access (pipeline infrastructure) from Mill to Tanjung Miring Village. However, the management has sent the response on 30 July 2021, that the company can not approve yet the proposal, due to feasibility matter (too much cost for pipeline and pump, the distance is around 3 km). - The company has demonstrated that recruitment process are based on suitability in skills needed. The vacancies always be informed to surrounding community. - The company has shown a letter in 2020 that the previous village head has submit a proposal to the company, that due to the water intake pump house is located near Tanjung Miring Village, therefore, ask for Village Official as the operator/security of water intake pump house. Therefore the person whom said by current Village Head a employed by Village Official. The agreement are by company to village official.
7	<p>Feedbacks:</p> <p>Contractor: FFB Transporter PT Satrindo Jaya Agropalma</p> <p>The contractor has agreement with PT BSP to adhere legal requirement, such as using appropriate PPE, employment status and contractual agreement and minimum payment to worker, as well as enroll them in national employment and health insurance (<i>BPJS</i>).</p>

	<p>Audit Team verification and response:</p> <p>FFB transporter on behalf of PT Satrindo Jaya Agropalma, the statement to adhere company's policy stipulated in contractual agreement No. 004/BSP/JKTO-II/XII/2019-ATBS dated 2 December 2019. In the contract, has mentioned that the contractor shall adhere the PT BSP policy, such as minimum payment, insurance, and OHS/PPE provision to workers.</p> <p>Sample of payment has been verified, such as for Sunarto (ID 12066) in May 2022, has been paid amount of IDR 3,317,775 (above minimum payment).</p> <p>List of workers (100 workers) has been shown that all of them are permanent workers, and there is no child labor. Moreover, all workers also have been enrolled in National Health Insurance (BPJS <i>Kesehatan</i>) and National Employment Insurance (BPJS <i>Ketenagakerjaan</i>). The recent BPJS <i>Kesehatan</i> and BPJS <i>Ketenagakerjaan</i> have been paid on 10 May 2022 and 6 June 2022 respectively.</p>
8	<p>Feedbacks:</p> <p>Labor Union (SPSI)</p> <p>There is no negative issue related to employment (payment, contractual agreement, worker status) and OHS. The meeting with management has been conducted regularly. The company gave liberation for all worker to join union or let union to run its activities.</p> <p>Audit Team verification and response:</p> <p>There are no negative issues that need further verification. It has been verified and described that the company has complied the requirement such as recruitment (criterion 3.5), OHS (criterion 3.6), payment and work condition (criterion 6.2).</p>
9	<p>Feedbacks:</p> <p>Gender Committee</p> <p>The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. Have implemented regulations related to reproductive rights such as menstruation leave and childbirth. The new mother need analysis has been conducted by the company. There are no issues related to sexual harassment or reproduction rights violation.</p> <p>Audit Team verification and response:</p> <p>There are no negative issues that need further verification. Related no gender discrimination has been verified in Criterion 6.1</p> <p>Management has fulfilled new mother need by fulfilling:</p> <ul style="list-style-type: none"> - Clinic including company's doctor and paramedic, for getting regular check-up, consultation and giving birth. - Monthly 'Posyandu' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. - Maternity leave: 3 months including before and after giving birth in accordance with legal regulation. - Company's ambulance for emergency respond, to get to nearest hospital. - Daycare/crech.

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
None	-	-	-	-	-

Note : There are no previous land owner; The concession for plantation of PT. Bumi Sawit Permai was allocated from state land, there was no customary land.

Previous land owner / user comment

Feedbacks: -

Audit Team verification and response: -

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Bumi Sawit Permai- Bumi Sawit POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Bumi Sawit Permai- Bumi Sawit POM has is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Prastio Ramadhan	Name: Yahya Mustakim
Company Name: PT BSI Group Indonesia	Company Name: PT Bumi Sawit Permai
Title: RSPO Client Manager	Title: Head Of Sustainability Management System and Certification Operations Sustainability
Signature: 	Signature: 
Date: 1 July 2022	Date: 4 July 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -</p>	<p>Certificate holder has shown lists of stakeholders for the period of 2020, 2021 and 2022 arranged by category (government agencies, village, religious leaders/village community and business partners). List of stakeholders is well maintained and updated annually or if there any change by SPO Officer. The last update was performed in January 2022. Information available to stakeholder specified in the Information List for SMART’s stakeholder (F/SMART/UMUM /SADV/004/003) dated on 01 December 2020. List of the information available to the public and stakeholder as much as 15 type of documents, such as:</p> <ul style="list-style-type: none"> - Certificate / land use rights - AMDAL - RKL-RPL Report - Occupational health and safety plan - Social impact assessment - Identification and management of HCV - Environmental management plan - Human Rights policy - Public summary report from Certification body - Social procedure 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - Complaint and responses documents - Negotiation procedure 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on consultation with the stakeholders, review of Logbook of incoming mail and response, and review of mandatory report, it is known that the information provided to stakeholders delivered in Indonesian language. There is no migrant worker, and all surrounding communities understood Indonesian language.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Recording information requests can be seen in Logbook of Incoming and Outgoing Mail. From the Logbook review, there was no request for data/information from the stakeholders, therefore there was no response. However, the company regularly submitted the mandatory report to the related agency such as in aspect of plantation and land legality (HGU utilization report, plantation progress report), environmental (environmental license document implementation report, waste management report), OHS (employment report, OHS management report), that will be mentioned in related indicators.</p> <p>It has been verified mandatory report submission in the period of 2020, 2021, and 2022. The recent mandatory report submission as follows (note: the auditor mentioned only recent example, because the recent report will not approved by Agencies if the previous period report not reported yet):</p> <ul style="list-style-type: none"> - Plantation progress report (LPUP) period of Semester II of 2021 has been sent to Plantation Agency on 03 June 2022. - HGU usage annual report of 2021 has been sent to Land Agency on 03 June 2022 - Environmental Management and Monitoring Report of Semester II of 2021 has been sent on 18 February 2022. - Waste-Water Monitoring Report of Semester II of 2021 has been sent on 18 February 2022. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>- Quarterly Report of OHS Committee (P2K3) Quarter I of 2022 has been sent to Employment Agency on 28 April 2022.</p>	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -</p>	<p>SOP to describe the process of information sharing/dissemination defined in Social communication procedures SOP Communication and Consultation Procedure No. SOP/SMART/UMUM/SADV/I/04 dated 1 July 2014. Consultation and communication with stakeholders conducted by collecting community leaders, village heads and local community or visiting the office/the village hall to meet with the village head, village officials and community. The response to requests for information by the above procedure is at least 30 days or 4 weeks. Procedures and a list of information available in Indonesian and easily understood.</p> <p>Documents available to the public and stakeholder can be provided to stakeholders according to their relevance through a written request to the organization. Information provided to the public and stakeholder was disseminated to the stakeholder together with social procedure (Information request and response procedure, environmental complain handling, land conflict resolution procedure, and social communication procedure).</p> <p>Organization has assigned Public Relations (Mr. Yusik Mardianto) to be responsible for providing and updating information and stakeholder, according the letter of appointment from RC Sumsel 1 dated 30 November 2017 regarding Designation as Social PIC. Responsibility and function were described in Humas/Manager Estate & Mill job description.</p> <p>The dissemination of communication procedure to worker has been conducted in period of April 2022 for all workers in Mill and all Estate's Division.</p> <p>Based on interview with workers, contractors, governmental agencies, the stakeholders aware of the type of information available and the procedures for accessing the information based on regular oral dissemination from Public Relation Staff in the formal or informal</p>	<p>Complied</p>

		meeting. All stakeholders know and understand how they should ask for information to the organization and how to communicate with the organization. Moreover, even though not requested, the company regularly sent mandatory report in Indonesian language.	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	The company has a List of stakeholders updated in January 2022 by Public Relation, which includes 9 types of stakeholders i.e: <ul style="list-style-type: none"> - Statutory bodies (Rambang Kuang Subdistrict Administration, Ogan Ilir Regency Office, including the National Land Agency, etc.) - Indigenous people - Local Communities; i.e: Tanjung Miring Village Administration, Kayu Ara Village, Sukananti Village etc.) - Worker Organizations; i.e: Laor Union - Independent smallholder: there is no independent smallholder scheme at PT BSP. - FFB Supplier; i.e: Rezeki Raya Sejahtera, Putra Tunggal Mulia Sawit, Anggi Dwi Mahendra Mirzata and LPG Tani - Local NGOs; i.e: there is no local NGOs - National NGOs; i.e; The Forest Trust (TFT) - Other Stakeholders; i.e: FFB transport contractors, infrastructure contractors, financial institutions (banks), police etc. 	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	PT. Bumi Sawit Permai referring to "Kebijakan Bisnis dan Hak Asasi Manusi Golden Agri Resources" signed by Head of PCDV, June 2021. Point 10 stated "Mematuhi ketentuan hukum mengenai pencegahan praktik suap dan korupsi" – to comply with laws related to prevention of bribery and corruption.	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

<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"> - Minor compliance - 	<p>PT. Bumi Sawit Permai has communicated the policy on code of ethical conduct to worker:</p> <ul style="list-style-type: none"> - 16 Harvester and Loose Fruit Collector Division VII; 23 Upkeep workers Division VII dated 15 September 2020 - 8 Upkeep workers including sprayer Division I dated 15 September 2020. Audit team interviewed sample upkeep worker in Division I and they understood. - 15 Upkeep workers in Division IV dated 19 September 2021. - 18 Harvesters and Loose Fruit Collector Division II dated 19 August 2021. <p>PT. Bumi Sawit Permai carried out internal audit against RSPO P&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"> - Company carried out internal audit year 2020 on 4-14 May 2020, for indicator 1.2.2 contractor compliance CV Sukses Arta Mulia evident. - Company carried out internal audit year 2021 on 15-21 March 2021, for indicator 1.2.2 contractor compliance PT SJA evident. - Company carried out internal audit year 2022 on 21-25 February 2022, for indicator 1.2.2 contractor compliance FFB supplier Putra Tunggal Mulia evident. <p>Sampled ontime payment to contractor/FFB transporter:</p> <ul style="list-style-type: none"> - Minutes of work handover FFB transport "Berita Acara Serah Terima TBS PT. Satrindo Jaya Agropalma", period ends 20 April 2022. - Payment Order and payment reference No.0078SJALBSWT0422, transfer payment made on "payment reference No.0078SJALBSWT0422" dated 10 May 2022 for Rp.26x,xxx,xxx. 	<p>Complied</p>
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>PT. Bumi Sawit Permai demonstrate control through sampled PT. Satrindo Jaya Agropalma made levy payment for worker's social insurance BPJS period of May 2022 of Rp.31,xxx,xxx.</p> <p>PT. Bumi Sawit Permai demonstrate control through review of worker list PT. Satrindo Jaya Agropalma period January 2021 and January 2022, none of the worker under 18 years old.</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Plantation permit "Keputusan Gubernur Sumatera Selatan No.172/KPTS/DISBUN/2008 tentang Pemberian Izin Usaha Perkebunan (IUP) Atas Nama PT. Bumi Sawit Permai" dated 18 March 2008. Area of permit for oil palm plantation 10,079.90 Ha; mill capacity 30 tons FFB/hour. - Land Title/HGU see 4.4.1 - Tax payer number PT. Bumi Sawit Permai No.01.451.387.3-312.001. - Payment of lands and building tax 2021: "Bukti Penerimaan Negara" payment from PT. Bumi Sawit Permai date 13 October 2021 of Rp.1,6xx,xxx,xxx. - Payment of lands and building tax 2020: "Bukti Penerimaan Negara" payment from PT. Bumi Sawit Permai date 15 May 2021 of Rp.1,63x,xxx,xxx. 	Complied
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. - Minor compliance -</p>	<p>PT. Bumi Sawit Permai 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>	Complied

		<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".</p> <p>Evaluation and review in 2019, Ex: Peraturan Menteri Energi Sumber Daya Mineral No.12 tahun 2019 tentang Kapasitas Pembangkit Tenaga Listrik untuk Kepentingan Sendiri yang Dilaksanakan Berdasarkan Izin Operasi – Ministry regulation on Electric Generating Machinery. Comply through application of "Izin Operasi" through letter "Surat PT. Bumi Sawit Permai No.159/BSP/V/2022; Perihal Permohonan Penyediaan Tenaga Listrik untuk Kepentingan Sendiri", dated 30 May 2022. The existing permit "Surat Keterangan Laporan S.D 500KW untuk PT. Bumi Sawit Permai No.671/39/DESDM/VI-2/2022" dated 10 June 2022.</p> <p>Evaluation and review in 2020, Ex: "Peraturan Menteri Tenaga Kerja No.8 Tahun 2020 tentang K3 Pesawat Angkat Angkut" – Ministry regulation on lift and carry tools. Comply through "Riksa Uji Pengujian Pesawat Angkat-Angkut Traktor Grabber No.1128/K3-PAA/Nakertrans/2017" dated October 2021.</p> <p>"Undang-undang No.11 Tahun 2020 tentang Cipta Kerja" – Laws on Omnibus Law. Comply through "Perjanjian Kerja Bersama".</p> <p>Evaluation and review in 2021, Ex: "Peraturan Pemerintah Republik Indonesia No.36 tahun 2021 tentang Upah Minimum" – Government Regulation on Minimum Wage. Comply through management decree on wage scale and structure "Surat Keputusan No.013/CEO_PSM_2/HR_PSM_2/01/2022 tentang Strukur dan Skala Upah Pekerja Tetap PT. Bumi Sawit Permai Region Sumsel I Tahun 2022" dated 17 January 2022 refers to "Keputusan Gubernur Sumatera Selatan No.746/KPTS/Disnakertrans/2021 tentang Upah Minimum</p>	
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		<p>Provinsi Sumatera Selatan Tahun 2022”, dated 18 November 2021. The wage scale meet regulation of Rp.3,144,446 per month.</p> <p>“Peraturan Menteri Lingkungan Hidup dan Kehutanan No.11 tahun 2021 tentang Baku Mutu Emisi Mesin dengan Pembakaran Dalam” – Ministry regulation on emission level for internal combustion machine. Comply through emission test period 2019-2022, all meet emission level.</p> <p>To ensure update with relevant parties/regulatory body, PIC listed in form “Daftar Kontak Person Updating Peraturan dan Persyaratan Lainnya”, Contact person list consist of 10 organization: “Dinas Perkebunan dan Kehutanan Kabupaten Ogan Ilir, Dinas Lingkungan Hidup dan Pertanahan Kabupaten Ogan Ilir, Dinas Transmigrasi dan Tenaga Kerja Kabupaten Ogan Ilir, Dinas Lingkungan Hidup Provinsi Sumatera Selatan, Dinas Perkebunan Provinsi Sumatera Selatan, Badan Pertanahan Nasional Kabupaten Ogan Ilir, Kementerian Lingkungan Hidup dan Kehutanan, Kementerian Pertanian RI, Kementerian Tenaga Kerja RI, ELMS”. Latest update 14 February 2022.</p>	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

<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 Sawit Permai performs monitoring of the HGU boundary stones. Total 130 HGU boundary stones in Bumi Sawit Estate monitored every 3 months.</p> <p>Audit team checked the Bumi Sawit Estate HGU boundary onsite vs HGU map, "Peta Posisi Patok PT. Bumi Sawit Permai" scale 1:60,000:</p> <ul style="list-style-type: none"> - HGU No.12 (3° 30' 15.45"S & 104° 21' 00.00"E) Division I, block F3. Condition good, neighbouring with local community plantation. - HGU No.171 (3° 31' 35.15"S & 104° 20' 4.80"E) Division II, block D12. Condition good, neighbouring with local community plantation. - HGU No.100 (3° 30' 51.75"S & 104° 19' 24.21"E) Division I, block C7. Condition good, neighbouring with local community plantation. <p>Audit team reviewed the program and implementation of HGU boundary stone maintenance/upkeep record period January 2019 – May 2022.</p> <table border="1" data-bbox="1131 837 1975 1391"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>47 HGU boundary stones. Ex: BSP101, BSP100</td> <td>47 HGU boundary stones. Ex: BSP99, BSP98</td> <td>47 HGU boundary stones. Ex: AG11, AG12</td> <td>47 HGU boundary stones. Ex: AG13, AG72</td> </tr> <tr> <td>February</td> <td>83 HGU boundary stones. Ex: AGR14, AGR15</td> <td>83 HGU boundary stones. Ex: AGR16, AGR17</td> <td>83 HGU boundary stones. Ex: AGR18, BPN19</td> <td>83 HGU boundary stones. Ex: BPN20, BPN21</td> </tr> <tr> <td>April</td> <td>47 HGU boundary stones. Ex:</td> <td>47 HGU boundary stones. Ex:</td> <td>47 HGU boundary stones. Ex:</td> <td>47 HGU boundary stones. Ex: AG83,AG84</td> </tr> </tbody> </table>		2019	2020	2021	2022	January	47 HGU boundary stones. Ex: BSP101, BSP100	47 HGU boundary stones. Ex: BSP99, BSP98	47 HGU boundary stones. Ex: AG11, AG12	47 HGU boundary stones. Ex: AG13, AG72	February	83 HGU boundary stones. Ex: AGR14, AGR15	83 HGU boundary stones. Ex: AGR16, AGR17	83 HGU boundary stones. Ex: AGR18, BPN19	83 HGU boundary stones. Ex: BPN20, BPN21	April	47 HGU boundary stones. Ex: AG83,AG84	<p>Complied</p>			
	2019	2020	2021	2022																			
January	47 HGU boundary stones. Ex: BSP101, BSP100	47 HGU boundary stones. Ex: BSP99, BSP98	47 HGU boundary stones. Ex: AG11, AG12	47 HGU boundary stones. Ex: AG13, AG72																			
February	83 HGU boundary stones. Ex: AGR14, AGR15	83 HGU boundary stones. Ex: AGR16, AGR17	83 HGU boundary stones. Ex: AGR18, BPN19	83 HGU boundary stones. Ex: BPN20, BPN21																			
April	47 HGU boundary stones. Ex:	47 HGU boundary stones. Ex:	47 HGU boundary stones. Ex:	47 HGU boundary stones. Ex: AG83,AG84																			

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

			AG71, AG70	AG69, AG68	AG67, AG66	
	May	83 HGU boundary stones. Ex: BPN22, BPN23	83 HGU boundary stones. Ex: BPN24, BPN25	83 HGU boundary stones. Ex: BPN26, BPN27	83 HGU boundary stones. Ex: BPN28, BPN29	
	July	47 HGU boundary stones. Ex: AG85, AG86	47 HGU boundary stones. Ex: AG87, AG56	47 HGU boundary stones. Ex: AG58, AG89	Not yet	
	August	83 HGU boundary stones. Ex: BPN30, BPN31	83 HGU boundary stones. Ex: BPN32, BPN33	83 HGU boundary stones. Ex: BPN34, BPN35	Not yet	
	October	47 HGU boundary stones. Ex: AG48, AG50	47 HGU boundary stones. Ex: AG47, AG92	47 HGU boundary stones. Ex: AG94, AG96	Not yet	
	November	83 HGU boundary stones. Ex: BPN38, BPN39	83 HGU boundary stones. Ex: BPN40, BPN41	83 HGU boundary stones. Ex: BPN42, BPN43	Not yet	

Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

<p>2.2.1</p>	<p>A list of contracted parties is available. - Minor compliance -</p>	<p>The company has a list of contractors and is well maintained in the format of Monitoring of Contractual Agreement of Manufacturing and Payment. The contracted parties were FFB Suppliers and FFB transporter, while for CPO & PK transporter are conducted by the buyers themselves.</p> <p>In 2020 and 2021, there are 1 contractor of FFB transporter (PT Satrindo Jaya Agropalma) and 4 contractors of FFB Suppliers. The monitoring variable covers job type, job period, job progress as well as BAP status/payment of contract.</p> <p>In 2022, there is 1 contractor of FFB transporter (PT Satrindo Jaya Agropalma) and 1 contractor of FFB Suppliers (CV Anugerah Agung Amanah). The monitoring variable covers job type, job period, job progress as well as BAP status/payment of contract.</p> <p>For FFB transporter on behalf of PT Satrindo Jaya Agropalma, the statement to adhere company's policy stipulated in contractual agreement No. 004/BSP/JKTO-II/XII/2019-ATBS dated 2 December 2019.</p>	<p>Complied</p>
<p>2.2.2</p>	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party. - Minor compliance -</p>	<p>All contracts or statement letters has contained specific clause on meeting relevant legal requirements as follows:</p> <p>FFB Supplier</p> <p>The four FFB suppliers in the period of 2020 - 2022 have signed a statement letter related to the implementation of company policies:</p> <ul style="list-style-type: none"> - Statement Letter of Supplier on behalf of Anugerah Agung Amanah dated 24 March 2020 - Statement Letter of Supplier on behalf of Anggi Dwi Mahendra Mirzatan, dated 24 March 2020 - Statemement Letter of Supplier on Behalf of CV LPG Tani namely M. 	<p>Complied</p>

		<p>Toyib, dated 1 August 2020</p> <ul style="list-style-type: none"> - Statement Letter of Supplier on Behalf of PT Putra Tunggal Mulia Sawit namely Muhammad Azlizar, dated 15 January 2020 - Statement Letter of Supplier on behalf of CV Rejeki Raya Sejahtera namely Hendrik Sutanto, dated 11 January 2019. <p>FFB Transporter</p> <p>For FFB transporter on behalf of PT Satrindo Jaya Agropalma, the statement to adhere company's policy stipulated in contractual agreement No. 004/BSP/JKTO-II/XII/2019-ATBS dated 2 December 2019. In the contract, has mentioned that the contractor shall adhere the PT BSP policy, such as minimum payment, insurance, and OHS/PPE provision to workers. Moreover, commitment to adhere legal compliance also stipulated in Statement Letter of PT Satrindo Jaya Agrotama dated 01 February 2021.</p> <p>Sample of payment has been verified, such as for Sunarto (ID 12066) in May 2022, has been paid amount of IDR 3,317,775 (above minimum payment).</p> <p>List of workers (100 workers) has been shown that all of them are permanent workers, and there is no child labour.</p> <p>Moreover, all workers also have been enrolled in National Health Insurance (BPJS <i>Kesehatan</i>) and National Employment Insurance (BPJS <i>Ketenagakerjaan</i>). The recent BPJS <i>Kesehatan</i> and BPJS <i>Ketenagakerjaan</i> have been paid on 10 May 2022 and 6 June 2022 respectively.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>In all contractual agreements and Statement Letter mentioned in Indicator 2.2.2, have mentioned that the contractor shall adhere the PT BSP policy and national requirements, including prohibition of child, trafficked and forced labour. It has been verified based on the list of</p>	Complied

		workers, sample of contractual agreements, and interview in the field, that there is no child, forced and trafficked labour employed by the contractors.	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>Bumi Sawit POM implemented mass balance module. Mill received FFB from certified and uncertified sources. The list of FFB supplier as follows:</p> <p>2022 :</p> <ol style="list-style-type: none"> a. Bumi Sawit Estate (certified) b. Bumi Sawit Estate (non-certified area) c. PT. Anugrah Agung Amanah (PAAX) ; third party/non-certified; coordinate 03° 45' 43.15" S and 103° 90' 34.12" E; SHM certificate was sighted and reviewed. <p>2021</p> <ol style="list-style-type: none"> a. Bumi Sawit Estate (certified) b. Bumi Sawit Estate (non-certified area) c. PT. Sawit Mas Sejahtera (RSPO certified; in the same group with PT. Bumi Sawit Permai; HGU and IUP) d. PT. Putra Tunggal Mulia Sawit (PTMX); third party/non-certified; coordinate 03° 72' 59.33" S and 105° 33' 89.41" E; SHM certificate was sighted and reviewed. e. PT. Anggi Dwi Mahendra Mirzata (ADMX); third party/non-certified; coordinate 03° 18' 05.26" S and 104° 55' 83.62" E; SHM certificate <p>2020</p> <ol style="list-style-type: none"> a. Bumi Sawit Estate (certified) b. Bumi Sawit Estate (non-certified area) 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>c. PT. Rejeki Raya Sejahtera (RRSX); non-certified; HGU and IUP</p> <p>d. PT. Putra Tunggal Mulia Sawit (PTMX); third party/non-certified; coordinate 03° 72' 59.33" S and 105° 33' 89.41" E; SHM certificate</p> <p>e. PT. Anggi Dwi Mahendra Mirzata (ADMX); third party/non-certified; coordinate 03° 18' 05.26" S and 104° 55' 83.62" E; SHM certificate.</p> <p>f. LPG Tani (LPGX); third party/non-certified; coordinate 03° 28' 05.4" S and 103° 52' 12.3" E; SHM certificate</p> <p>All third parties FFB suppliers has signed a Statement Letter which one of the clause is about tracebility of FBB</p> <p>Article (4):</p> <ul style="list-style-type: none"> • FFB sold to PT. BSP are come from area that: <ul style="list-style-type: none"> - Has received all permit regarding acquisition of land and plantations business from the authorities. - Cultivated areas are in accordance with applicable law and regulation in Republic of Indonesia and not obtained illegally. <p>Details of FFB Supplier stated in document "<i>Data Supplier TBS Bumi Sawit Mill 2022</i>" dated 6 June 2022 ; "<i>Data Supplier TBS Bumi Sawit Mill 2021</i>" dated 5 Januari 2021 ; "<i>Data Supplier TBS Bumi Sawit Mill 2020</i>" dated 23 September 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>There no FFB from indirectly source. Details in 2.3.1</p>	<p>Complied</p>
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			

Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai has a long-term management plan in document “ <i>Analisa Kelayakan Ekonomi 5 tahun PT. Bumi Sawit Permai Tahun 2022 – 2026</i>” dated 2 June 2022. The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) • Replanting 	Complied
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 organization have procedure for replanting stated in SOP/SMART/MCAR/VI/TA-RPL (Replanting). Replanting normally necessary for plant in the age around 25 years, but can be >25 years due to productivity consideration.</p> <p>The organization has a replanting program and included in long-term management plan 2022 – 2026. Details are :</p> <ul style="list-style-type: none"> • Year 2022 = 0 Ha • Year 2023 = 271.00 Ha • Year 2024 = 1,176.00 Ha • Year 2025 = 1,954.00 Ha • Year 2026 = 1,678.00 Ha 	Complied
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p>	<p>The organizations has held management review in each year, such as :</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>- Minor compliance -</p>	<p>a. Management review Bumi Sawit Mill dated 18 March 2022 and Bumi Sawit Estate dated 28 March 2022 discussed about RSPO, ISPO, ISCC, SMK3 and OIA results. Internal audit for RSPO was conducted in 21 – 25 February 2022. One of findings in internal audit was about the RaCP process still in process in RSPO.</p> <p>b. Management review Bumi Sawit Mill dated 10 May 2021 and Bumi Sawit Estate dated 11 May 2021 discussed about RSPO, ISPO, ISCC, SMK3 and OIA results. Internal audit for RSPO was conducted in 15 – 22 March 2021. One of findings in internal audit was about the RaCP process for land planted after 15 November 2018.</p> <p>c. Management review Bumi Sawit Mill and Bumi Sawit Estate dated 24 June 2020 discussed about RSPO, ISPO, ISCC, SMK3 and OIA results. Internal audit for RSPO was conducted in 4 – 14 May 2020. One of findings in internal audit was about AK3 Umum certificate has been expired and extension process still not done from 20 June 2019 until the date of internal audit.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuos improvement action plan in 2022 are :</p> <p>a. Using gadget and application e-Fact for monitoring of road maintenance. The plan still ongoing.</p> <p>b. Insecticide and fungicide application using new technology. The plan still ongoing.</p> <p>c. Conduct annual community perception management survey to get input from stakeholder about social impact. The plan still ongoing.</p> <p>d. Training and counselling to local FFB suppliers. The plan still ongoing.</p> <p>Continuos improvement action plan in 2021 are :</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> a. Using resin for gupon or Tyto alba cages. The plan has been implemented. b. Using gadget and application e-Fact for monitoring of pruning maintenance. The plan has been implemented. c. Using GAR Sustainability Information System for GHG data collection. The plan has been implemented. d. Conduct annual community perception management survey to get input from stakeholder about social impact. The plan has been implemented e. Training and counselling to local FFB suppliers. The plan has been implemented. <p>Continuos improvement action plan in 2020 are :</p> <ul style="list-style-type: none"> a. Modification replacement of disc clutch in tractor. The plan has been implemented. b. Pipe modification to replace hose in tractor. The plan has been implemented. c. Using GAR Sustainability Information System for Sustainability data collection. The plan has been implemented. d. Conduct annual community perception management survey to get input from stakeholder about social impact. The plan has been implemented e. Training and counselling to local FFB suppliers. The plan has been implemented. <p>For social and environment impact please refer to 3.4.2 and 3.4.3</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO Annual Communication of Progress 2020 of PT Bumi Sawit Permai has been available in RSPO website under membership number 1-0022-06-000-00. The report has been submitted on 4 June 2020.</p>	Complied

		The organization has filled the RSPO Metric Template Y2022 and Y2021 and has been reviewed by the auditor during audit.	
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has operational procedures for estate and mill as follows:</p> <p>Oil Palm Agronomy Procedure</p> <p>Procedure of Agronomy established by Management Committee Agronomy and Research (MCAR) on 12 June 2012, for example as follows:</p> <ul style="list-style-type: none"> • Procedure No. SOP/SMART/MCAR/I/TA-PPA about new planting. • Procedure No. SOP/SMART/MCAR/II/TA-PRP about replanting. • Procedure No. SOP/SMART/MCAR/III/TA-BBT about nursery. • Procedure No. SOP/SMART/MCAR/IV/TA-PLB about land preparation. • Procedure No. SOP/SMART/MCAR/V/TA-TNM about planting. • Procedure No. SOP Nomor SOP/SMART/MCAR/VI/TA-HPT replanting. • Procedure No. SOP/SMART/MCAR/VII/TA-TNM about integrated pest management. • Procedure No. SOP/SMART/MCAR/VIII/TA-PGM about weeding management. • Procedure No. SOP/SMART/MCAR/IX/TA-PPK about manuring. • Procedure No. SOP/SMART/MCAR/X/TA-PTB about field upkeep on immature area. • Procedure No. SOP No. SOP/SMART/MCAR/XI/TA-PMP about 	Complied

		<p>harvesting preparation.</p> <ul style="list-style-type: none"> • Procedure No. SOP No. SOP/SMART/MCAR/XIII/TA-PNN about harvesting. • Procedure No. SOP/SMART/MCAR/XIV/TA-PPT about FFB transportation and delivery. • Procedure No. SOP/SMART/MCAR/XV/TA-PCH about rainfall measurement. <p>Oil Palm Processing and Supply Chain</p> <p>Procedure of oil palm processing is presented in document procedure No. 04-09/MCMD-SOP/438 (Rev. 04) dated 01 September 2010. Procedure has covers technical mechanism in all processing Stations, i.e. Weighbridge, Sortation, Sterilization, Threshing, Press, Clarification, Sub Station Oil Recovery Tank, Nut and Kernel, Boiler, Engine Room, Water Treatment, Final Effluent and Storage Tank. Furthermore, there is also procedure No. PT TN-SMLM/SOP/07 dated 01 May 2012 about CPO and Kernel delivery, and procedure No. SOP/SMART/CERS-EHSD/SADV/I/001 dated 01 July 2014 about product identification and supply chain.</p> <p>Safety Aspect</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.</p>	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>The organization have mechanism to check implementation of procedures through annual Operational Internal Audit (OIA). Records was sighted, such as :</p> <ul style="list-style-type: none"> a. OIA Report April 2022 (9 – 24 April 2022), the issues found was about pruning rotation achievement below budget. b. OIA report April 2021 (16-20 April 2022), the issues found was about losses production due to lack of discipline from the harvester or foreman. c. OIA report July 2020 (21 – 23 July 2020), the issues found was about the harvesters and FFB loose-fruit pickers output under basis. 	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>The organization conducted monitoring of operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily.</p> <p>Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p>	Complied
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>Environment Impact Assessment</p> <p>Initial Environmental Impact Assessment documents (ANDAL, RKL and RPL) for Bumi Sawit Permai Mill and Estate were available. Documents of EIA, RKL and RPL were approved by Governor of South Sumatera Letter No.479/KPTS/BAPEDALDA/2007 on 25 July 2007.</p>	Complied

		<p>The EIA has been conducted by Pusat Penelitian Lingkungan Hidup Lembaga Penelitian Universitas Sriwijaya and documented in "<i>Analisa Dampak Lingkungan (ANDAL) Kegiatan Pengembangan Perkebunan Dan Pabrik Pengolahan Kelapa Sawit Di Kecamatan Rambang Kuang Kabupaten Ogan Ilir Dan Kecamatan Lubai Kabupaten Muara Enim Luas Kebun Inti 10,079.90 Ha, Luas Kebun Plasma 1,500 Ha, Kapasitas Pabrik 30 ton TBS/Jam 2007</i>".</p> <p>The documents (EIA, RKL and RPL) were established in according to local requirements and include consultation with relevant stakeholders to identify impact and to develop any mitigation measures. The result of consultation and the mitigation measures were stated at ANDAL Bumi Sawit Mill and Estates have ensured that all activities with significant environmental impacts were managed.</p> <p>Control measure were defined and implemented for ensuring that negative environmental impact was prevented or mitigated. The implementation of those control measures is monitored during monthly environmental patrol and round of internal audits. The evident sighted regarding stakeholder consultations include government and public as the minutes of meeting within the documented of RKL RPL.</p> <p>Document of environmental impact assessment covered:</p> <ul style="list-style-type: none"> • Water resources • Biological diversity • Air quality • Environment quality • Economic, social and culture • Building new roads, processing mills or other infrastructure; • Putting in drainage or irrigation systems; • Replanting and/or expansion of planting areas; 	
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		<ul style="list-style-type: none"> • Management of mill effluents; • Clearing of remaining natural vegetation; • Management of pests and diseases palms by controlled burning; • Result of stakeholder consultation <p>The company also have an Environmental Aspect and Impact Identification and Evaluation Form (F/SMART/LEMS-EHSD/SADV/001/001), updated annually. Records was sighted and reviewed :</p> <ol style="list-style-type: none"> a. Environmental aspect and impact identification and evaluation form updated on 9 January 2019 (Bumi Sawit mill) and 2 July 2019 (Bumi Sawit estate) b. Environmental aspect and impact identification and evaluation form updated on 11 January 2020 (Bumi Sawit mill) and 2 July 2020 (Bumi Sawit estate) c. Environmental aspect and impact identification and evaluation form updated on 5 May 2021 (Bumi Sawit mill) and 3 May 2021 (Bumi Sawit estate) d. Environmental aspect and impact identification and evaluation form updated on 12 January 2022 (Bumi Sawit mill) and 14 February 2022 (Bumi Sawit estate) <p><u>Social Impact Assessment :</u></p> <p>Social Impact Assessment (SIA) was conducted by internal parties (Department Sustainability) in year 2014, documented in SIA report. Process of SIA was described, and the findings documented in SIA Report, positive and negative impact. Assessment was conducted in villages such as Desa Kayu Ara, Desa Tambangan Rambang, Desa Gunung Raja, Desa Jiwa Baru, Desa Tanjung Miring, Desa Tangai.</p>	
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		<p>Evidence of participatory action from local communities was also sighted in related SIA documentation including photos. Some aspects were considered during assessment such as:</p> <ul style="list-style-type: none"> • Access and use rights, • Economic livelihoods and working conditions. • Subsistence activities, • Cultural and religious values, • Health and education facilities, • Other community values. <p>SIA was updated in the Social Monitoring Report 2019 by adding several aspects in accordance with RSPO INANI, as follows:</p> <ul style="list-style-type: none"> • Traditional or customary rights owned by the local community. • Welfare of workers/labour and women, children and vulnerable group • Contribution to the local development, including improvement of human resources, local and customary communities. 	
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>Social Environment management and monitoring plan document were available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document has been approved by Governor of South Sumatera Letter No.479/KPTS/BAPEDALDA/2007 on 25 July 2007 about <i>Rencana Pengelolaan Lingkungan (RKL) and Rencana Pemantauan Lingkungan (RPL) Kegiatan Pengembangan Perkebunan Dan Pabrik Pengolahan Kelapa Sawit Di Kecamatan Rambang Kuang Kabupaten Ogan Ilir Dan Kecamatan Lubai Kabupaten Muara Enim Luas Kebun Inti 10,079.90 Ha, Luas Kebun Plasma 1,500 Ha, Kapasitas Pabrik 30 ton TBS/Jam 2007</i>". Environmental management based on document, e.g:</p>	Complied

		<ul style="list-style-type: none"> • Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard muffler usage, reduce the vehicle speed in emplacement, road maintenance and signboard installation, OHS implementation in Palm Oil Mill. • Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling. • Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around waste water pond and maintenance of waste water pond, domestic and hazardous waste management. • Erosion and sedimentation management performed by creating and maintenance the individual terrace (tapak kuda) in area with slope 3 – 15% and maintain the land cover crop (Leguminosae), frond stacking and EFB application. • Flora fauna management perfomed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation enrichment in conservation area, wildlife protection and maintain the conservation area. 	
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		<ul style="list-style-type: none"> Community perception management performed in order to prevent and control the negative perception and potential conflict from community against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy were publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and conseling to plasma member, CSR programme implementation. <p>The reporting of RKL - RPL was conducted every semester that consist of analysis of wheel quality, noise quality, waste water quality and flow rate, surface water quality, the air emissions measured by third party, and social aspect. Documents of RKL RPL was sighted and reviewed such as :</p> <ol style="list-style-type: none"> RKL RPL PT Bumi Sawit Permai Period July – December 2021, reported to <i>Kementrian Lingkungan Hidup dan Kehutanan</i> on 14 January 2022 based on <i>Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK No. 1642158183-2046</i>. The report has been send also to Dinas Lingkungan Hidup Kabupaten Muara Enim and Dinas Lingkungan Hidup Kabupaten Ogan Ilir on 18 February 2022. RKL RPL PT Bumi Sawit Permai Period January - June 2021, reported to <i>Kementrian Lingkungan Hidup dan Kehutanan</i> on 1 July 2021 based on <i>Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK No. 1625112262-2046</i>. The report has been send also to Dinas Lingkungan Hidup Kabupaten Muara Enim and Dinas Lingkungan Hidup Kabupaten Ogan Ilir on 16 August 2021. RKL RPL PT Bumi Sawit Permai Period July – December 2020, reported to <i>Kementrian Lingkungan Hidup dan Kehutanan</i> on 30 December 2020 based on <i>Tanda terima Elektronik Sistem Informasi</i> 	
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		<p><i>Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK No. 1609318755-2046.</i> The report has been send also to Dinas Lingkungan Hidup Kabupaten Muara Enim and Dinas Lingkungan Hidup Kabupaten Ogan Ilir on 12 March 2021.</p> <p>d. RKL RPL PT Bumi Sawit Permai Period January - June 2020, reported to <i>Kementrian Lingkungan Hidup dan Kehutanan</i> on 29 May 2020 based on <i>Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK No. 1590749293-2046.</i> The report has been send also to Dinas Lingkungan Hidup Kabupaten Muara Enim and Dinas Lingkungan Hidup Kabupaten Ogan Ilir on 10 August 2020.</p> <p>e. RKL RPL PT Bumi Sawit Permai Period July – December 2019, reported to <i>Kementrian Lingkungan Hidup dan Kehutanan</i> on 3 January 2020 based on <i>Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK No. 1578049456-2046</i> The report has been send also to Dinas Lingkungan Hidup Kabupaten Muara Enim and Dinas Lingkungan Hidup Kabupaten Ogan Ilir on 12 May 2020.</p> <p><u>Social Impact Asssment</u></p> <p>In accordance to SOP <i>Pengelolaan dan Pemantauan Dampak Sosial</i> No SOP/SMART/SIGS-CSR/SADV/I/002 dated 1 July 2014, review of Social Impact Assessment conducted once in every 2 year. The last review was for period 2021, conducted on 27 December 2021 – 25 January 2022.</p> <p>There are five (5) villages in Kecamatan Rambang Kuang and two (2) villages in Kecamatan Lubai, taken as target or priority for social impact assessment.</p> <p>Aspect that being monitored are :</p> <ul style="list-style-type: none"> • Water quality • Manpower or labour recruitment 	
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		<ul style="list-style-type: none"> • FFB transportation causes dust • PSR program • Local communities development <p>Generally public perception was positive regarding the company presence and contribution to the surrounding community. Records of consultation such as attendance list, documentation/photos and list of questions has been reviewed.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Bumi Sawit Permai. All environment analysis in 2019 – now was conducted by PT. Mutu Agung Lestari Testing Laboratory, except for waste water quality and soil quality in land application. Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit :</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. • Air emission quality • Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. • Waste water quality monitoring analyse by UPTD Laboratorium Lingkungan Dinas Lingkungan Hidup dan Pertanahan Pemerintah Provinsi Sumatra Selatan. Waste water analysis result in period July 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>– December 2019; January – December 2020; January – December 2021; January – May 2022 shown comply with regulation KepMENLH No. 28 tahun 2003.</p> <ul style="list-style-type: none"> • Surface water quality test (upstream and downstream Rambang River and Lubai River). The analysis result in period July – December 2019; January – December 2020; January – December 2021; January – May 2022 shown comply with regulation PP RI No. 82/2001 (before 2021) and PP RI No. 22/2021. • Soil quality monitoring performed by soil sampling analysis in “rorak, antar rorak and lahan kontrol”. For period 2019 – 2021, the analysis was conducted by SEAMEO BIOTROP Services Laboratory. • Groundwater analysis conduct annually and the last result (6 October 2021) shown comply with the regulation Permenkers RI No 32/2017. • Erossion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result in periode 2019 – May 2022 shown erosion level average below 6 ton/ha/year categorized as very good criteria. • Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Monitoring result in period 2019 – 2021 shown that there were species of mammal presence (<i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i>, <i>Paradoxurus sp</i>), 13 species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i>, <i>Pycnonotus aurigaster</i>), 4 species of reptile (<i>Varanus salvator</i>, <i>fejevarya sp</i>, <i>Mabouya sp</i>, <i>Denrelaphis caudolineatus</i>). • Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. 	
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		<p>Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 13 December 2021 and 25 January 2022, questioner of public perception can be demonstrated and well documented in RKL-RPL report and in Social Impact Monitoring. Generally public perception was positive regarding the company presence and contribution to the surrounding community.</p> <p>All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity has been carried out and presented in RKL-RPL report semester I and II 2021.</p> <p>Evaluation consist of:</p> <ul style="list-style-type: none"> • Trend evaluation of air ambient quality, air emission, odor, ground water quality, wate water quality, surface water quality, soil erosion shown that the result of monitoring are all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall the trend evaluation shown the consistency and increasing in environmental performance. • Critical evaluation, the critical point in environmental monitoring is waste water quality and surface water usage. Based on the result of monitoring shown that waste water quality since January – December 	
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		<p>2021; and January – April 2022 was met with regulation (BOD < 5,000 mg/l and pH 6 – 9).</p> <ul style="list-style-type: none"> • Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Bumi Sawit Permai – Bumi Sawit POM has comply with all relevant regulation. • Public perception monitoring for 2021 has been carried out and there is no negative perception occurred. <p>Report of environmental analysis, such as:</p> <p>July – December 2019</p> <ul style="list-style-type: none"> • Mini-tractor mission, certificate No : 7575/ENV/X/2019 dated 4 November 2019 • Vibration, certificate No : 7610/ENV/X/19 dated 4 November 2019 <p>January – June 2020</p> <ul style="list-style-type: none"> • Noise, certificate No : 1420/SL/III/20 dated 13 March 2020 • Odor, certificate No : 1423/SL/III/20 dated 13 March 2020 <p>July – December 2020</p> <ul style="list-style-type: none"> • Boiler emission, certificate No : 5005/SL/IX/20 dated 13 October 2020 • Genset emission (Div 5 – 45KVA), certificate No : 5042/SL/IX/20 dated 13 October 2020 <p>January – June 2021</p>	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> • Surface water, certificate No : 1443/SL/III/21 dated 17 March 2021, location Sungai Lubai Hulu • Water biota, certificate No : 0600/MICRO/III/21 dated 15 March 2021 <p>July – December 2021</p> <ul style="list-style-type: none"> • Ambient quality (24 Hours), analysis certificate No : 9447/SL/IX/2021 dated 6 October 2021 • Waste water analysis, certificate No : 660/2125/SHU-LAB/XI/2021 dated 2 November 2021 	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>The company has recruitment procedures including promotion and retirement:</p> <p>Recruitment process</p> <p>Recruitment process has been set in SOP of Recruitment No. PSD A-004-00, dated 1 September 2005. Moreover, it also has been set in the Collective Labor Agreement (PKB) period of 2020 – 2022 Article 7.</p> <p>Employees who have been determined to pass the selection, will follow a probationary period of 3 months, and will be assessed for the appointment of permanent employees in accordance with Letter No. 178/EAS/HRD/09/00, September 1, 2000.</p> <p>Selection process</p> <p>Selection process has been arranged in Circulate Letter No 113/HR PSM2/05/2015 dated 1 April 2015, that inferred in the Position</p>	Complied

		<p>Description and Job Profile. Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness.</p> <p>Promotion and Career Development:</p> <p>Employee performance appraisal and career development refers to the Decree concerning Employee Career Development (No. 178/EAS/HRD/09/00, dated September 1, 2000). Parameters for promotion of groups and positions, among others, are related to years of service, minimum age for each position and class and assessment of superiors. Employee performance appraisal is conducted annually.</p> <p>The company has implemented an employee appraisal system in accordance with procedures, and appointed employees or their groups. The appointment documentation consists of an assessment form, email documentation of the application and approval of the appointment, as well as the appointment decree. For example, promotion of employee initials WN (NIK 18006) from an estate that was previously temporary worker (PKWT) and was appointed as permanent worker (PKWTT) Level PT4 according to the Manager's Decree dated February 13, 2021.</p> <p>Based on interview with Labor Union and Gender Committee, the procedure of recruitment, selection, promotion, and termination were regularly comminated to the worker of Labor Union/Gender Committee. All workers are treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has been evaluated by the organisation as described in criterion 2.1.</p>	
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	Sample of implementation of employment procedures has been verified as follows:	Complied

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<ul style="list-style-type: none"> - It was observed a recruitment in March 2020 for an upkeep worker at BSWE with the status temporary worker (PKWT - <i>Perjanjian Kerja Waktu Tertentu</i>), based on Appointment Letter No. 231/BSWE/03/2020 dated 02 March 2020. - Prospective workers on behalf of Alpa Rizie (date of birth: August 31, 1998/22 years) have submitted a job application letter on 25 March 2020. The application letter also attaches the necessary requirements including: photocopy of identity card (KTP), family card, Health Certificate No. 531/KBSP/SKS/03/2020 dated 25 March 2020 from the PT Bumi Sawit Permai Clinic on behalf of doctor Weston Ade Chandra, stated that he is physically fit and ready to do work. Then PT BSP issued temporary worker contractual agreement (<i>Perjanjian Kerja Waktu Tertentu</i> - PKWT) No. BSWE/PKWT/04/2020/001 dated 1 April 2020. Recruitment process was in accordance with the company procedure. - Contractual Agreement of Temporary Worker. e.g. No. 004/BSWM/PKWT-A2/007/2001 dated 13 July 2021, for the role of water intake operator. The new PKWT worker of 2021 has been reported to Manpower Agency dated 28 July 2021. This new PKWT reporting is accordance with the Act No. 13 of 2003 related employment. - Promotion Letter No. 001/EM-BSWE/SK/BSWE/06/2022 dated 1 June 2022 on behalf of initial HU with ID 18002, promoted from grade PT 4A to PT 4B. <p>In 2020, there were 10 workers promoted to the higher grader, while in 2021 there were 15 workers promoted to the higher grader. Meanwhile, to month May 2022, the workers promotion is being process in the phase of assessment.</p> <p>In the period of 2020 until 2022, there is no appointment of permanent worker.</p>	
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Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.		
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Sawit Permai has established the occupational Health and Safety Policy dated 1 November 2013. The content of policy includes risk mitigation (Hazard Identification and Risk Assessment Control was established for all workplace activities both in estates and mill), regulation compliance and continual improvement. The policy was displayed at strategic locations of estate and mill and communicated to employees including contractor workers; the records of socialization were also evident.</p> <p>PT Bumi Sawit Permai has also prepared the procedure to identify and prepare a risk assessment under SOP of Hazard identification and Risk Assessment No. SOP/SMART/HESS-EHSD/SADV/I/02. Then the OHS Officer will arrange the ISBPR that reviewed annually.</p> <p>ISBPR of 2020, 2021, and 2022 for Estate and Mill have been observed. The hazard identification has covered all activities in the Estate and Mill, among other land clearing, manuring, harvesting, road maintenance, FFB transport, IPM activities, weighbridge, grading station, sterilizer station, pressing station, engine room, boiler, dispatch of CPO. All working risks have been identified and mitigated, such as by giving regular training, increasing supervision, PPE provision, and regular medical check-up.</p> <p>The Company has also prepared the procedure to identify and prepare a risk assessment under SOP of Hazard identification and Risk Assessment No. SOP/SMART/HESS-EHSD/SADV/I/02. Then the OHS Officer will arrange the ISBPR that reviewed annually.</p> <p>Several Procedure to mitigate the risk and hazard has been develop by company:</p> <ul style="list-style-type: none"> - SOP/SMART/HESS-EHSD/SADV/I/002 Hazard identification and risk

Complied

		<p>assessment.</p> <ul style="list-style-type: none"> - SOP/SMART/UMUM/SADV/I/005 dated 1 July 2014 regarding - SOP/SMART/HESS-EHSD/SADV/I/015 Safe work permit. - SOP/SMART/SMART/LH-19 Lock out tag out (LOTO). - SOP/SMART/HESS-EHSD/SADV/I/005 Work accident and illness handling. - SOP/SMART/HESS-EHSD/SADV/I/010 PPE Management. - SOP/SMART/HESS-EHSD/SADV/I/011 First aid. <p>Based on field observation and interview with workers and Labor Union, the HIRAC has been implemented in the field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE. One of the improvements of to reduce risk is by build specific storage for harvesting pole and sickle in every housing area. The harvesters are prohibited to store their sickle in the house.</p> <p>The company has also prepared the mitigation plans and procedures are documented and implemented in the OHS Annual Program for mill and estate, where evidence and the records and monitoring form were maintained. Several programs intended to improve OHS performance among others:</p> <ul style="list-style-type: none"> - OHS Meeting - Safety trainings, - Safety inspection, - Safety parameters monitoring, - Medical Check-up - Handling of incidents, 	
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		<ul style="list-style-type: none"> - Emergency simulation, - Fire-fighting tools monitoring - Safety report, - Safety committee meeting 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The effectiveness of the OHS Program to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none"> - Monthly OHS Committee meeting, to discuss and address current OHS issues. The recent meeting conducted on 27 May 2022 discussed the preparation of fire-fighting tools due to dry season preparation. - Documentation of accident record and the calculation of LTA. - Trimester OHS Report, that has been submitted regularly to Labor Agency. - Annual review of HIRAC. - Annual Review of OHS Program. 	Complied
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Certificate holder has had an annual training program in each unit based on training need analysis matrix that submitted by SPO Officer (refer to document F/SMART/UMUM/SADV/003/001). Those programs covered training for internal employee, contractors, governmental, women-specific need.</p> <p>The auditor has verified company’s annual training program of 2020, 2021, and 2022. Based on verification, these programs comprise of:</p> <p>Mill Training</p>	Complied

		<ul style="list-style-type: none"> • First aider training • Environmental training and PROPER compliance • Hydrant usage training • Mandatory training <p>Simulation:</p> <ul style="list-style-type: none"> • Firefighting simulation • Hazardous waste spill out simulation • Earthquake simulation • Riot handling simulation <p>Dissemination</p> <ul style="list-style-type: none"> • Dissemination of company’s policy • Dissemination of material safety data sheet • Dissemination of company SOP’s • Dissemination of PPE usage • Dissemination of emergency response • Dissemination of HCV • Dissemination of complaint handling procedure • Dissemination of gender policy • Dissemination of sustainability palm oil certification scheme implementation • Dissemination of OHS policy • Dissemination of zero child worker • Dissemination of equality in carrier • Dissemination of hazardous waste handling and contaminated 	
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		<p>packaging.</p> <p>Estate</p> <p>Training</p> <ul style="list-style-type: none"> • First aider training • Environmental training and PROPER compliance • LSU/SSU training • Integrated pest management • Chemical weeding • Manuring • HCV management training • Mandatory training <p>Simulation:</p> <ul style="list-style-type: none"> • Firefighting simulation in housing complex and land • Hazardous waste spill out simulation • Earthquake simulation • Riot handling simulation <p>Dissemination</p> <ul style="list-style-type: none"> • Dissemination of company's policy • Dissemination of material safety data sheet • Dissemination of company SOP's • Dissemination of PPE usage 	
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		<ul style="list-style-type: none"> • Dissemination of emergency response • Dissemination of HCV • Dissemination of complaint handling procedure • Dissemination of gender policy • Dissemination of sustainability palm oil certification scheme implementation • Dissemination of OHS policy • Dissemination of zero child worker • Dissemination of equality in carrier • Dissemination of hazardous waste handling and contaminated packaging 	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The company has recorded the internal and external/mandatory training from 2020 until May 2022:</p> <ul style="list-style-type: none"> - Mandatory Training of Welding Operator (2 persons) based on license dated 15 February 2020. - Mandatory Training of Fire Fighting Team (4 persons) based on certificate dated 17 February 2020. - Mandatory Training of Lifting Tools Operator (1 person) based on license dated 30 March 2020. - Mandatory Training of Steam/Boiler Operator (2 persons) based on license dated 25 April 2020. - Mandatory Training of OHS Expert in Limited Space (<i>K3 ruang terbatas</i>) (2 persons) based on license dated 17 June 2020. - Mandatory Training of Fire Fighting Team (5 persons) based on certificate dated 14 October 2020. - Mandatory Training of Environmental Sampling Operator (1 person) dated 11 December 2020. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - Mandatory Training of Genset Operator (1 person) based on license dated 24 December 2020. - Mandatory Training of First Aid in Accident (1 person) based on certificate dated 15 February 2021. - Training of OHS on 24 April 2021. - Training of RSPO P&C on 18 August 2021. - Training of Covid 19 Prevention on 30 August 2021. - Mandatory Training of Lifting Tools Operator (2 person) based on license dated 15 November 2021. - Training of IPM on 15 November 2021. - Training of Leaf Sampling Unit on 11 January 2022. - Mandatory Training of OHS Expert (<i>AK3 Umum</i>) (1 person) based on license dated 7 February 2022. - Training of Hazardous Waste Management and GHG on 16 March 2022. - Training of Safe Working Practice on 22 March 2022. - Training of Hazardous Waste Management on 31 August 2021. - Training of RSPO P&C on 29 April 2022. - Training of Reproduction Right, Sexual Harassment, and Grievance Mechanism on 9 May 2022. <p>Training for stakeholder (surrounding village head) and supplier concerning FPIC, social impact assessment, social impact management, corporate responsibility, grievance, traceability, HCV, land burning prohibition, business ethic, RSPO general standard conducted on 23 November 2020 and 16 December 2021, while for 2022 will be conducted in the end year. Training for FFB, CPO and PK transporter driver and attendance (contrantor) has been conducted on 5 April 2022.</p>	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>Training program RSPO SCCS</p> <ul style="list-style-type: none"> - Program Training Tahun 2021; Refresh Training Sustainable Palm Oil – ICSCC, RSPO, RSPO SCCS, ISPO, CCP planned on June 2020 – implemented. - Program Training Tahun 2021; Refresh Training Sustainable Palm Oil – ICSCC, RSPO, RSPO SCCS, ISPO, CCP planned on April 2021 – implemented. - Program Training Tahun 2022; Refresh Training Sustainable Palm Oil – ICSCC, RSPO, RSPO SCCS, ISPO, CCP planned on October 2022. <p>Training record for RSPO SCCS:</p> <ul style="list-style-type: none"> - Minutes of Training “Berita Acara Refresh Training Sertifikasi ISPO, RSPO SCCS 2020 & Traceability kepada Karyawan Critical Control Point”, 15 June 2020. Training attended by 8 personnel: Manager, SPO officer, staff, laboratory attendant. - Minutes of Training “Berita Acara Refresh Training Sertifikasi ISPO, RSPO SCCS 2020 & Traceability kepada Karyawan Critical Control Point”, 17 June 2020. Training attended by 12 personnel: weighbridge attendant, grading personnel, security, processing assistant, warehouse attendant, dispatch operator. - Minutes of Training “Berita Acara Refresh Training Sertifikasi ISPO, RSPO SCCS 2020 & Traceability kepada Karyawan Critical Control Point”, 12 April 2021. Training attended by 8 personnel: manager, assistant, administrative clerk. - Sample personnel record (interviewed during onsite visit): Jeki Susanto – Dispatch Operator, has joined training “Petugas Penguji Bejana Tekan dan Tangki Timbun” – tank calibration training, 28 May 2019; “Refresh Training RSPO SCCS”, 17 June 2020; “Refresh Training RSPO SCCS”, 18 April 2021; 	<p>Complied</p>
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		- Sample personnel record (interviewed during onsite visit): Ender – Assistant, has joined training “Refresh Training RSPO SCCS”, 15 June 2020; “Refresh Training RSPO SCCS”, 12 April 2021;	
Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	PT. Bumi Sawit Permai – Bumi Sawit POM is not implementing RSPO SCCS – Identity Preserved Module because receiving and processing non-certified FFB. Not applicable.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	PT. Bumi Sawit Permai – Bumi Sawit POM is implementing RSPO SCCS – Mass Balance Module because receiving and processing non-certified FFB. CH is maintaining Mass Balance spreadsheet to monitor receipt, process and sales of RSPO certified and non-certified product. Bumi Sawit POM only claim proportion of oil palm products produced from processing certified FFB. The RSPO SCCS module stipulated under the SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08, dated 24 March 2022.	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>PT. Bumi Sawit Permai reported the quota in the last RSPO P&C public summary report with FFB 87,580.93 MT.</p> <p>In PalmTrace, PT. Bumi Sawit Permai – Bumi Sawit POM license indicate the production from the last RSPO P&C public summary report, certificate and volume extensions.</p> <p>FFB 206,777.28 MT; CPO 41,113.29 MT; PK 12,529.50 MT;</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM registering and reporting the FFB production (for standard 12 months), certified CPO and PK production, certified CPO and PK sales through PalmTrace account. RSPO IT account PT. Bumi Sawit Permai – Bumi Sawit POM No.RSPO_PO1000001611, license active until 8 July 2022.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. 	<p>SOP RSPO SCCS</p> <ul style="list-style-type: none"> a) PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08”, dated 24 March 2022. The procedure consist of scope of procedure; roles and responsibilities; working steps from receiving to product dispatch; processing; production monitoring; three-monthly report; transaction registration; document control; b) PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08”, dated 24 March 2022. Section 7 “Dokumentasi” explains the requirement for overall process reporting documentation and record which referring to corporate procedure “SOP Pengendalian Dokumen dan Rekaman No.SOP/SMART/UMUM/SADV/I/001”. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>c) PIC for RSPO SCCS implementation in Bumi Sawit POM is Kepala Tata Usaha (Traceability Officer). Job description: create CPO delivery from POM to buyer; summarize data on CPO delivery to buyer; update contractor and supplier database; prepare certified product report every 3 months. Appointment letter: "Surat Keputusan No.003/FM-BSWM/III/2020 tentang Penunjukan Traceability Officer PT. Bumi Sawit Permai – Bumi Sawit Mill", dated 10 March 2020 for Mr. Sasiono – Kasie Administrasi Bumi Sawit POM.</p> <p>d) PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure "SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08", dated 24 March 2022. Section 6.1 explains the process for FFB receiving, certified FFB and non-certified FFB recording.</p> <p>Section 6.3 explains the FFB grading and rejection.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Internal audit procedure for RSPO SCCS implementation refers to "SOP Internal Audit No.SOP/SMART/UMUM/SADV/I/009" dated 1 July 2014. "Section 2.2.1 – Penyusunan Program Internal Audit" stated Internal Audit carried out minimum once per annum and possible to be added. Section "2.4.10 Penyusunan Rencana Perbaikan dan Pencegahan" stated Unit Head will prepare and implement correction and corrective action.</p> <p>Internal auditor has received training: Joko Alam participated in RSPO Supply Chain Certification Standard 2020 Training by Checkmark Training, dated 9-10 March 2020.</p> <p>PT. Bumi Sawit Permai – Bumi Sawit POM carried out internal audit against RSPO P&C including the RSPO SCCS requirement:</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - Internal audit RSPO year 2020 on 4-14 May 2020, for criterion 3.8 including the market communication and claim in 3.8.17. Report available. - Internal audit RSPO year 2021 on 15-21 March 2021, for criterion 3.8 including the market communication and claim in 3.8.17. Report available. - Internal audit RSPO year 2022 on 21-25 February 2022, for criterion 3.8 including the market communication and claim in 3.8.17. Report available. 	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08”, dated 24 March 2022.</p> <ul style="list-style-type: none"> - Section 6.1 explains the process for FFB receiving, certified FFB and non-certified FFB recording. - Section 6.6 explains if the projection of certified product more than certified product claim, mill will inform RSPO CB and RSPO IT system/Palmtrace of the projected overproduction. The communication will be assisted by Certification Department. - Section 6.3 explains the FFB grading and rejection. PT. Bumi Sawit Permai – Bumi Sawit POM has a list of certified and non-certified oil palm plantation block. The block list was referring to Memorandum Regional Controller Sumsel-1 No.521/RC-Sumsel1/IX/2017 dated 11 September 2017. The database and map of non-certified blocka in Bumi Sawit Estate updated on annual basis and locked in weighbridge system. The FFB from non-certified block in Bumi Sawit Estate will be delivered with FFB delivery docket, which identifying block identity and “NC – Non-certified” marking. Certified 3821.62 Ha and non-certified 1,317.53 Ha. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Non-conforming FFB and non-certified FFB will be downgraded to non-certified FFB.</p> <p>Docket and weighbridge ticket FFB certified sampled:</p> <p>2020: Surat Pengantar Buah Bumi Sawit Estate No.5724, vehicle No.BH8609WM; date 17 November 2020; FFB 542 bunches. Weighbridge ticket No.A053703.014487 date 17 November 2020; from block 00D26; weigh FFB 10,250 kg; Status certified.</p> <p>2021: Surat Pengantar Buah Bumi Sawit Estate No.10903, vehicle No.BG8703TB; date 25 May 2021; FFB 485 bunches. Weighbridge ticket No.A007850.007950 date 25 November 2021; from block 96D20; weigh FFB 8,760 kg; Status certified.</p> <p>2022: Surat Pengantar Buah Bumi Sawit Estate No.11862, vehicle No.BH8608WM; date 8 June 2022; volume FFB 384 bunches. Weighbridge ticket No.M194-BSWME-04575 date 8 June 2022; from block 96D27; volume FFB 8,690 kg; Status certified.</p> <p>Docket and weighbridge ticket for FFB non certified sampled:</p> <p>2020: Surat Pengantar Buah No.0186/TBS PK/2020 Putra Tunggal Mulia Sawit, vehicle No.BG8165KB; date 17 November 2020; FFB 385 bunches. Weighbridge ticket No.A053633.018403 date 17 November 2020; weigh FFB 8,320 kg; non-certified.</p> <p>2021: Surat Pengantar Buah No.0070/TBS PK/2021 ADMX, vehicle No.BG8023P; date 25 May 2021; FFB 380 bunches. Weighbridge ticket No.A007801.007903 date 25 May 2021; weigh FFB 8,500 kg; non-certified.</p> <p>2022: Surat Pengantar Buah No.0105/TBS PK/2022 Anugerah Ageng Amanah, vehicle No.BG8314CE; date 31 May 2022; volume FFB 300</p>	
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		<p>bunches. Weighbridge ticket No.M194-BSWME04243 date 31 May 2022; volume FFB 9,820 kg; non-certified.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08”, dated 24 March 2022. Section 6.7 explains the product sales/dispatch starting from Delivery Order receiving, product dispatch process referring to mill procedure “SOP Pengiriman Produk CPO & Kernel No. PT. SIP-SMRM/SOP/07”.</p> <p>Sample of sales documents with complete information as per standard: Contract DIC/2750/181219/0003, dated 18 December 2019; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 100,000 kg; product Palm Kernel. Sample Weighbridge ticket No.A021358.00, dated 21 December 2019; volume 19,060 kg; product Palm Kernel; certificate FMS40042-19120037/RSPO MB. Transporter Cipta Maju Mandiri. Shipping announcement TR-61dd1caa-053c.</p> <ul style="list-style-type: none"> - The name and address of the buyer: PT. Sumber Indah Perkasa, address in Tarahan, Lampung Province, Indonesia. - The name and address of the seller: PT. Bumi Sawit Permai-Bumi Sawit POM, address in Rambang Kuang district, Ogan Ilir Regency, Sumatera Selatan Province, Indonesia. - The loading or shipment/delivery date: 21 December 2019. - The date on which the documents were issued: weighbridge ticket for PK dispatch issued 21 December 2019. - RSPO certificate number: FMS40042 (from previous CB) - A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel RSPO MB 	<p>Complied</p>

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<ul style="list-style-type: none"> - The quantity of the products delivered: 19.06 MT - Any related transport documentation: transport from CV Ipta Maju Mandiri - A unique identification number: DIC/2750/181219/0003 <p>Other samples of sales documents with complete information:</p> <ul style="list-style-type: none"> - TR-34f8282f-9a60; Contract 2750/KER/2750/20/C020, dated 2 September 2020; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 100,000 kg; product Palm Kernel. Sample Weighbridge ticket No.M194.BSWM.M.12028, dated 9 September 2020; volume 20,380 kg; product Palm Kernel; certificate FMS40042-20090010/RSPO MB. - TR-2be6a894-377f; Contract 2750/KER/2750/20/C018, dated 19 August 2020; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 200,000 kg; product Palm Kernel. Sample Weighbridge ticket No.M194.BSWM.M.11500, dated 1 September 2020; volume 20,500 kg; product Palm Kernel; certificate FMS840042-2000901/RSPO MB. - TR-02bedc02-5785; Contract 2750/CPO/2750/21/C009, dated 3 March 2021; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 200,000 kg; product CPO. Sample Weighbridge ticket No.A004649.004708, dated 22 March 2021; volume 19,420 kg; product CPO; certificate RSPO733461/RSPO MB. - TR-c273ece1-cded; Contract 2750/CPO/2750/21/C010, dated 10 March 2021; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 400,000 kg; product CPO. Sample Weighbridge ticket No.A004647.004706, dated 22 March 	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>2021; volume 19,230 kg; product CPO; certificate RSPO733461/RSPO MB.</p> <ul style="list-style-type: none"> - TR-ff9ac955-a774; contract 2750/CPO/2750/21/C014; dated 3 June 2021; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 200,000 kg; product CPO. Sample Weighbridge ticket No.A008270.008285, dated 3 June 2021; volume 19,310 kg; product CPO; certificate RSPO733461/RSPO MB. - TR-982b7d3e-ae0d; contract 2750/CPO/2750/21/C024; dated 12 August 2021; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 250,000 kg; product CPO. Sample Weighbridge ticket No.A011570.011765, dated 18 August 2021; volume 19,660 kg; product CPO; certificate RSPO733461/RSPO MB. - TR-e04bdb76-c324; contract 2750/CPO/2750/21/C025; dated 7 July 2021; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 500,000 kg; product CPO. Sample Weighbridge ticket No.A011575.012614, dated 18 August 2021; volume 19,840 kg; product CPO; certificate RSPO733461/RSPO MB. - TR-e6eda47d-; contract 2750/KER/2750/22/C004; dated 23 February 2022; Seller PT. Bumi Sawit Permai – Bumi Sawit POM; Buyer PT. Sumber Indah Perkasa; volume contract 100,000 kg; product Palm Kernel. Sample Weighbridge ticket No.A0040180.04115, dated 18 April 2022; volume 19,630 kg; product Palm Kernel; certificate RSPO733461/RSPO MB. 	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM and Bumi Sawit Estate contracting FFB transport to independent third party, PT. Satrindo Jaya Agropalma.</p> <p>a) In work agreement "Surat Perjanjian Kerja PT. Bumi Sawit Permai dan PT. Satrindo Jaya Agropalma No.004/BSP/JKTO-II/XII/2019-</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>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> <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>ATBS" dated 2 December 2019 and valid until 31 December 2024. In the agreement, section 3 stipulates the FFB belongs to PT. Bumi Sawit Permai and to be transported from estate to mill by PT. Satrindo Jaya Agropalma.</p> <ul style="list-style-type: none"> b) In work agreement "Surat Perjanjian Kerja PT. Bumi Sawit Permai dan PT. Satrindo Jaya Agropalma No.004/BSP/JKTO-II/XII/2019-ATBS" dated 2 December 2019. In addition, the independent third-party contractor signed statement letter "Surat Pernyataan" dated 1 February 2021. In the statement, section 6 stated PT. Satrindo Jaya Agropalma will comply to sustainable palm oil requirement and willing to be audited by Certification Body. c) PT. Bumi Sawit Permai perform internal audit to review compliance of the independent third-party contractor. Evident in internal audit report 2020, 2021 and 2022. d) During onsite RSPO P&C RAV in PT. Bumi Sawit Permai, audit team interviewed the contractor and noted the contractor understanding on critical aspect in transporting certified FFB from estate to mill. 	
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM and Bumi Sawit Estate contracting FFB transport to independent third party, PT. Satrindo Jaya Agropalma. The names and contact detail of PIC in PT. Satrindo Jaya Agropalma recorded.</p> <p>PT. Satrindo Jaya Agropalma, address Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, Sumatera Selatan Province; PIC: Khoirun; Telephone number and email address available.</p>	<p>Complied</p>
<p>3.8.11</p>	<p>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.</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM and Bumi Sawit Estate contracting FFB transport to independent third party, PT. Satrindo Jaya Agropalma. The names and contact detail of PIC in PT. Satrindo Jaya Agropalma recorded.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>PT. Satrindo Jaya Agropalma, address Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, Sumatera Selatan Province; PIC: Khoirun; Telephone number and email address available.</p> <p>During onsite RSPO P&C RAV in PT. Bumi Sawit Permai, audit team interviewed the contractor PIC from PT. Satrindo Jaya Agropalma.</p>	
<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure “SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08”, dated 24 March 2022.</p> <p>- Section 7 “Dokumentasi” explains the requirement for overall process reporting documentation and record which referring to corporate procedure “SOP Pengendalian Dokumen dan Rekaman No.SOP/SMART/UMUM/SADV/I/001”.</p> <p>PT. Bumi Sawit Permai – Bumi Sawit POM refers to Document Control Procedure “SOP Pengendalian Dokumen dan Rekaman No.SOP/SMART/UMUM/SADV/I/001” – Section 2.4.12.e. stipulated the document retention kept for 10 (ten) years.</p> <p>Audit team verified the implementation of the procedure through checking delivery dockets and weighbridge as far as 2019.</p> <ul style="list-style-type: none"> a. PT. Bumi Sawit Permai – Bumi Sawit POM maintains mass balance spreadsheet to monitor the proportion of certified FFB, non-certified FFB, certified CPO, non-certified CPO, certified PK and non-certified PK. b. PT. Bumi Sawit Permai – Bumi Sawit POM through mass balance spreadsheet monitors the proportion of certified CPO and certified PK. c. Based on document review against Bumi Sawit POM mass balance spreadsheet period 2019-2022 (to date April 2022), CH has not sell short. 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

3.8.13	<p>Extraction Rate 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>Yes, extraction rate updated on daily basis and summarized into Monthly report. The projected OER and KER for 12 months period has been sets at 20% and 6.02%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Yes, extraction rate updated on daily basis and summarized into Monthly report. Sample recorded from Bumi Sawit POM: - 31 December 2019 based on "Daily Production Report" period December 2019, OER todate 20.68%; KER 6.00% - 31 May 2020 based on "Daily Production Report" period May 2020, OER todate 18.99%; KER 5.86% - 31 May 2021 based on "Daily Production Report" period May 2021, OER todate 19.65%; KER 6.00% - 31 May 2022 based on "Daily Production Report" period May 2022, OER todate 20.79%; KER 6.09%</p>	Complied
3.8.15	<p>Processing 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>PT. Bumi Sawit Permai – Bumi Sawit POM implement RSPO SCCS Module: Mass Balance.</p>	Complied
3.8.16	<p>Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM register its CSPO and CSPK sales transaction into PalmTrace. Shipping announcement sampled: - TR-61dd1caa-053c for 97.82 MT CSPK; Contract DIC/2750/181219/0003, dated 18 December 2019. - TR-34f8282f-9a60 for 101.91 MT CSPK; Contract 2750/KER/2750/20/C020, dated 2 September 2020.</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<ul style="list-style-type: none"> - TR-2be6a894-377f for 201.15 MT CSPK; Contract 2750/KER/2750/20/C018, dated 19 August 2020. - TR-02bedc02-5785 for 195.56 MT CSPO; Contract 2750/CPO/2750/21/C009, dated 3 March 2021. - TR-c273ece1-cded for 404.31 MT CSPO; Contract 2750/CPO/2750/21/C010, dated 10 March 2021. - TR-ff9ac955-a774 for 194.91 MT CSPO; contract 2750/CPO/2750/21/C014; dated 3 June 2021. - TR-982b7d3e-ae0d for 507.87 MT CSPO; contract 2750/CPO/2750/21/C024; dated 12 August 2021. - TR-e04bdb76-c324 for 505.2 MT CSPO; contract 2750/CPO/2750/21/C025; dated 7 July 2021. <p>All shipping announcement does not exceed three months from the transaction/delivery date.</p> <p>PT. Bumi Sawit Permai – Bumi Sawit POM remove the CSPO and CSPK sales transaction for other certification into PalmTrace. Remove quota sampled:</p> <ul style="list-style-type: none"> - ST-TR-8373d0e8-0479; for removal of 3,168.01 MT CSPO; dated 4 November 2020. - ST-TR-53c8d9e7-c3a7; for removal of 65.01 MT CSPK; dated 8 July 2020. 	
<p>3.8.17</p>	<p>Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM refers to procedure "SOP Supply Chain Produk Bersertifikat Model Mass Balance No.PT. BSP-BSWM/SOP/SCCS-MB/26 rev.08", dated 24 March 2022.</p> <p>Section 6.7.4 stated all product delivery shall not include logo, trademark of label as regulated in RSPO Rules on Market Communications & Claims Standard.</p>	<p>Complied</p>

		Audit team confirmed no claim being made by PT. Bumi Sawit Permai – Bumi Sawit POM.	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The following was communicated in the group website: www.goldenagri.com.sg Our operating entity in Indonesia, PT SMART Tbk, joined the Roundtable on Sustainable Palm Oil (RSPO) when it started in 2005. GAR joined subsequently in 2011. To date, the following assets have received RSPO certification.	Complied
4.2	In corporate communications a member is allowed to: <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. 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.	The following was communicated in the group website: www.goldenagri.com.sg Our operating entity in Indonesia, PT SMART Tbk, joined the Roundtable on Sustainable Palm Oil (RSPO) when it started in 2005. GAR joined subsequently in 2011. To date, the following assets have received RSPO certification (265,867 Ha plantations, 31 mills. No RSPO trademark display.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The communication in www.goldenagri.com.sg does not do that. There is clear that no statement 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.	The communication in www.goldenagri.com.sg is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Bumi Sawit Permai - Bumi Sawit POM own products.	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

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.	There is no RSPO corporate logo has been used in the website, official documents, or official letterhead template.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	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.	The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT. Bumi Sawit Permai – Bumi Sawit POM is not a distributor or wholesaler.</p> <p>Not Applicable.</p>	Not Applicable
5.4	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	<p>PT. Bumi Sawit Permai – Bumi Sawit POM is not a distributor or wholesaler.</p> <p>Not Applicable.</p>	Complied

	<p>be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no label used.</p>	
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>100% of the oil palm content in product, both CSPO and CSPK is RSPO MB.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>No non-certified product claimed.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 	<p>The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no messaging/label/trademark/label used.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no messaging/label/trademark/label used.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			

<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Sawit Permai has the company policy related to Business Ethic (<i>Etika Bisnis dan hak Asasi Manusia Sinarmas Agri Business and Food</i>) signed by Head of Policy and Compliance Division on 12 December 2019. Stipulated that:</p> <ul style="list-style-type: none"> • Respect workers' rights and dignity in accordance with the provisions of law, provide natural treatment without discrimination and build harmonious industrial relations • Respect workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining trade unions / labor unions • Prevent forced labor practices and do not use workers resulting from human trafficking • Ensure not to employ child labor in all lines of operation • Ensuring the safety of the work environment and company operations • Recognize the equal rights and participation of women around the operating unit • Creating a working area that is safe and healthy and provides environmental protection • Respect the rights of local and customary communities in which the company operates • Respect and protect the rights of whistleblowers and human rights defenders (HRD) • Comply with legal provisions regarding the prevention of bribery and corruption • Carry out remedial measures and resolve negative impacts if there are human rights violations through a transparent and legal process 	<p>Complied</p>
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		The policy has been disseminated annually to all employees through notice boards of company and by direct dissemination. The recent dissemination has conducted for all worker in Mill and every Division in the period of April 2022.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	The company's policy not to apply military means and or using intimidation in land dispute resolution procedures available in SOP SOP/NP/SMART/VII/D&L002 dated 1 July 2010. Describes the mechanism of compensation before clearing land and land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation. Also available SOP Social Conflict Management No: SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014, which describes land conflict resolution process through dialogue mechanism and explanation verbally/in writing, the remedies by facilitating local government if the first method does not find an agreement, the process to level court to obtain legal certainty if the way 1 until 3 is not reached. During public consultation with stakeholders informed that so far company did not apply military means and or using intimidation in land dispute resolution.	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The company has had the system to handling complaints and grievances in the SOP of Complaints and Grievance Handling No. SOP/SMART/GIMS-SCMD/USDV/I/001 dated 02 June 2016 revised on 11 April 2017. The procedure has set the dispute resolution in an appropriate manner, ensuring the anonymity of complainants, protecting the Human Rights Defenders, community spoke persons, and whistle blowers where requested. The system ensures that there is no risk of reprisal or intimidation to the complainants. If no deal achieved,	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		every party might deliver the case to the lawsuits or RSPO complaint panel.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The grievance handling procedure is in place and was disseminated annually, targeted to all workers in the Mill and Estates as well as relevant stakeholders. The dissemination conducted in written and verbally, as well as using picture in the housing complex, office, and storage complex. Based on interview with workers, contractors, governmental agencies, the stakeholders aware the company's mechanism to submit a grievance.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and dissatisfaction No. F/SMART/SIGSCSRD/SADV/003/001. Based on review of logbook of communication/grievance and interviews with workers and communities there are no complaints or dissatisfaction.	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 -	In the SOP of Complaints and Grievance Handling No. SOP/SMART/GIMS-SCMD/USDV/I/001 dated 02 June 2016 revised on 11 April 2017, has been set that the complaint resolution is address in deliberation in advance. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.	Complied
Criteria 4.3: 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 -	Laporan hasil konsultasi dan Laporan pelaksanaan CSR 2019, "Rencana dan Realisasi CSR 2019", a. Education – implemented on 1 January-30 June 2019 (Rp.1xx,xxx,xxx) for additional honorarium for teacher in Rambang Kuang Elementary School. b. Assisting independence day; Tanjung Miring Village, Tambang Rambang, Kayu Ara Village, Tangai Village, Gunung Raja Village,	Complied

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<p>Jiwa Baru Village; Rp.3,500,000 – implemented on 17 August 2019 for Belida Darat District, Lubai District, Gunung Raya Village, Rambang Kuang District, Sialingan Village, Tanjung Miring Village, Tambang Rambang Village, etc.</p> <p>c. Assisting medical post “Posyandu” provision extra fooding for Tanjung Miring Village, Kayu Ara Village, Tangai Village, Gunung Raja Village, Jiwa Baru Village; Rp.7,080,000 – implemented for Tanjung Miring Village, Kayu Ara Village, Tambang Rambang Village’s Posyandu, period January-June 2019.</p> <p>d. Assisting heavy machinery for road maintenance Tanjung Miring Village, Kayu Ara Village, Tangai Village, Gunung Raja Village, Jiwa Baru Village; Rp.72,000,000 – implemented on 9 February 2019 (Rp.999,472) for Sialingan Village; implemented on 28 February 2019 (Rp.1,768,968) in Tanjung Miring Village; implemented on 15 January 2019 (Rp.803,117) for Gunung Raja Village; implemented on 16-18 June 2019 (Rp.1,395,000) for Talang Beliuang Village.</p> <p>e. Assisting clean water during dry season Tanjung Miring Village, Kayu Ara Village; Rp.3,600,000 – implemented on 19-20 June 2019 (Rp.2,020,060) for Tanjung Miring Village; implemented 19-20 June 2019 (Rp.2,020,060) for Sialingan Village; implemented on 7 September 2019 (Rp.705,000) for Tanjung Miring Village;</p> <p>f. Masjid renovation in Tanjung Miring Village, Tangai Village; Rp.22,000,000 – implemented for Tangai Village (Rp.20,550,000) on 9 February 2019.</p> <p>2020</p> <p>“Rencana Kerja dan Implementasi CSR 2020 Desa Tanjung Miring” has been consulted with interested parties. Planning consist of support in education, assisting heavy machinery for road maintenance, assisting independence day, assisting religious festivities, assisting sport,</p>	
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		<p>assisting school building renovation – total Rp.29,100,000. Signed by Manager, RC and Tanjung Miring Village Head 10 January 2020. Sampled implementation: implemented on 1 January-31 December 2020 (Rp.1xx,xxx,xxx) for additional honorarium for teacher in Rambang Kuang Elementary School; masjid renovation on 1 July 2020 (Rp.1,000,000) in Tanjung Miring Village; road hardening on 8 July 2020 (Rp.4,250,000) in Tanjung Miring Village;</p> <p>“Rencana Kerja dan Implementasi CSR 2020 Desa Sukananti” has been consulted with interested parties. Planning consist of community development in agriculture through pineapple farming, assisting heavy machinery for road maintenance, assisting independence day, assisting religious festivities, assisting sport, assisting school building renovation – total Rp.29,900,000. Signed by Manager, RC and Sukananti Village Head 10 January 2020. Sampled implementation: implemented village gate construction on 6 August 2020 (Rp.4,000,000) in Sukananti Village; implemented Pineapple seedling provision on 8 September 2020 (Rp.1,566,000) in Sukananti Village; implemented community study building on 23 October 2020 (Rp.750,000) in Sukananti Village;</p> <p>“Rencana Kerja dan Implementasi CSR 2020 Desa Gunung Raja” has been consulted with interested parties. Planning consist of assisting heavy machinery for road maintenance, assisting independence day, assisting religious festivities, assisting sport, assisting school building renovation – total Rp.12,866,000. Signed by Manager, RC and Gunung Raja Village Head 10 January 2020. Sampled implementation: implemented donation for village development committee on 10 July 2020 (Rp.500,000) in Gunung Raja Village; implemented Musholla renovation on 25 October 2020 (Rp.800,000) in Gunung Raja Village;</p> <p>2021</p>	
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		<p>"Rencana Kerja dan Realisasi CSR 2021" has been consulted with interested parties. Ex. Rencana Kerja CSR Desa Sukananti for assisting heavy machinery for road maintenance, assisting independence day, assisting religious festivities, assisting sport, assisting school building renovation – total Rp.29,100,000; signed by Regional Controller and Sukananti Village on 11 January 2021. Sampled implementation: implemented box culvert installation on 30 September 2021 (Rp.3,668,000) in Sukananti Village;</p> <p>"Rencana Kerja dan Realisasi CSR Desa Tangai 2021" for assisting heavy machinery for road maintenance, assisting medical post, assisting independence day, assisting religious festivities, assisting sport – total Rp.14,800,000; signed by Regional Controller and Tangai Village on 11 January 2021. Sampled implementation: implemented house renovation of fire victim on 13 February 2021 (Rp.3,000,000) in Tangai Village;</p> <p>"Rencana Kerja dan Realisasi CSR Desa Sialingan 2021" for assisting heavy machinery for road maintenance, assisting medical post, assisting independence day, assisting religious festivities, assisting sport – total Rp.13,800,000; signed by Regional Controller and Sialingan Village on 11 January 2021. Sampled implementation: implemented school graduation donation on 30 November 2021 (Rp.250,000) in Sialingan Village;</p> <p>"Rencana Kerja dan Realisasi CSR Desa Tambang Rambang 2021" for assisting heavy machinery for road maintenance, assisting independence day, assisting religious festivities, assisting sport – total Rp.14,000,000; signed by Regional Controller and Tambang Rambang Village on 11 January 2021.</p> <p>2022</p> <p>"Rencana Kerja CSR 2022" has been consulted with interested parties. Ex. Rencana Kerja CSR Desa Tambang Rambang for assisting</p>	
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		<p>independence day, assisting religious festivities, assisting sport, assisting Pesantren Darul Funun – total Rp.4,450,000; signed by Regional Controller and Tambang Rambang Village on 31 January 2022.</p> <p>“Rencana Kerja CSR 2022” has been consulted with interested parties. Ex. Rencana Kerja CSR Desa Gunung Raja for assisting Posyandu, assisting heavy machinery for road maintenance, independence day, assisting religious festivities, assisting sport – total Rp.12,866,000; signed by Regional Controller and Gunung Raja Village on 31 January 2022.</p> <p>“Rencana Kerja CSR 2022” has been consulted with interested parties. Ex. Rencana Kerja CSR Desa Tanjung Miring for assisting Posyandu, assisting heavy machinery for road maintenance, assisting water intake, independence day, assisting religious festivities, assisting sport – total Rp.25,082,000; signed by Regional Controller and Tanjung Miring Village on 31 January 2022.</p>	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The concession for plantation of PT. Bumi Sawit Permai was allocated from state land, there was no customary land.</p> <p>PT. Bumi Sawit Permai 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.16/HGU/1990 based on</p> <ul style="list-style-type: none"> - Location permit “Surat Keputusan Gubernur Kepala Daerah Tingkat I Sumatera Selatan No.108/KPTS/BKPM/1988 tentang Izin Lokasi dan Pembebasan Hak/Pembelian Tanah 10,000 Ha untuk Usaha Kelapa Hibrida dan Coklat atas nama PT. Bumi Sawit Permai” dated 14 December 1988. - Principle permit “Izin Prinsip Menteri Pertanian cq Direktur Jenderal Perkebunan No.HK.350/E.4.60/01.89 tentang Izin Prinsip PT. Bumi 	<p>Complied</p>

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<p>Sawit Permai untuk mengusahakan Tanaman Kelapa Hibrida dan Coklat seluas 8,000 Ha” dated 24 January 1989.</p> <ul style="list-style-type: none"> - Summary of survey planning “Risalah Pemeriksaan Tanah B Proponsi Sumatera Selatan” dated 23 and 24 October 1989. Summary stated the application for the land of HGU 7,579.90 Ha approved. - HGU decree “Keputusan Kepala Badan Pertanahan Nasional No.16/HGU/1990 tentang Hak Guna Usaha atas Nama PT. Bumi Sawit Permai, Palembang”, dated 20 September 1990. Granting HGU for PT. Bumi Sawit Permai on state land of 7,579.90 Ha located in Tanjung Miring Village, Muara Kuang District, Ogan Komering Ilir District, Sumatera Selatan Province, with situation map No.03/OKI/1990 and No.04/OKI/1990 dated 2 February 1990. The HGU valid until 31 December 2020 and can be extend for max. 25 years. - Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.1 No.04.07.79.26.2.00001, Desa Tanjung Miring, PT. Bumi Sawit Permai, berakhir hak 31 Desember 2020; Gambar Situasi No.03/OKI/1990 of 2,536.30 Ha” dated 20 February 1990. Completed with map of boundary stone scale 1:60,000. - Land title “Sertipikat Tanda Bukti Hak – Buku Tanah No.1 No.04.07.79.28.2.00001, Desa Tangai, PT. Bumi Sawit Permai, berakhir hak 31 Desember 2020; Gambar Situasi No.04/OKI/1990 of 5,043.60 Ha” dated 2 February 1990. Completed with map of boundary stone scale 1:60,000. <p>PT. Bumi Sawit Permai is processing the extension of HGU since 2019:</p> <ul style="list-style-type: none"> - Application for HGU extension “Surat PT. Bumi Sawit Permai No.46/BSP-D&L/VII/2019; Kepada Kepala Kantor Pertanahan Kabupaten Ogan Ilir; Perihal Permohonan Perpanjangan Jangka 	
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**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<p>Waktu Hak Guna Usaha No.1 Tangai, 5,043.60 Ha, Peta Bidang Tanah No.04/OKI/1990 dan Hak Guna Usaha No.1 Tanjung Miring, 2,536.60 Ha, Peta Bidang Tanah No.03/OKI/1990” dated 5 July 2019.</p> <ul style="list-style-type: none"> - Respond from Lands Office “Surat Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan No.458/16-200.IP.02.02/I/2020 Perihal Permohonan Pengukuran Kadastral Untuk Perpanjangan Jangka Waktu Hak Guna Usaha” dated 27 January 2020. The letter stated company need to coordinate with “Bidang Pertanahan Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan” – provincial level. - Application for HGU extension “Surat PT. Bumi Sawit Permai No.095/BSP-D&L/XI/2020; Kepada Kepala Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan; Perihal Permohonan Pengukuran Kadastral untuk Perpanjangan Jangka Waktu Hak Guna Usaha (HGU) No.1 Tangai, 5,043.60 Ha” dated 2 November 2020. - Respond from Lands Office “Surat Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan No.4743/16-200.IP.02.02/XI/2020 Perihal Permohonan Pengukuran Kadastral Untuk Perpanjangan Jangka Waktu Hak Guna Usaha seluas 5,043.60” dated 17 November 2020. The letter stated company need to fulfil the requirements. - Application for HGU extension “Surat PT. Bumi Sawit Permai No.096/BSP-D&L/XI/2020; Kepada Kepala Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan; Perihal Permohonan Pengukuran Kadastral untuk Perpanjangan Jangka Waktu Hak Guna Usaha (HGU) No.1 Tanjung Miring 2,536.60 Ha” dated 2 November 2020. 	
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**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<ul style="list-style-type: none"> - Respond from Lands Office "Surat Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan No.4744/16-200.IP.02.02/XI/2020 Perihal Permohonan Pengukuran Kadastral Untuk Perpanjangan Jangka Waktu Hak Guna Usaha seluas 2,536.30 Ha" dated 17 November 2020. The letter stated company need to fulfil the requirements. - Assignment letter for mapping and measurement "Surat Tugas Badan Pertanahan Nasional – Direktorat Jenderal Survei dan Pemetaan Pertanahan dan Ruang No.384/ST-300.14/UK/XI/2020" dated 26 November 2020 – for measurement of HGU 5,043.60 Ha. - Minutes of measurement "Berita Acara Direktorat Jenderal Survei dan Pemetaan Pertanahan Nasional dan Ruang No.291/BA-300.16-Uk.01.03/VI/2021" dated 4 June 2021. The lands office handed over measurement result in form of printed map No.12/2021 dated 6 May 2021; DI 302:34/2020. - Minutes of measurement "Berita Acara Direktorat Jenderal Survei dan Pemetaan Pertanahan Nasional dan Ruang No.292/BA-300.16-Uk.01.03/VI/2021" dated 4 June 2021. The lands office handed over measurement result in form of printed map No.13/2021 dated 6 May 2021; DI 302:33/2020. - Review of forest area by Forestry Service "Surat Dinas Kehutanan Provinsi Sumatera Selatan No.522.503/5549-II/Hut Kepada Direktur PT. Bumi Sawit Permai; Perihal Rekomendasi Bebas Kawasan Hutan dan Gambut" dated 22 November 2021. The HGU map of PT. Bumi Sawit Permai was overlaid against maps: "Lampiran Keputusan Menteri Lingkungan Hidup dan Kehutanan No.SK.454/MenLHK/SETJEN/PLA.2/6/2016 tanggal 17 June 2017 – Peta Kawasan Hutan dan Konservasi Perairan Provinsi Sumatera Selatan". Stipulated the area of 4,822.19 Ha and 2,507.75 Ha designated as "Area Penggunaan Lain/APL" and outside forest area. Overlaid against map "Lampiran Surat Keputusan Menteri 	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Lingkungan Hidup dan Kehutanan No.SK5446/MENLHK/PKTL/IPSDH/PLA.1/8/2021 tanggal 26 August 2021 – Peta Indikatif Penghentian Pemberian Perizinan Berusaha, Persetujuan Penggunaan Kawasan Hutan, atau Persetujuan Perubahan peruntukan Kawasan Hutan Baru Pada Hutan Alam Primer dan Lahan Gambut Tahun 2021 Periode II scale 1:250,000. Stipulated the area of 4,822.19 Ha and 2,507.75 Ha was not primary forest and not fall into new permit moratorium.</p> <p>b. Hak Guna Usaha/HGU No.97/HGU/BPN.RI/2009 based on</p> <ul style="list-style-type: none"> - Location permit "Surat Keputusan Bupati Muara Enim No.943/KPTS/PERTANAHAN/2005 tentang Izin Lokasi untuk Perkebunan Kelapa Sawit atas Tanah Seluas 4000 Ha di Desa Gunung Raja, Jiwa Baru, Beringin, Pagar Gunung, Sukamerindu, Kecamatan Lubai, Kabupaten Muara Enim, Provinsi Sumatera Selatan", dated 12 October 2005. - Survey planning "Peta Bidang Kantor Wilayah Badan Pertanahan Nasional Provinsi Sumatera Selatan No.20/ME/2008 NIB.04.06.00.00.00002 tentang Pengukuran Kadasteral yang Dapat Dipertimbangkan untuk Hak Guna Usaha seluas 1,244 Ha di Desa Suka Merindu, Jiwa Baru, Gunung Raja, Kecamatan Lubai, Kabupaten Muara Enim, Provinsi Sumatera Selatan", dated 17 June 2008. - Letter from Forestry Service "Surat Kepala Dinas Kehutanan Provinsi Sumatera Selatan No.522.593/2906.II/HUT" dated 23 July 2008 stated the area of 1,244 Ha was outside forest area and designated as "Area Penggunaan Lain/APL". - Summary of survey planning "Risalah Pemeriksaan Tanah B Provinsi Sumatera Selatan No.16/R/P"B"/BPN.Prov.SS/26/2008" dated 19 September 2008. Summary stated the land under 	
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		<p>application for HGU is state land and designated for plantation as per "Peraturan Daerah Provinsi Sumatera Selatan No.14 tahun 2006 tentang Rencana Tata Ruang Wilayah Provinsi Sumatera Selatan". The land has been acquired and compensated by applicant from state land utilized by Kosasih bin Arsat (309 families, 855.05 Ha) and the rest is vacant state land. For the land under application, there is no objection from other parties and has been utilized for plantation 928.40 Ha; land clearing 224.36 Ha; road 50.00 Ha; swamp 21.24 Ha; housing 20.00 Ha. Conclusion can be granted with HGU.</p> <ul style="list-style-type: none"> - HGU decree "Keputusan Kepala Badan Pertanahan Nasional Republik Indonesia No.97/HGU/BPN.RI/2009 tentang Pemberian Hak Guna Usaha atas Nama PT. Bumi Sawit Permai Atas Tanah di Kabupaten Muara Enim, Provinsi Sumatera Selatan", dated 10 July 2009. Granting HGU for PT. Bumi Sawit Permai on state land of 1,244.00 Ha located in Suka Merindu, Jiwa Baru, and Gunung Raja Village, Lubai District, Muara Enim District, Sumatera Selatan Province, with situation map No.GS.00.03/OKI/1990 dated 11 November 2009. The HGU valid for 35 years. - Land title "Sertipikat Hak Guna Usaha No.05 No.04.06.00.00.2.00005, Desa Suka Merindu, Desa Jiwa Baru, Desa Gunung Raja, Kecamatan Lubai, Kabupaten Muara Enim, Provinsi Sumatera Selatan, PT. Bumi Sawit Permai", dated 11 November 2009 Completed with map of boundary stone scale 1:25,000. 	
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<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>PT. Bumi Sawit Permai reached out to communities whose land in HGU operation. PT. Bumi Sawit Permai was giving proposal to compensate the land and assisting in development of scheme smallholder for oil palm plantation in the HGU area but controlled by the communities.</p> <ul style="list-style-type: none"> - Socialization meeting with Tanjung Miring Village, 27 February 2021 attended by 5 community representative. In the meeting, PT. Bumi Sawit Permai explains company plan to compensate the land inside HGU area and develop scheme smallholder. Community agreed and appointed Village Head as their representative. Recorded under "Berita Acara Rapat Sosialisasi Kemitraan Plasma PT. Bumi Sawit Permai di Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan". <p>Audit team also reviewed Memorandum of Understanding "Nota Kesepahaman No.12/BSP-D&L/II/2021" dated 27 February 2021 between PT. Bumi Sawit Permai (signed by Directors) and Tanjung Miring Village Head. The agreement points: Company and village agreed company will compensated and develop 80% of the land as company plantation and develop 20% of the land as scheme smallholder plantation based on the participative mapping.</p> <ul style="list-style-type: none"> - Socialization meeting with Tambang Rambang Village, 9 March 2021 attended by 14 community landowner. In the meeting, PT. Bumi Sawit Permai explains company plan to compensate the land inside HGU area and develop scheme smallholder. Community agreed and appointed Village Head as their representative. Recorded under "Berita Acara Rapat Sosialisasi Kemitraan Plasma PT. Bumi Sawit Permai di Desa Tambang Rambang, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan". There was 2 female landowners attended the meeting. <p>Audit team also reviewed Memorandum of Understanding "Nota Kesepahaman No.16/BSP-D&L/II/2021" dated 9 March 2021</p>	<p>Complied</p>
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		<p>between PT. Bumi Sawit Permai (signed by Directors) and Tambang Rambang Village Head. The agreement points: Company and village agreed company will compensated and develop 80% of the land as company plantation and develop 20% of the land as scheme smallholder plantation based on the participative mapping. The MoU valid for 24 months.</p> <ul style="list-style-type: none"> - Socialization meeting with Kayu Ara Village, 19 March 2021 attended by 30 community landowner. In the meeting, PT. Bumi Sawit Permai explains company plan to compensate the land inside HGU area and develop scheme smallholder. Community agreed and appointed Village Head as their representative. Recorded under "Berita Acara Rapat Sosialisasi Kemitraan Plasma PT. Bumi Sawit Permai di Desa Kayu Ara, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan". There was 1 female landowner participated in the meeting. <p>Audit team also reviewed Memorandum of Understanding "Nota Kesepahaman No.17/BSP-D&L/II/2021" dated 19 March 2021 between PT. Bumi Sawit Permai (signed by Directors) and Kayu Ara Village Head. The agreement points: Company and village agreed company will compensated and develop 80% of the land as company plantation and develop 20% of the land as scheme smallholder plantation based on the participative mapping. The MoU valid for 24 months.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>PT. Bumi Sawit Permai respect community decision to not selling their land in the HGU area.</p> <p>Based on stakeholder interview with landowner Tanjung Miring Village, there is no coercion from company to community to sell their land. Company proposed to compensate the land and develop scheme smallholder for oil palm on the land inside the HGU in early 2021.</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>Based on stakeholder interview with Rambang Kuang District Head and Tanjung Miring Village Head/landowner; stated the community has been talked and consulted with in company plan to compensate and develop scheme smallholder oil palm plantation in area controlled by community in HGU area. The legal, economic, environmental consequences have been explained and community understood.</p> <p>Based on document review, audit team found;</p> <ul style="list-style-type: none"> - Minute of meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma PT. Bumi Sawit Permai di Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan" dated 27 February 2021. Paragraph 5 stated community member joining the socialization meeting has understood and accept the explanation from PT. Bumi Sawit Permai to develop and manages the oil palm plantation with scheme smallholder model. - Minutes of meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma PT. Bumi Sawit Permai di Desa Tambang Rambang, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan" dated 9 March 2021. Paragraph 5 stated community member joining the socialization meeting has understood and accept the explanation from PT. Bumi Sawit Permai to develop and manages the oil palm plantation with scheme smallholder model. - Minute of meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma PT. Bumi Sawit Permai di Desa Kayu Ara, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan" dated 19 March 2021. Paragraph 5 stated community member joining the socialization meeting has understood and accept the explanation from PT. Bumi Sawit Permai to develop and manages the oil palm plantation with scheme smallholder model. 	
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<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -</p>	<p>As evidence of legal ownership of the land, CH demonstrated:</p> <ul style="list-style-type: none"> - Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.1 No.04.07.79.26.2.00001, Desa Tanjung Miring, PT. Bumi Sawit Permai, berakhir hak 31 Desember 2020; Gambar Situasi No.03/OKI/1990 of 2,536.30 Ha" dated 20 February 1990. Completed with map of boundary stone scale 1:60,000. - Land title "Sertipikat Tanda Bukti Hak – Buku Tanah No.1 No.04.07.79.28.2.00001, Desa Tangai, PT. Bumi Sawit Permai, berakhir hak 31 Desember 2020; Gambar Situasi No.04/OKI/1990 of 5,043.60 Ha" dated 2 February 1990. Completed with map of boundary stone scale 1:60,000. - Land title "Sertipikat Hak Guna Usaha No.05 No.04.06.00.00.2.00005, Desa Suka Merindu, Desa Jiwa Baru, Desa Gunung Raja, Kecamatan Lubai, Kabupaten Muara Enim, Provinsi Sumatera Selatan, PT. Bumi Sawit Permai", dated 11 November 2009 Completed with map of boundary stone scale 1:25,000. <p>PT. Bumi Sawit Permai also shows map titled "Area Statement Map Bumi Permai Estate", scale 1:70,000. The map and its legend shows "Okupasi Masyarakat" in area of 3,883.69 Ha.</p> <p>Furthermore, inventory map based on participatory mapping with landowner and village's appointed team:</p> <ul style="list-style-type: none"> - Map "Peta Inventarisasi Persil Periode Pengukuran s/d 7 Februari 2022", scale 1:90,000. List of 674 land parcels, the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 1,322.49 Ha of Tanjung Miring village. <p>Minute of inventory "Berita Acara Inventarisasi 17 July 2021", identifying area 2.5Ha, landowner Inalidin, neighbouring landowner</p>	<p>Complied</p>
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		<p>identification, land ownership document, current vegetation, measurement witness Daliansyah & Sayuti.</p> <ul style="list-style-type: none"> - Map "Peta Inventarisasi Persil Periode Pengukuran s/d 7 Februari 2022", scale 1:90,000". List of 42 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 246.37 Ha of Tambang Rambang Village. - Map "Peta Inventarisasi Persil Periode Pengukuran s/d 7 Februari 2022", scale 1:90,000. List of 276 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 602.31 Ha of Kayu Ara Village. - Map "Peta Inventarisasi Persil Periode Pengukuran s/d 7 Februari 2022", scale 1:90,000. List of 39 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 96.96 Ha of Sukananti Village. 	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on document review on communication files, the socialization material, scheme smallholder plan, procedures and form are all in Bahasa Indonesia.</p> <p>Based on stakeholder interview with Tanjung Miring Village Head and Rambang Kuang District Head, it was confirmed that company communicating their plan, informing document in Bahasa Indonesia and understood by the community. If community has any inquiry or question, field assistant and community relation officer, estate manager or mill manager can be contacted.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review and interview with landowner in Tanjung Miring Village, landowners in Tanjung Miring village appoint Village Head as their representative for land compensation and scheme smallholder development. Document sighted:</p> <ul style="list-style-type: none"> - Minutes of socialization meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Tanjung Miring, Kecamatan Rambang 	Complied

		<p>Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan”, dated 27 February 2021. In the meeting, PT. Bumi Sawit Permai explains their plan to invite landowners in operation area to develop scheme smallholder. The landowners, accepts the proposal and appoint village head to hold power of attorney in scheme smallholder partnership with PT. Bumi Sawit Permai. Community: Rasio, Musdawal, Mursid, Daliansyah gave power of attorney to Inalidin SH (Village Head).</p> <p>The village appoint their community member to be team in assisting and witnessing land inventory and identification process “Penetapan Tim untuk Membantu Kegiatan Pengukuran Lahan Rencana plasma di Desa Tanjung Miring”, dated 17 July 2021; appointed Agusmawan, Mulyadi, Alham, Sayuti, Aldin, Arman, Yandri.</p> <ul style="list-style-type: none"> - Minutes of socialization meeting “Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Kayu Ara, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan”, dated 19 March 2021. In the meeting, PT. Bumi Sawit Permai explains their plan to invite landowners in operation area to develop scheme smallholder. The landowners in Kayu Ara Village, accepts the proposal and appoint village head to hold power of attorney in scheme smallholder partnership with PT. Bumi Sawit Permai. Community: Azwardi, Alamuddin, Yun Azwar and the other 28 communities gave power of attorney to Sastra (Village Head). <p>The village appoint their community member to be team in assisting and witnessing land inventory and identification process “Penetapan Tim untuk Membantu Kegiatan Pengukuran Lahan Rencana plasma di Desa Kayu Ara”, dated 17 January 2022; appointed Andri Yanto Nedi, Rademan, Ahmad Fuad.</p> <ul style="list-style-type: none"> - Minutes of socialization meeting “Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Tambang Rambang, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan”, dated 9 	
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		<p>March 2021. In the meeting, PT. Bumi Sawit Permai explains their plan to invite landowners in operation area to develop scheme smallholder. The landowners in Rambang Kuang, accepts the proposal and appoint village head to hold power of attorney in scheme smallholder partnership with PT. Bumi Sawit Permai. Community: Nasrul Ilyas, Supardi, Seprizal and the other 14 community member gave power of attorney to Ahmad Muslihin (Village Head).</p> <p>The village appoint their community member to be team in assisting and witnessing land inventory and identification process "Penetapan Tim untuk Membantu Kegiatan Pengukuran Lahan Rencana plasma di Desa Tambang Rambang", dated 14 June 2021; appointed Sahirun.</p>	
<p>4.4.6</p>	<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 Sawit Permai has not started any negotiation with community landowner in the HGU area.</p> <p>On 12 January 2021, PT. Bumi Sawit Permai carried out the management review on proposal to compensate and develop scheme smallholder for land in HGU area. The steps are: establishment of socialization team and strategize program for scheme smallholder partnership; identification the condition of the HGU area; socialization to villages and communities; identification and inventory landownership in HGU area; socialization scheme smallholder partnership to landowner communities; land negotiation and compensation.</p> <p>PT. Bumi Sawit Permai record the progress of land compensation and scheme smallholder development, including reporting and consultation to villages and communities. On 5 June 2021, CH discussing inventory and land measurement in Tanjung Miring village; CH communicating plan to conduct inventory and land measurement in Tanjung Miring village. Feedback from Tanjung Miring village, some landowner was hard to meet because activity in rubber plantation, and village head asking</p>	<p>Complied</p>

		<p>for compensation figure – responded CH has not prepare compensation figure.</p> <p>On 8 June 2021 with Sukananti village; Feedback from Sukananti village and will coordinate with landowner.</p> <p>On 8 June 2021 with Tambang Rambang village; Feedback from Tambang Rambang village landowner will be ready for inventory process on 15 June 2021. The counsellor has been appointed by village authority to witness the inventory process.</p> <p>Based on stakeholder interview with landowner Tanjung Miring Village and Rambang Kuang District, in 2021, PT. Bumi Sawit Permai and communities made Memorandum of Understanding on compensating 80% area and develop 20% area identified in HGU. Next step was inventory and participatory mapping, but no negotiation started.</p>	
<p>Criteria 4.5: No new plantings are established on local peoples’ land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.5.1</p>	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai carried out inventory of land parcel and landowner.</p> <ul style="list-style-type: none"> - Inventory in Tanjung Miring Village “Daftar Pemilik Lahan di HGU PT. Bumi Sawit Permai Desa Tanjung Miring” listed 674 land parcels, the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 1,322.49 Ha. - Inventory in Tambang Rambang Village “Daftar Pemilik Lahan di HGU PT. Bumi Sawit Permai Desa Tambang Rambang” listed 42 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 246.37 Ha. This is including “Tanah Kas Desa”. The information recorded in map, “Draft Peta Inventarisasi Persil PT. Bumi Sawit Permai” measurement period up to 7 February 2022. 	<p>Complied</p>

		<p>Sampled inventory record: inventory and measurement on 15 June 2021 for Ahmad Sarkati, Sajili Hata, Sefrizal for 19 Ha, identifying vegetation and status of legal ownership of the land. Inventory and measurement on 22 June 2021 for Yanto, Mintaryadi, Nasrul Ilyas, Zulpendri, Subandi for 9.5 Ha, identifying vegetation and status of legal ownership of the land</p> <ul style="list-style-type: none"> - Inventory in Kayu Ara Village "Daftar Pemilik Lahan di HGU PT. Bumi Sawit Permai Desa Kayu Ara" listed 276 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 602.31 Ha. - Inventory in Sukananti Village "Daftar Pemilik Lahan di HGU PT. Bumi Sawit Permai Desa Sukananti" listed 39 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 96.96 Ha. - Inventory in Tangai Village "Daftar Pemilik Lahan di HGU PT. Bumi Sawit Permai Desa Tangai" listed 14 land parcels the hectarage of each parcel, vegetation type and identification of landowners, progress land identified 17.89 Ha. 	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not started land compensation to owners of within the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai communicating the proposal with information on legal aspect, economic aspect, sustainability aspect. Economic aspect such as additional income, statutory incentive for local government, opportunity for business. Social impact such as creation of job opportunity.</p>	Complied

<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 Sawit Permai respect community decision to not selling their land in the HGU area.</p> <p>Based on stakeholder interview with landowner Tanjung Miring Village and Rambang Kuang District, there is no coercion from company to community to sell their land inside HGU area. There was no coercion or use of violence.</p> <p>Next step was inventory and participatory mapping, but negotiation has not started.</p>	<p>Complied</p>
<p>4.5.4</p>	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai communicating the proposal with information on legal aspect, economic aspect, sustainability aspect. Sustainability aspect such as additional income, statutory incentive for local government, opportunity for business, creation of job opportunity. Part from the sustainability aspect discussing allocation for local food and water provision, however the community indicated the land allocation for oil palm plantation development in the MoU (see 4.4.6).</p>	<p>Complied</p>

<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai communicating the proposal with information on legal aspect, economic aspect, sustainability aspect. Economic aspect such as additional income, statutory incentive for local government, opportunity for business. Social impact such as creation of job opportunity.</p> <p>Based on interview with stakeholders from surrounding villages, aside from the information provided by company – the communities each village appoint their community member to be team in assisting and witnessing land inventory and identification process. These teams has other duty to observe and seek information and advice, seek legal council, check environmental and social impact on the proposed operation. Information on team establishment see 4.5.5</p>	<p>Complied</p>
<p>4.5.6</p>	<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>- Minutes of socialization meeting “Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan”, dated 27 February 2021. The landowners, accepts the proposal and appoint village head to hold power of attorney in scheme smallholder partnership with PT. Bumi Sawit Permai. Community: Rasio, Musdawal, Mursid, Daliansyah gave power of attorney to Inalidin SH (Village Head).</p> <p>The village appoint their community member to be team in assisting and witnessing land inventory and identification process “Penetapan Tim untuk Membantu Kegiatan Pengukuran Lahan Rencana plasma di Desa Tanjung Miring”, dated 17 July 2021; appointed Agusmawan, Mulyadi, Alham, Sayuti, Aldin, Arman, Yandri.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - Minutes of socialization meeting “Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Kayu Ara, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan”, dated 19 March 2021. The landowners in Kayu Ara Village, accepts the proposal and appoint village head to hold power of attorney in scheme smallholder partnership with PT. Bumi Sawit Permai. Community: Azwardi, Alamuddin, Yun Azwar and the other 28 communities gave power of attorney to Sastra (Village Head). The village appoint their community member to be team in assisting and witnessing land inventory and identification process “Penetapan Tim untuk Membantu Kegiatan Pengukuran Lahan Rencana plasma di Desa Kayu Ara”, dated 17 January 2022; appointed Andri Yanto Nedi, Rademan, Ahmad Fuad. - Minutes of socialization meeting “Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Tambang Rambang, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan”, dated 9 March 2021. The landowners in Rambang Kuang, accepts the proposal and appoint village head to hold power of attorney in scheme smallholder partnership with PT. Bumi Sawit Permai. Community: Nasrul Ilyas, Supardi, Seprizal and the other 14 community member gave power of attorney to Ahmad Muslihin (Village Head). The village appoint their community member to be team in assisting and witnessing land inventory and identification process “Penetapan Tim untuk Membantu Kegiatan Pengukuran Lahan Rencana plasma di Desa Tambang Rambang”, dated 14 June 2021; appointed Sahirun. 	
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in	Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating	Complied

	<p>cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai is continuing land acquisition process based on the plantation permit in 2008. Next step was inventory and participatory mapping, but no negotiation started.</p> <p>In PT. Bumi Sawit Permai, the plantation and mill was not result from national expropriation as explained in 4.4.1.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai respect community decision to not selling their land in the HGU area. There was no land acquisition performed by the company for the land inside the HGU.</p> <p>Based on stakeholder interview with landowner Tanjung Miring Village and Rambang Kuang District, it was confirmed there was no land acquisition up to date. And there is no community in voluntary isolation in the HGU area whereby community from 5 villages as the landowner.</p>	Complied
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai refers to land acquisition procedure "SOP Ganti Rugi Tanah/Lahan No.SOP/NP/SMART/VII/D&L002" dated 1 July 2010. Section 6.2 explains process for pre-inventory together with village communities and district representative. The pre-inventory process includes activity such as field visit, check legal ownership of land documentation, check ownership upon land/vegetation, check with neighbouring witnesses.</p> <p>Section 6.3 explains process for physical inventory: land measurement, calculation of quantity and type of vegetation per parcel, carried out as per evidence of ownership; carried out by witness (landowner, village government, boundary appointer, neighbouring witness, district government, company representative).</p>	Complied

		<p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai is continuing land acquisition process based on the plantation permit in 2008. Next step was inventory and participatory mapping, but no negotiation started.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai refers to land acquisition procedure "SOP Ganti Rugi Tanah/Lahan No.SOP/NP/SMART/VII/D&L002" dated 1 July 2010. Section 6.4 explains that post inventory activities, company coordinates and consulting the calculation and distribution process with village and district government to achieve agreement on compensation rate</p> <p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai is continuing land acquisition process based on the plantation permit in 2008. Next step was inventory and participatory mapping, but no negotiation started.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>Based on document review, audit team noted a number of female landowner, Ex. Sumiati from Sukananti Village agreed to have her land to be developed for scheme smallholder.</p>	Complied
4.6.4	<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>PT. Bumi Sawit Permai refers to land acquisition procedure "SOP Ganti Rugi Tanah/Lahan No.SOP/NP/SMART/VII/D&L002" dated 1 July 2010. Section 6.7 explains upon agreed compensation rate, company will carry out the compensation process. If there is no agreement on</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>compensation rate with landowner, the negotiation process will be done again until agreement is achieved. If the landowner has not agreed the negotiation for compensation rate, the area will be enclaved by company.</p> <p>Section 6.8 explains the documentation requirement for land compensation application from compensation team to management.</p> <p>Section 6.9 explains the record attachment requirement during the land compensation/payment process: payment receipt with signature; video or photograph during landowner receive payment from company; copy of ID card and family card or domicile letter; minute of land handover signed by landowner and company representative, witnessed by village government and district government; statement letter of land ownership; statement letter of handover land; map of land being compensated; attendance list of land measurement activity signed by landowner, village government, measurement officer and 2 witnesses.</p> <p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai is continuing land acquisition process based on the plantation permit in 2008. Next step was inventory and participatory mapping, but no negotiation started.</p>	
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
<p>4.7.1</p>	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai refers to land acquisition procedure "SOP Ganti Rugi Tanah/Lahan No.SOP/NP/SMART/VII/D&L002" dated 1 July 2010. Section 6.2 explains process for pre-inventory together with village communities and district representative. The pre-inventory process includes activity such as field visit, check legal ownership of land</p>	<p>Complied</p>

		<p>documentation, check ownership upon land/vegetation, check with neighbouring witnesses.</p> <p>Section 6.3 explains process for physical inventory: land measurement, calculation of quantity and type of vegetation per parcel, carried out as per evidence of ownership; carried out by witness (landowner, village government, boundary appointer, neighbouring witness, district government, company representative).</p> <p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p> <p>PT. Bumi Sawit Permai is continuing land acquisition process based on the plantation permit in 2008. Next step was inventory and participatory mapping, but no negotiation started.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Bumi Sawit Permai refers to land acquisition procedure "SOP Ganti Rugi Tanah/Lahan No.SOP/NP/SMART/VII/D&L002" dated 1 July 2010. Section 6.4 explains that post inventory activities, company coordinates and consulting the calculation and distribution process with village and district government to achieve agreement on compensation rate.</p> <p>Section 6.6 explains after the compensation rate obtained, company will conduct socialization to community and landowners.</p> <p>Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021.</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		PT. Bumi Sawit Permai is continuing land acquisition process based on the plantation permit in 2008. Next step was inventory and participatory mapping, but no negotiation started.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	Based on stakeholder consultation with village and district head, audit team noted that PT. Bumi Sawit Permai has not compensated the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021. - Minutes of socialization meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Tanjung Miring, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan", dated 27 February 2021. - Minutes of socialization meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Kayu Ara, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan", dated 19 March 2021. - Minutes of socialization meeting "Berita Acara Rapat Sosialisasi Kemitraan Plasma di Desa Tambang Rambang, Kecamatan Rambang Kuang, Kabupaten Ogan Ilir, Provinsi Sumatera Selatan", dated 9 March 2021.	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Based on stakeholder interview with Tanjung Miring Village Head and Rambang Kuang District Head, stated despite there is land inside HGU area belong to community, there is no land dispute with surrounding community – therefore community have no objection and support the HGU extension of PT. Bumi Sawit Permai.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see	Based on stakeholder interview with Tanjung Miring Village Head and Rambang Kuang District Head, stated despite there is land inside HGU	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	area belong to community, there is no land dispute with surrounding community – therefore community have no objection and support the HGU extension of PT. Bumi Sawit Permai.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Based on stakeholder interview with Tanjung Miring Village Head and Rambang Kuang District Head, there was no acquisition through dispossession or force abandonment. audit team noted that PT. Bumi Sawit Permai has not acquired the land in the HGU area. PT. Bumi Sawit Permai has just started communicating proposal to compensation and scheme smallholder development in 2021. Audit team noted that no compensation/acquisition performed yet.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on stakeholder interview with Tanjung Miring Village Head and Rambang Kuang District Head, stated there is no land conflict and no land dispute with surrounding community. However, PT. Bumi Sawit Permai has established SOP for land conflict/land dispute including SOP for settling/compensating the disputed land if decided by all interested parties. a. Social conflict handling procedure "SOP Penanganan Konflik Sosial No.SOP/SMART/SENS-CSR/SAD/I/002" dated 1 July 2014. b. Land compensation procedure "SOP Ganti Rugi Tanah/Lahan No.SOP/NP/SMART/VII/D&L002" dated 1 July 2010.	Complied
Principle 5: Support smallholder inclusion			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	FFB price of the outgrowers was determined by FFB Purchase HO/JKT based on formula agreed with outgrowers. FFB price depends on CPO and PK price and processing cost. The organisation informed FFB price	Complied

	- Minor compliance -	<p>through short message service. The information was sent directly from FFB Purchase HO/JKT to the related supplier and forwarded to Mill Unit Head.</p> <p>FFB price determined by Plantation Agency of South Sumatera Province ("Berita Acara Hasil Rapat Tim Penetapan Harga Pembelian TBS Kelapa Sawit Provinsi Sumatera Selatan") is applied for smallholders.</p> <p>Based on interview with FFB supplier, there is no complaint on FFB pricing and the other issues.</p>	
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Bumi Sawit Mill informed FFB through short message service. The information was sent directly from FFB Purchase HO/JKT to the related supplier and forwarded to Mill Unit Head. There is no complaint on FFB pricing and the other issues. This was verify during interview with FFB suppliers.</p> <p>The company explain the FFB pricing through Whatsapp Message and by calling each of suppliers. Evidences of Whatsapp message received by the supplier has been sighted and reviewed during audit.</p>	Complied
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Agreement between Bumi Sawit Mill and FFB supplier are described in Contractual Agreement or Statement Letter. FFB purchasing agreements were established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement. Sample refer to 2.3.1</p>	Complied
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-</p>	<p>Agreement between Bumi Sawit Mill and FFB supplier are described in Contractual Agreement or Statement Letter. FFB purchasing agreements were established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into as evidence in the signature of both parties.</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement. Sample refer to 2.3.1</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Agreement between Bumi Sawit Mill and FFB supplier are described in Contractual Agreement or Statement Letter. FFB purchasing agreements were established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement. Sample refer to 2.3.1</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Payments are made through bank transfer. The mill records and summarised the FFB purchased from third party supplier or middleman in weekly basis then reported to FFB Purchase HO/JKT. FFB Purchase HO/JKT then creates receipt as the basic of payment. Finance department then issued Application for Funds Transfer.</p> <p>KTU of Bumi Sawit Mill kept all transaction and payment records.</p> <p>Agreed payments been made in a timely manner which is in weekly basis (7 working day). There was no complaint from stakeholders during audit related to FFB payments.</p>	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>Weighbridge in Bumi Sawit POM is verified by third party (PT MUGI) in annual basis. Latest verification was performed on 30 June 2021. Basd on technical verification by PT MUGI, certificate of calibration was issued by Dinas Perindustrian dan Perdagangan Bidang Kemetrolgian Pemerintah Kota Prabumulih.. Weighbridges calibration certificate were sighted during audit:</p> <ul style="list-style-type: none"> • Surat Keterangan Hasil Pengujian Nomor: 307/Disperindag/Bid.Met/VII/2021 dated 6 July 2021, valid until 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>June 2022. Weighbridge Avery weigh Tronix; Serial Number 112850336; Type: ZM510; Capacity 50,000 kg.</p> <p>According to certificate it was noted that verification result were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.</p> <p>For 2022, team from PT MUGI will come to PT. Bumi Sawit Permai on 20 June 2022 to conduct technical verification. Record was sight such as email from PT MUGI – Palembang to Bumi Sawit Mill on 7 June 2022.</p>	
5.1.8	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>At the moment, PT Bumi Sawit Permai not have a mutual agreement with independent smallholder for certification. The relationship of company and independent smallholder limited to buyer and FFB supplier.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>The company did not have a scheme smallholder yet. Currently, the company is being progress to develop scheme smallholder in regards the requirement of HGU/land title extension. The company has set that the SOP of Complaints and Grievance Handling No. SOP/SMART/GIMS-SCMD/USDV/I/001 dated 02 June 2016 revised on 11 April 2017 will be applicable for smallholder.</p>	Complied
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company.</p> <p>Community perception monitoring or called Social Impact Monitoring, in other companies, is to obtain information from stakeholders including small farmers and local communities about the social impacts they have including daily needs, livelihoods and suggestions for future programs.</p>	Complied

		<p>From the monitoring results, the company then makes a CSR program or social improvement program. If the results of the monitoring show that the community is satisfied, it will be maintained and if there are deficiencies, it will be increased through mentoring programs or the like.</p> <p>Company has monitored the public perception through questionnaire each year. Question to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 13 December 2021 and 25 January 2022, questioner of public perception can be demonstrated and well documented in RKL-RPL report and in Social Impact Monitoring. One of the monitoring result, the local communities have a variety choices of livelihood compare to the traditional option (farmer) such as become workers in the company, as FFB suppliers, and or as contractors.</p>	
<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>At the moment, the organization helping improve the livelihood of the local communities by buying the FFB from their land.</p> <p>The company has developed livelihood improvement program through training and CSR program. All FFB suppliers (including smallholder) has been trained and socialized about RSPO P&C Standard, FFB Quality and grading and companies policy and procedures. The organization has a CSR program for livelihood improvement, please refer to 4.3.1.</p> <p>For FFB purchasing mechanism please refer to indicator 3.8.7</p>	<p>Complied</p>
<p>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Agreement between Bumi Sawit Mill and FFB supplier are described in Contractual Agreement or Statement Letter. FFB purchasing agreements were established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement.</p>	<p>Complied</p>

		<p>All third parties FFB suppliers has signed a Statement Letter which one of the clause is about tracebility of FBB</p> <p>Article (4):</p> <ul style="list-style-type: none"> • FFB sold to PT. BSP are come from area that: <ul style="list-style-type: none"> - Has received all permit regarding acquisition of land and plantations business from the authorities. - Cultivated areas are in accordance with applicable law and regulation in Republic of Indonesia and not obtained illegally <p>Sample refer to 2.3.1</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>The company did not have a scheme smallholder yet. Currently, the company is being progress to develop scheme smallholder in regards the requirement of HGU/land title extension.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The company did not have a scheme smallholder yet. Currently, the company is being progress to develop scheme smallholder in regards the requirement of HGU/land title extension.</p>	Complied
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Policies on equal opportunities and treatment to get the job described in the Circular No.096/CEO2-SE/12/2010, 14 December 2010, on the implementation in relation industrial Unit. Explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race and gender in all types of field work.</p> <p>Circular letter No. 268/CEO2/HR PSM 2/10/2015, 1 October 2015 is revision of Circular letter No. 096/CEO2-SE/12/2010, stated that "in order to realize harmonious industrial relations, dynamic and fair</p>	Complied

		<p>company implemented industrial relations of each operational unit without distinction of race, religion, race, physical condition, gender, sexual orientation, membership of union, political affiliation and age in all types of field work". This policy is publicly available, and stakeholders can access it upon request. It was document verified during audit to workers data list, that there was no indication of discrimination at PT. Bumi Sawit Permai.</p>																					
<p>6.1.2</p>	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified the company's data related classification of workers based on status, gender, religion, and ethnic in 2020, 2021, and 2022. For instance, the data of November 2020 and May 2022 as follows:</p> <p>Workers List of BSWE and BSWM per November 2020</p> <table border="1" data-bbox="1133 791 1637 991"> <thead> <tr> <th>Gender</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>664</td> </tr> <tr> <td>Female</td> <td>302</td> </tr> <tr> <td>Total</td> <td>966</td> </tr> </tbody> </table> <table border="1" data-bbox="1133 1038 1637 1289"> <thead> <tr> <th>Religion</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>Muslim</td> <td>959</td> </tr> <tr> <td>Christiany</td> <td>5</td> </tr> <tr> <td>Hindu</td> <td>2</td> </tr> <tr> <td>Total</td> <td>966</td> </tr> </tbody> </table> <table border="1" data-bbox="1133 1337 1637 1385"> <thead> <tr> <th>Race/ethnic</th> <th>Number</th> </tr> </thead> <tbody> </tbody> </table>	Gender	Number	Male	664	Female	302	Total	966	Religion	Number	Muslim	959	Christiany	5	Hindu	2	Total	966	Race/ethnic	Number	<p>Complied</p>
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Lampung	1													
Melayu	638													
Banten	1													
Jambi	1													
Total	682													
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness. This has been arranged in Circulate Letter No 113/HR PSM2/05/2015 dated 1 April 2015.</p> <p>Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers are treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has been evaluated by the organisation as described in criterion 2.1.</p> <p>It has been verified that the recruitment and promotion process are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. For instance, the recruitment and promotion documentation of 2020, 2021 and 2022 consist of:</p> <ul style="list-style-type: none"> - Proposal of additional worker from Estate Manager to HR - Form of worker assessment for recruitment - Form of performance evaluation for promotion - List of worker assessment result 	<p>Complied</p>											

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - Compilation of assessment result - CV - List of worker promotion - Medical check-up result - Approval of Region Head of worker promotion and new recruitment - Contractual Agreement of Temporary Worker. <p>It was observed a recruitment in March 2020 for an upkeep worker at BSWE with the status PKWT (<i>Perjanjian Kerja Waktu Tertentu</i>/ temporary worker); in accordance with the company's announcement letter on the acceptance of workers at BSWE No. 231/BSWE/03/2020 dated 02 March 2020.</p> <p>Prospective workers on behalf of Alpa Rizie (date of birth: August 31, 1998/22 years) have submitted a job application letter on March 25, 2020, the application letter also attaches the necessary requirements including: photocopy of identity card (KTP), family card, Health Certificate No. 531/KBSP/SKS/03/2020 dated March 25, 2020 from the PT Bumi Sawit Permai Clinic on behalf of doctor Waston Ade Chandra, stated that he is physically fit and ready to do work. Furthermore, PT BSP, Bumi Sawit Estate issued a <i>Perjanjian Kerja Waktu Tertentu</i> (PKWT) No. BSWE/PKWT/04/2020/001 dated 1 April 2020. Recruitment process was in accordance with the company procedure.</p> <p>In 2021, also has been observed for initial AT No. 004/BSWM/PKWT-A2/007/2001 dated 13 July 2021, for the role of water intake operator. For the period of 2022 (to month May) the promotion and new recruitment are being processed.</p> <p>Based on recruitment and promotion documentation, as well as based on consultation with Labor Union and Gender Committee, can be concluded that the company has demonstrated the recruitment selection</p>	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>The company has had mechanism of recruitment and selection stipulated in SOP of Recruitment No. PSD A-004-00, dated 1 September 2005, Circulate Letter No 113/HR PSM2/05/2015 dated 1 April 2015, and Collective Labor Agreement (PKB) period of 2020 – 2022. In those documents, also based on interview with management, can be concluded that pregnancy women will not be treated as a discriminatory measure, rather, to protect their reproduction organ and fetus. For instance, the company will not employ pregnant women in the chemical related position.</p> <p>Based on interview with female workers, Gender Committee, and Labor Union, can be concluded that during recruitment process, the company did not conduct pregnancy test.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established a Gender Committee since RSPO initial certification to develop awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>The committee consider matters such as; dissemination on women’s rights, child care facilities to be provided by the growers and millers, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding.</p> <p>Organization has also setting several signboards about breastfeed up to nine months before resuming chemical spraying or usage tasks.</p> <p>The gender committee has determined the program and realization of its achievements in the 2020 period, as follows:</p> <ul style="list-style-type: none"> - Dissemination of sexual harassment issues and awareness. - Checking the child-care facilities. 	Complied

		<ul style="list-style-type: none"> - <i>Posyandu</i> (pregnant women, baby, and breastfeeding women check-up and consultancy event) activities. - Gender committee board meeting. <p>Policy on the prevention of sexual harassment written in SE No.003/CEO2-SE/01/2011 date January 10 year 2011 regarding the sexual harassment prevention. Organization also establishes the sexual harassment handling procedures SOP/NP/SMART/XII/MCAR001. Describes the workflow of sexual harassment handling. Complaints and grievance can submit orally and written addressed to gender committee --- gender and Persis (<i>Persatuan istri staff</i>) then --- performed victim accompaniment and inform/report to unit head--- based on information, data and evidence obtained and witnesses, the unit head verify and examination in order to obtain a decision, after found a guilty offender unit head may impose appropriate sanctions or company regulations through legal action.</p> <p>Based on document review and interview with Gender Committee, can be concluded that there were no issues concerning discrimination based on gender in recruitment and promotion, harassment in the workplace, or violation of reproduction rights.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on interview with management, workers, and Labor Union, there are several types of worker status in the company, that are Staff level, permanent worker (PKWTT), and temporary worker (PKWT). The company did not have casual worker scheme. The employment contract, company regulation and work agreement provided in Indonesian language and available for both parties.</p> <p>The evidence of equal pay for the same work scope has demonstrated based on payment list and sample of payment slips. The wages payment referred to the minimum wage consists of basic wage plus a fixed allowance.</p>	Complied

		<p>For instance, the upkeep workers with ID 15061 and ID 15062 have received the same basic salary amount of IDR 3,144,946 in May 2022.</p> <p>Based on the verification of the PT Bumi Sawit Permai employee salary slip document above, that PT BSP has implemented a wage system that is in accordance with the rules and regulations. The wages given to workers are in accordance with the type, scope and workload carried out (including overtime) or wages are given fairly in accordance with the scope of work.</p>	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Documentation of pay and working conditions is presented in the Collective Labor Agreement (CLA/PKB) of 2020 - 2022, set that the minimum wage referred to the governmental regulation.</p> <p>This collective work agreement is presented in Indonesian language and in it is explained about wages in Chapter V concerning Wages; which explains the meaning of wages, wage systems, family allowances, holiday allowances and increased wages for employees. The explanation related to working days and working hours is clearly presented in Chapter IV concerning Working Days and Working Hours; where working days are 6 working days in a week and working hours are 7 (seven) hours a day and 40 (forty) hours in a week, this refers to the applicable laws and regulations in Indonesia (Law No. 13 of 2003 concerning Manpower).</p> <p>The company has documented Governor Decree of Minimum Wage and Company's Director Decree regarding minimum wage (salary structure) for all worker's grade in accordance with legal minimum wage. The auditor has verified payment slip of workers in Estate and Mill for the period of 2020, 2021, and 2022. Based on verification, the minimum wage paid to the workers has above legal minimum wage stated by the Governor. The documentation as follows:</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Year of 2020</p> <ul style="list-style-type: none"> • Governor Decree of South Sumatera No. 595/KPTS/DISNAKERTRANS/2019 dated 25 October 2019, regarding minimum wage of 2020, amount IDR 3,043,111/month. • PT BSP Director Decree No. 017/CEOSUMSEL/HRPSMSUMSELLAMBABEL/01/2020, dated 31 January 2020, regarding worker wage based on worker structure and level/grade year of 2020, in accordance with Governor Decree. Based on this Director Decree, the lowest worker grade wage stated IDR 3,050,500/month. (above legal minimum wage). <p>Year of 2021</p> <ul style="list-style-type: none"> • Governor Decree of South Sumatera No. 720/KPTS/DISNAKERTRANS/2020 dated 02 November 2020, regarding minimum wage of 2021, amount IDR 3,144,446/month. • PT BSP Director Decree No. 366/CEOSUMSEL/HRPSMSUMSELLAMBABEL/12/2020, dated 28 December 2020, regarding worker wage based on worker structure and level/grade year of 2021, in accordance with Governor Decree. Based on this Director Decree, the lowest worker grade wage stated IDR 3,144,946/month. (above legal minimum wage). <p>Year of 2022</p> <ul style="list-style-type: none"> • Governor Decree of South Sumatera No. 746/KPTS/DISNAKERTRANS/2021 dated 18 November 2021, regarding minimum wage of 2022, amount IDR 3,144,446/month. (note: there is no increase due to Covid 19 pandemic). • PT BSP Director Decree No. 013/CEOPSM2/HRPSM2/01/2022, dated 17 January 2022, regarding worker wage based on worker structure and level/grade year of 2022, in accordance with Governor Decree. 	
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		<p>Based on this Director Decree, the lowest worker grade wage stated IDR 3,144,946/month. (above legal minimum wage).</p> <p>The auditor has verified payment slip of workers in Estate and Mill for the period of 2020, 2021, and 2022. Based on verification, the minimum wage paid to the workers has above legal minimum wage stated by the Governor. For instance, minimum wage for temporary worker (lowest level/grade) on behalf initial AT (Mill's water intake operator) with contractual No. 004/BSWM/PKWT-A2/007/2001 dated 13 July 2021, has been paid with basic wage IDR 3,144,946/month.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>Clauses concerning payments and conditions of employment (regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) stipulated in each contractual agreement and Collective Labor Agreement (CLA) period of 2020 – 2022.</p> <p>Based on review of Contractual Agreement, it is also states the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. For instance, Contractual Agreement of Temporary Worker. For instance, contractual of initial neme AT No. 004/BSWM/PKWT-A2/007/2001 dated 13 July 2021, for the role of water pump operator.</p> <p>Samples of contract and payslip reviewed during audit were 28 contracts and 31 payslips.</p> <p>Based on interview with workers in the field, they have received and understood their contractual agreements.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract and Collective Labor Agreement (CLA). In those document has been mentioned the determination of wages (including benefits and other benefit), working hours (including hours and overtime pay) has been mentioned. The working hours (maximum 40 hours per week and</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>working from Monday to Saturday), payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, in compliance with national legal requirements).</p> <p>The legal compliance of employment regulations have been verified based on these evidence (collected based on document review, interview with workers, Gender Committee, Labor Union, Manpower Agency):</p> <ul style="list-style-type: none"> - Payment: regulation of minimum wage of 2020, 2021 and 2022 have been mention in indicator 6.2.1. The payment has been verified based on review of list of payment and payment slips. For instance, the upkeep workers with ID 15061 and ID 15062 have received basic salary amount of IDR 3,144,946 in May 2022 - Working hours: maximum 40 hours per week (7 hours per day) and working from Monday to Saturday. For overtime working has been paid based on governmental regulation of overtime payment. Holiday is 12 days/year according government regulation. - Sickness including menstruation leave and maternity leave: based on document review and interview with Gender Committee and Nurse/Midwife are been provided with no issue. - Worker protection: the company has provide Clinics and paramedic, regular medical check-up, and PPE in accordance with the HIRAC and MSDS. <p>Samples of contract and payslip reviewed during audit were 28 contracts and 31 payslips.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is</p>	<p>The company has provide facilities to improve worker’s wellbeing based on document review, interview, and field observation, among others:</p> <ul style="list-style-type: none"> - Adequate housing: consist of semi-permanent and permanent housing. There is no temporary/non-permanent housing anymore. 	Complied

	<p>developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Sanitation facilities, domestic waste disposal, and drainage. - Water supplies: from water treatment and wells. - Medical facilities: Clinics in Estate (also cover for Mill’s worker) and paramedic (nurses and midwives) - Educational facilities: schools and school busses. - Staple food store: from surrounding villages around 15 minutes. - Electricity: from Mill and gensets - Mosque and Church. - Sport facilities: badminton, volley, and football courts. <p>Based on field observation in the housing complex, in can be seen that there is no major problem in the housing facilities. The residents said that if there any problem in the house, they can request for reparation to the housing assistant, and then the company will send carpenters to fix the houses with no charge. Moreover, the company has encouraged workers to use sport facilities to improve the worker’s fitness.</p> <p>Based on review of Grievance Logbook, it is known that there is no major complain related the housing/welfare facilities, but related common minor housing reparation.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There is no significant efforts needed to improve access the adequate and sufficient food, because the plantation is near the surrounding villages that provide food store and weekly market, among other:</p> <ul style="list-style-type: none"> - From Sialingan Village - Sunday Market about 15 minutes from the company. - From Kayu Ara Village - Saturday Market about 10 minutes from the company. - From Beliung Village, there are some big market that provide staple food, around 10 minutes from the company. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>The company has calculated a living wage using the benefit approach that the company has provided to workers, including job support, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health), etc.). The calculation has been made for every grade of worker (PT4, PT3, PT2, PT1).</p> <p>The calculation of DLW for lowest grade (PT4) is IDR 3,525,180/month in 2021 (where legal minimum payment is IDR 3,144,446) and IDR 3,513,940/month in 2022 (where legal minimum payment is IDR 3,144,446).</p>	Complied
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on Employee List in Estate and Mill, field observation in harvesting and Mill main process activities, as well as interview with Labor Union, Gender Committee and workers, it is known that there is no casual or temporary workers employed for core work such as in harvesting or mill's processing activities. Overall, the company did not employ casual worker anymore.</p> <p>The company employ temporary workers (PKWT/ <i>Perjanjian Kerja Waktu Tertentu</i>) only for temporary job such as loose fruits collector in the peak season, or nursery worker. Overall, the company did not employ casual worker anymore.</p>	Complied

<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has published a statement in local languages recognizing the rights of employees to freedom of association in Company Policy dated 1 December 2014. Organizations understand that workers have the right to argue associate and organize in a labor union. Organization committed to provides opportunities for workers to organize in unions and express an opinion. Commitment covered in the policy is "Respect the right of every employee to form or join trade unions in accordance they want and to bargain collectively"</p> <p>The policy has been disseminated annually to all employees by installing signboard of company policy and by direct dissemination. The recent dissemination has conducted for all worker in Mill and every Division in the period of April 2022.</p> <p>The company has accommodated employee rights to argued, associate and organize in a labor union. All employees were allowed to form associations and bargain collectively with their employer.</p> <p>The company's labor union is <i>Pengurus Unit Kerja PT. Bumi Sawit Permai Federasi Serikat Pekerja Pertanian dan Perkebunan SPSI</i> in 2018 – 2023. This was decided in decision letter no. KEP-021-100PC.F.SPPP-SPSI/SS/VIII/2018 date on 20 August 2018.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>The management and Labor Union regularly conducted meetings to discuss issues in the employment. The recent meeting conducted on 11 January 2022, discussing the annual bonus of 2022.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>The company provide a specific empty house for Labor Union to conduct internal meeting. The company also give permission to Labor Union Official to conduct meeting in working hours.</p>	Complied

	- Minor compliance -	Based on interview with Head of Labor Union, it is known that the management does not interfere with the formation or operation of registered labour union. There is no coercion and intervention related to membership and the course of the organization.	
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	PT. Bumi Sawit Permai referring to Corporate Letter "Surat Edaran Sinar Mas HR Director No.002/SE-HRDV/03/09 Perihal Batasan Usia Minimum", dated 31 March 2009. The letter stipulated "Sehubungan dengan pelaksanaan Undang-undang No.13 Tahun 2003 tentang Ketenagakerjaan pasal 68 mengenai larangan mempekerjakan anak maka dengan ini disampaikan dalam proses penerimaan karyawan ditetapkan batas usia minimum adalah 18 (delapan belas) tahun" – with regards to implementation of Undang-undang No.13 Tahun 2003 tentang Ketenagakerjaan chapter 68 on prohibition employing child worker, it is determined the minimum age for employee recruitment is 18 (eighteen) years old.	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available. - Critical (Major) compliance -	PT. Bumi Sawit Permai referring to recruitment procedure "Kebijakan Rekrutmen Tenaga Kerja No.KHI-smart/-001-00" dated 1 August 2017; General Requirement point 2.4 stipulates does not accepting potential worker aged less than 18 years old. PT. Bumi Sawit Permai carried out internal audit against RSPO and ISPO P&C on annual basis, covering indicator related to worker's minimum age in company operation and contractor: Company carried out internal audit year 2022 on 21-25 February 2022, for indicator 1.2.2 contractor compliance FFB supplier Putra Tunggal Mulia evident; for indicator 6.4.2 Bumi Sawit POM and Bumi Sawit Estate demonstrate no worker under 18 years old. Company carried out internal audit year 2021 on 15-21 March 2021, for indicator 1.2.2 contractor compliance PT SJA evident; for indicator 6.4.2	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Bumi Sawit POM and Bumi Sawit Estate demonstrate no worker under 18 years old.</p> <p>Company carried out internal audit year 2020 on 4-14 May 2020, for indicator 1.2.2 contractor compliance CV Sukses Arta Mulia evident; for indicator 6.4.2 Bumi Sawit POM and Bumi Sawit Estate demonstrate no worker under 18 years old.</p>	
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Audit team verified no young person employed by company to perform hazardous work. Based on interview with sampled workers in Estate and POM operation, all workers are 18 years and above. They stated none of their fellow worker under 18 years old.</p> <p>Based on document review "Daftar Karyawan" audit team noted none of the worker employed by PT. Bumi Sawit Permai is under 18 years old. Youngest employee in Bumi Sawit POM is Eko Sulistiano, born 12 December 1992 – start working 5 March 2012, at 20 years old. Now 30 years old.</p> <p>Youngest employee in Bumi Sawit Estate is Mr. Yadi Kusnadi, born 21 November 2002 – start working 2 January 2021, at 19 years old.</p> <p>Based on stakeholder interview with Tanjung Miring Village, audit team noted the workforce from the village is mature and none of them under 18 years old. Based on stakeholder interview with Manpower Service, audit team noted based on manpower report and manpower service inspection no child worker finding in the Estate and Mill Operation.</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>PT. Bumi Sawit Permai is communicating the policy on no child worker and other industrial relation policies to workers:</p> <ul style="list-style-type: none"> - 16 Harvester and Loose Fruit Collector Division VII; 23 Upkeep workers Division VII dated 15 September 2020 - 8 Upkeep workers including sprayer Division I dated 15 September 2020. Audit team interviewed sample upkeep worker in Division I and they understood. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - 15 Upkeep workers in Division IV dated 19 September 2021. - 18 Harvesters and Loose Fruit Collector Division II dated 19 August 2021. 	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy on the prevention of sexual harassment written in Decree Letter No.003/CEO2-SE/01/2011 date January 10 year 2011 regarding the sexual harassment prevention.</p> <p>Organization also establishes the sexual harassment handling procedures SOP/NP/SMART/XII/MCAR001. Describes the workflow of sexual harassment handling. Complaints and grievance can submit orally and written addressed to gender committee --- performed victim accompaniment and inform/report to unit head--- based on information, data and evidence obtained and witnesses, the unit head verify and examination in order to obtain a decision, after found a guilty offender unit head may impose appropriate sanctions or company regulations through legal action.</p> <p>Dissemination of sexual harassment policy was performed to all employees in July 2020. Based on workers interview and group discussion, it was concluded that there was no sexual harassment and violence within the organisation.</p> <p>Gender committee has been established by the organisation. 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 growers and millers, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women 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 usage tasks. It was observed that has been assembled on main access road and crowd locations such as: division</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		office and housing area. The policy reviewed regularly by Sustainability Department.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to protect women reproduction rights has been also stated in Circulate Letter No 095/CEO2-SE/12/2010 dated 14 December 2010. Menstruation leave are given to female worker for 2 days-off without any salary deduction.</p> <p>PT BSP has issued the Internal Memorandum No 001/MEMO-VPA PSM2/04/2011 date 8 April 2011 concerning pregnant and lactating women workers. It stated that Pregnant and lactating women employee are not allowed to work as a pesticide/herbicide sprayer.</p> <p>Gender committee was established by the organization. The committee has representatives from all areas of work. The committee consider matters such as; trainings on women’s rights, counselling for women affected by violence, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding.</p> <p>Communication to all workers pertinent to prevent sexual harassment and protect women reproduction was conducted by the gender committee team and attended by the organization. The last dissemination was in April 2022 to employee’s wife and woman workers.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>The company has identified the need of expectant mother and new mother in a documentation. Based on the document, the needs of new mother that have been identified among others to consult the health of their fetuses and babies, to get proper medical check-up and vitamins, a place and paramedic (nurse and midwife) to give proper birth, daycare/creche, emergency response, etc.</p> <p>Management has fulfilled their need by providing:</p> <ul style="list-style-type: none"> - Clinic including company’s doctor and paramedic, for getting regular check-up, consultation and giving birth. 	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> - Monthly 'Posyandu' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. - Maternity leave: 3 months including before and after giving birth in accordance with legal regulation. - Company's ambulance for emergency respond, to get to nearest hospital. - Daycare/crech. <p>Based on interview with sampled new mothers in employee housing compound, audit team noted the medical team of Bumi Sawit Estate has consulted the need for new mother. Then it is prepared in form of maternity check, labour preparation, vaccination program for infants and medical check based on "Kartu Menuju Sehat" for infants and prepare facility for infant day care.</p> <p>Based on interview with female worker in Bumi Sawit POM, she stated can return home to breastfeed her baby for 1 hour. Mill management prepare substitute manpower when she went home.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The company has the system to handle complaints and grievances as per the SOP of Complaints and Grievance Handling No. SOP/SMART/GIMS-SCMD/USDV/I/001 dated 02 June 2016 revised on 11 April 2017. The procedure has set the dispute resolution in an appropriate manner, ensuring the anonymity of complainants, protecting the Human Rights Defenders, community spoke persons, and whistle blowers where requested. The system ensures that there is no risk of reprisal or intimidation to the complainants. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Head of Gender Committee and women</p>	Complied

		workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights.	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>PT BSP also has policies related to business and human rights policies of Sinarmas Agri Business and Food which was signed by the Head of Policy and Compliance Division dated December 12, 2019, explaining the commitment to uphold human rights and prohibition of force and trafficked labor.</p> <p>The policy has been disseminated annually to all employees by installing signboard of company policy and by direct dissemination. The recent dissemination has conducted for all worker in Mill and every Division in the period of April 2022.</p> <p>Based on document verification (list of employees, salary slips and payroll for the period of 2020, 2021, 2022) and interviews with company management and Manpower Agency, no work termination was identified that was not in accordance with the work contract, the determination of overtime time was in accordance with the Overtime Work Order (SPL), and was not identified there are employees who work because of debt with the company.</p> <p>Moreover, no salary deduction are not in accordance with the regulations, even though there were subsidies and deductions for BPJS (employment insurance) contributions that were in accordance with applicable regulations. There was no identification of a work bond that impeded employee resignation, there was no indication of a cost involved in the employee recruitment process.</p> <p>Based on field observation, and interview with workers and Labor Union, is known that there is no migrant worker within the company. All workers also have been recruited in accordance with legal regulation and provided with contractual agreement.</p>	Complied

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>The company not employed migrant worker, but temporary worker (PKWTT). PT BSP has established a policy on Work Environment and Industrial Relations No. KHI-smart/002-00 dated August 1, 2017. This policy is also a mechanism for the use of temporary workers (either non-permanent or casual workers) with several provisions, as follows:</p> <ul style="list-style-type: none"> - Temporary Work Agreement (PKWT) is an agreement between a worker/laborer and a company to establish a working relationship for a certain period of time or for a certain job. - A work agreement or contract is a written letter in Indonesian that is easily understood and agreed upon by the worker/laborer with the company as a basis and evidence of an employment relationship. - The company is responsible for the costs required for the implementation of the work agreement - A work agreement for a specified period of time based on a certain period can be made for a period of 2 (two) years and may only be extended 1 (one) time for a maximum period of 1 (one) year - In the event that the work agreement has been extended for a certain period of time but due to certain conditions the work has not been completed, then the work agreement may be renewed for a certain time. 	Complied
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The responsible in health and safety has been established in accordance with the legal requirements, that is OHS Committee (<i>Struktur P2K3</i>) that has been endorsed by Manpower Agency, and the Secretary is a legal OHS Expert.</p> <p>OHS Committee of Bumi Sawit Mill</p>	Complied

		<p>OHS Committee (P2K3) of Bumi Sawit Mill has been established based on Manpower Agency Decree No. 568/SK/Nakertrans/2017.</p> <p>The safety officer as responsible person in OSH is Mr Kunto Tri Atmojo, based on appointment letter of Labor Minister No. 05/305/AS.01.03/II/2022 dated 7 February 2022, valid for 3 years.</p> <p>OHS Committee of Bumi Sawit Estate</p> <p>OHS Committee (P2K3) of Bumi Sawit Estate has been established based on Manpower Agency Decree No. 1295/SK/Nakertrans/2020 dated 18 June 2020.</p> <p>The safety officer as responsible person in OSH is Mr I Wayan Bayu Ardi Setiawaan, based on appointment letter of Labor Minister No. 5/3982/AS.02.04/IV/2020 dated 15 April 2020, valid for 3 years.</p> <p>The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and corrective actions to achieve target and improve the program such as Personal Protective Equipment (PPE), hazard from animal, safety notes, accidents etc. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc.</p> <p>The quarterly OHS Report has been submitted to Labor Agency. The latest report, that is for Quarter I of 2022 has been sent to Employment Agency on 28 April 2022.</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>The company has had sort of OHS policy and procedures. These policy and procedures stated the company's commitment on the implementation of occupational health and safety within company's operation.</p>	Complied

	<p>- Minor compliance -</p>	<p>This procedures designed to control the hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings of OHS Committee in every month.</p> <p>According to the emergency procedure, the emergency conditions have been identified including Fire and explosion at buildings; land fire; earthquake; flooding; chemical spill and poisonings also waste water ponds spillage. The procedures described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, the emergency contact number of each internal emergency team and external related parties such as public fire station at local area and Public health centre were also available.</p> <p>The accidents happen has been recorded and using the LTA calculation. Described in more detail in indicator 6.7.5.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PPE Provision</p> <p>Based on document review, interview with workers and Labor union, the PPEs are provided to all workers without any charge. The type of PPE is defined based on risk analysis (HIRAC) and/or MSDS. It has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, manuring, mill's machineries, harvesting, etc.</p> <p>Based on field observation in the high risk workplace in the Mill and Estate, known that the workers provided proper PPE in accordance with the HIRAC and/or MSDS. For instance:</p> <ul style="list-style-type: none"> - Harvester: has been provided sickle and axe cover. - Manuring, spraying, checmical storage operator: has been provided rubber gloves, mask, face protector, apron, boots. 	<p>Complied</p>

		<ul style="list-style-type: none"> - Genset/engine room, boiler operator: has been provided mas and ear muff/ear plug. <p>Interview with the workers and Labor Union, the PPE has been provided, exchanged regularly or anytime if broken without any charge. The PPE stocks can be seen on material storage.</p> <p>Sanitation facilities for chemical applicator</p> <p>Sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Division Offices. Therefore, the PPE and working tools are washed and stored in the special place and prohibited to be placed in worker's houses.</p>	
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>Medical care</p> <p>The company established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility. The company has complied legal compliance toward the clinic facilities as follows:</p> <ul style="list-style-type: none"> - Clinic permit based on Decree of Investment and Permit Agency (DPMPTSP) No. 440/00/DPMPTSP/2019 dated 19 August 2019, valid for 5 years. - Appointment Decree of PT BSP's doctor (dr. Waston Ade Siregar) from Labor Ministry No. 5/27/AS.02.02/V/2021 dated 1 May 2021, valid for 3 years. - Appointment Decree of paramedic (Anggi Oktasari Am.Kep) from Health Agency No. 440/082/DINKES/SIPP/2019 dated 25 September 2019, valid for 5 years. <p>Accident and health insurance</p>	Complied

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<p>For further or un-handled medical care covered in government employment and health insurance programs (<i>BPJS Ketenagakerjaan & BPJS Kesehatan</i>). This insurance has been paid monthly based on document review according to the applicable rule.</p> <p>The auditor has verified the payment of <i>BPJS Ketenagakerjaan & BPJS Kesehatan</i> from period of 2020 until April 2022. It can be concluded that the payments have been conducted routinely (monthly) in accordance with total worker including family member for national health insurance.</p> <p>The recent payments are as follows (note: the payment written in this report only for recent payment, because the current payment of <i>BPJS Ketenagakerjaan & BPJS Kesehatan</i> will not be accepted if the previous period payment have not been paid yet):</p> <p>National Employment Insurance (<i>BPJS Ketenagakerjaan</i>):</p> <ul style="list-style-type: none"> - Estate for April 2022: has been paid on 9 May 2022. - Mill for April 2022: has been paid on 9 May 2022. <p>National Health Insurance (<i>BPJS Kesehatan</i>):</p> <ul style="list-style-type: none"> - Estate for May 2022: has been paid on 9 May 2022. - Mill for April 2022: has been paid on 9 May 2022. <p>Based on interview with the workers and Labor Union, there is no issue related medical care. If the clinic can not handle the medical care, the patient will be brought to the partner hospital in the city using company's Ambulance.</p> <p>For contractor's workers, based on document review and interview with contractor representative, it is known that the accident insurance for workers is covered by the contractors.</p>	
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		For instance, for PT Satrindo Jaya Agropalma as the FFB transporter contractor, all workers also have been enrolled in National Health Insurance (BPJS <i>Kesehatan</i>) and National Employment Insurance (BPJS <i>Ketenagakerjaan</i>). The recent BPJS <i>Kesehatan</i> and BPJS <i>Ketenagakerjaan</i> have been paid on 10 May 2022 and 6 June 2022 respectively.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The company has documented Lost Time Accident 2020, 2021, and 2022 (including monthly and yearly data) for Mill and Estate with the summary as follow: 2018: zero accident 2019: zero accident 2020: 1 case dated 22 nd October 2020, lost time by accident is 2 days. 2021: zero accident To month May 2022: zero accident The calculation for frequency rate and severity rate was generated from lost time accident (LTA) data, employee working hour's data and lost time day (LTD) data. The timesheet calculation for each month was shown during audit.	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The implementation of Integrated Pest Management was monitored. Census of nettle caterpillar, bagworm and rodent was conducted regularly to determine its controlling. The implementation of IPM are: a. Detection of caterpillar is conducted monthly. Controlling of caterpillar's attack is performed based on level of attack. There are three levels of caterpillar attack: low (< 5%), medium (5-10%) and	Complied

		<p>high (> 10%). Result of census was recorded including area of census, type of caterpillar, quantity of caterpillar and level of attack. There was caterpillar attack in 2019 – May 2022 with low level and its handling is by natural predator (<i>Turnera subulata</i>).</p> <p>b. Census of rat is conducted every three months, and the attack threshold < 5%. Record reviewed was for 2019 – May 2022 periods. Based on record of rat census there was no attack above 5%. Therefore, there was no rodenticide application and its handling by natural predator (<i>Tyto alba</i>).</p> <p>c. Breeding of <i>Tyto alba</i> as natural biological control of rat. Monitoring of <i>Tyto alba</i> is conducted monthly. Record reviewed was for 2019 – May 2022 periods. Samples was reviewed for each year, such as :</p> <ul style="list-style-type: none"> • May 2022; 166 cages in good condition and 13 cages are damaged/broken; 166 adults (couple), 20 juveniles and 14 eggs. • May 2021; 169 cages in good condition and 10 cages are damaged/broken; 169 adults (couple), 14 juveniles and 14 eggs. • May 2020; 158 cages in good condition and 21 cages are damaged/broken; 158 adults (couple), 13 juveniles and 9 eggs. <p>d. Programme for planting beneficial plants (<i>Turnera subulatta</i> and <i>Antigonon leptopus</i>) had been established. These beneficial plants can be seen along the main road and collection road. Upkeep of beneficial plants is conducted manually.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The company only uses natural predators namely <i>Tyto alba</i> and <i>Turnera subulatta</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php.</p>	Complied

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control.</p>	Complied																								
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																											
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The procedures SOP/SMART/MCAR/VII/TA-HPT (Pengendalian Hama dan Penyakit Tanaman-Pest and Disease Control) and SOP/SMART/MCAR/VIII/TA-PGM (Pengendalian Gulma-Weed Control) mentioned the use of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species and measures to avoid the development of resistance (such as pesticide rotation) should be applied.</p> <p>The organisation has policy on safe use of chemical including pesticides which stated in GAR Social and Environment Policy, dated September 8th, 2015. The organisation has also established memorandum No: 032/PD/VIII/2016 dated 13 August 2015 signed by President Director Mr. Daud Darsono, that there are no use of paraquat for weed control. It was verified that no paraquat been used for weed control and based on observations in pesticides warehouse, there was no paraquat. The organization has identified all the pesticide have a valid registration license, such as :</p> <table border="1" data-bbox="1131 1109 1977 1398"> <thead> <tr> <th>Pesticides</th> <th>Unit</th> <th>Actives Ingredient</th> <th>LD 50</th> <th>Ijin edar</th> <th>Expired</th> </tr> </thead> <tbody> <tr> <td>Rollup 480 SL</td> <td>Ltr</td> <td>isopropil amina glyphosate</td> <td>5000</td> <td>RI.010301 20042133</td> <td>03-Sep-23</td> </tr> <tr> <td>Rollifos 150 SL</td> <td>Ltr</td> <td>amonium glufosinat</td> <td>2000</td> <td>RI.010301 20103683</td> <td>13-Jan-25</td> </tr> <tr> <td>Erkafuron 20 WG</td> <td>Kg</td> <td>methyl metsulfuron</td> <td>5000</td> <td>RI.010301 20134861</td> <td>13-Sep-23</td> </tr> </tbody> </table>	Pesticides	Unit	Actives Ingredient	LD 50	Ijin edar	Expired	Rollup 480 SL	Ltr	isopropil amina glyphosate	5000	RI.010301 20042133	03-Sep-23	Rollifos 150 SL	Ltr	amonium glufosinat	2000	RI.010301 20103683	13-Jan-25	Erkafuron 20 WG	Kg	methyl metsulfuron	5000	RI.010301 20134861	13-Sep-23	Complied
Pesticides	Unit	Actives Ingredient	LD 50	Ijin edar	Expired																						
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		Garlon Mix 333	Ltr	triclopyr butoksil etil ester	3592	RI.010301 1984695	16-Apr-23	
		Starane 480 EC	Ltr	fluroxypyr methylheptyl ster	2320	RI.010301 20083155	02-Feb-23	
		Decis 25 EC	Ltr	fluroxypyr methylheptyl ster	2320	RI.010101 1979387	06-Oct-22	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The organization has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Kebun Bumi Sawit has calculated the LD50 based on amount of active ingredients applied per Ha and number of applications, such as :</p> <p>2019 Period January – December 2019, known that LD50 of isopropyl amina glifosat was 0.091 mg/Ha.</p> <p>2020 Period January – December 2021, known that LD50 of isopropyl amina glifosat was 0.133 mg/Ha.</p> <p>2021 Period January – December 2021, known that LD50 of isopropyl amina glifosat was 0.062 mg/Ha.</p> <p>2022 Period January – May 2022, known that LD50 of isopropyl amina glifosat was 0.0078 mg/Ha.</p>						Complied

7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Details of IPM can be seen in 7.1.1.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -</p>	<p>There was no evidence of prophylactic use of pesticides, all pesticides only used for certain targets of weeds or pests accordance to the plan and best agriculture practice.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: - Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p> <p>7.2.5d Process to limit the negative impacts of the application.</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients) such as:</p> <ul style="list-style-type: none"> • Ammonium glufosinate • Metal metsulfuron • Triklopir • Triklopir butoksi etil ester • Isoprophyl amina glifosate • Fluoksifir <p>Certificate holder has had procedure related to Pest and Disease management (No. SOP/SMART/MCAR/VII/TA-HPT dated 12 June 2012) about Pests and Diseases (P&D) Control Management mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than threshold limits. Furthermore, for weeds control purposes, work instruction No. IK/SMART/MCAR/VIII/TA-PGM/03 dated 26 March 2012 has describes weeds control on the palm circle, harvesting path, FFB platform, rotation, pesticides use, type of weeds and recommendation of pesticides.</p> <p>Furthermore, certificate holder also has Memorandum of President Director No. 044/PD/IX/2014 dated 21 November 2014 and No.</p>	Complied

		032/PD/VIII/2016 dated 13 August 2015 which mentioned that there will be no paraquat starting from 2016. During the audit, there is no complaint letter submitted to the top management and other stakeholders.	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide were handled and applied by a trained person. Records of training was sighted and reviewed such as :</p> <ul style="list-style-type: none"> - Mandatory Training of First Aid in Accident (1 person) based on certificate dated 15 February 2021. - Training of OHS on 24 April 2021. - Training of RSPO P&C on 18 August 2021. - Training of Covid 19 Prevention on 30 August 2021. - Mandatory Training of Lifting Tools Operator (2 person) based on license dated 15 November 2021. - Training of IPM on 15 November 2021. - Training of Leaf Sampling Unit on 11 January 2022. - Mandatory Training of OHS Expert (<i>AK3 Umum</i>) (1 person) based on license dated 7 February 2022. - Training of Hazardous Waste Management and GHG on 16 March 2022. - Training of Safe Working Practice on 22 March 2022. - Training of Hazardous Waste Management on 31 August 2021. - Training of RSPO P&C on 29 April 2022. - Training of Reproduction Right, Sexual Harassment, and Grievance Mechanism on 9 May 2022. 	Complied
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked areas with limited access. The storage was ventilated. MSDS and hazard symbol label were</p>	Complied

		<p>provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Based on a field visit to the Pesticides Storage dated 7th June 2022, there was found that:</p> <ul style="list-style-type: none"> • Permanent Buildings, • A good ventilation, • Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", • Eye wash shower, first aid box, PPE and Fire extinguisher are provided. • PPE room • Operation control: MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available • A package management/ used pesticide package is available • Water wash of pesticides containers collected in "spillage trap" • The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products has been identified and documented under the Environmental Aspect and Impact Identification and Evaluation Form (F/SMART/LEMS-EHSD/SADV/001/001), which updated annually.</p>	
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7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (<i>Tempat Penyimpanan Sementara Limbah B3</i>) location in Bumi Sawit Estate</p> <p>Details of ex pesticide container in 7.3.2.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document "<i>Daftar dan Data Pemakaian Pestisida BSWE</i>" and interview with company representatives, it was found during September 2019 – May 2022 there were no aerial application of pesticide throughout the company plantation.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide and fertilizer. The latest medical check-up performed on 7 March 2022 at company medical healthcare "Klinik BSWE" and attended by 50 workers, consisted of fertilizer applicators, spraying applicator and PIC in pesticides storage. The results of medical check up concluded all worker in normal or good condition.</p> <p>Based on interview with sprayers on 8th June 2022, they told that the medical check up results was informed to them.</p>	Complied
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>The organization had an internal memorandum regarding Breastfeeding and Pregnant Workers No : 001/MEMO-VPA PSM2/04/2011 dated 8 April 2011.</p> <p>The organization has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month. Records of pregnancy test was sighted and reviewed for 9 May 2022, 3 January 2022, 3 May 2021, 4 January 2021, 6 May 2020 and 4 January 2020. All the female sprayer in well condition and not being pregnant nor breast feeding.</p>	Complied

Note For 7.2.11

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 Sawit Permai has a procedure for Hazardous Waste Management No. SOP/SMART/LEMS-EHSD/SADV/I/002 dated 2 July 2014</p> <p>License of hazardous waste temporary storage (TPS LB3) from Head of Ogan Ilir Regent No.416/KEP/DLHP/2017 dated 16 June 2017 valid for 5 years and had storage time 180 days. Location :</p> <ul style="list-style-type: none"> • Bumi Sawit Estate, coordinate 3° 30' 40.95"S and 104° 20' 20.99"E • Bumi Sawit Mill, coordinate 3° 52' 57.00" S and 104° 34' 43.00" E <p>License covered some hazardous waste such as used oil, used filter, used battery, used rag, ex pesticide and chemical container, medical waste, and used lamp.</p> <p>The organization has send a letter No. 063/D&L – BSP/IV/2022 dated 25 April 2022 to Governor of South Sumatera cq. Kepala Dinas LHP South Sumatra regarding "<i>Permohonan Penerbitan Rincian Teknis Penyimpanan Limbah B3 a.n. PT. Bumi Sawit Permai</i>". The letter has been responded by Environmental and Land Agency of South Sumatra Province on 30 May 2022 by issuance of "<i>Berita Acara Pemeriksaan Kelengkapan Administrasi</i>" with registration number : Reg/023/RT.PSLB3/DLHP/B.II/5/2022. Based on that document, PT. Bumi Sawit Permai has completed all documents requirement. The next step is Technical and Field Verification that will be scheduled by team from Environmental and Land Agency of South Sumatra Province.</p> <p>The company also have an identification of potential impact in handling hazardous waste which stated in Environmental Aspect and Impact</p>	<p>Complied</p>
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Identification and Evaluation Form (F/SMART/LEMS-EHSD/SADV/001/001), updated annually.</p>	
<p>7.3.2</p>	<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>PT. Bumi Sawit Permai has an agreement with third parties for hazardous waste management. They are a registered collector/transporter which approved by Environmental Ministry. Document of agreement :</p> <ul style="list-style-type: none"> • Letter of Cooperation Agreement No. 177/EPMD/SPK-Pengelolaan LB3/BSP-PJ/X/2019 dated October 3, 2019 which is valid until October 2, 2021 between PT Bumi Sawit Permai and PT Primanru Jaya for B3 waste management. • Letter of Cooperation Agreement No. 233/EPMD/SPK-Management LB3/BSP-PJ-PLIB/XI/2019 dated November 4, 2019 between PT BSP and PT Primanru Jaya and PT Pengelolaan Limbah Industri Bekasi which is valid for 1 (one) year. The managed waste is in the form of medical waste, TL lamps, and used ink packaging. • Addendum-I between PT BSP and PT Primanru Jaya and PT Industrial Waste Management Bekasi with SPK number No. 233/EPMD/SPK-Pengelolaan LB3/BSP-PJ-PLIB/XI/2019 dated 16 November 2020 and valid until 4 November 2021. This SPK addendum is effective as of 4 November 2020. • Letter of Cooperation Agreement No. 076/EPMD/SPK-Pengelolaan LB3/BSP-PJ/X/2021 dated October 6, 2021 which is valid until October 6, 2023 between PT Bumi Sawit Permai and PT Primanru Jaya for B3 waste management. • Letter of Cooperation Agreement No. 091/EPMD/SPK-Pengelolaan LB3/BSP-PJ-PLIB/XI/2021 dated November 1, 2021 between PT BSP and PT Primanru Jaya and PT Pengelolaan Limbah Industri Bekasi which is valid for 1 (one) year until November 1, 2022. Waste that managed in the form of medical waste, TL lamps, and used ink packaging. 	<p>Complied</p>

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<p>For hazardous waste processing/utilization activities, PT Primanru Jaya has collaborated with several B3 waste processors/destroyers/utilizers with evidence of a cooperation agreement (SPK) as follows:</p> <ul style="list-style-type: none"> • PT Pengelolaan Limbah Industri Bekasi with SPK No. 233/EPMD/SPK-Pengelolaan LB3/BSP-PJ-PLIB/XI/2019 dated November 4, 2019 which was then added to the SPK No. 233/EPMD/SPK-Pengelolaan LB3/BSP-PJ-PLIB/XI/2019 dated November 16, 2020 and valid until November 4, 2021. This SPK addendum is effective as of November 4, 2020. LB3 Management Permit for LB3 Processing Services Business using Incinerator and Electrocoagulation from KLHK RI No. S.108/Menlhk/Setjen/PLB.3/2/2019 dated 27 February 2019 and valid for 5 years. • PT Non Ferindo Utama with SPK No. 265/PGA/NFU/IX/2021 dated 24 September 2021 which is valid until 24 September 2022. Waste utilization permits are available from the Ministry of Environment and Forestry based on Decree No. S.914/Menlhk/Setjen/PLB.3/10/2019 dated October 18, 2019 is valid for 5 years covering the utilization of lead from used batteries, fly ash, bottom ash. • PT Sinkona Indonesia Lestari with SPK No. Perj-082/E/XII/2021 dated December 9, 2021 and is valid until December 31, 2022. Permits for the utilization of B3 waste in the form of used oil are available from KLH No. SK.219/Menlhk/Setjen/PSB.3/5/2018 dated 9 May 2018 and is valid for 5 years. <p>Manifest for hazardous waste on 1 March 2022 :</p> <ul style="list-style-type: none"> • Number KLHK-1648077901 for ex ink container • Number KLHK-1648077284 for medical waste 	
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<ul style="list-style-type: none"> • Number KLHK-1648077096 for used rag filter • Number KLHK-1648076754 for ex chemical container • Number KLHK-1648076452 for ex hazardous waste container • Number KLHK-1648076001 for used battery • Number KLHK-1648074078 for neon • Number KLHK-1648073708 for used oil <p>Records of manifest for hazardous waste were seen and reviewed for 9 August 2021, 11 February 2021, 30 July 2020 and 10 August 2019. PT Bumi Sawit Permai has received letter from Primanru Jaya No. 015/PMB/PMJ/IV/2020 dated 1 April 2020 regarding “<i>Notifikasi Penghentian Sementara Pengangkutan Limbah Bahan Berbahaya dan Beracun</i>” in accordance to governance instruction related to Covid-19 situation.</p> <p>The organization also regularly in quarter basis send their hazardous waste monitoring report to <i>Kementerian Lingkungan Hidup dan Kehutanan RI</i>. Records was sighted and reviewed such as Electronic Receipt dated 1 April 2022 for Q1/2022 and Electronic Receipt dated 1 July 2020 for Q2/2020.</p> <p>Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Identification of waste from Bumi Sawit Mill and Estates activities was available and recorded at SOP/SMART/LEMS-EHSD/SADV/I/002 – waste management procedure. The organic and anorganic waste was	Complied

		<p>segregated at point of source meanwhile for hazardous waste will be kept in the hazardous waste temporary storage.</p> <p>Organic and inorganic wastes from Mill and Estates including housing were disposed to landfill in the Estate area. Areas of organic and inorganic wastes disposal was far from housing, in the flood-free area and not in swamp area and completed with warning sign not burning wastes. Based on observation there was open and close date at landfill. Landfill was available and observed during audit at Block D12 Division II Bumi Sawit Estate. Previous landfill was used during 9 March 2022 to 3 June 2022, and the new landfill was opened on 3 June 2022.</p>	
<p>Criteria 7.4: 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>Organization has been defined the SOP for Good Agricultural Practices in managing soil fertility which documented in SOP/SMART/MCAR/IX/TA-PPK (Manuring – Pemupukan). Manuring was performed manually and mechanically by EMDEK based on type and dosage defined by SMATRI.</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by SMARTRI, samples was reviewed for year 2021 and 2020.</p> <p>During audit, there was no fertilization activity due to weather condition (dry).</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>Organization has been defined work instruction for LSU (Leaf sampling unit) IK/SMART/MCAR/IX/TA-PPK/05-Pengambilan LSU and for SSU (Soil Sampling Unit) IK/SMART/MCAR/IX/TA-PPK/06-Pengambilan SSU. Soil and leaf sampling were analysed regularly by SMARTRI to determine the nutritional status of soil, to assist and to be guided in the preparation of annual fertilising programme recommendation. Soil is analysed when the age of the plant is 3, 5, 8 years and continued with age of the plant</p>	<p>Complied</p>

		<p>is added by 5 years and 1 year before replanting. Leaf was analysed annually. Soil and leaf sampling were taken from each division.</p> <p>Leaf Analysis</p> <ul style="list-style-type: none"> • Memorandum of Laboratory Analysis Result Ref #166/DAUN/LAB-SMARTRI/IV/2022 dated 21 April 2022 for 29 samples. • Memorandum of Laboratory Analysis Result Ref #322/DAUN/LAB-SMARTRI/IV/2021 dated 30 April 2021 for 17 samples. Memorandum of Laboratory Analysis Result Ref #322/DAUN/LAB-SMARTRI/IV/2021 dated 15 May 2020 for 36 samples. <p>Soil Analysis</p> <ul style="list-style-type: none"> • Memorandum of Laboratory Analysis Result Ref #075/TANAH/LAB-SMARTRI/VIII/2019 dated 15 August 2019 for 204 samples. • Memorandum of Laboratory Analysis Result Ref #277/TANAH/AL/ANLZ/07/2021 dated 28 July 2021 for 66 samples. <p>Leaf and soil analysis done by Field Research Coordinator (Analytical Laboratory. Section of SMARTRI). Head laboratory analysis results it is shown in the form of leaf nutrients content (Nitrogen, Phosphor, Kalum, Calcium, Magnesium Chloride and Boron) and soils (pH (H₂O) and KCl, C-organik, N, P, K, Na, Ca, Mg, KTK, etc.).</p>									
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>There was the nutrient recycling strategy performed by company such as land application from POME (Palm Oil Mill Effluent) and Empty fruit bunch (EFB) application. POME or liquid waste from mill used as Land application, it gives nutrient for palm oil plantation. Land application was applied in BWSE. Liquid waste applied dosage was 750 m³ /ha/year with 3 times rotation and BOD 2,500 – 4,500 mg/L.</p> <p>Record of POME application in BSWE are as follows :</p> <table border="1" data-bbox="1133 1294 1794 1393"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">POME Application</th> </tr> <tr> <th>Hectarage</th> <th>M³</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Year	POME Application		Hectarage	M ³				Complied
Year	POME Application										
	Hectarage	M ³									

**RSPO P&C Public Summary Report
Revision 13 (Apr 2022)**

		<table border="1"> <tr> <td>2019</td> <td>767.68</td> <td>96,460</td> </tr> <tr> <td>2020</td> <td>604.71</td> <td>75,230</td> </tr> <tr> <td>2021</td> <td>500.31</td> <td>65,278</td> </tr> <tr> <td>2022 (May 2022)</td> <td>464.26</td> <td>58,025</td> </tr> </table> <p>EFB were applied based on the recommendation from SMARTRI in terms of dosage per ha and location (30 ton/ha dosage). EFB were applied in BSWE by manually and mechanical using tractor. EFB were not applied nearby housing and water spring. Empty fruit bunch application was performed as mulch ground cover and added of organic material.</p> <p>Record of EFB application are as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="2">EFB Application</th> </tr> <tr> <th>Hectarage</th> <th>Ton</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>450.45</td> <td>19,154.42</td> </tr> <tr> <td>2020</td> <td>1,133.46</td> <td>25,766.10</td> </tr> <tr> <td>2021</td> <td>525.34</td> <td>15,760.92</td> </tr> <tr> <td>2022 (May 2022)</td> <td>212.12</td> <td>6,363.72</td> </tr> </tbody> </table> <p>Fibre and kernel shell were utilized as boiler fuels and boiler ash was used for road hardening.</p> <p>During audit there was no EFB application. Rest of EFB application was sighted during visiting to other activities. Field observation to Land Application at Block I15 Division III observed that POME was applied in line the procedure.</p>	2019	767.68	96,460	2020	604.71	75,230	2021	500.31	65,278	2022 (May 2022)	464.26	58,025	Year	EFB Application		Hectarage	Ton	2019	450.45	19,154.42	2020	1,133.46	25,766.10	2021	525.34	15,760.92	2022 (May 2022)	212.12	6,363.72	
2019	767.68	96,460																														
2020	604.71	75,230																														
2021	500.31	65,278																														
2022 (May 2022)	464.26	58,025																														
Year	EFB Application																															
	Hectarage	Ton																														
2019	450.45	19,154.42																														
2020	1,133.46	25,766.10																														
2021	525.34	15,760.92																														
2022 (May 2022)	212.12	6,363.72																														

<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained. - Minor compliance -</p>	<p>Organization has been defined the SOP for Good Agricultural Practices in managing soil fertility which documented in SOP/SMART/MCAR/IX/TA-PPK (Manuring – Pemupukan). Manuring was performed manually and mechanically by EMDEK based on type and dosage defined by SMATRI.</p> <p>Records of fertiliser inputs are well maintained in documented “Rencana dan Realisasi Pemupukan” (Plan and Realisation of Manuring). Fertiliser inputs recorded each semester.</p> <p>Records of fertilizer usage periode 2019 – May 2022</p> <table border="1" data-bbox="1131 686 1921 1209"> <thead> <tr> <th rowspan="2">Fertilizer</th> <th colspan="2">2019</th> <th colspan="2">2020</th> </tr> <tr> <th>Budget (Kg)</th> <th>Actual (Kg)</th> <th>Budget (Kg)</th> <th>Actual (Kg)</th> </tr> </thead> <tbody> <tr> <td>Urea</td> <td>1,335,850</td> <td>1,335,850</td> <td>617,050</td> <td>617,050</td> </tr> <tr> <td>RP</td> <td>14,200</td> <td>14,200</td> <td>448,100</td> <td>448,100</td> </tr> <tr> <td>TSP</td> <td>977,100</td> <td>977,100</td> <td>104,450</td> <td>104,450</td> </tr> <tr> <td>MOP</td> <td>1,943,600</td> <td>1,943,600</td> <td>1,082,800</td> <td>1,082,800</td> </tr> <tr> <td>S.Dolomit</td> <td>62,400</td> <td>62,400</td> <td>107,900</td> <td>107,900</td> </tr> <tr> <td>Kieserite Granular</td> <td>566,250</td> <td>566,250</td> <td>35,450</td> <td>35,450</td> </tr> <tr> <td>Kieserite Powder</td> <td>49,600</td> <td>49,600</td> <td>0</td> <td>0</td> </tr> <tr> <td>Borate</td> <td>35,980</td> <td>35,980</td> <td>24,011</td> <td>24,011</td> </tr> </tbody> </table> <table border="1" data-bbox="1131 1260 1921 1375"> <thead> <tr> <th rowspan="2">Fertilizer</th> <th colspan="2">2021</th> <th colspan="2">2022 (per May 2022)</th> </tr> <tr> <th>Budget (Kg)</th> <th>Actual (Kg)</th> <th>Budget (Kg)</th> <th>Actual (Kg)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Fertilizer	2019		2020		Budget (Kg)	Actual (Kg)	Budget (Kg)	Actual (Kg)	Urea	1,335,850	1,335,850	617,050	617,050	RP	14,200	14,200	448,100	448,100	TSP	977,100	977,100	104,450	104,450	MOP	1,943,600	1,943,600	1,082,800	1,082,800	S.Dolomit	62,400	62,400	107,900	107,900	Kieserite Granular	566,250	566,250	35,450	35,450	Kieserite Powder	49,600	49,600	0	0	Borate	35,980	35,980	24,011	24,011	Fertilizer	2021		2022 (per May 2022)		Budget (Kg)	Actual (Kg)	Budget (Kg)	Actual (Kg)						<p>Complied</p>
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		Urea	856,750	856,750	523,450	450,937		
		RP	771,350	771,350	424,600	76,850		
		TSP	33,000	33,000	0			
		MOP	1,467,750	1,467,750	864,300	571,025		
		S.Dolomit	713,400	713,400	12,950	1,600		
		Kieserite Granular	900	900	207,200	66,269		
		Kieserite Powder	0	0	10,800	10,800		
		Borate	23,345	23,345	25,662	25,662		

Criteria 7.5: Practices minimise and control erosion and degradation of soils.

7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The organization have the soil suitable map and there were no fragile soils and peat land at Bumi Sawit Estate area. The map described types of soil, topography and hydrology.</p> <p>Soil type and topography of PT. Bumi Sawit Permai concession based on semi-detail Soil Map scale 1 : 75.000 issued on September 2019 was as follow</p> <table border="1" data-bbox="1131 1029 1915 1327"> <thead> <tr> <th>Soil type</th> <th>Topography (%)</th> <th>Areas (Ha)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Typic Endoaquepts</td> <td>0 – 3</td> <td>700.37</td> <td>7.90</td> </tr> <tr> <td>Typic Endoaquepts</td> <td>0 – 3</td> <td>436.81</td> <td>5.00</td> </tr> <tr> <td>Typic Hapludults</td> <td>3 – 9</td> <td>1,238.31</td> <td>14.00</td> </tr> </tbody> </table>	Soil type	Topography (%)	Areas (Ha)	%	Typic Endoaquepts	0 – 3	700.37	7.90	Typic Endoaquepts	0 – 3	436.81	5.00	Typic Hapludults	3 – 9	1,238.31	14.00	Complied
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RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

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7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on field verification and replanting program, there are no replanting in Bumi Sawit Estate. Replanting will start in 2023.	Complied																								
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on field verification and interview with company representatives, there are no new palm oil planting in PT. Bumi Sawit Permai.	Complied																								
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																											
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	The organization have the soil suitable map and there were no fragile soils and peat land at Bumi Sawit Estate area. The map described types of soil, topography and hydrology. Soil type and topography of PT. Bumi Sawit Permai concession based on semi-detail Soil Map scale 1 : 75.000 issued on September 2019 was available.	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.		Complied																								

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	- Minor compliance -	Based on field verification and interview with company representatives, there are no new palm oil planting in PT. Bumi Sawit Permai.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -		Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) 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 -	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai.	Not Applicable
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 -		Not Applicable
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai	Not Applicable
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before	Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai	Not Applicable

	<p>reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>		
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai</p>	<p>Not Applicable</p>
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	<p>Based on soil map, field verification and interview with company representatives, obtained information there was no peat area in PT Bumi Sawit Permai</p>	<p>Not Applicable</p>
<p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			

<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Water management programme defined the method of water management plan include water source and distribution identification, volume of water utilization, parameter/standards of water utilization, identify the impacts include water effluents/wastes and the method to reduce and control. Water management program create based on environment monitoring procedure No. SOP/SMART/LEMS-EHSD/SADV/I/003 and management and monitoring water resources procedure No. SOP/SMART/BCOS-EHSD/SADV/I/004.</p> <p>Water supplies for Bumi Sawit Mill were from surface water Rambang river while estate was using groundwater. Licenses for water utilization was sighted, i.e. license of surface water utilization (APU) from South Sumatera Investment and Permit Services Agency No. 0157/DPMPTSP.V/IV/2022 dated on 26 April 2022 valid for 2 years. License of groundwater utilization (ABT) from South Sumatera Investment and Permit Services Agency No. 0240/DPMPTSP.V/VI/2022 dated 2 June 2022, No. 0241/DPMPTSP.V/VI/2022 dated 2 June 2022 and No. 0242/DPMPTSP.V/VI/2022 dated 2 June 2022 valid for 2 years.</p> <p>The records of retribution payment were sighted for period 2019 – May 2020. The 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>The organization has established management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> • Riparian restoration with forest vegetation plant/tree. • Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Bunian) in block F11/12 Division 2. • Conserve natural vegetation in riparian zone 	<p>Complied</p>
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	7.8.1b Workers have adequate access to clean water.	Based on field observation in Estate and Mill, the company has provided clean water in housing complex from Mill's water treatment or well/water treatment located in Estate's housing complex. Based on interview with Labor Union and housing resident, it is said that there is no issue related clean water facility.	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>The organization has established management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> • Riparian restoration with forest vegetation plant/tree. • Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Bunian) in block F11/12 Division 2. • Conserve natural vegetation in riparian zone 	Complied
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>POME from Bumi Sawit 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 September 2019 until May 2022.</p> <p>The Environment Ministry Decree No. 28/2003 requires that BOD of POME is less than 5,000 mg/litre, pH 6 – 9. The result of POME quality during this period was under 5,000 mg/litre (average 2,650 mg/L) for BOD and pH average 7.7. Quality of wastewater effluent is monitored monthly by third party i.e. Environmental Laboratories of Environmental Agency of Sumatera Selatan Province.</p> <p>Permit of wastewater for land application (LA) was available based on Head of Investment Board of Ogan Ilir Regency dated 20 May 2019. Valid for 5 years after issuance.</p>	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	The water was utilized for mill operations (include boilers, processes and domestics usage) that through the water treatment plant (using	Complied

	- Minor compliance -	<p>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 2020 - 2022</i>" while budget of water consumption sighted in document namely Water Supply Running Account 2020-2022.</p> <p>According to the record of water consumption during September 2019 until May 2022, the water consumption still under the budget.</p>	
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Bumi Sawit mill and estates has been developing the programme/plan on how to conduct efficiency for utilization of fossil fuel by develop the standard to manage the consumption each of vehicles and electricity generator within litre per hours both for organization owned and contractors; the monitoring conducted by monthly and reported to technical department. It was also developed the plan/programme regarding optimization of renewable energy known as fibre and shell as boiler fuels at mills, monitoring also conducted monthly by calculate the fibre and shell and utilize as boiler fuels whether during the construction or upgrading of all operations. There are monitoring records sighted regarding the utilization of fossils fuels and fibre shell.</p>	Complied
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>The source of greenhouse gas emission has identified on Environmental aspect and impact identification, updated on annual basis, as listed below:</p> <ul style="list-style-type: none"> • Methane from POME and composting at mill • Fossil fuels emissions from vehicles and engines generator 	Complied

		<ul style="list-style-type: none"> • Chemical fertilizer • Electricity usage • Chemical spraying <p>Several efforts to reduce GHG emissions is prepared as follows:</p> <ul style="list-style-type: none"> • Zero burning • Utilization of waste fibre and shell as boiler fuel and electricity from turbines • Reduce chemical fertilizer using EFB composting <p>The records of each programme were sighted as evident implementation. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 (six) months to ensure target was achieved.</p> <p>The Mill has calculated the net GHG emissions using The RSPO Palm GHG Calculator Version 4.0 and that data inputs are verified to be accurate. Capturing the information about summary of net GHG emissions, summary of field emissions and sinks, and summary of mill emissions and credits. Please refer to Appendix B for GHG Emission calculation.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011.</p>	Not Applicable

		This indicator is not applicable.	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. Replanting was conducted by chipping and no use of fire.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -	There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. Replanting was conducted by chipping and no use of fire.	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures. - Minor compliance -	There is no new planting within certified area of PT Bumi Sawit Permai – Bumi Sawit Estate after November 2005. Currently, the planting year of oil palm from 1995 - 2011. Replanting was conducted by chipping and no use of fire.	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.			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC</p>			

<p>countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>		
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>Based on Areal Statement 2022, Bumi Sawit Estate as Unit of Certification had oil palm crops planted after November 2005. Those are:</p> <ul style="list-style-type: none"> • YoP 2008 = 108.61 Ha • YoP 2010 = 18.37 Ha • YoP 2011 = 46.56 Ha <p>Total =173.54 Ha</p> <p>According to this, Unit of Certification shall follow the Remediation and Compensation Procedure (RaCP) and started with Land Use Change Analysis (LUCA). Golden Agri Resources (GAR) as parent company of PT Bumi Sawit Permai – Bumi Sawit POM already submit LUCA to the RSPO in May 2018 and has been responded by RSPO.</p> <p>Historical communication related RaCP process as below:</p> <ul style="list-style-type: none"> • Dated 7th May 2019 – GAR submitted 2nd clarification to RSPO • Dated 11th November 2019 – RSPO send feedback 3rd to GAR • Dated 29th July 2020 – GAR sent 3rd clarification to RSPO • Dated 1st September 2020 – RSPO send feedback 4th to GAR • Dated 22nd September 2020 – GAR sent 4th clarification to RSPO • RSPO Compliance Advisory No: 0003/03/21 Assurance – Integrity Issue Date: 25 March 2021 • Dated 25 January 2022 to RSPO : Request the 2nd Advisory Note for the Seven (7) Certified Companies • RSPO email on 18 February 2022 : 2nd Advisory Note to CB on GAR's Certification and RaCP process
		<p>Complied</p>

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		<p>Based on email from RSPO Secretariat on 18 February 2022 stated "We take consideration to provide a Conditional Approval as referring to the previous Advisory Note that we had provided to you before. This considering that the Advisory Note was given for the first case that came to us, and when the continuation of the previous approval for the similar case, we only give you the conditional approval.</p> <p>Now, this Conditional Approval would only be given for those Management Units that have been certified before to allow the Company to complete the RaCP process and continue the Annual Surveillance Assessment (ASA) and/or Recertification. And this will only be valid until the next 6 months from the date of this email. From time to time, we will review all the progress and status of the Certification and RaCP process for the particular certified management units, and we may revoke this conditional approval if any issues happen that may heavily threaten the integrity of RSPO standard requirements.</p> <p>While for the uncertified management units, The Initial Certification audit may be conducted, but the Certificates can only be issued when the completion of the RaCP Process (i.e approval of Compensation and Remediation Plans) is approved by the Compensation Panel".</p>	
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> - Critical (Major) compliance - <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>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 Sawit Permai Region South Sumatera, Unit BSWE 2013". HCV Assessment was conducted internally (by Environmental team of PT. SMART Tbk (parent company)) and using HCV Toolkit Indonesia 2008. The team consist of four members as following:</p> <ul style="list-style-type: none"> • Dr. Kunkun J. Gurmaya as Lead Assessor (Biodiversity specialist) – Lead Assessor • Agus Budianto (flora and fauna ecology specialist) - Assistant 	Complied

		<p>assessor</p> <ul style="list-style-type: none"> • Nugroho Wahyu W. (Ecology and Environmental Services specialist) - Assistant assessor • Yosaphat Ardilla (Economic and socio-culture specialist) - Assistant assessor <p>Lead assessor and assistant assessor have been approved by RSPO according to the list of RSPO Approved HCV Assessors date 30 May 2012. Field survey HCV identification conducted on January 12 to 15 June 2012. Presentation assessment result to management was conducted on 16 June 2012 and public consultation was held on 17 April 2013. Based on the assessment report, there are 4 types of HCV been identified such as HCV 1.1, HCV 1.2, HCV 4.1 and HCV 6 cover total area of 335,43 ha.</p>	
	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	There is no new planting within certified area of PT Bumi Sawit Permai after November 2018	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	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 Sawit Permai Region South Sumatera, Unit BSWE 2013". Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT. Bumi Sawit Permai.	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or	HCV assessment has been conducted and documented in the "Report of the Identification and Analysis of the Existence of High Conservation	Not Applicable

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

	<p>enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Value (HCV) area at PT Bumi Sawit Permai Region South Sumatera, Unit BSWE 2013". HCV Assessment was conducted internally (by Environmental team of PT. SMART Tbk (parent company)) and using HCV Toolkit Indonesia 2008.</p> <p>This indicator is Not Applicable.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>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 Sawit Permai Region South Sumatera, Unit BSWE 2013". HCV Assessment was conducted internally (by Environmental team of PT. SMART Tbk (parent company)) and using HCV Toolkit Indonesia 2008.</p> <p>There was HCV 6 identified in the concessions of PT Bumi Sawit Permai in the form of sacred graves. Maintenance and protection of graves area has been agreed with the local community. PT Bumi Sawit Permai facilitating to conduct care and maintenance of graves and community were not forbidden to visit or access the areas of HCV (sacred graves).</p> <p>PT Bumi Sawit Permai has made an agreement with local communities represented by Head of Tanjung Miring village for maintenance and management of <i>Makam Keramat Puyang Segagau/simong-simong</i> (sacred graves) in Block E12 Bumi Sawit Estate. There was evident by document of management cooperation with the community on 20 August 2016. This agreement has been verified during public consultation.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place.</p>	<p>To manage and monitor the HCV identified in PT Bumi Sawit Permai, Organization has established the HCV Management Plan which updated annually. The HCV Management Plan year 2020 - 2022 of consists:</p>	Complied

	<p>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>	<ul style="list-style-type: none"> • Monitoring and maintenance of HCV attributes in all type of HCV area • Install and repair boundary markers of HCV in all type of HCV area • Dissemination of HCV to employees and contractors • Dissemination of HCV to the public stakeholders • Training HCV • Monitoring and maintenance of HCV areas • Routine Patrol • Monitoring and management of protected species (HCV 1.2) • Planting plants barriers to erosion in Riparian area (HCV 4.1) • Monitoring and maintenance of erosion control plants (HCV 4.1) <p>HCV Monitoring Form has been filled monthly by a skilled and trained HCV officer.</p> <p>Job descriptions for HCV officer are:</p> <ul style="list-style-type: none"> • Conduct and monitor HCV areas management activities In Bumi Sawit Estate • Report the HCV monitoring programs to Unit Head • Act as document controller about HCV management 	
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>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 Sawit Permai Region South Sumatera, Unit BSWE 2013". HCV Assessment was conducted internally (by Environmental team of PT. SMART Tbk (parent company)) and using HCV Toolkit Indonesia 2008.</p> <p>Refer to 7.12.6 for HCV Management and Monitoring program.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15</p>	Refer to 7.12.1	Complied

	November 2018, the Remediation and Compensation Procedures (RaCP) applies. - Critical (Major) compliance -		
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Bumi Sawit POM** 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 **2021** for **Bumi Sawit POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.06
PK	1.06

Extraction	%
OER	20.11
KER	6.04

Production	t/yr
FFB Process	99,539
CPO Produced	22623.92
PK Produced	6801.734

Land Use	Ha
OP Planted Area	4489.42
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	335.43
Total	

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	4721.11	0.05	0.00	0.00	0.00	0.00	4721.11	0.05
CO ₂ Emission from fertilizer	3658.43	0.04	0.00	0.00	0.00	0.00	3658.43	0.04
NO ₂ Emission	2947.44	0.03	0.00	0.00	0.00	0.00	2947.44	0.03
Fuel Consumption	1385.09	0.01	0.00	0.00	0.00	0.00	1385.09	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-5047.39	-0.05	0.00	0.00	0.00	0.00	-5047.39	-0.05
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	7664.67	0.08	0.00	0.00	779.63	0.00	8444.30	0.08

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	22056.37	0.20
Fuel Consumption	544.63	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	22601.00	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

The GHG emissions that were produced in **2020** for **Bumi Sawit POM** 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 **Bumi Sawit POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.79
PKO	1.79

Extraction	%
OER	19.15
KER	5.87

Production	t/yr
FFB Process	133,146.37
CPO Produced	25501.479
PKO Produced	7814.29

Land Use	Ha
OP Planted Area	8,214.06
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	356.43
Total	8,214.06

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	25345.92	0.25	0.00	0.00	0.00	0.00	25345.92	0.25
CO ₂ Emission from fertilizer	3708.93	0.04	0.00	0.00	0.00	0.00	3708.93	0.04
NO ₂ Emission	2096.47	0.02	0.00	0.00	0.00	0.00	2096.47	0.02
Fuel Consumption	933.57	0.01	0.00	0.00	0.00	0.00	933.57	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-6853.54	-0.07	0.00	0.00	0.00	0.00	-6853.54	-0.07
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	25231.35	0.24	0.00	0.00	0.00	0.00	25231.35	0.24

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	26098.94	0.20
Fuel Consumption	398.53	0.00
Grid Electricity Utilisation	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	26497.47	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

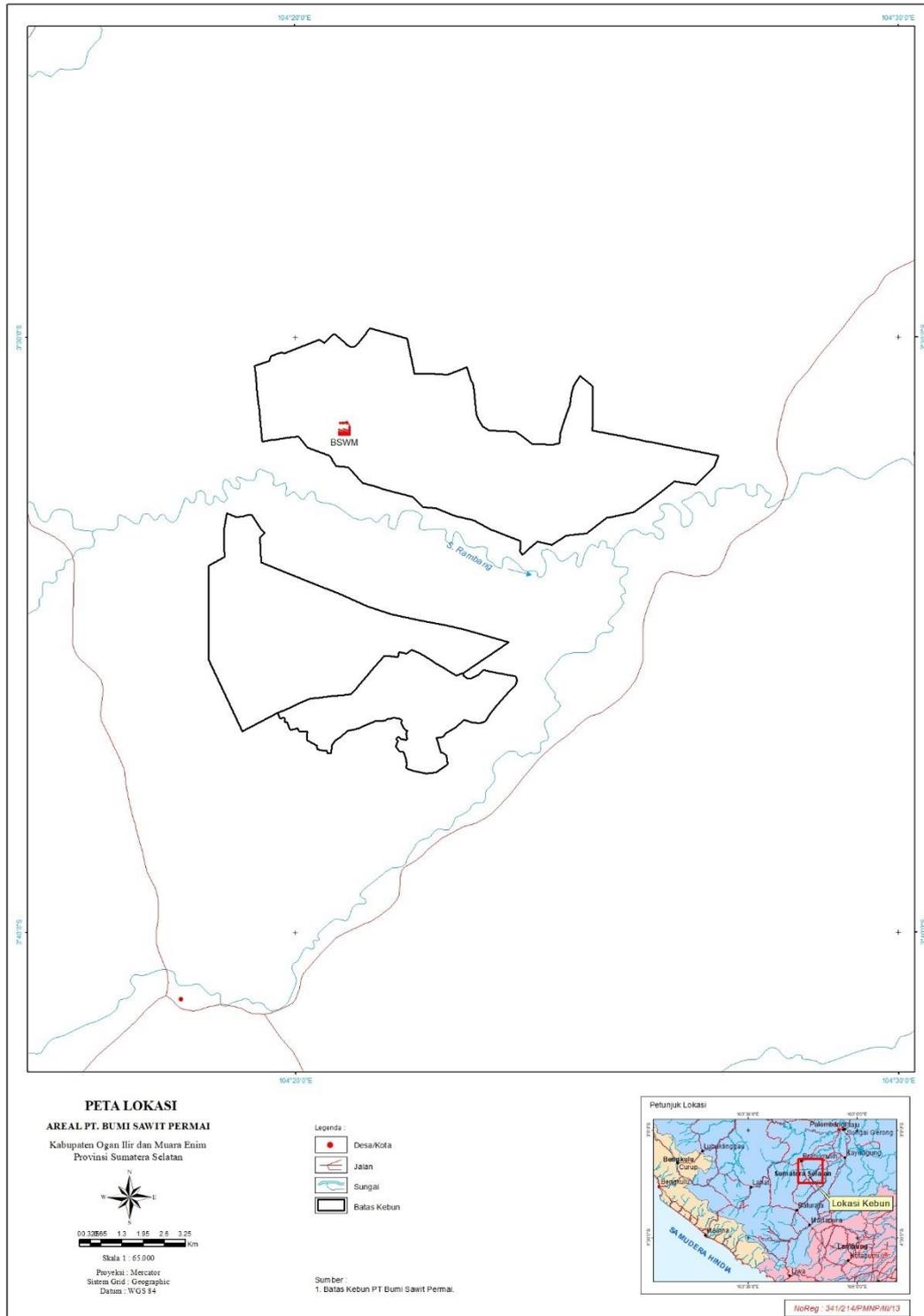
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

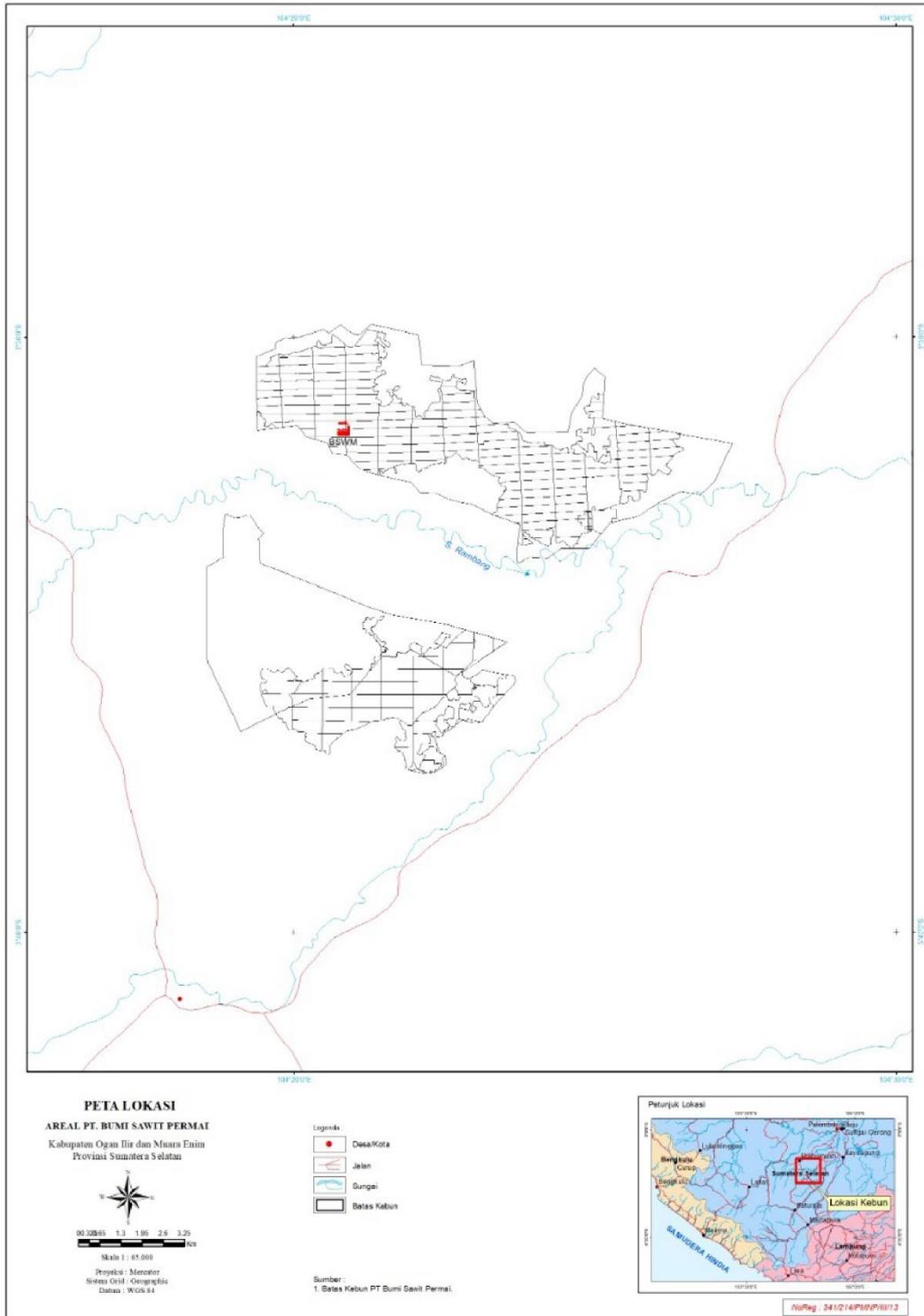
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and/or sampled

Not applicable for PT Bumi Sawit Permai.

Appendix F: List of Abbreviations

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