

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA2)
- Extension of Scope

<b>Client Company name (Parent Company):</b> <b>SIPEF GROUP</b>
<b>Client company Address:</b> Forum Nine Building, 10th Floor, Suite 1-11, Jl.Imam Bonjol No.9 Medan – 20112, Sumatera Utara Province, Indonesia
<b>Certification Unit:</b> <b>PT Agromuko Bunga Tanjung Palm Oil Mill</b>
<b>Location of Certification Unit:</b> Brangan Jaya, Kec. Teramang Jaya Kab. Mukomuko, Indonesia
Date of Final: 14/06/2022

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### Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	SIPEF Group		
<b>RSPO Membership Number</b>	1-0021-05-000-00	<b>Membership Approval Date</b>	7/12/2005
<b>Address</b>	Head Office – North Sumatera: Forum Nine Building, 10th Floor, Suite 1-11, Jl.Imam Bonjol No.9, Medan – 20112 Sumatera Utara Province, Indonesia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT Agromuko Bunga Tanjung Palm Oil Mill		
<b>Location / Address</b>	Brangan Jaya, Kec. Teramang Jaya, Kab. Mukomuko, Indonesia		
<b>Website</b>	<a href="http://www.tolantiga.co.id">www.tolantiga.co.id</a>		
<b>Management Representative</b>	Mr. Sander Van den Ende	<b>E-mail</b>	<a href="mailto:svdende@sipef.com">svdende@sipef.com</a>
<b>Telephone</b>	+62 61 415 2043	<b>Facsimile</b>	+62 61 452 0908

2. Certification Information			
<b>Certificate Number</b>	RSPO 646338	<b>Certificate Start Date</b>	01/03/2022
<b>Date of First Certification</b>	22/02/2011	<b>Certificate Expiry Date</b>	28/02/2027
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with RSPO Standard INA-NI, April 2020.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> <li>• 70% continuation onsite assessment from 30% remote assessment.</li> <li>• Determination of the conformity of an extension to scope of Sungai Teramang Estate as an additional FFB supply base, with RSPO Standard INA-NI, April 2020.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil with supply chain Module <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil. <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		

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<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 MT / hr
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
10374408	ISO 9001:2015	Lloyd's Register Indonesia	02/07/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Bunga Tanjung POM	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	02° 43' 00.39"S	101° 22' 16.94"E
Bunga Tanjung Estate	Brangan Mulia Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	02° 43' 30.14"S	101° 22' 21.51"E
Air Bikuk Estate	Air Bikuk Village, Lubuk Bento Village and Air Berau Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	02° 46' 27.67"S	101° 24' 44.68"E
Air Buluh Estate	Air Buluh Village, Semundam Village, Tanjung Jaya Village, Talang Baru Village and Talang Arah Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	03° 01' 27.29"S	101° 33' 15.79"E
Malin Deman Estate	Air Merah Village, Talang Arah Village and Talang Baru Village, Malin Deman District, Mukomuko Regency, Bengkulu Province, Indonesia	03° 01' 27.29"S	101° 33' 15.79"E
Sungai Teramang Estate*	Batu Ejung Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	02° 45' 30.30"S	101° 22' 15.20"E
Kebun Masyarakat Desa/KMD	Mukomuko Regency, Bengkulu Province, Indonesia	02° 43' 30.14"S	101° 22' 21.51"E
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	03° 03' 15.11"S	101° 29' 53.43"E
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	02° 58' 50.37"S	101° 35' 51.83"E

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Koperasi Harapan Jaya Lubuk Talang (KHJLT)	Air Merah Village, Talang Arah Village and Talang Bari Village, Malin Deman District and Ipuh District, Mukomuko, Regency, Bengkulu Province, Indonesia	02° 58' 43,17"S	101° 37' 40,61"E
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**Note:**

- 1) \*Sungai Teramang Estate is an extension to scope for Bunga Tanjung Mill
- 2) Information provided above (except the Sungai Teramang Estates) is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

**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
Bunga Tanjung Estate	2,312.19	519.63	71.18	2,903.00	79.65
Air Bikuk Estate	1,212.90	188	9.10	1,410.00	86.02
Air Buluh Estate	2,170.79	257.13	72.08	2,500.00	86.83
Malin Deman Estate	631.76	133.49	412.75	1,178.00	53.63
Sungai Teramang Estate*	272.91	35.91	1,461.18	1,770.00	15.41
Kebun Masyarakat Desa	224.24	0	0	224.24	100.00
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	135.10	4.41	0	139.51	96.84
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	164.40	3.35	0	167.75	98.00
Koperasi Harapan Jaya Lubuk Talang (KHJLT)	106.99	18.01	0.6	125.6	85.18
<b>Total</b>	<b>7,231.28</b>	<b>1,159.93</b>	<b>2,026.89</b>	<b>10,418.1</b>	<b>77.95</b>

**Note:**

- 1) Koperasi Harapan Jaya Lubuk Talang (KHJLT) as the new supply bases of Bunga Tanjung POM. The information for an extension to scope during RAV has been provided at Public Announcement.
- 2) Information provided above (except the Sungai Teramang Estates) is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.
- 3) \*Sungai Teramang Estate is an extension to scope for Bunga Tanjung Mill
- 4) Overall certified area increases due to scope extension.

**6. Plantings & Cycle**

Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		

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Bunga Tanjung Estate	0	0	891.06	1,421.13	0	2,312.19	0
Air Bikuk Estate	526.62	469.87		216.41		686.28	526.62
Air Buluh Estate	0	0	524.30	1,646.49	0	2,170.79	0
Malin Deman Estate	0	631.76	0	0	0	631.76	0
Sungai Teramang Estate*	272.91	0	0	0	0	0	272.91
Kebun Masyarakat Desa	0	45.24	179.00	0	0	224.24	0
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	0	135.10	0	0	0	135.10	0
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	0	164.40	0	0	0	164.40	0
Koperasi Harapan Jaya Lubuk Talang (KHJLT)	106.99	0	0	0	0	0	106.99
<b>Total (ha)</b>	<b>906.52</b>	<b>1,446.37</b>	<b>1,591.36</b>	<b>3,284.03</b>	<b>0</b>	<b>6,324.76</b>	<b>906.52</b>

**Note:**

- 1) Only Mature area is considered as production area
- 2) Information provided above (except the Sungai Teramang Estates) is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.
- 3) \*Sungai Teramang Estate is an extension to scope for Bunga Tanjung Mill
- 4) Overall mature/immature area increases due to scope extension.

**7. Summary of Certified Tonnage of FFB (Own Certified Scope)**

Estate / Smallholders	Tonnage / year			
	Estimated last year (Feb 2021-Jan 2022)	Actual (Nov 2019 – Sep 2021)		Forecast (Feb 2022-Jan 2023)
		Previous license period (Nov 2019-Dec 2020)	Current license period (Jan-Sep 2021)	
Bunga Tanjung Estate	29,324.51	38,325.83	33,532.57	56,477.19
Air Bikuk Estate	10,208.04	11,953.64	11,440.13	13,640.30
Air Buluh Estate	33,239.78	44,613.36	44,453.35	87,433.00
Malin Deman Estate	11,580.81	13,160.98	12,883.15	17,688.03
Sungai Teramang Estate*	0	0	0	1,877.63
Kebun Masyarakat Desa	1,845.12	3,621.19	2,605.51	4,120.00
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	2,069.80	3,868.09	2,670.14	4,435.22
Koperasi Perkebunan Sejahtera Bersama	1,716.33	3,628.26	2,594.96	4,535.93

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Mukomuko Agro Sejahtera (KPSB-MMAS)				
Koperasi Harapan Jaya Lubuk Talang (KHJLT)	0	0	0	500
<b>Total</b>	<b>89,984.39</b>	<b>229,351.17</b>		<b>190,707.30</b>
Total volume extension*	142,917.69	0	0	0
<b>Grand Total (ha)</b>	<b>232,902.08</b>	<b>229,351.17</b>		<b>190,707.30</b>

**Note:**

- 1) \*Volume extension for period Feb 2021 – Jan 2022
- 2) Information provided above (except the Sungai Teramang Estates) is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.
- 3) \*Sungai Teramang Estate is an extension to scope for Bunga Tanjung Mill.

**8. Summary of Certified Tonnage of FFB (from other certified unit(s))**

Estate / Smallholders	Tonnage / year			
	Estimated last year (key in period)	Actual (key in period)		Forecast (key in period)
		Previous license period (key in period covered)	Current license period (key in period covered)	
-		-	-	
-		-	-	
<b>Total</b>		<b>N/A</b>		

**Note:** Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

**9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)**

Out growers / smallholders	Tonnage / year			
	Estimated last year (key in period)	Actual (key in period)		Forecast (key in period)
		Previous license period (key in period covered)	Current license period (key in period covered)	
-	-	-	-	-
-	-	-	-	-
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>N/A</b>

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<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Nov-19	8,532.58	-	8,532.58
2	Dec-19	9,498.67	-	9,498.67
3	Jan-20	8,574.13	-	8,574.13
4	Feb-20	10,075.03	-	10,075.03
5	Mar-20	10,035.47	-	10,035.47
6	Apr-20	8,063.86	-	8,063.86
7	May-20	11,263.93	-	11,263.93
8	Jun-20	11,354.25	-	11,354.25
9	Jul-20	11,088.61	-	11,088.61
10	Aug-20	10,566.48	-	10,566.48
11	Sept-20	9,799.54	-	9,799.54
12	Oct-20	9,695.42	-	9,695.42
13	Nov -20	9,696.23	-	9,696.23
14	Dec-20	10,915.82	-	10,915.82
15	Jan-21	9,799.54	-	9,799.54
16	Feb-21	9,865.73	-	9,865.73
17	Mar-21	10,745.51	-	10,745.51
18	Apr-21	9,791.47	-	9,791.47
19	May-21	9,785.02	-	9,785.02
20	Jun-21	9,791.47	-	9,791.47
21	Jul-21	10,664.80	-	10,664.80
22	Aug-21	9,944.83	-	9,944.83
23	Sept-21	9,802.77	-	9,802.77
<b>TOTAL</b>		<b>229,351.17</b>	<b>-</b>	<b>229,351.17</b>

**Note:** Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

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<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Feb 2021-Jan 2022)</b>	<b>Actual (Nov 2019 – Sep 2021)</b>		<b>Forecast (Feb 2022-Jan 2023)</b>
	Previous license period (Nov 2019-Dec 2020)	Current license period (Jan-Sep 2021)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
232,902.08 mt	119,171.35 mt	110,179.81 mt	190,707.30* mt
	229,351.16 mt		
<b>CPO (OER: 23.20%)</b>	<b>CPO (OER: 22.78%)</b>		<b>CPO (OER: 22.15%)</b>
77,014.06 mt	27,147.23 mt	25,098.96 mt	42,241.66* mt
	52,246.19 mt		
<b>PK (KER: 5.00%)</b>	<b>PK (KER: 5.12%)</b>		<b>PK (KER: 4.73%)</b>
15,477.08 mt	6,101.57 mt	5,641.21 mt	9,020.66* mt
	11,742.78 mt		

**Note:**

- Information on **"Estimated last year"** and **"Actual"** provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.
- In the previous published Recertification Audit report, the **"Forecast"** volumes were - FFB 188,329.67MT; CPO 41,715.02MT; PK 8,907.99MT.

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Nov-19	1,943.72	436.87
2	Dec-19	2,163.80	486.33
3	Jan-20	1,953.19	439.00
4	Feb-20	2,295.09	515.84
5	Mar-20	2,286.08	513.82
6	Apr-20	1,836.95	412.87
7	May-20	2,565.92	576.71
8	Jun-20	2,586.50	581.34
9	Jul-20	2,525.98	567.74
10	Aug-20	2,407.04	541.00
11	Sept-20	2,232.34	501.74
12	Oct-20	2,208.62	496.41
13	Nov -20	2,208.80	496.45

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14	Dec-20	2,486.62	558.89
15	Jan-21	2,232.34	501.74
16	Feb-21	2,247.41	505.13
17	Mar-21	2,447.83	550.17
18	Apr-21	2,230.50	501.32
19	May-21	2,229.03	500.99
20	Jun-21	2,230.50	501.32
21	Jul-21	2,429.44	546.04
22	Aug-21	2,265.43	509.16
23	Sept-21	2,233.06	501.90
<b>TOTAL</b>		<b>52,246.19</b>	<b>11,742.78</b>

**Note:** Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

### 11. Summary of Actual Volume sold

#### Current License period (Jan 2021-Sep 2021)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	9,999.65	0	0	8,000	17,999.65
<b>PK (MT)</b>	3,830.93	0	0	0	3,830.93
<b>Credits</b>	-	-	-	-	-

#### Previous License period (Nov 2019-Dec 2020)

<b>CPO (MT)</b>	13,498.85	0	0	0	13,498.85
<b>PK (MT)</b>	2,418.85	0	0	0	2,418.85
<b>Credits</b>	-	-	-	-	-

**Note:**

- 1) Conventional is RSPO certified material but sold as non-RSPO.
- 2) Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

### 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	Wira Inno Mas	TR-26146386-86c6	-	18.85
2	Wira Inno Mas	TR-5e55dd02-1eae	1,499.75	-
3	Wira Inno Mas	TR-2a5f9f65-d3a7	1,000	-

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4	Wira Inno Mas	TR-2bd27d9b-ca92	-	561.96
5	Wira Inno Mas	TR-edba90b7-5efc	999.78	-
6	Wira Inno Mas	TR-bdc0c573-32b1	2,499.88	-
7	Wira Inno Mas	TR-d84b0d83-db2f	999.86	-
8	Wira Inno Mas	TR-ada219d3-e8e2	-	88.04
9	Wira Inno Mas	TR-df24746d-04b2	-	413.66
10	Wira Inno Mas	TR-c59cf40f-4dbb	-	236.34
11	Wira Inno Mas	TR-e6afa290-3e59	2,499.91	-
12	Wira Inno Mas	TR-f9fd9a1b-465f	-	320.54
13	Wira Inno Mas	TR-e180349f-a7bc	-	279.46
14	Wira Inno Mas	TR-92508f30-a231	1,499.91	-
15	Wira Inno Mas	TR-eec150a7-5756	-	300.4
16	Wira Inno Mas	TR-90dad4c5-50bc	2,499.76	-
17	Wira Inno Mas	TR-3505ba41-4ced	-	199.6
18	Wira Inno Mas	TR-037b014a-dd89	-	346.48
19	Wira Inno Mas	TR-17f37425-2625	1,000	-
20	Wira Inno Mas	TR-4d154430-1a23	-	385.53
21	Wira Inno Mas	TR-7f338400-f514	-	3.52
22	Wira Inno Mas	TR-5bf74b1c-4a14	-	64.47
23	Wira Inno Mas	TR-9e98c01b-26e4	1,000	-
24	Wira Inno Mas	TR-17953e52-924a	1,499.94	-
25	Wira Inno Mas	TR-381c8f9c-282e	-	335.02
26	Wira Inno Mas	TR-5be76577-09a8	-	214.98
27	Wira Inno Mas	TR-d52ef668-c239	1,000	-
28	Wira Inno Mas	TR-4602b5a8-5347	-	567.48
29	Wira Inno Mas	TR-7a06e114-b055	-	82.52
30	Wira Inno Mas	TR-4a079eb9-3cd8	1,499.79	-
31	Wira Inno Mas	TR-2bfabcea-eefb	-	583.29
32	Wira Inno Mas	TR-20b2a88d-22c9	-	16.71
33	Wira Inno Mas	TR-8fd140aa-e981	-	200
34	Wira Inno Mas	TR-1be0af03-f86d	-	364.92
35	Wira Inno Mas	TR-15c53fee-e0df	1,499.95	-
36	Wira Inno Mas	TR-911f686c-e3a4	-	135.08
37	Wira Inno Mas	TR-a13e34ee-9702	2,499.97	-
38	Wira Inno Mas	TR-0832b837-321e	-	530.93
<b>TOTAL</b>			<b>23,498.50</b>	<b>6,249.78</b>

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11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
-	-	-	-	-
-	-	-	-	-
<b>TOTAL</b>				

**Note:** Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Wilmar Nabati Indonesia	8,000.00	-
<b>TOTAL</b>		<b>8,000.00</b>	-

**Note:** Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

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

**Note:** Information provided above is the same as previous published Recertification Audit report. This same information is included in this Scope Extension report for report completeness.

12. Independent Smallholders Certified Tonnage / 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			-			-			-

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IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
<b>Current License period (Not Applicable)</b>						
Credits				-	-	-
Physical	-	-	-			

## 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: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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

### 2.1 Assessment Methodology, Programme, Site Visits

The onsite audit for the extension to scope was conducted on **28 – 29 March 2022**.

Prior to the scope extension audit a recertification audit was conducted, the on-site assessment for the recertification audit was conducted on **25 – 30/10/2021**. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **20/09/2021**: [https://rspo.org/certification/public-announcement?keywords=bunga+tanjung&country=&assessment\\_type=](https://rspo.org/certification/public-announcement?keywords=bunga+tanjung&country=&assessment_type=)

Due to the COVID-19 pandemic, the recertification audit had 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 **11-13/11/2020**.

The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and its 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

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workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re- Certification)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Bunga Tanjung Estate	X			X	
Air Bikuk Estate	X	X		X	
Air Buluh Estate	X	X			X
Malin Deman Estate	X		X		X
Sungai Teramang Estate	X		X		
Kebun Masyarakat Desa	X	X	X	X	X
Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	X	X	X	X	X
Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	X	X	X	X	X
Koperasi Harapan Jaya Lubuk Talang (KHJLT)	X	X	X	X	X

**Tentative Date of Next Visit:** 1 November 2022 – 9 November 2022.

**Total Number of Mandays: 24.5 mandays**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Imam Fakhrurozi (IF)	Team Leader for Recertification audit and Team	<b>Education:</b> Holds a Bachelor Degree majoring in Agriculture Technology from Gadjah Mada University.

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	Member for Scope Extension audit	<p><b>Work Experience:</b> 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p><b>Training attended:</b> Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&amp;C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETAR requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation</p> <p><b>Aspect covered in Recertification audit:</b> Occupational Health and Safety, Environmental Aspect, Supply Chain.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p>
Andi Pratama Pasaribu (APP)	Team Member for Recertification audit and Scope Extension audit	<p><b>Education:</b> Holds a Bachelor Degree majoring Social Economy from Jember University</p> <p><b>Work Experience:</b> 5 years working experience as Field Agronomy Assistant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p><b>Training attended:</b> Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, Endorsed RSPO P&amp;C Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course, ISO45001:2018 Lead Auditor Course, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p><b>Aspect covered in Recertification audit:</b> Best Practice Agronomy and Mill, Business Plan, Workers Welfare.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p>
Yudwi Wisnu Rahmanto (YWR)	Team Member for Recertification audit Team Leader for Scope extension audit	<p><b>Education:</b> Holds a Bachelor of Forestry with Silviculture background from Gadjah Mada University.</p> <p><b>Work Experience:</b> 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p><b>Training attended:</b> Completed Endorsed RSPO P&amp;C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&amp;C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p><b>Aspect covered in both audits:</b> Legal and Social aspect, HCV, Stakeholder Consultation.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p>

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<p><b>Eko Purwanto</b></p>	<p>Team Member for Scope extension audit</p>	<p><b>Education:</b> Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p><b>Work Experience:</b> Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p><b>Training attended:</b> Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&amp;C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&amp;C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&amp;C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&amp;C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of mill and estate best management practices and supply chain for CPO mills.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p>
<p>Dr Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p>

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		<ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. ASI Reviewer training</li> <li>3. Safety and Health</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4</li> <li>7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard : GLOBALG.A.P., Euro GAP</li> </ol>
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**Accompanying Persons:**

Name	Role
None	

**2.3 Assessment Plan**

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

**Onsite audit plan**

Date	Time	Subjects	IF	APP	YWR
Monday, 25/10/21	08.00 -09.30	Opening Meeting PT Agro Muko – Bunga Tanjung POM (location in Air Buluh Estate)	√	√	√
	08.00-12.00	<b>Field visit: Air Buluh Estate dan Malin Deman Estate</b> - Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices). - pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety) - HGU pegs maintenance, HCV area, river, buffer zone	√	-	-
		<b>Field visit and Interview:</b> KMD Tanjung Harapan, KMD Bukit Harapan and KMD Mundam Marap (Air Buluh Estate)	-	√	-
		<b>Field visit and Interview:</b> Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS) Koperasi Perkebunan Air Buluh Agromuko (KOPABA) Koperasi Harapan Jaya Lubuk Talang (KHJLT)	-	-	√
	12.00-14.00	<b>Break</b>	√	√	
	14.00-17.00	<b>Document Review: Air Buluh Estate and KMD</b> RSPO P&C	√	√	√
	17.00-	<b>Travel to GMO</b>			

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Date	Time	Subjects	IF	APP	YWR
Tuesday, 26/10/21	08.00-12.00	<b>Field visit: Air Bikuk Estate &amp; Bunga Tanjung Estate</b> <ul style="list-style-type: none"> <li>- Harvesting, transport of FFB, spraying, fertilizer regime, IPM implementation and worker interview (best management practices).</li> <li>- pesticide and agrochemical storage, equipment and PPE storage, diesel fuel storage, workshop and; Interview with Workers (welfare, environmental, health and safety)</li> <li>- HGU pegs maintenance, HCV area, river, buffer zone</li> </ul>	√	-	√
		<b>Field visit and Interview:</b> Stakeholder interview (with surrounding village)	-	-	√
		<b>Field visit and Interview:</b> <ul style="list-style-type: none"> <li>- KMD Air Bikuk, KMD Air Berau, KMD Pondok Suguh (Bikuk Estate)</li> <li>- KMD Pasar Bantal, KMD Nelan Indah (Bunga Tanjung Estate)</li> </ul>	-	-	√
	12.00-14.00	<b>Break</b>	√	√	√
	14.00-17.00	<b>Continues Audit</b>	√	√	√
Wednesday, 27/10/21	08.00-12.00	<b>File Visit and Document review: Bunga Tanjung Mill</b> <ul style="list-style-type: none"> <li>- CC Requirement</li> <li>- General information; time bound plan; partial certification verification; RSPO P&amp;C (Management Plan); Palm Oil Mill's Best Management Practices, Social policy and implementation, Continual Improvement.</li> <li>- RSPO P&amp;C (Health and Safety, Environmental Management System, Waste management system, Continual Improvement, Use of Renewable Energy, GHG Calculation).</li> <li>- EMS, EFB, WWTP, emissions, diesel tanks, fire extinguishers, clinic, first aiders and boxes, workshop, storage, etc.</li> <li>- Mill process from incoming FFB to CPO storage tank, PK silo, PPE use, safe working environment, walk ways, signs, etc.</li> <li>- Interview with workers</li> </ul>	√	√	√
	12.00-14.00	<b>Break/Lunch</b>	√	√	√
	14.00 – 15.30	<b>Continue Audit</b>	√	√	√
	15.30-16.00	Auditor Discussion	√	√	√
Thursday 28/10/21	06.00 – 17.00	Travel to Padang (PCR covid-19 test)	√	√	√
Friday 29/10/21	08.00 – 12.00	Visit AMTT	√	√	√
Saturday 30/10/21	08.00 – 09.00	<b>Closing Meeting</b>	√	√	√
	09.00 – 11.00	Travel back to Jakarta			

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**Remote audit plan**

Date	Time	Subjects	IF	EP	YWR	ICT Planned
Wednesday 11/11/2020	14.00 – 14.30	Opening Meeting <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√	Video conference and Teleconference with Skype Meeting
	14.30 – 17.00	Verification on related documents and records; Interview with Auditee. Criteria 3.4: Indicator 3.4.1 (C); 3.4.2; 3.4.3 (C) Criteria 3.6: Indicator 3.6.1 (C) Criteria 3.8: Supply Chain Criteria 6.7: Indicator 6.7.1 (C); 6.7.2; 6.7.5 Criteria 7.2: Indicator 7.2.6; 7.2.9 Criteria 7.3: Indicator 7.3.1 Criteria 7.8: Indicator 7.8.1; 7.8.3; 7.8.4 Criteria 7.9: Indicator 7.9.1 Criteria 7.10: Indicator 7.10.1 (C); 7.10.2 (C); 7.10.3 (C) Criteria 7.12: Indicator 7.12.1 (C); 7.12.2 (C); 7.12.4 (C); 7.12.6; 7.12.8	√			Video conference and Teleconference Skype Meeting Document review through Email/Whatsapp/Google Drive/Zoom meeting share doc. Video conference and Teleconference Skype Meeting Document review through Email/Whatsapp/Google Drive/Zoom meeting share doc.
		Verification on related documents and records; Interview with Auditee. Criteria 1.1: Indicator 1.1.1 (C); 1.1.3 (C); 1.1.4 (C); 1.1.5 Criteria 1.2: Indicator 1.2.1; 1.2.2 Criteria 2.1: Indicator 2.1.1 (C) Criteria 2.2: Indicator 2.2.1; 2.2.2; 2.2.3 Criteria 2.3: Indicator 2.3.1 (C) Criteria 4.1: Indicator 4.1.1 (C) Criteria 4.2: Indicator 4.2.2; 4.2.3; 4.2.4 Criteria 4.4: Indicator 4.4.1 (C); 4.4.3 (C) Criteria 6.1: Indicator 6.1.1 (C); 6.1.3; 6.1.5 (C); 6.1.6 Criteria 6.3: Indicator 6.3.1 (C) Criteria 6.4: Indicator 6.4.1; 6.4.2 (C) Criteria 6.5: Indicator 6.5.1 (C); 6.5.2 (C)			√	

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Date	Time	Subjects	IF	EP	YWR	ICT Planned
Wednesday 11/11/2020	14.30 – 17.00	Verification on related documents and records; Interview with Auditee. Criteria 3.1: Indicator 3.1.1 (C); 3.1.2; 3.1.3 Criteria 3.2: Indicator 3.2.1 (C); 3.2.2 Criteria 3.3: Indicator 3.3.1 (C); 3.3.3 Criteria 3.5: Indicator 3.5.1 Criteria 3.7: Indicator 3.7.1 (C); 3.7.2 Criteria 5.1: Indicator 5.1.1; 5.1.5; 5.1.6 (C); 5.1.7; 5.1.9 (C) Criteria 6.2: Indicator 6.2.1 (C); 6.2.2 (C); 6.2.3 (C); 6.2.6 Criteria 6.6: Indicator 6.6.1 (C); 6.6.2 (C) Criteria 7.1: Indicator 7.1.1 (C); 7.1.2 Criteria 7.2: Indicator 7.2.5 Criteria 7.4: Indicator 7.4.1; 7.4.2; 7.4.3 Criteria 7.5: Indicator 7.5.1 (C) Criteria 7.6: Indicator 7.6.1 (C) Criteria 7.7: Indicator 7.7.1 (C); 7.7.2; 7.7.3 (C); 7.7.4 (C); 7.7.5 (C)		√		Video conference and Teleconference Skype Meeting Document review through Email/Whatsapp/Google Drive/Zoom meeting share doc.
Thursday 12/11/2020	08.00 – 11.00	Verification on related documents and records; Interview with Auditee. <b>(Continued)</b>	√	√	√	Video conference and Teleconference with Zoom Meeting, Document review through Email/Whatsapp/Google Drive/Zoom meeting share doc.
	12.00 – 14.00	Break	√	√	√	
	14.00 – 17.00	Verification on related documents and records; Interview with Auditee. <b>(Continued)</b>	√	√	√	Video conference and Teleconference with Zoom Meeting, Document review through Email/Whatsapp/ Google Drive/Zoom meeting share doc.
Friday 13/11/2020	08.00 – 11.00	Verification on related documents and records; Interview with Auditee. <b>(Continued)</b>	√	√	√	Video conference and Teleconference with Zoom Meeting, Document review through Email/Whatsapp/Google

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Date	Time	Subjects	IF	EP	YWR	ICT Planned
						Drive/Zoom meeting share doc.
	12.00 – 14.00	Break	√	√	√	
	14.00 – 15.30	Verification on related documents and records; Interview with Auditee. <b>(Continued)</b>	√	√	√	Video conference and Teleconference with Zoom Meeting, Document review through Email/Whatsapp/ Google Drive/Zoom meeting share doc.
	15.30 – 16.00	Preparation for Closing Meeting	√	√	√	Video conference and Teleconference with Zoom Meeting
	16.00 – 17.00	Closing Meeting	√	√	√	Video conference and Teleconference with Zoom Meeting

**Extension to scope audit plan**

Date	Time	Subjects	YWR	APP	IF	EP
Sunday Minggu, 27/03/2022	09.10 – 11.05	Flight Jakarta to Padang	√	√	√	√
	11.05 – 18.30	Traveling from Padang Airport to PT Agro Muko	√	√	√	√
Monday Senin, 28/03/2022	08.00 – 09.00	Opening Meeting: - Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) - Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	√	√	√	√
	09.00 – 12.00	Stakeholders consultation to related agencies and local communities at Mukomuko Regency (by phone call)		√		
		Field Observation to <b>Sungai Teramang Estate</b> Aspect to be verified: <ul style="list-style-type: none"> <li>• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV area</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>• Implementation of Environmental, Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage,</li> </ul>	√		√	√

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Date	Time	Subjects	YWR	APP	IF	EP
		Hazardous Waste Storage, Fire Control Facilities, Waste Management) <ul style="list-style-type: none"> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Employment Procedure and Mechanism Aspect</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place)</li> </ul> Interview at <b>Sungai Teramang Estate</b> : <ul style="list-style-type: none"> <li>• Gender Committee</li> <li>• New Mother</li> <li>• Worker Union</li> <li>• Sample of workers</li> </ul>				
	12.00 – 13.30	Lunch Break	√	√	√	√
	13.30 – 16.30	Activities in morning agenda (continued) Document review: Implementation of Supply Chain System against FFB receiving from Sungai Teramang Estate	√	√	√	√
Tuesday Selasa, 29/03/2022	08.00 – 11.00	Field Observation <b>Bunga Tanjung POM</b> : <ul style="list-style-type: none"> <li>• RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous &amp; Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond. Preparation system for new extension supply base of Sungai Teramang Estate</li> <li>• Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop</li> </ul>	√	√	√	√
	11.30 – 12.00	Closing meeting and report preparation	√	√	√	√
	12.00	Closing Meeting <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	√	√	√	√

### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiary and group of companies of SIPEF Group. The TBP was verified against the Group Member information published in the RSPO website under the parent company SIPEF.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	There are estates and mills that are not certified within 5 years of the RSPO membership. But, since this requirement was published in July 2017, the 5 years starts from 2017 in which the SIPEF have up to 2022 to comply with this requirement.  Despite the above, SIPEF had demonstrated that those units/estates that are not able to be certified are either due to awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i> ) and/or awaiting for full estate development.	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.	PT. Asri Rimba Wirabhakti (ARWB) in Bengkulu Province was acquired by SIPEF in end of 2018 with Sungai Teramang Estate attached to the acquisition. Sungai Teramang was supposed to be audited during the recertification audit of PT Agro Muko – Bunga Tanjung Palm Oil Mill. However, due to technical glitch at RSPO where the liabilities cannot yet be confirmed, the certification audit for Sungai Teramang Estate has to be postponed and audited as extension of scope to the current PT Agro Muko – Bunga Tanjung Palm Oil Mill supply base. The estimated time to audit will be end 2021 / 2022 depending of the results of the liability check by RSPO Secretariat.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company.	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?	The commitment timeline has shorten from 2024 to 2023. The changes are acceptable as the control of being certified is not on the hands of the Company due to awaiting for HGU which the approval is beyond the company choice.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	All lapses of implanting the original plan are justified base on the awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i> ) and/or awaiting for full estate development. While for the newly	Complied

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	acquired estate, it is justified based on awaiting for RSPO Secretariat to confirm liabilities for Sei Temarang Estate.	
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	There is no fundamental failure as all delays are justified as stated above.	Complied
<b>Un-Certified Units or Holdings</b>		
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.	Previously prior to certification, PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website</p> <p>PT Agro Muara Rupit</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit</a></li> </ul> <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii</a></li> </ul> <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1</a></li> </ul> <p>PT Bandar Sumatra Indonesia</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate</a></li> </ul>	Complied

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<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>On 20 December 2018, te complaint is officially closed. The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail">https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</a></p> <p>Based on RaCP tracker in RSPO website there are 4 MU's which have potential liability, 2 of them are PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015. Whilst the other 2, PT. Dendymarker Indah Lestari have submitted CN to the RSPO Secretariat and waiting for approval and PT Bandar Sumatra Indonesia awaiting for RSPO to revert regarding any potential liabilities.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Kati Lama. The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5000o000039f8kAAA/detail">https://askrspo.force.com/Complaint/s/case/5000o000039f8kAAA/detail</a></p> <p>Date complaints submitted 22 January 2021.  Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p> <ul style="list-style-type: none"> <li>-The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government;</li> <li>-The daily casual workers are not protected and no remedy available for work accidents;</li> </ul>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>-The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools;</li> <li>-The daily casual workers did not receive festive allowance in accordance with the regulation;</li> <li>-The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment.</li> </ul> <p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. The latest update is on 25 August 2021 where the first pre-mediation was complete and pending finalization of the mediation process agreement.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Currently (2021) Sungai Teramang Estate - PT Mukomuko Agro Sejahtera is uncertified estate. NPP for Sungai Teramang Estate has been conducted onsite visit on 5 – 9 February 2021 by Global Gateway Certification. Area covers for NPP is 372.62 Ha. Submission of NPP notification to RSPO on September 2021 and still ongoing approval process by RSPO.</p> <p>Internal audit for Sungai Teramang Estate has been conducted in 19 July 2021. Report of internal audit completed in 14 August 2021 with reference to RSPO Certification System. Reference criteria of internal audit covers Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <p>Positive assurance statement already justified within the Internal Audit Checklist that Sungai Teramang Estate almost fulfilled with RSPO P&amp;C requirement and Sungai Teramang Estate is ready to RSPO P&amp;C certification as scheduled in Time Bound Plan.</p>	<p>Complied</p>

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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?	According to Internal Audit Report dated 14 August 2021, No Critical (Major non-compliance) raised against required RSPO P&C Criterion.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholder consultation conducted during HCS Assessment on 13-14 September 2018, 9 July 2019 and 10 February 2021.	Complied

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Yes. PT Agro Muko – Bunga Tanjung POM put all of the smallholder into certification.	Comply

**Approved Time Bound Plan**

Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
PT Agro Muko	Muko Muko POM	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
Air Manjunto Estate, Malin Deman Estate			2014	Certified	
PT Asri Rimba Wirabhakti (acquisition in 2018) – Sungai Teramang Estate			2022	2022 (this audit report)	
PT Mukomuko Agro Sejahtera	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Air Manjunto Estate, Malin Deman Estate	2014	Certified
			PT Asri Rimba Wirabhakti (acquisition in 2018) – Sungai Teramang Estate	2022	2022 (this audit report)
PT Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	PT Eastern Sumatra Indonesia – Bukit Maradja Estate PT Kerasaan Indonesia – Kerasaan Estate	2010	Certified May 2010
			PT Timbang Deli Indonesia	2018	Certified in 2018 as supply base of Bukit Maradja POM
	Perlabian POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian Estate and Tolan Estate.	2010	Certified May 2010
PT Umbul Mas Wisesa	Umbul Mas Wisesa (UMW) POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate PT Tonton Usaha Mandiri Estate	2014	Certified in March 2015
PT Agro Kati Lama	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
PT Agro Rawas Ulu	No mill	Musirawas Regency, South Sumatera, Indonesia		2023	Part of Muara Rupit POM supply base; Certification to take place after obtaining HGU.

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Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
PT Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
Hargy Oil Palm Limited (HOPL)	Hargy POM	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo POM	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengan Estate	2009	Certified in April 2009
	Barema POM	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	Certified in April 2014
PT Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	RSPO-certified in 2015. Then acquired on 1 August 2017 by SIPEF (RSPO-certified when acquired).
PT Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province		2022	Certification to take place after HGU, following review by RSPO.
PT Bandar Sumatra Indonesia	No mill	Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai, North Sumatra Indonesia	Bandar Pinang Estate	2025	Rubber plantation conversion. NPP submitted in July 2021

### 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 1 (one) Opportunity For Improvement raised.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<p>Indicator 3.4.3</p> <p>PT Agro Muko has conducted an SIA in 2010, where there are 2 strategic issues identified, namely Conflict of land/land claims and environmental management.</p> <p>Recommendations for social management based on the SIA document consist of communication with stakeholders focusing on land issues, improving community development programs and paying attention to activities that can disrupt the company. In addition, transparency of information on environmental aspects as well as evaluation and monitoring of the Village Community Plantation/Smallholders (KMD) program as a whole.</p> <p>The Social Impact Management and Monitoring Plan is also available every year by conducting regular monitoring, one of which is in the form of interviews with the community.</p> <p>The monitoring function is carried out through a questionnaire method to stakeholders and the surrounding community to obtain information about the presence or absence of new identified social impacts. The collection of information in the questionnaire is based on the following aspects:</p> <ol style="list-style-type: none"> <li>1. Impact of Plantation and Mill Management on the Regional Economy</li> <li>2. Job Opportunities and Business Opportunities</li> <li>3. Public Relations with Companies</li> <li>4. Impact on the Environment</li> <li>5. Public Health</li> <li>6. Stakeholder suggestions/input</li> </ol> <p>In some operating units, the social impacts that arise are likely to be different. Therefore, the opportunities for improvement in the questionnaire must be increased, so that the parameters for the questions are adjusted to the social conditions surrounding the community/respondent</p>

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Transparency of Village Community Plantation/Smallholder Partnership Share Value (KMD) in Public Media (Radar Mukomuko newspaper).
<b>PF 2</b>	Certification Unit has carried out the complete dose of Covid-19 vaccination.
<b>PF 3</b>	The existence of special personnel (TIM RANGER) in the management of Conservation areas and HCV.

### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	1853924-201911-N1	<b>Date Issued</b>	16 November 2019
<b>Due Date</b>	Next surveillance assessment	<b>Date of nonconformity Closure</b>	30 <sup>th</sup> October 2021
<b>Clause &amp; Category (Critical / Minor)</b>	2.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	The contracts between PT. Agro Muko and the KMD (scheme smallholder), and CPO transporters have not contain specific clauses on meeting applicable legal requirements.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
<b>Objective Evidence:</b>	<p>KMD Nelan Indah:</p> <p>"Perjanjian Pemborongan Pekerjaan No: 01/TRPT-NI/KMD/IX/2019, dated 1 September 2019". Contractor for KMD's only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Nelan Indah and BUMDES Nelan Sejahtera. Within this contract was not contain clause on meeting applicable legal requirements.</p> <p>KMD Bantal:</p> <p>"Perjanjian Pemborongan Pekerjaan No: 02/TRPT-PB/KMD/IX/2019, dated 1 September 2019". Contractor for KMD's only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Pondok Baru (including Pasar Bantal) and CV. Dimas Putra. Within this contract was not contain clause on meeting applicable legal requirements.</p> <p>Bunga Tanjung POM:</p> <p>Based on document review upon contracts for CPO transporters: CV. Usaha Jaya, PT. Genta Perdana Diandra, PT. Bersama Sejahtera Mandiri and PT. Mutia Mulia - there was no specific clauses on meeting applicable legal requirements.</p>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>Put the specific clauses on meeting applicable legal requirements into all contracts.</li> <li>Carried out contract addendum to all contract that has not included specific clauses on meeting applicable legal requirements</li> </ul>		
<b>Root Cause Analysis:</b>	Indicator that specified requirement to include specific clauses on meeting applicable legal requirements was a new indicator, therefore the Operation Unit does not aware yet.		
<b>Corrective Actions:</b>	<p>Management of PT Agro Muko through RMO issues a circular to ensure that specific clauses on meeting applicable legal requirements are included into all contracts, including but not limited to KMDs contract and transport contract.</p> <p>Target date:</p> <ul style="list-style-type: none"> <li>For new contract, the specific clauses on meeting applicable legal requirements included during contract drafting.</li> </ul>		

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	<ul style="list-style-type: none"> <li>For existing contract, addendum of contract completed not later than 1st Semester of 2020.</li> </ul> <p>PIC: All OU Head.</p>
<b>Assessment Conclusion:</b>	<p>During RAV, Unit of Certification provides the evidence of third-party agreement that containing specific clause on meeting applicable legal requirement.</p> <ul style="list-style-type: none"> <li>Put the specific clauses on meeting applicable legal requirements into all contracts.</li> <li>Carried out contract addendum to all contract that has not included specific clauses on meeting applicable legal requirements.</li> </ul> <p>Sample of contract seen during RAV:</p> <ul style="list-style-type: none"> <li>"Perjanjian Pemborong Pekerjaan No: 09/KMD-SI/SJE/2020", dated 1 September 2020. This contract between representative of KMD Sungai Ipuh and village-owned enterprises (BUMDes Pondok Medan) related to contract working on mature oil palm activities at KMD. Specific clause on meeting applicable legal requirement was describe within Article 5 and Article 9.</li> <li>"Perjanjian Pemborong Pekerjaan No: 09/KMD-SIGA/SJE/2020", dated 1 September 2020. This contract between representative of KMD Sungai Ipuh Group A (Talang Kunig, Teruntung and Talang Medan) and local contractor CV. Putri Tunggal Talang Kuning related to contract working on mature oil palm activities at KMD. Specific clause on meeting applicable legal requirement was describe within Article 5 and Article 9.</li> <li>"Addendum No: 01/2020 PERJANJIAN PENGANGKUTAN No. 06/Angkutan/CPO/AM/09", dated 2 January 2020. This contract between PT. Agro Muko and PT. Bersama Sejahtera Mandiri (CPO Transporter) related to contract working of CPO transportation from Mills (Muko Muko POM and Bunga Tanjung POM) to bulking station.</li> <li>"Addendum No: 01/2020 PERJANJIAN PENGANGKUTAN No. 06/Angkutan/CPO/AM/12", dated 2 January 2020. This contract between PT. Agro Muko and PT. Mutia Mulia (CPO Transporter) related to contract working of CPO transportation from Mills (Muko Muko POM and Bunga Tanjung POM) to bulking station.</li> </ul> <p>Specific clause on meeting applicable legal requirement was describe within Article 5, which stated: Second party shall comply with applicable law and regulations; disallowing employ workers below 18 years old; disallowing force labour and not employed manpower from human trafficking.</p> <p>According to the sample of evidence provides, auditor team concludes this minor NC was satisfactorily CLOSED.</p>

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Non-conformity			
<b>NCR Ref #</b>	1853924-201911-N2	<b>Date Issued</b>	16 November 2019
<b>Due Date</b>	Next surveillance assessment	<b>Date of nonconformity Closure</b>	30 <sup>th</sup> October 2021
<b>Clause &amp; Category (Critical / Minor)</b>	2.2.3 (Minor)		
<b>Statement of Nonconformity:</b>	The contracts between PT. Agro Muko and KMD (scheme smallholder as FFB supplier), and CPO transporters have not contain clauses disallowing child, forced and trafficked labour.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		
<b>Objective Evidence:</b>	<p>Air Buluh Estate: Surat Perjanjian Kerja No. 205/ABE/RMO-AM/2019, dated 30 August 2019. This contract between PT. Agro Muko and CV. Lisana Rollis Jabenk, assignment job: Repairing Housing, Warehouse, Mosque and Kindergarten at Air Buluh Estate. Clause 4: Pelaksanaan Pekerjaan, the contract requires shall comply with Employment Law, disallowing child labour, shall follow minimum wage, aware with health and safety and environmental protection, preventing environmental pollution. Within this contract was not contain clause disallowing forced and trafficked labour.</p> <p>Malin Deman Estate: Perjanjian Pemborongan Pekerjaan No: 01/KSU-MMAS/PPTK-FL/I/2019, dated 1 January 2019. This contract between PT. Muko Muko Agro Sejahtera and Koperasi Serba Usaha Agro Muko (KSU-AM), assignment job Upkeep and Maintenance. This contract contain disallowing child labour (Clause/Pasal 8), follow applicable law and regulation (Clause/Pasal 3). Within this contract was not contain clause disallowing forced and trafficked labour</p> <p>KMD Nelan Indah: "Perjanjian Pemborongan Pekerjaan No: 01/TRPT-NI/KMD/IX/2019, dated 1 September 2019". Contractor for KMD's only for FFB transportation from KMD block to Bunga Tanjung POM. This contract between Village Nelan Indah and BUMDES Nelan Sejahtera. Within this contract was not contain clause disallowing child, forced and trafficked labour.</p> <p>Bunga Tanjung Estate: Surat Perjanjian Kerja SPK No. 182/BTE/RMO-AM/2019, dated 13 June 2019. This contract between PT. Agro Muko and UD. Simpang Pabrik, assignment job: Construction of warehouse and fire fighting resources. In Clause 4 "Pelaksanaan Pekerjaan", point 5 only stated shall comply with Employment Law, disallowing child labour, disallowing paid under required minimum wage, paying attention to OHS and Environmental. This contract was not contain disallowing forced and trafficked labour.</p>		

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	<p>Bunga Tanjung POM: Based on document review upon contracts for CPO transporters: CV. Usaha Jaya, PT. Genta Perdana Diandra, PT. Bersama Sejahtera Mandiri and PT. Mutia Mulia - there was no clauses disallowing child, forced and trafficked labour.</p>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>Put the clauses on disallowing child, forced and trafficked labour into all contracts.</li> <li>Carried out contract addendum to all contract that has not included clauses on disallowing child, forced and trafficked labour.</li> </ul>
<b>Root Cause Analysis:</b>	<p>Indicator that specified requirement to include clauses on disallowing child, forced and trafficked labour was a new indicator, therefore the Operation Unit does not aware yet.</p>
<b>Corrective Actions:</b>	<p>Management of PT Agro Muko through RMO issues a circular to ensure that specific clauses on meeting applicable legal requirements are included into all contracts, including but not limited to KMDs contract and transport contract. Target date:</p> <ul style="list-style-type: none"> <li>For new contract, the clauses on disallowing child, forced and trafficked labour included during contract drafting.</li> <li>For existing contract, addendum of contract completed not later that 1st Semester of 2020.</li> </ul> <p>PIC: All OU Head.</p>
<b>Assessment Conclusion:</b>	<p>Verification during onsite audit (RAV-October 2021), the audit team has interview with OU Head (Senior Manager of Administration, they stated that Management of PT Agromuko communicated the policy to all contractor to ensure all contractor understand the contract and policy related to disallowing child, forced and trafficked labor included during contract drafting</p> <p>The latest record of corporate/company policies notified to the relevant stakeholders (including contractor) as below:</p> <ul style="list-style-type: none"> <li>Malin Deman Estate dated 17<sup>th</sup> July 2021. Contractor name: CV. Mamas Putra.</li> </ul> <p>Air Buluh Estate: dated . Contractor name: UD. TPR. Bunga Tanjung Estate: Dated 8<sup>th</sup> May 2021. Participant: workers and stakeholder.</p> <p>Sample of contract seen during RAV</p> <ul style="list-style-type: none"> <li>"Perjanjian Pemborong Pekerjaan No: 09/KMD-SI/SJE/2020", dated 1 September 2020. This contract between representative of KMD Sungai Ipuh and village-owned enterprises (BUMDes Pondok Medan) related to contract working on mature oil palm activities at KMD.</li> <li>"Perjanjian Pemborong Pekerjaan No: 09/KMD-SIGA/SJE/2020", dated 1 September 2020. This contract between representative of KMD Sungai Ipuh Group A (Talang Kunig, Teruntung and Talang Medan) and local contractor CV. Putri Tunggal Talang Kuning related to contract working on mature oil palm activities at KMD.</li> </ul>

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	<ul style="list-style-type: none"> <li>• "Addendum No: 01/2020 PERJANJIAN PENGANGKUTAN No. 06/Angkutan/CPO/AM/09", dated 2 January 2020. This contract between PT. Agro Muko and PT. Bersama Sejahtera Mandiri (CPO Transporter) related to contract working of CPO transportation from Mills (Muko Muko POM and Bunga Tanjung POM) to bulking station.</li> <li>• "Addendum No: 01/2020 PERJANJIAN PENGANGKUTAN No. 06/Angkutan/CPO/AM/12", dated 2 January 2020. This contract between PT. Agro Muko and PT. Mutia Mulia (CPO Transporter) related to contract working of CPO transportation from Mills (Muko Muko POM and Bunga Tanjung POM) to bulking station.</li> </ul> <p>According to the sample of evidence provides, auditor team concludes this minor NC was satisfactorily CLOSED.</p>
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Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>RSPO P&amp;C Generic Nov 2018 indicator 6.2.4</b></p> <p>The Certification Unit has done periodic inspection in monthly basis regarding employee housing using Form ENC/CHK/06 (Emplacement Inspection Checklist), consist of inspection to the Building, Facility, Cleanliness and Prevention of Pollution), House Keeping, Health and Safety, Emergency First Response dan Electricity Equipment. Point of consideration on coverage of points recommended in ILO Guidance on Workers' Housing Recommendation No 115 in the form ENC/CHK/06 (Emplacement Inspection Checklist).</p> <p><b>Verification / Follow-up actions during RAV – October 2021:</b></p> <p>PT Agro Muko – Bunga Tanjung POM has provide the housing sanitation facilities, water supplies, medical, educational and welfare amenities to national standards. Housing for workers has been provide by company, based on "Rekapitulasi Fasilitas Umum (Fasum)" facility provide by company.</p> <p>The record sample seen period August 2021 and September 2021, Emplacement Inspection Checklist has covered of points recommended in ILO Guidance on Workers' Housing Recommendation No 115. The report of inspection reported good condition.</p>
<b>OFI 2</b>	<p><b>RSPO P&amp;C Generic Nov 2018 indicator 6.5.3</b></p> <p>Based on interview with Gender Committee and female worker, stated that the certification unit has policy to give opportunities to the breastfeeding woman to breastfeed their child during working hour at 10.00, this policy has been included in Collective Labor Agreement 2018-2020 as well.</p> <p>Based in interview, the policy regarding breastfeeding time has been implemented. Point of consideration on policy evaluation taking into account voice from new mothers and breastfeeding women by involving Gender Committee.</p> <p><b>Verification / Follow-up actions during RAV – October 2021:</b></p> <p>PT Agro Muko – Bunga Tanjung POM has evaluated the policy regarding breastfeeding by involving Gender Committee. For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.</p>
<b>OFI 3</b>	<p><b>RSPO P&amp;C Generic Nov 2018 indicator 6.7.2</b></p>

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	<p>The Unit of Certification has completed Emergency Response Facility for land fire provided per 2 (two) estates. Point of consideration on improved the emergency response team's (Satgas Pengendalian Kebakaran Lahan Perkebunan) understanding on instruction to use emergency response equipment.</p> <p><b>Verification / Follow-up actions during RAV – October 2021:</b></p> <p>Based on interview with emergency response team in Bunga Tanjung Estate and Air Buluh Estate, they have understanding on instruction to use emergency response equipment. Emergency response simulation programs and their implementation conducted on 13<sup>th</sup> February 2021 – during Bulan K3.</p>
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### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
CR01	Minor		01/10/2010	10/02/2012
CR02	Minor		01/10/2010	10/02/2012
A675812/1	Major		10/02/2012	10/02/2012
A675812/1	Minor		10/02/2012	01/02/2013
A675812/2	Minor		10/02/2012	01/02/2013
A675812/3	Minor		10/02/2012	01/02/2013
A675812/4	Minor		10/02/2012	01/02/2013
A675812/5	Minor		10/02/2012	01/02/2013
463917-1	Minor	RSPO P&C INA-WG 2008 4.7.7	01/02/2013	08/01/2014
463917-2	Minor	RSPO P&C INA-WG 2008 6.5.3	01/02/2013	08/01/2014
1010903M3	Major	RSPO P&C INA-WG 2008 2.1.1	08/01/2014	06/03/2014
1010903M7	Major	RSPO P&C INA-WG 2008 4.7.1	08/01/2014	06/03/2014
1010903M10	Major	RSPO P&C INA-WG 2008 4.8.2	08/01/2014	06/03/2014
1010903M16	Major	RSPO P&C INA-WG 2008 6.10.1	08/01/2014	06/03/2014
1010903M18	Major	RSPO SCCS 2011 D.3.4	08/01/2014	06/03/2014
1010903N1	Minor	RSPO P&C INA-WG 2008 2.1.4	08/01/2014	25/11/2014
1010903N6	Minor	RSPO P&C INA-WG 2008 4.6.5	08/01/2014	25/11/2014
1010903N8	Minor	RSPO P&C INA-WG 2008 4.7.5	08/01/2014	25/11/2014
1010903N9	Minor	RSPO P&C INA-WG 2008 4.7.10	08/01/2014	25/11/2014
1010903N13	Minor	RSPO P&C INA-WG 2008 5.3.4	08/01/2014	25/11/2014
1010903N15	Minor	RSPO P&C INA-WG 2008 5.5.4	08/01/2014	25/11/2014
1420737M1	Major	RSPO P&C INA-NI 2016 4.7.1	17/12/2016	02/02/2016
1420737N1	Minor	RSPO P&C INA-NI 2016 4.4.1	17/12/2016	07/12/2017
1420737N2	Minor	RSPO P&C INA-NI 2016 5.1.3	17/12/2016	07/12/2017

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1563740-201712-M1	Major	RSPO P&C INA-NI 2016 1.2.1	07/12/2017	22/01/2018
1563740-201712-M2	Major	RSPO P&C INA-NI 2016 2.1.1	07/12/2017	22/01/2018
1563740-201712-M3	Major	RSPO P&C INA-NI 2016 4.7.1	07/12/2017	22/01/2018
1563740-201712-M4	Major	RSPO P&C INA-NI 2016 5.1.1	07/12/2017	22/01/2018
1563740-201712-M5	Major	RSPO P&C INA-NI 2016 6.2.1	07/12/2017	22/01/2018
1563740-201712-M6	Major	RSPO P&C INA-NI 2016 6.3.1	07/12/2017	22/01/2018
1563740-201712-M7	Major	RSPO P&C INA-NI 2016 6.4.1	07/12/2017	22/01/2018
1563740-201712-M8	Major	RSPO P&C INA-NI 2016 6.8.1	07/12/2017	22/01/2018
1563740-201712-M9	Major	RSPO P&C INA-NI 2016 6.9.1	07/12/2017	22/01/2018
1563740-201712-M10	Major	RSPO P&C INA-NI 2016 6.9.2	07/12/2017	22/01/2018
1563740-201712-M11	Major	RSPO P&C INA-NI 2016 6.13.1	07/12/2017	22/01/2018
1563740-201712-M12	Major	RSPO P&C INA-NI 2016 7.6.2	07/12/2017	22/01/2018
1563740-201712-N1	Minor	RSPO P&C INA-NI 2016 1.1.1	07/12/2017	06/12/2018
1563740-201712-N2	Minor	RSPO P&C INA-NI 2016 1.3.1	07/12/2017	06/12/2018
1563740-201712-N3	Minor	RSPO P&C INA-NI 2016 2.1.2	07/12/2017	06/12/2018
1563740-201712-N4	Minor	RSPO P&C INA-NI 2016 2.1.3	07/12/2017	06/12/2018
1563740-201712-N5	Minor	RSPO P&C INA-NI 2016 2.1.4	07/12/2017	06/12/2018
1563740-201712-N6	Minor	RSPO P&C INA-NI 2016 5.1.2	07/12/2017	06/12/2018
1563740-201712-N7	Minor	RSPO P&C INA-NI 2016 5.1.3	07/12/2017	06/12/2018
1563740-201712-N8	Minor	RSPO P&C INA-NI 2016 6.2.2	07/12/2017	06/12/2018
1563740-201712-N9	Minor	RSPO P&C INA-NI 2016 6.2.3	07/12/2017	06/12/2018
1563740-201712-N10	Minor	RSPO P&C INA-NI 2016 6.4.2	07/12/2017	06/12/2018
1563740-201712-N11	Minor	RSPO P&C INA-NI 2016 6.9.3	07/12/2017	06/12/2018
1853924-201911-N1	Minor	RSPO P&C Generic 2018 2.2.2	16/12/2019	13/11/2020
1853924-201911-N2	Minor	RSPO P&C Generic 2018 2.2.3	16/12/2019	13/11/2020

**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 Agromuko – Bunga Tanjung Palm Oil Mill, Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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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.

<b>Stakeholders contacted</b>		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Kantor Lingkungan Hidup (KLH) Kabupaten Mukomuko	Face to face interview Phone interview (during extension scope)
Governmental Department	Dinas Perkebunan Kabupaten Mukomuko	Face to face interview Phone interview (during extension scope)
Governmental Department	Dinas Penanaman Modal dan Ketenagakerjaan Kabupaten Mukomuko	Face to face interview Phone interview (during extension scope)
Governmental Department	National Land Office Kabupaten Mukomuko	Phone interview (during extension scope)
NGO	LSM Lokal Koalisi Rakyat Menggugat  Sawit Watch Indonesia, World Conservation Society Indonesia, Aid Environment, WALHI, Forest Watch Indonesia, Zoological Society of London.	Face to face interview  Send notification by email (during extension scope)
Internal stakeholder / Union	Serikat Pekerja Agro Mandiri	Face to face interview Phone interview (during extension scope)
Local community	Bunga Tanjung Village Batu Ejung and Teramang Jaya Village	Phone interview and face to face
Smallholders	KMD Nelan Indah	Face to face interview

<b>Stakeholders comment</b>	
<b>1</b>	<p><b>Feedbacks:</b>  <b>Kantor Lingkungan Hidup (KLH) Kabupaten Mukomuko</b></p> <ul style="list-style-type: none"> <li>Several villagers report to Environmental Agency related pollution of haze, ashes and odour from the Mill.</li> <li>DLH visited to Agro Muko on 14 September 2021 in regard of monitoring visit. However, there is no improvement was made by the company against the findings.</li> </ul>

- The company must encourage ethics in domestic waste management.
- There is potential of social conflict occurs in Bunga Tanjung regarding closing out of road access entering the Estate. Local communities using this access as shortcut road with unpermitted, but Estate prohibit it.
- There is indicates that several activities was not covered up within the environmental impact management scope.
- Report of RKL-RPL and quarterly report of Hazardous waste is always late.
- Less information of Forest and Land Fires from the company. There is no Forest and Land Fires facilities and emergency team are established in the company. No Firewatch Tower and Fire Danger Rating System (FDRS) was installed in all Estates
- PT Agro Muko and PT Mukomuko Agro Sejahtera already have environmental permits (including Sungai Teramang Estate ex PT Asri Rimba Wirabhakti) including waste management permits.
- The company has submitted regular environmental management reports. There are no specific issues related to the environment.
- So far there have been no complaints/complaints/issues related to environmental pollution due to the company's operational activities.
- There are still cattle/buffaloes that are released for grazing by the surrounding community, especially in high-risk areas such as MM-POM and BT-POM waste ponds. This should be controlled by the company by minimizing the social impact with the community.

During extension to scope Sungai Teramang Estate:

- PT Agro Muko and PT Mukomuko Agro Sejahtera already have environmental permits (including Sei Teramang Estate ex PT Asri Rimba Wirabhakti) including waste management permits.
- The company has submitted regular environmental management reports. There are no specific issues related to the environment.
- So far there have been no complaints/complaints/issues related to environmental pollution due to the company's operational activities.
- There are still cattle/buffaloes that are released for grazing by the surrounding community, especially in high-risk areas such as MM-POM and BT-POM waste ponds. This should be controlled by the company by minimizing the social impact with the community.

**Audit Team verification and response:**

- Bunga Tanjung POM has conducted air quality tests every semester, namely testing of Emissions (boilers & generators), noise (boilers, generators, residential environments), Ambien (factory environments & residential environments) and Odors (factory, residential and village environments) in accordance with regulations applicable. Until now the test results still meet the quality standards. In addition, no public complaints were submitted verbally or in writing regarding the smoke, dust and aroma of the factory to Bunga Tanjung POM.
- The results of the visit from the Environmental Service are still being followed up by Bunga Tanjung POM, some of the findings have been completed 100% and some are in progress.
- Disposal of domestic waste is collected and separated between organic waste and plastic waste to be sent to the Final Disposal Site and monitored when the landfill is opened and closed.
- All activities at PT Agro Muko have been covered by the certificates stated in the RKL & RPL matrix document.

There is no negative issue on Sungai Teramang Estate (the new acquisition land from previous company PT Asri Rimba Wirabhakti. Positive feedback will be followed up.

- PT. Agro Muko has routinely carried out reporting on RKL-RPL every semester and reporting on B3 waste management on a quarterly basis. RKL-RPL reports and B3 waste management, apart from being sent to agencies, they are also reported online through applications issued by the Ministry of

	<p>Environment &amp; Forestry (KLHK), namely: SIMPEL (Electronic Environmental Reporting Information System) and SIRAJA LIMBAH (Waste Management Performance Reporting Application) B3). RKL-RPL and B3 Waste that have been reported online are equipped with Electronic Receipts (TTE) for National, Provincial &amp; Regency/City levels. It is true that there is a slight delay in routine reporting of RKL-RPL and hazardous waste management. This is because some of the test results (environmental) documents per semester are sometimes received late. The delay in the B3 waste management report was due to several operating units forgetting (the SIRAJA LIMBAH operator) to report on a quarterly basis. In the future PT. Agro Muko will improve the reporting time of RKL-RPL and B3 waste management so that it is not too late to submit it to the relevant agencies.</p> <ul style="list-style-type: none"> <li>PT. Agro Muko already has the facilities and infrastructure to control land and plantation fires in accordance with the Minister of Agriculture No. 5 of 2018. The locations of land and plantation fire control facilities and infrastructure are in several estates (according to the Circular of the Administrative Manager dated March 20, 2020), namely: Air Buluh Estate (including including Malin Deman Estate) equipped with 1 fire monitoring tower Each Estate already has an organizational structure for the Emergency Response Division and the Anti-Fire Coordination Agency (Bakortiba). In addition, each Estate has a support team who are farmers or planters around the Estate. Each Estate has installed a Fire Risk Status Signboard in accordance with the SOP "Land Fire Prevention and Control" (OHS-01-12/06-12-2019/Rev.0). The signboard contains information on the announcement date as well as the color and type of fire risk. PT. Agro Muko reports regularly, namely the Report on the Preparedness of the Land and Plantation Fire Controlling Facilities and Infrastructure System to the Mukomuko Regency Environmental Service.</li> </ul>
<p><b>2</b></p>	<p><b>Feedbacks:</b></p> <p><b>Dinas Perkebunan Kabupaten Mukomuko</b></p> <ul style="list-style-type: none"> <li>Report of Production Mill and Estate always reported in timely manner. PT Agro Muko and Dinas Perkebunan has had collaborative program an agricultural extension to local communities or independent smallholders related Agronomy practices.</li> <li>Partnership program in form of Kebun Masyarakat Desa and Koperasi.</li> <li>There is no land disputes/land conflict within last three years that reported to Dinas Perkebunan.</li> <li>PT Agro Muko already complied for 20% smallholder partnership as required by the regulation regarding to renewing/extension of land title.</li> <li>There are no cases of land disputes in the entities of PT Agromuko and PT Mukomuko Agro Sejahtera, especially the Sungai Teramang Estate area (ex. HGU PT Asri Rimba Wirabhakti). The swap process also went well and was mutually beneficial.</li> <li>Reports related to the progress of the partnership with the community have not been reported.</li> <li>LPUP's quarterly reporting is carried out on a regular basis.</li> <li>There is no overlap with mining permits. So far, because there is no definitive RTRWP, the 'Galian-C' permit is still being granted by the Bengkulu Province Mining and Energy Service.</li> <li>PUP is still valid and is in the queue for reassessment.</li> <li>Land fire infrastructure facilities have so far been met in a documented manner.</li> <li>The company has a very good commitment to conservation area management.</li> <li>The company has a partnership for oil palm plantations in the form of Village Community Land (KMD). The partnership process is transparent and is regularly reported in local newspapers that are accessible to the entire community.</li> </ul> <p><u>During extension to scope Sungai Teramang Estate:</u></p> <ul style="list-style-type: none"> <li>There are no cases of land disputes in the entities of PT Agromuko and PT Mukomuko Agro Sejahtera, especially the Sungai Teramang Estate area (ex. HGU PT Asri Rimba Wirabhakti). The swap process also went well and was mutually beneficial.</li> </ul>

	<ul style="list-style-type: none"> <li>• Reports related to the progress of the partnership with the community have not been reported.</li> <li>• LPUP's quarterly reporting is carried out on a regular basis.</li> <li>• There is no overlap with mining permits. So far, because there is no definitive RTRWP, the 'Galian-C' permit is still being granted by the Bengkulu Province Mining and Energy Service.</li> <li>• PUP is still valid and is in the queue for reassessment.</li> <li>• Land fire infrastructure facilities have so far been met in a documented manner.</li> <li>• The company has a very good commitment to conservation area management</li> <li>• The company has a partnership for oil palm plantations in the form of Village Community Land (KMD). The partnership process is transparent and is regularly reported in local newspapers that are accessible to the entire community.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• The reporting of LPUP Agro Muko cooperatively has conveyed it, regarding the Best management practice, there is collaboration in counselling the community regarding plants and other agronomic aspects and they will maintain this to be even better</li> <li>• PT Agro Muko since 2000 has established a Village Community Garden Partnership (KMD) with villages around PT Agro Muko.</li> <li>• In the last 3 years no information on land disputes has been received by the Plantation Service and they will maintain this so that it can be even better</li> <li>• PT. Agro Muko has fulfilled 20% of the partnership according to the regulations set for the extension of the HGU according to the data available at PT Agro Muko.</li> </ul> <p><u>During extension to scope Sungai Teramang Estate:</u></p> <ul style="list-style-type: none"> <li>• There is no negative issue on Sungai Teramang Estate (the new acquisition land from previous company PT Asri Rimba Wirabhakti).</li> </ul>
<p><b>3</b></p>	<p><b>Feedbacks:</b></p> <p><b>Dinas Penanaman Modal dan ketenagakerjaan:</b></p> <ul style="list-style-type: none"> <li>• Quarterly report of manpower and surveillance activities are responsible by Provincial office, in Regency office was not given a copy then not much data and information that can be share related manpower in PT Agro Muko.</li> <li>• Due to less data, therefore assisting and surveillance from Regency Office are very limited.</li> <li>• Safety aspects, PPE for harvesters were not implemented. Very often found that harvesters did not use helmet during working.</li> <li>• Effluent discharge to the river is inappropriate with threshold, it possible to polluting the river and change the ecosystem. How to manage the effluent during rainy season.</li> <li>• Company should make priority to absorb local manpower not only for field workers, but also in Field Assistant or Manager level. There is a report that local Field Assistant chose resignation from the company because he would not agree to moving to other Estate or province.</li> <li>• CSR and partnership program against private or government institutions should be improved, then can creating collaboration program in between.</li> <li>• There is an issues related gender manpower discrimination occurs at the company</li> <li>• There is an issues related family gank occurs at the Estates.</li> <li>• Minimum wage for all workers should be reported to Manpower Office in Mukomuko Regency level, to ensure that wages are paid properly or not.</li> <li>• There is Foreign worker at PT Agro Muko, it must be reported to Manpower Office to ensure that s/he worked is appropriate with job description.</li> </ul>

	<ul style="list-style-type: none"> <li>• Related to oil palm seeds program to communities, is 20% of land location already existed..? No report are received for that program.</li> </ul> <p><u>During extension to scope Sungai Teramang Estate:</u></p> <ul style="list-style-type: none"> <li>• So far there are no labor issues at PT Agro Muko and PT Mukomuko Agro Sejahtera.</li> <li>• Aspirations: ensure that the recruitment process accommodates slots for people with disabilities.</li> </ul> <hr/> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• Helmets for harvesters are not included in the Personal Protective Equipment (PPE) according to the occupational risk impact assessment.</li> <li>• The quality standard of liquid waste has conducted an analysis of wastewater every month and is tested by an accredited laboratory. The waste pool is given 1 (one) special officer to carry out monitoring and maintenance, so that if there is an indication of a leak, the officer will immediately repair or ask for help if he cannot do it himself.</li> <li>• The absorption of local workers has long been carried out by PT Agro Muko in accordance with the needs of the Company and for Assistant workers and above, they are willing to work anywhere under the management of PT Tolan Tiga Indonesia in accordance with the work agreement.</li> <li>• PT Agro Muko and PT MMAS each year have realized CSR to buffer villages according to the needs of the village and the community for public facilities and others in accordance with the company's capabilities and in the future CSR aspects and partnership programs for private and government institutions will be increased if there are regulations that has been determined by the local government.</li> <li>• Until now there is no indication of gender discrimination in Agro Muko.</li> <li>• There are no family gank/ family member workers for daily workers and the company accepts daily workers according to the needs and work program of the company.</li> <li>• PT Agro Muko has fulfilled the Minimum Wage obligation in accordance with the UMK Kab. Mukomuko.</li> <li>• The Seed Partnership Program is in accordance with the Circular Letter of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency No. 11/SE-HK.02.02/VIII/2020 concerning the Implementation of Company Obligations in Facilitating the Development of Community Gardens and the Land Plane Map (PBT) of the Palm Oil Seed Partnership has been signed by Kantah Kab. Mukomuko according to the coordinates of the Seed Plasma distribution in Mukomuko Regency.</li> </ul> <p><u>During extension to scope Sungai Teramang Estate:</u></p> <p>There is no negative issue on Sungai Teramang Estate (the new acquisition land from previous company PT Asri Rimba Wirabhakti. Positive feedback will be followed up.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b></p> <p><b>LSM Lokal Koalisi Rakyat Menggugat</b></p> <ul style="list-style-type: none"> <li>• The programs that have been implemented by PT AM both social and environmental for the coverage of the Air Dikit area which are known by NGOs are positive.</li> <li>• During the pandemic there is no reduction in employment relations to workers.</li> <li>• Labor absorption is always informed to the village authorities and NGOs.</li> <li>• Issues from the Antara Bengkulu news media on May 3, 2019 there were 40 female workers laid off from work for no clear reason, located in the Air Bikuk Estate garden. And a similar case occurred on October 2, 2019, the location was also at Air Bikuk Estate.</li> </ul> <hr/> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• During the pandemic there is no reduction in employment relations to workers</li> <li>• The issue of 40 female workers being forced to stop in May 2019 is not true as well as the same case in 2019 that was not proven true which was published in the online mass media.</li> </ul>

<p><b>5</b></p>	<p><b>Feedbacks:</b>  <b>Serikat Pekerja Agro Mandiri</b></p> <ul style="list-style-type: none"> <li>• Union Membership is voluntary without any discrimination.</li> <li>• Family member is totally prohibited to helping workers without work agreement. The company explained this policy continuously.</li> <li>• In 2021 there is no issues raised from the workers, good relationship between union and the company. But if there is an issues occurs, union and the company will discuss it to resolve the problem</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• Workers follow or register the union, it is freely chosen.</li> <li>• There was no worker without work agreement can working at the company, moreover family members is totally forbidden.</li> <li>• If there is problem with workers they have to discussed together.</li> </ul>
<p><b>6</b></p>	<p><b>Feedbacks:</b>  <b>Bunga Tanjung Village</b></p> <ul style="list-style-type: none"> <li>• Good relationship with the company.</li> <li>• Transparency of CSR program need more improved. Therefore, village and the company can collaborate the program.</li> <li>• Concern about cattle grazing in the Estate, why is cattle grazing is forbidden. Villagers hope that company can give an access for grazing cattle in the estate with total supervised by cattle owner.</li> <li>• The company are very helpful, particularly for road maintenance. Even though the road is not used by company vehicle, but attention to road maintenance are still implemented.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• CSR program is transparent and can be accesible with permission. If other parties want to see the CSR program it is allowed by the request.</li> <li>• This is company policy that all of they must be committed to follow. Cattle grazing is disallowed but collecting grass is permitted. The prohibition is intended for both parties, the company (its oil palm crops) and the community safety when grazing activity.</li> <li>• The company still committed to improved the CSR program, particularly road maintenance for surrounding village access.</li> </ul>
<p><b>7</b></p>	<p><b>Feedbacks:</b>  <b>KMD Nelan Indah</b></p> <ul style="list-style-type: none"> <li>• KMD Nelan Indah located in Bunga Tanjung village. The land status is owned by individual villagers but already has MoU with village to develop as KMD's.</li> <li>• Currently, status FFB from KMD Nelan Indah is very prone of FFB's theft. Especially with the current price which is relatively high.</li> <li>• KMD need transparency of FFB's grade. Why during FFB sortation, they never had Grade A. Their location is very close with Bunga Tanjung POM, after harvesting they directly deliver FFB to the mill. They already follow the FFB quality that required by the company, but the result still same, never reach Grade A.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>• Safety patrol develop between KMD and village. Also can involve the company if needed or by report to the company when its occurs.</li> <li>• FFB quality is the highest priority to entering the Mill. FFB's quality can affect to the FFB price for the smallholders/KMD's. If there is more questions, can be discuss with Mill Manager for the certain reason.</li> </ul>

<p><b>8</b></p>	<p><u>During extension to scope Sungai Teramang Estate:</u>  <b>Feedbacks:</b>  <b>Village Head of Batu Ejung and Teramang Jaya</b></p> <ul style="list-style-type: none"> <li>• PT Asri Rimba Wirabhakti was originally a company that owned a natural forest concession and no community worked on the area. Then, in the 1990s, PT Asri Rimba Wirabhakti received a mandate from the government to be the executor of the transmigration area but was cancelled. Subsequently, PT Asri Rimba Wirabhakti obtained a concession for the area to be planted with rubber and cocoa before being converted into oil palm. At that time, most of the area was not cultivated by the HGU holder/abandoned so that most of the HGU land was occupied by the community until now. The HGU area covers 4 villages and many residential areas of the surrounding village communities are included in the HGU area. This is known to the public from the Land Office team who refused to issue a Certificate of Ownership / SHM because the area requested by the community was included in the HGU.</li> <li>• Most of the community sharecroppers are aware that their residential and arable areas are included in the HGU area. However, not all are willing to be compensated (land acquisition). The community, especially smallholders, hopes that SIPEF management as the new owner is willing to release the area from the HGU so that it can be owned by the community.</li> <li>• The company has a good relationship with the village community. So far there have been no land disputes with the community.</li> <li>• The process of taking over the HGU area from PT Asri Rimba Wirabhakti went well and there were no problems with the community.</li> <li>• The existence of the company has a positive impact with the existence of job opportunities and business opportunities for the community (by becoming a local contractor). In addition, the company actively assists the community, especially in terms of maintenance of access roads and material assistance for the construction of village facilities.</li> </ul> <p><b>Audit Team verification and response:</b>  There is no negative issue on Sungai Teramang Estate (the new acquisition land from previous company PT Asri Rimba Wirabhakti. The land legality issues has been covered in HCV/SIA assessment report. The company will remain settled the land conflict issues through the FPIC mechanism.</p>
<p><b>9</b></p>	<p><u>During extension to scope Sungai Teramang Estate:</u>  <b>Feedbacks:</b>  Chairman of Serikat Pekerja Mukomuko Agro Sejahtera Mandiri (SP-MMAS)</p> <ul style="list-style-type: none"> <li>• No employment issues.</li> <li>• There are only 6 members who join SP-MMAS.</li> <li>• Employee rights have been fulfilled.</li> </ul> <p>The PKB was approved by the Manpower Office on March 25, 2022.</p> <p><b>Audit Team verification and response:</b>  There have been no problems related to industrial relations between Sungai Teramang Estate workers since SIPEF took over PT Asri Rimba Wirabhakti.</p>
<p><b>10</b></p>	<p><u>During extension to scope Sungai Teramang Estate:</u>  <b>Feedbacks:</b>  <b>National Land Agency Mukomuko Regency</b></p> <ul style="list-style-type: none"> <li>• There are no cases of land disputes so far with the surrounding village communities or with other entities.</li> </ul>

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	<ul style="list-style-type: none"> <li>There is no information on the change in the name of the entity in the land documents for the concession area of Sei Teramang Estate (ex PT Asri Rimba Wirabhakti) to the District Land Office. Mukomuko.</li> <li>There have been no complaints/complaints/land disputes between the community and the company so far.</li> <li>No information related to the development of partnership gardens with the community has been submitted to the Land Office of Mukomuko Regency to date.</li> </ul>
	<p><b>Audit Team verification and response:</b>  <u>During extension to scope Sungai Teramang Estate:</u>          There is no negative issue on Sungai Teramang Estate (the new acquisition land from previous company PT Asri Rimba Wirabhakti. Positive feedback will be followed up.</p>
<b>11</b>	<p>During extension to scope Sungai Teramang Estate:</p> <p><b>Feedbacks:</b>          Zoological Society of London          Thank you for your email. Please can you clarify why I personally am included in this consultation and what the scope of expected feedback is? My team assesses this parent company on public reporting (<a href="https://www.spott.org/palm-oil/sipef/">https://www.spott.org/palm-oil/sipef/</a>), but we have not worked on the ground at this mill/supply base, so would appreciate a clarification of what kind of input you are looking for from me.</p>
	<p><b>Audit Team verification and response:</b>          During extension to scope Sungai Teramang Estate:          Auditor has reply to make clarification but afterwards no more reply from ZSL.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
2 <sup>nd</sup> Recertification and Third Cycle, no need previous landowner					

Previous land owner / user comment	
	<p><b>Feedbacks:</b> 2<sup>nd</sup> Recertification and Third Cycle, no need previous landowner</p> <p><b>Audit Team verification and response:</b> 2<sup>nd</sup> Recertification and Third Cycle, no need previous landowner</p>

**3.5 Impartiality and conflict of interest**

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

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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that **PT Agro Muko – Bunga Tanjung POM (extension to scope Sungai Teramang Estate)** has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that **PT Agro Muko – Bunga Tanjung POM (extension to scope Sungai Teramang Estate)** is certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: <b>Yudwi Wisnu Rahmanto</b>	Name: <b>Sander Van Den Ende</b>
Company Name: <b>BSI Services Malaysia Sdn. Bhd.</b>	Company Name: <b>PT Agro Muko – Bunga Tanjung POM</b>
Title: <b>Lead Auditor</b>	Title: <b>Regional Director Sustainability</b>
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: <b>15 March 2022</b>	Date: <b>15 March 2022</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<p><b>Principle 1: Behave ethically and transparently</b></p>		
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>		
<p><b>Criteria 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>		
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p>	<p>PT. Agro Muko as Unit of Certification entity has an operational document are made publicly available within "Dokumen – dokumen yang Tersedia Untuk Umum". These documents is apply for Mill and Estates (including smallholders) and available in place. In example:</p> <p><b>Bunga Tanjung POM</b></p> <p>"Dokumen yang Tersedia Untuk Umum", dated January 2020. Type of documents that publicly available are:</p> <ul style="list-style-type: none"> <li>• Izin Usaha Tetap (Business License)</li> <li>• Izin Usaha Perkebunan (Plantation Permit)</li> <li>• Analisis Dampak Lingkungan (EIA)</li> <li>• Rencana Pengelolaan Lingkungan (Environmental Management Plan)</li> <li>• Rencana Pemantauan Lingkungan (Environmental Monitoring Plan)</li> <li>• Upaya Pengelolaan Lingkungan Hidup Biogas (Environmental Monitoring Plan of Biogas)</li> <li>• Laporan Pemantauan dan Pengelolaan Lingkungan (Environmental Monitoring and Management Report)</li> <li>• Izin Pembuangan Air Limbah ke Sungai (Wastewater Discharge Permit)</li> <li>• Laporan Tanggung Jawab Sosial Perusahaan (Corporate Social Responsibility Report)</li> </ul>

		<ul style="list-style-type: none"> <li>• Program P2K3 LHS (Social, Environmental and OHS Committee Program)</li> <li>• Penilaian Internal Dampak Sosial (Internal Assessment of Social Impact)</li> <li>• Rencana Pengurangan dan Pencegahan Polusi (Reducing and Mitigation Pollution Plan)</li> <li>• Rekaman keluhan-kesah internal &amp; eksternal (Record of Internal &amp; External Grievance)</li> <li>• Rencana Perbaikan Berkelanjutan (Continuous Improvement Plan)</li> <li>• Laporan Penilaian Sertifikasi (Certification Public Summary Report)</li> <li>• Semua Kebijakan Perusahaan (Corporate Policies)</li> <li>• Prosedur Permintaan Informasi dan Jawaban (Procedure of Information Request and Reponse)</li> <li>• Prosedur Whistle Blowing System</li> </ul> <p><b>Air Buluh Estate</b></p> <p>“Dokumen yang Tersedia Untuk Umum”, dated 1 June 2020. Type of documents that publicly available are:</p> <ul style="list-style-type: none"> <li>• Akta Pendirian Perseroan Terbatas (Company Deed of Establishment)</li> <li>• Izin Usaha Perkebunan (Plantation Permit)</li> <li>• Izin Usaha Tetap (Business License)</li> <li>• Analisis Dampak Lingkungan (EIA)</li> <li>• Rencana Pengelolaan Lingkungan (Environmental Management Plan)</li> <li>• Rencana Pemantauan Lingkungan (Environmental Monitoring Plan)</li> <li>• Laporan Pemantauan dan Pengelolaan Lingkungan (Environmental Monitoring and Management Report)</li> <li>• Laporan Tanggung Jawab Sosial Perusahaan (Corporate Social Responsibility Report)</li> <li>• Penilaian Internal Dampak Sosial (Internal Assessment of Social Impact)</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Laporan Keselamatan dan Kesehatan Kerja (OHS Report)</li> <li>• Laporan Penilaian NKT (HCV Assessment Report)</li> <li>• Rencana Pengelolaan Limbah dan Penilaian Internal Aspek dan Dampak Lingkungan (Waste Management Plan and Internal Assessment of Environmental Aspect and Impact)</li> <li>• SOP Keluh Kesah dan Eksternal Stakeholder (Grievance and External Stakeholders Procedure)</li> <li>• Prosedur Ganti Rugi Lahan (Land Compensation Procedure)</li> <li>• Rencana Perbaikan Berkelanjutan (Continuous Improvement Plan)</li> <li>• Laporan Penilaian Sertifikasi (Certification Public Summary Report)</li> <li>• Semua Kebijakan Perusahaan (Corporate Policies)</li> <li>• Prosedur Permintaan Informasi dan Jawaban (Procedure of Information Request and Reponse)</li> <li>• Prosedur Whistle Blowing System</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Certificate holder can show the document of “Dokumen yang Tersedia Untuk Umum”, dated January 2020. Type of documents that publicly available are:</p> <ul style="list-style-type: none"> <li>• Izin Usaha Tetap (Business License)</li> <li>• Izin Usaha Perkebunan (Plantation Permit)</li> <li>• Analisis Dampak Lingkungan (EIA)</li> <li>• Rencana Pengelolaan Lingkungan (Environmental Management Plan)</li> <li>• Rencana Pemantauan Lingkungan (Environmental Monitoring Plan)</li> <li>• Laporan Pemantauan dan Pengelolaan Lingkungan (Environmental Monitoring and Management Report)</li> <li>• Laporan Tanggung Jawab Sosial Perusahaan (Corporate Social Responsibility Report)</li> <li>• Program P2K3 LHS (Social, Environmental and OHS Committee Program)</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Penilaian Internal Dampak Sosial (Internal Assessment of Social Impact)</li> <li>• Rencana Pengurangan dan Pencegahan Polusi (Reducing and Mitigation Pollution Plan)</li> <li>• Rekaman keluhan-kesah internal &amp; eksternal (Record of Internal &amp; External Grievance)</li> <li>• Rencana Perbaikan Berkelanjutan (Continuous Improvement Plan)</li> <li>• Laporan Penilaian Sertifikasi (Certification Public Summary Report)</li> <li>• Semua Kebijakan Perusahaan (Corporate Policies)</li> <li>• Prosedur Permintaan Informasi dan Jawaban (Procedure of Information Request and Reponse)</li> <li>• Prosedur Whistle Blowing System</li> </ul> <p>All these documents are managed by Administration Manager at Regional Management Office.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	All the information above documents are in Bahasa Indonesia and its accessible by relevant stakeholders.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>Records of request for information and response are recorded within "Buku Permintaan Informasi dan Jawaban" in each unit (mill and estates).</p> <p>Sample verified during remote audit:</p> <p>Bunga Tanjung Estate: Dated 18 September 2020. Sender KMD Bunga Tanjung. Related to billing payment in KMD Bunga Tanjung. The information has been responded by responsible person in Estate.</p> <p>Malin Deman Estate: dated 17 June 2020 – from Ipuh Village asking related to needs additional manpower. The information has been responded by responsible person at the Estate</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Sungai Teramang Estate can show their records of request for information and response are recorded within "Buku Permintaan Informasi dan Jawaban" in each unit</p>	Complied

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		(mill and estates). It covered the request from external and internal stakeholder. For example, within 2021, Sungai Teramang Estate received 3 incoming letters. Generally, the incoming letter is a request for assistance or a loan of heavy equipment. For example, an incoming letter on August 21, 2021 from an individual in the form of a job application. The letter was followed up by the Junior Office Assistant on August 18, 2021, by sending the application letter to RMO.	
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	<p>Unit of Certification has had consultation and communication procedure and written in ENC-01-11/02-10-2017/Rev.0 - Responding to Requests for Information, dated 20 November 2017.</p> <p>Person in Charge of Consultation and Communication is Estate or Mill Manager. Based on interview with relevant stakeholders, communication and consultation mostly conducted by phone and direct visit. Record of consultation and communication when direct visit is according to level of importance.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Person in Charge of Consultation and Communication is Estate or Mill Manager. Based on interview with relevant stakeholders, communication and consultation mostly conducted by phone and direct visit. Record of consultation and communication when direct visit is according to level of importance</p>	Complied
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>“Daftar Pemangku Kepentingan” as stakeholder list are available in each unit (mill and estates). The stakeholder list consist of Government Agencies, Local Joint Committee Consultative (Muspika/Tripika), Villages, Suppliers and Contractors. List of previous landowners is not available because for Nucleus Estates are included in established plantation and start from 2013 replanting activities are commenced. Meaning that all crops for Estates is in 2<sup>nd</sup> cycle of planting and currently, Unit of Certification is undergoing for 2<sup>nd</sup> cycle Re-Certification, therefore no more expansion. Unless for smallholder with fully managed by the company known as “Kebun Masyarakat Desa (KMD)”.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p>	Complied

		<p>Sungai Teramang Estate stakeholder list updated 18 February 2022 comprise of 22 stakeholders covering Government (5 stakeholders), MUSPIKA (3 stakeholders), Village heads/elders (8 stakeholders), NGO (1 stakeholder), Worker union (1 stakeholder), and Contractors (3 stakeholders) and Hospital (1 stakeholder).</p>	
<b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p>	<p>In general, companies under SIPEF Group have had policy related to Code of Conduct which have been signed by President Director, dated 28<sup>th</sup> September 2018. Policy for ethical conduct also publicly available on the website <a href="https://www.sipef.com/hq/sustainability/policies/ethics-policy/">https://www.sipef.com/hq/sustainability/policies/ethics-policy/</a> , where the ethics policy is concerning related:</p> <ul style="list-style-type: none"> <li>• Compliance: all relevant international and national laws will be upheld.</li> <li>• Transparency: shareholders and stakeholders will be provided with all non-confidential information.</li> <li>• Zero-tolerance towards bribery and corruption. Facilitation payments are actively avoided, and gifts may only be given with prior approval from senior management.</li> <li>• There is zero-tolerance of slavery or forced labour.</li> <li>• Management and employees are prohibited from using the Group’s facilities or working hours to conduct personal business.</li> </ul> <p>Dissemination of information related corporate/company policy concerning ethical conduct to the employees are conducted regularly.</p> <p>The latest record of corporate/company policies notified to the relevant stakeholders (including contractor) as below:</p> <ul style="list-style-type: none"> <li>• Malin Deman Estate dated 26 May 2021. Contractor name: CV. Mamas Putra. Location: Estate.</li> <li>• Air Buluh Estate: dated 26 May 2021. Contractor name: UD. TPR.</li> <li>• Bunga Tanjung Estate : dated 14<sup>th</sup> April 2021. Participant: workers and stakeholder.</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p>	Complied

		<p>Policy of code of conduct which develop by SIPEF group also applicable and implemented by Sungai Teramang Estate.</p> <p>Dissemination of information related corporate/company policy concerning ethical conduct to the employees are conducted regularly.</p> <p>The latest record of corporate/company policies notified to the relevant stakeholders (including contractor) on 14<sup>th</sup> April 2021. Participant: workers and stakeholder. The socialization is together with Bunga Tanjung Estate, because the estate management is manage by 1 Estate Manager.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>Internal audit to monitor compliance and implementation of the policy:</p> <ul style="list-style-type: none"> <li>• Bunga Tanjung Estate. Internal audit has been conducted on 16 June 2020. Report of Internal Audit resulting some findings, there were: Discrepancy of Hectare Movement; Transfer Asset; Civil Work.</li> <li>• Malin Deman Estate. Internal audit has been conducted on 6 September 2020. Report of Internal Audit resulting some findings, there were: Discrepancy of Hectare Movement; Transfer Asset; Civil Work.</li> <li>• Air Buluh Estate. Internal audit related on physical check of stock material at Air Manjuntto warehouse. This activity conducted on 17 April 2020.</li> </ul> <p>PT Agromuko – Bunga Tanjung POM have whistle blowing mechanism that describe under policy and procedure.</p> <ul style="list-style-type: none"> <li>• Whistleblowing Policy signed by President Director on 14 January 2019.</li> <li>• Whistleblowing System IAD-01-07/29-03-2019/Rev.0, dated 27 Mar 2019.</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Internal audit to monitor compliance and implementation of the policy:</p> <ul style="list-style-type: none"> <li>• Sungai Teramang Estate. Internal audit has been conducted on 19 July 2021 and report finished on 14 August 2021. An internal audit is refer to RSPO P&amp;C INA-NI</li> </ul>	Complied

		2020, where the result of internal audit there was 15 findings with corrective action plan was implemented.	
<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies to relevant regulations.</p>	<p>PT Agromuko – Bunga Tanjung POM has established list of applicable law and regulation, documented by ENC (Environment and Conservation) Department, which until now there are 299 regulations, including 39 Laws and Regulation that been updated and added. Those lists of applicable regulation already following Annex 1 of the RSPO P&amp;C Indonesia National Interpretation, April 2020 and include international conventions that have been ratified by the government of Republic of Indonesia.</p> <p>PT Agromuko – Bunga Tanjung POM has also consistently conducted evaluation of compliance to the applicable regulation whenever there is new regulation issued by government. The latest evaluation of applicable law has been conducted in October 2020 by adding and updating the new regulation from Ministry of Environmental and Forestry concerning Customary Forest and Private Forest (Permen LHK No. 21 Year 2019) and Emergency Program on Hazardous Waste Management (Permen LHK No. 74 Year 2019).</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Sungai Teramang Estate managed by PT Mukomuko Agro Sejahtera has established list of applicable law and regulation, documented by ENC (Environment and Conservation) Department, which until now there are 299 regulations, including 39 Laws and Regulation that been updated and added. Those lists of applicable regulation already following Annex 1 of the RSPO P&amp;C Indonesia National Interpretation, April 2020 and include international conventions that have been ratified by the government of Republic of Indonesia.</p> <p>Managed area of Sungai Teramang Estate previously is owned by PT Asririmba Wirabhakti. In 13 August 2018, as per Act No.08, PT Asririmba Wirabhakti has been</p>	Complied

		<p>took over by PT Mukomuko Agro Sejahtera (SIPEF). Prior to acquired by SIPEF, PT Asririmba Wirabhakti already comply with legal requirement, such as:</p> <ol style="list-style-type: none"> <li>1. Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</li> <li>2. Environmental Permit according to "Surat Keputusan Kepala Kantor Pelayanan Terpadu Satu Pintu Kab. Mukomuko Nomor: 503/05/KPTSP/IL/III/2016", dated 2 March 2016.</li> <li>3. Izin Lingkungan approved by Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kab. Mukomuko no. 503/14 / D.10 / IL / XI / 2019 dated 11 November 2019.</li> <li>4. Izin Usaha Perkebunan/IUP (Operational Business Permit) approved by Bupati Mukomuko Nomor 121/year 2012 tentang Pemberian Izin Usaha Perkebunan (IUP) atas nama PT Asririmba Wirabhakti for areas 1,700 ha.</li> <li>5. Updated 'Izin Usaha Perkebunan/IUP' (Operational Business Permit) approved by Bupati Mukomuko no. 503/2/KPTSP/IUP/IX/2014, dated 15 September 2014 atas nama PT. Mukomuko Agro Sejahtera for areas 1,700 ha.</li> <li>6. Based on overlapping with 'Peta Kawasan Hutan dan Perairan' (National Forest Map) as regulated in SK. Menhut no. 784/Menhut-II/2012 which indicated that status of PT. MMAS STGE is non forest area, namely: "Areal Penggunaan Lain / APL".</li> <li>7. Based on PIPPB map Rev. XV as regulated in Forestry Ministry Decree no. 8599/MenLHK-PKTL/IPSDH/PLA.1/12/2018 that PT. MMAS STGE is not located in forest area and peat land.</li> </ol> <p>Unit of certification has complies with relevant regulations which applicable in Indonesia.</p>	
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<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>PT Agromuko – Bunga Tanjung POM has mechanism to ensure that all contractors works at the company’s area are only contractors that already comply to the law and technically able to cooperate with PT Agromuko/PT MMAS.</p> <p>Based on verification of document “Surat Perjanjian Kerja” (contract/work agreement), contractors demonstrated that the contract has include clauses related to compliance to legal aspects, such as uses of PPE’s, prohibition of employing workers under 18 years old, not giving salary under province minimum salary, avoid environment pollution, giving break time for workers, tax payment and other relevant regulation.</p> <p>Document verified:</p> <ul style="list-style-type: none"> <li>• “Surat Perjanjian Kerja” No.10/RMO-BG/SKGE/2019 dated 1<sup>st</sup> August 2021 between PT. Agromuko and UD. Talang Petai Raya, a FFB transport enterprise located at Mukomuko Regency.</li> <li>• “Surat Perjanjian Kerja” No.39/SBE/RMO_AM/2020 dated 5<sup>th</sup> May 2021 between PT Agromuko and CV. Putri Bungsu, one of construction enterprise related road upkeep and compacting, located Muko Muko regency.</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) has mechanism to ensure that all contractors works at the company’s area are only contractors that already comply to the law and technically able to cooperate with company activities.</p> <p>Unit of Certification has monitored the change in laws and regulation. The changes and update in laws and regulation documented under “Pemantauan Penambahan atau Perubahan Undang-Undang/Peraturan”, updated January 2022.</p> <p>Based on verification of document “Surat Perjanjian Kerja” (contract/work agreement), contractors demonstrated that the contract has include clauses related to compliance to legal aspects, such as uses of PPE’s, prohibition of employing workers under 18 years old, not giving salary under province minimum salary, avoid environment pollution, giving break time for workers, tax payment and other relevant regulation.</p> <p>Sample contract:</p>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• “Surat Perjanjian Kerja” No.01/STGE/RMO_MMAS/2022 dated 3<sup>rd</sup> January 2022 between PT Agromuko and CV. Putri Bungsu, one of construction enterprise related road upkeep and compacting, located Muko Muko regency.</li> </ul>	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	<p>According to pictures taken onsite of boundary pegs are in good conditions and well maintained. Monthly monitoring were consistently performed by appointed officer (Ranger). Monitoring result are recorded in “Daftar Pemeriksaan Patok Batas Kebun (HGU)” each estate. No indication of oil palm planting outside the HGU area. Boundary ditch have been built at the border of PT Agromuko and PT MMAS concession.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Unit of certification have legal boundaries and clearly demarcated. Sample of boundaries stone visited in Sungai Teramang Estate are:</p> <ol style="list-style-type: none"> <li>1. HGU #12 (S 02°46’03.29”    E 101°22’23.06”) Block 20B04.</li> <li>2. HGU #11 (S 02°45’49.98”    E 101°22’25.25”) Block 20B03.</li> <li>3. HGU #09 (S 02°45’26.16”    E 101°22’31.65”) Block 19A04.</li> <li>4. HGU #38 (S 02°44’26.47”    E 101°22’41.13”) located near security gate.</li> </ol> <p>All legal boundaries are mapped and well demarcated.</p>	Complied
<p><b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	A list of contracted parties is available.	<p>PT Agromuko – Bunga Tanjung POM has a contract registers in each unit (mill and estates).</p> <p>Sample taken for list of contracted parties, the list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 10 parties for manpower supply, replanting, palm sanitation, electric installation, health development. Such as:</p> <ul style="list-style-type: none"> <li>• “Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/06” between PT. Agro Muko and CV. Usaha Jaya for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 May 2006) – signed on 26 April 2006.</li> </ul>	Complied

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2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p>	<p>PT Agromuko – Bunga Tanjung POM has a contract registers in each unit (mill and estates). Sample taken for list of contracted parties, the list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 10 parties for manpower supply, replanting, palm sanitation, electric installation, health development. Such as:</p> <ul style="list-style-type: none"> <li>• “Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/06” between PT. Agro Muko and CV. Usaha Jaya for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 May 2006) – signed on 26 April 2006.</li> <li>• “Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/12” between PT. Agro Muko and CV. Genta Perdana for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since March 2012) – signed on 5 March 2012.</li> <li>• “Addendum No.01/2014 - Perjanjian Pengangkutan No.06/Angkutan/CPO/AM/09 between PT. Agro Muko and PT. Bersama Sejahtera Mandiri (previously UD. Budi Syukur)” for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction</li> </ul>	Complied

		<p>(tolerable susut); contract validity (will be automatically extended since 1 December 2009) – signed on 30 April 2014</p> <p>According to the sample of evidence provides, third-party agreement already containing specific clause on meeting applicable legal requirement.</p>	
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p>	<p>PT Agromuko – Bunga Tanjung POM has a contract registers in each unit (mill and estates). Sample taken for list of contracted parties, the list indicating contracted party name, contract number, scope of contracted work, date of contract, and remarks. The list comprise of 10 parties for manpower supply, replanting, palm sanitation, electric installation, health development. Such as:</p> <ul style="list-style-type: none"> <li>• “Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/06” between PT. Agro Muko and CV. Usaha Jaya for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 May 2006) – signed on 26 April 2006.</li> <li>• “Perjanjian Pengangkutan No.05/Angkutan/CPO/AM/12” between PT. Agro Muko and CV. Genta Perdana for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since March 2012) – signed on 5 March 2012.</li> <li>• “Addendum No.01/2014 - Perjanjian Pengangkutan No.06/Angkutan/CPO/AM/09 between PT. Agro Muko and PT. Bersama Sejahtera Mandiri (previously UD. Budi Syukur)” for transport of CPO from Mukomuko POM/Bunga Tanjung POM to Agro Muko Tank Terminal. The contract covers transport cost for each POM; sanction (tolerable susut); contract validity (will be automatically extended since 1 December 2009) – signed on 30 April 2014</li> </ul> <p>According to the sample of evidence provides, third-party agreement already containing specific clause on meeting applicable legal requirement.</p>	<p>Complied</p>
<p><b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			

<p>2.3.1</p>	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul>	<p>Bunga Tanjung POM implementing IP model so that all FFB suppliers coming into the Mill are from certified area. Bunga Tanjung POM has had list of FFB origins, including:</p> <p>A. Information on geo-location of FFB origins.</p> <ul style="list-style-type: none"> <li>Map of FFB suppliers from KMD smallholders (scale 1:45,000)</li> <li>FFB origins of Bunga Tanjung POM as listed in the Annex of Certificate.</li> </ul> <table border="1" data-bbox="965 563 1957 1390"> <thead> <tr> <th>No</th> <th>FFB Origin</th> <th>Scope</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bunga Tanjung Estate</td> <td>BTE</td> <td>2° 43' 0.39" S</td> <td>101° 22' 16.94" E</td> </tr> <tr> <td>2</td> <td>Air Bikuk Estate</td> <td>ABKE</td> <td>2° 46' 27.67" S</td> <td>101° 24' 44.68" E</td> </tr> <tr> <td>3</td> <td>Air Buluh Estate</td> <td>ABE</td> <td>3° 01' 27.29" S</td> <td>101° 33' 15.79" E</td> </tr> <tr> <td>4</td> <td>Malin Deman Estate</td> <td>MDE</td> <td>3° 01' 27.29" S</td> <td>101° 33' 15.79" E</td> </tr> <tr> <td>5</td> <td>Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)</td> <td>KOPABA</td> <td>3° 3' 15.11" S</td> <td>101° 29' 53.43" E</td> </tr> <tr> <td>6</td> <td>Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)</td> <td>KPSB-MMAS</td> <td>2° 58' 50.37" S</td> <td>101° 35' 51.83" E</td> </tr> <tr> <td>7</td> <td>KMD Mundam Marap</td> <td>ABE</td> <td>3° 01' 55.53" S</td> <td>101° 31' 25.43" E</td> </tr> <tr> <td>8</td> <td>KMD Air Buluh</td> <td>ABE</td> <td>3° 03' 21.19" S</td> <td>101° 30' 59.60" E</td> </tr> <tr> <td>9</td> <td>KMD Bukit Harapan</td> <td>ABE</td> <td>3° 02' 41.91" S</td> <td>101° 36' 54.73" E</td> </tr> <tr> <td>10</td> <td>KMD Dusun Pulau</td> <td>ABE</td> <td>3° 04' 35.40" S</td> <td>101° 34' 22.57" E</td> </tr> <tr> <td>11</td> <td>KMD Dusun Pulau</td> <td>ABE</td> <td>3° 04' 25.04" S</td> <td>101° 34' 29.46" E</td> </tr> <tr> <td>12</td> <td>KMD Medan Jaya</td> <td>ABE</td> <td>2° 59' 15.58" S</td> <td>101° 39' 18.91" E</td> </tr> <tr> <td>13</td> <td>KMD Pulau Baru</td> <td>ABE</td> <td>3° 02' 56.92" S</td> <td>101° 29' 21.84" E</td> </tr> <tr> <td>14</td> <td>KMD Sumendam</td> <td>ABE</td> <td>3° 01' 6.20" S</td> <td>101° 31' 31.32" E</td> </tr> <tr> <td>15</td> <td>KMD Talang Arah</td> <td>ABE</td> <td>2° 59' 4.50" S</td> <td>101° 38' 38.31" E</td> </tr> </tbody> </table>	No	FFB Origin	Scope	Latitude	Longitude	1	Bunga Tanjung Estate	BTE	2° 43' 0.39" S	101° 22' 16.94" E	2	Air Bikuk Estate	ABKE	2° 46' 27.67" S	101° 24' 44.68" E	3	Air Buluh Estate	ABE	3° 01' 27.29" S	101° 33' 15.79" E	4	Malin Deman Estate	MDE	3° 01' 27.29" S	101° 33' 15.79" E	5	Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	KOPABA	3° 3' 15.11" S	101° 29' 53.43" E	6	Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	KPSB-MMAS	2° 58' 50.37" S	101° 35' 51.83" E	7	KMD Mundam Marap	ABE	3° 01' 55.53" S	101° 31' 25.43" E	8	KMD Air Buluh	ABE	3° 03' 21.19" S	101° 30' 59.60" E	9	KMD Bukit Harapan	ABE	3° 02' 41.91" S	101° 36' 54.73" E	10	KMD Dusun Pulau	ABE	3° 04' 35.40" S	101° 34' 22.57" E	11	KMD Dusun Pulau	ABE	3° 04' 25.04" S	101° 34' 29.46" E	12	KMD Medan Jaya	ABE	2° 59' 15.58" S	101° 39' 18.91" E	13	KMD Pulau Baru	ABE	3° 02' 56.92" S	101° 29' 21.84" E	14	KMD Sumendam	ABE	3° 01' 6.20" S	101° 31' 31.32" E	15	KMD Talang Arah	ABE	2° 59' 4.50" S	101° 38' 38.31" E	<p>Complied</p>
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2.3.2	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>Bunga Tanjung POM implementing IP model, so that all FFB suppliers coming into the Mill are from certified area. Bunga Tanjung POM did not received FFB from non-certified and indirectly sources, including Sungai Teramang Estate.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>            Currently, Sungai Teramang Estate is uncertified management unit. FFB's from Sungai Teramang Estate did not entering to Bunga Tanjung Mill but sells out to independent mill.</p>	Complied																																																																	
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>            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	<b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	<p>PT Agro Muko and its subsidiaries – Consolidated Financial Statements for the Year ended December 31, 2019. It was available Independent Auditor’s Report No.00613/2.1265/AU.1/01/1208-1/1/X/2020 dated 1 October 2020 by Imelda &amp; Rekan (Deloitte) Registered Public Accountants License No. 308/KM.1/2020. Report established by Theodorus Bambang Dwi K.A., Public Accountant License No.AP.1208. In the report, stated “The accompanying consolidated financial statements present fairly, in all material respects, the financial position of PT Agro Muko and its subsidiaries as of December 31, 2019, and their financial performance and their cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p> <p>PT Mukomuko Agro Sejahtera and its subsidiaries (Malin Deman Estate and Air Manjunto Estate) – Consolidated Financial Statements for the Year ended December 31, 2019. It was available Independent Auditor’s Report No.00365/2.1265/AU.1/01/1208-1/1/VI/2020 dated 8 June 2020 by Imelda &amp; Rekan (Deloitte) Registered Public Accountants License No. 308/KM.1/2020. Report established by Theodorus Bambang Dwi K.A., Public Accountant License No.AP.1208. In the report, stated “The accompanying consolidated financial statements present fairly, in all material respects, the financial position of PT Mukomuko Agro Sejahtera and its subsidiaries as of December 31, 2019, and their financial performance and their cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p> <p>PT. Agro Muko – Bunga Tanjung POM have prepared a business plan for period 2021 – 2031. The business plan updated on 5 June 2021 considering achievement since 2017 to May 2021. The business plan indicating the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This figures including from the supply base of PT. Mukomuko Agro Sejahtera’s Estate and KMD. Below are projection of production 2022 – 2026 of Bunga Tanjung POM that include in the business plan updated 5 June 2021.</p>	Complied												
		<table border="1"> <thead> <tr> <th>Description</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Description	2022	2023	2024	2025	2026							
Description	2022	2023	2024	2025	2026										

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FFB (Ton):						
Bunga Tanjung Estate	48,336	41,489	34,030	27,737	24,801	
Air Bikuk Estate	17,446	15,555	19,919	24,141	28,969	
Air Buluh Estate	44,020	40,450	33,750	26,485	22,813	
KMD	4,787	4,771	4,539	6,352	7,538	
MMAS	28,619	30,715	33,421	32,344	30,987	
Total	143,208	132,980	125,659	117,059	115,108	
CPO (Ton)	33,511	31,117	29,404	27,392	26,935	
PK (Ton)	7,017	6,516	6,157	5,736	5,640	
OER (%)	23.40	23.40	23.40	23.40	23.40	
KER (%)	4.90	4.90	4.90	4.90	4.90	
Processing Cost CPO (Rp/kg)	29	31	33	35	36	
Processing Cost PK (Rp/kg)	136	147	155	167	170	
Air Buluh Estate:						
Business Plan Projection year 2019 – 2022:						
	2019	2020	2021	2022	2023	
FFB prod.	53,171	52,105	51,197	46,314	38,739	
Mature Area	2,170.79	2,170.79	2,170.79	2,014.11	1,727.90	
Cost (Rp/Kg)	448	476	503	537	573	
The budget signed on 1 January 2019.						

Air Bikuk Estate:

Business Plan Projection year 2019 – 2022:

	2019	2020	2021	2022	2023
FFB prod.	35,178	36,937	38,784	40,732	42,759
Mature Area	1,232.89	1,232.89	1,232.89	1,232.89	1,232.89
Cost (Rp/Kg)	835	835	835	795	777

The budget signed on 1 January 2019.

Budget for KMD Air Buluh demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	390	390	360	360	360
Area (Ha)	15.00	15.00	15.00	15.00	15.00

Budget for KMD Talang Baru demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	330	330	330	330	330
Area (Ha)	15.00	15.00	15.00	15.00	15.00

Budget for KMD Talang Arah demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	285	315	315	315	315
Area (Ha)	15.00	15.00	15.00	15.00	15.00

Budget for KMD Semundam demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	294	294	294	294	294
Area (Ha)	14.00	14.00	14.00	14.00	14.00

Budget for KMD Dusun Pulau demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	170	190	210	210	210
Area (Ha)	10.00	10.00	10.00	10.00	10.00

Budget for KMD Talang Rio demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	190	210	210	210	210
Area (Ha)	10.00	10.00	10.00	10.00	10.00

Budget for KMD Pulau Baru demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	225	225	225	225	216
Area (Ha)	9.00	9.00	9.00	9.00	9.00

Budget for KMD Medan Jaya demonstrates Budget 2019-2023:

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	2019	2020	2021	2022	2023
FFB (Ton)	180	198	198	198	198
Area (Ha)	9.00	9.00	9.00	9.00	9.00

Budget for KMD Tanjung Harapan demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	180	198	198	198	198
Area (Ha)	9.00	9.00	9.00	9.00	9.00

Budget for KMD Bukit Harapan demonstrates Budget 2019-2023:

	2019	2020	2021	2022	2023
FFB (Ton)	68	77	97	106	116
Area (Ha)	9.65	9.65	9.65	9.65	9.65

**Extension to scope Sungai Teramang Estate:**

Sungai Teramang Estate:

Business Plan Projection year 2019 – 2023:

	2022	2023	2024	2025	2026
FFB prod.	1,585	3,933	6,427	7,432	8,446
Mature Area	105.64	219.96	335.14	335.14	335.14
Cost (Rp/Kg)	781	472	304	263	243

The budget signed on 12 October 2021.

		During field visit to Bunga Tanjung POM, verified that FFB from Sungai Teramang Estate is not processed at Bunga Tanjung POM. Due to the Estate is not certified yet, currently FFB from Sungai Teramang Estate sold to another palm oil mill out of SIPEF Group.																									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The company has provided replanting program up to year 2030.  Replanting program amended 2021:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Bunga Tanjung</td> <td>-</td> <td>-</td> <td>-</td> <td>280.37</td> <td>330.36</td> </tr> <tr> <td>Air Bikuk</td> <td>221.66</td> <td>166.51</td> <td>216.41</td> <td>-</td> <td>-</td> </tr> <tr> <td>Air Buluh</td> <td>-</td> <td>-</td> <td>-</td> <td>156.68</td> <td>286.21</td> </tr> </tbody> </table> <p>Annual review of replanting was conducted during management review. There is a letter from Agronomy Manager of PT Agromuko mention that replanting program 2020 will be postponed.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>  Sungai Teramang Estate carry out replanting activities, which are documented in the "Rekapitulasi Laporan Mingguan Progress Kerja Replanting Tahun 2021". In 2021, replanting has been carried out in Sungai Teramang Estate for 105.86 Ha. As evidence that the replanting was carried out without burning, the company documented a picture of replanting work in 2021.</p> <p>The replanting activities is due to replacing crops from previous company which unproductive crops and the planting year is 1992.</p>	Estate	2021	2022	2023	2024	2025	Bunga Tanjung	-	-	-	280.37	330.36	Air Bikuk	221.66	166.51	216.41	-	-	Air Buluh	-	-	-	156.68	286.21	Complied
Estate	2021	2022	2023	2024	2025																						
Bunga Tanjung	-	-	-	280.37	330.36																						
Air Bikuk	221.66	166.51	216.41	-	-																						
Air Buluh	-	-	-	156.68	286.21																						
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	The certification unit has conducted Management Review recently on 31 August 2020, held at Bunga Tanjung POM meeting room, attended by Regional Director Bengkulu, STM, SFM, Administration Manager, Mill Manager, Estate Managers, Smallholder Manager, Agronomy Manager, Safety Officer, QCA Lab Independent and FA-QC. Each unit conducted Management Review.	Complied																								

		<p>Latest Management Review in Bunga Tanjung Estate conducted on 22 Sep 2020. Based on minutes of management review meeting, the meeting has discussed:</p> <ul style="list-style-type: none"> <li>• Transparency: Customer feedback;</li> <li>• Evaluation of compliance with laws &amp; regulations;</li> <li>• Performance and efficiency;             <ul style="list-style-type: none"> <li>○ Achievement of management plan 2020</li> <li>○ SOP related</li> <li>○ Trainings</li> </ul> </li> <li>• Matters related to community rights and human rights;</li> <li>• Support the smallholders;</li> <li>• Employee and its requirements;</li> <li>• Environment Management and Monitoring;</li> <li>• Review to the audit result (internal and external);</li> <li>• Continuous improvement recommendation and monitoring.</li> </ul> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Latest Management Review in Sungai Teramang Estate conducted on 13 October 2021. Based on minutes of management review meeting, the meeting has discussed:</p> <ul style="list-style-type: none"> <li>• Internal Audit result that conducted on 19 July 2021; action plan consists of follow up from 1 Major, 2 minor, and 7 observation. Beside that, internal audit team has recommended some opportunities for improvement.</li> <li>• Customer feedback; there was no customer feedback from the palm oil mill.</li> <li>• Evaluation of pesticides uses, fertilizer input, waste management, water uses, management of HCV and HCS, social issues, performance and productivity (last five year performance and quality ripeness) as Process performance and product appropriateness; Prevention and improvement action status; Follow up action</li> </ul>	
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		resulted from the management review; Changes that could influence management system; Improvement recommendation.	
<p><b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>Each operation unit (Mill and Estate) has a continuous improvement program. The program approved by Mill or Estate Manager. Continuous improvement program in Estates, consist of:</p> <ul style="list-style-type: none"> <li>• Monitoring and evaluation of best agricultural practices;</li> <li>• Monitoring and management of agrochemical uses and waste;</li> <li>• Interview with communities regarding social aspects;</li> <li>• Mitigation of Green House Gas;</li> <li>• Dissemination to the stakeholder regarding conservation including RTE species.</li> </ul> <p>Continuous improvement program in Palm Oil Mill, consist of:</p> <ul style="list-style-type: none"> <li>• Monitoring and evaluation of best management practices in mill;</li> <li>• Monitoring the use of renewable energy;</li> <li>• Monitoring and management of chemical use and chemical waste;</li> <li>• Interview with the community for the social aspect;</li> <li>• Mitigation and efforts to reduce greenhouse gas emissions;</li> <li>• Socialization of conservation areas including socialization of protected, rare, threatened and endangered species status to stakeholders.</li> </ul> <p>Internal audit has been conducted in Bunga Tanjung POM on 25 – 26 Jun 2020; in Bunga Tanjung Estate on 22 – 23 Jun 2020; in Air Buluh Estate on 10 – 12 Aug 2020. Internal audit using RSPO Principles &amp; Criteria, that covers social and environmental impact and its opportunities. Several findings have been recorded; consist of minor finding, Observation and Opportunity for Improvement. In general, follow up action have been verified by the internal auditor.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p>	Complied

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		<p>Internal audit of sustainability has been conducted in Sungai Teramang Estate on 19 July 2021; Internal audit using RSPO Principles &amp; Criteria, that covers social and environmental impact and its opportunities. Several findings have been recorded; consist of 1 Major, 2 minor and 7 Observation. Beside that, internal audit team has recommended some opportunities for improvement. In general, follow up action have been implemented by Operation Unit and verified by the internal auditor.</p> <p>Action plan also conducted based on Top Management visit such as Regional Director (RD) and Senior Manager (SM) on 31 August 2021. Action plan consist of road maintenance, sanitasion, and consolidation.</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>The company has been reported Annual Communication of Progress (ACOP) 2019 to RSPO website under organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&amp;C Certification are 9 units; total certified land under RSPO P&amp;C is 82,976.23 Ha; Scheme Smallholders is 19171.97 Ha. Total FFB produce is 922,264.34 tonnes; Total certified FFB is 847,767.46 tonnes. CSPO sold as RSPO-certified is 183,111 MT; CSPO sold under other certification schemes is 83,180 MT; CSPO sold as conventional is 28,079 MT; Total CSPO is 294,370 MT. CSPK sold under RSPO-certified is 43,897 MT; CSPK sold as conventional is 10,108 MT; Total CSPK is 54,005 MT.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The company has reported Annual report using RSPO Metric Template and submitted to CB. Based on the report, Annual Production period September 2020 to August 2021 for Certified Palm Oil is 31,746.73 MT, and for Certified Palm Kernel is 6,946.14 MT. There is no uncertified product produced by the unit of certification.</p>	Complied
<p><b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>Estate:</p> <p>The procedures documented in "Oil Palm Agricultural Manual" (revised April 2019), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water</p>	Complied

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		<p>level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows:</p> <ol style="list-style-type: none"> <li>1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm.</li> <li>2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery.</li> <li>3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit</li> <li>4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit.</li> <li>5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit.</li> <li>6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan.</li> <li>7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan.</li> <li>8. OPM-03-03; dated 06/02/2019; Land Preparation – Persiapan Lahan.</li> <li>9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracheteata</i> – <i>Mucuna bracheteata</i> Kacangan Penutup Tanah.</li> <li>10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan.</li> <li>11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman.</li> <li>12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman.</li> <li>13. OPM-05-01; dated 06/02/2019; Ablation and Sanitation – Ablasi dan Sanitasi.</li> <li>14. OPM-05-02; dated 06/02/2019; Harvesting – Panen.</li> <li>15. OPM-05-03; dated 06/02/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan.</li> <li>16. OPM-05-04; dated 02/10/2017; Frond Pruning – Pemangkasan Pelepah.</li> <li>17. OPM-05-05; dated 16/02/2019; Black Bunch Count – Sensus Buah.</li> <li>18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>.</li> <li>19. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik.</li> </ol>	
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		<p>20. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik</p> <p>21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman.</p> <p>22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</p> <p>23. OPM-07-01; dated 06/02/2019; Detection and Census – Deteksi dan Sensus.</p> <p>24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama.</p> <p>25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit.</p> <p>26. OPM-07-04; dated 02/10/2017; Integrated Pest Management – Pengendalian Hama Terpadu.</p> <p>27. OPM-08-01; dated 06/02/2019; Weed Control – Pengendalian Gulma.</p> <p>28. OPM-09-01; dated 19/03/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir.</p> <p>29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area.</p> <p>30. OPM-09-03; dated 01/04/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida.</p> <p>31. OPM-10-01; dated 06/02/2019; Field Quality Control.</p> <p>Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function.</p> <p>Bunga Tanjung POM:  Mukomuko Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under "Palm Oil Mill Manual". The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> <li>1. POM-01-03; Rev2; dated 25/03/2019; Reception in Agro Muko Palm Oil Mill.</li> <li>2. POM-02-03; Rev2; dated 25/03/2019; Sterilizer in Agro Muko Palm Oil Mill.</li> </ol>	
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		<ol style="list-style-type: none"> <li>3. POM-03-03; Rev1; dated 25/03/2019; Threshing in Agro Muko Palm Oil Mill.</li> <li>4. POM-04-03; Rev1; dated 25/03/2019; Pressing in Agro Muko Palm Oil Mill.</li> <li>5. POM-05-03; Rev1; dated 25/03/2019; Clarification in Agro Muko Palm Oil Mill.</li> <li>6. POM-06-03; Rev3; dated 25/03/2019; Kernel Plant in Agro Muko Palm Oil Mill.</li> <li>7. POM-07-03; Rev1; dated 25/03/2019; Steam Plant in Agro Muko Palm Oil Mill.</li> <li>8. POM-08-03; Rev1; dated 25/03/2019; Power Plant in Agro Muko Palm Oil Mill.</li> <li>9. POM-09-03; Rev1; dated 25/03/2019; Water Treatment in Agro Muko Palm Oil Mill.</li> <li>10. POM-10-03; Rev1; dated 25/03/2019; Effluent Plant in Agro Muko Palm Oil Mill.</li> <li>11. POM-11-03; Rev1; dated 25/03/2019; Storage and Dispatch in Agro Muko Palm Oil Mill.</li> <li>12. POM-12-03; Rev1; dated 25/03/2019; Workshop in Agro Muko Palm Oil Mill.</li> <li>13. POM-13-03; Rev1; dated 25/03/2019; EFB Plant in Agro Muko Palm Oil Mill.</li> <li>14. POM-14-03; Rev1; dated 25/03/2019; Biogas Plant in Agro Muko Palm Oil Mill.</li> <li>15. MKT-03-06; dated 04/03/2019; Supply Chain and Traceability of Palm Oil.</li> </ol> <p>A set of work instruction for mill's workshop are available, dated 25/03/2019; including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>Engineering Procedures:</p> <ol style="list-style-type: none"> <li>1. ENG-01-01; Rev1; dated 28/03/2019; Civil Mechanical and Eelctrical Work.</li> <li>2. ENG-02-01; Rev1; dated 28/03/2019; Weekly Prodcution Report.</li> <li>3. ENG-02-03; Rev1; dated 28/03/2019; Monthly Prodcution and Stock.</li> <li>4. ENG-02-14; Rev1; dated 28/03/2019; Material Dstribution From Storage.</li> <li>5. ENG-02-16; Rev1; dated 28/03/2019; Resceiving HSD Oil.</li> </ol>	
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		<ol style="list-style-type: none"> <li>6. ENG-02-21; Rev0; dated 07/03/2019; Weighing Administration.</li> <li>7. ENG-03-01; Rev1; dated 28/03/2019; Master List of Measuring Equipment.</li> <li>8. ENG-03-02; Rev1; dated 28/03/2019; Planning, Monitoring and Reporting of Calibration and Verification.</li> <li>9. ENG-03-03; Rev1; dated 28/03/2019; Calibration Administration Excluding Weighbridge.</li> <li>10. ENG-03-04; Rev1; dated 28/03/2019; Calibration Administration Weighbridge.</li> <li>11. ENG-03-05; Rev1; dated 28/03/2019; Verification Administration Procedure.</li> </ol> <p>In regard the COVID-19 pandemic, the company has established procedure COVID-19 Prevention And Management Plan (MED-01-23 / 24-08-2020/ Rev. 0) dated 24 August 2020. The procedure was made to protect all employees and the environment of the company against Covid-19 outbreak. The procedure applies to all employees at the office, estates, mills, public transportation, public area and at home, and other parties (contractors and visitors) who are in the company's area. The procedure reference are Guidelines for the Prevention and Control of Coronavirus Disease (COVID 19) Ministry of Health 1-5; WHO Letter Concerning Workplace Preparation for Covid – 19; Letter of from the Indonesian Ministry of Health on Prevention of Covid-19 transmission at workplace.</p> <p>Based on interview to the workers, the company has implemented the COVID-19 protocol, such as washing hand frequently, wearing mask and social distancing. The company also prohibits its employees from leaving the company environment, unless there is an urgent need.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Based on field visit to harvesting activity at 19A03 and upkeep at 19A01 verified that each workers have undertood their activities according to good agricultural practices. Harvesting carried out by 9 harvester supervised by 1 Mandore. Harvesiting round is 9 days; basis is 300 kg, premium is IDR 46 for first 250 kg; IDR 47 for 251 – 500 kg; IDR 48 for 501 kg and above.</p> <p>All the Estate procedures developed by SIPEF also adopted by Sungai Teramang Estate.</p>	
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3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>During onsite visit, mechanism to check consistent implementation of procedure conducting in regular visit by Agronomy Manager, Senior Estate/Mill Manager and internal audit. Where internal audit consist of Finance Audit, Sustainability Audit and Management System Audit.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Regular visit to Sungai Teramang Estate by Top Management has been conducted for example Regional Director (RD) and Senior Manager (SM) on 31 August 2021. Action plan consist of road maintenance, sanitation, and consolidation.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Internal audit has been conducted in Bunga Tanjung POM on 9-10 August 2021; action plan consists of follow up from 5 minor and 1 observation. Beside that, internal audit team has recommended some opportunities for improvement.; in Bunga Tanjung Estate on 22 – 23 Jun 2020; in Air Buluh Estate on 10 – 12 Aug 2020. Internal audit using RSPO Principles &amp; Criteria, that covers social and environmental impact and its opportunities. Several findings have been recorded; consist of minor finding, Observation and Opportunity for Improvement. In general, follow up action have been verified by the internal auditor.</p> <p>Record of monitoring in Bunga Tanjung POM are available under documents Action Plan Bunga Tanjung POM as result of Internal Audit. Description of monitoring result and action plan based on visit in June 2020 are as follows:</p> <ol style="list-style-type: none"> <li>1. Most of the fire extinguishers have expired in March 2020; Periodic inspection / maintenance not consistently implemented, recorded up November 2019; Pressure gauge indicates "low" position; Some of the contents of the First Aid Box are incomplete, e.g. masks, tweezers, triangular cloth, aquades, 1.25 cm plaster, triangular cloth &amp; scissors; The fire extinguisher at the workshop was blocked by drum material; The safety shower at the temporary hazardous waste storage is not functioning, the water to the sink does not flow. <b>Action Plan:</b> Refill the expired fire extinguisher; Make sure that the fire extinguisher checked regularly to ensure that it continues to function and replace the fire extinguisher that is not appropriate; Complete the contents of the first aid kit; Make sure there is no fire</li> </ol>	Complied

		<p>extinguishers are blocked; Repair the water safety shower installation at temporary hazardous waste storage.</p> <p>2. There is no sign of an area limitation at the CST 02 station which is being repaired; LPG gas cylinders does not have MSDS and hazardous symbols; Ethrel chemicals are not equipped with a secondary containment; No mask is available for work on the bunch analysis; The gas cylinder in the warehouse is not attached; The walking way markings in warehouses, workshops &amp; hazardous waste storage are faded; There is no MSDS for SKF Bearing Grease, Radiator Coolant and Sika Concrete Additive. <b>Action Plan:</b> Create an area limitation on the area that is under repair, to prevent harm from the repair activities; Complete the B3 and MSDS symbols for LPG gas; Complete the secondary containment for Ethrel; Ensure that analysis workers are provided with appropriate PPE; Ensure gas cylinders are stored safely. Pedestrian lines in warehouses and workshops are suggested to be renewed. Complete all MSDS of chemicals used at BT POM.</p> <p>Record of monitoring in Bunga Tanjung Estate are available under documents Action Plan Bunga Tanjung Estate as result Internal Audit visit. Description of monitoring result and action plan based on internal audit are as follows:</p> <p>1. Generator sets in Divisions I &amp; IV are not equipped with van belt cover guards; Water safety shower in the area of Storage &amp; Pesticide Mixing Warehouse does not flow; Division III fertilizer warehouse is not equipped with clean water facilities that function as a safety shower; Air circulation in the fertilizer warehouse, especially when packing, types of fertilizers with dusty characteristics such as Rock Phosphate fertilizer are not feasible. <b>Action Plan:</b> Install the genset v-belt cover guard in Division I &amp; IV; Make sure water for the safety shower is always available at all times; Complete a safety shower in the Division III fertilizer warehouse; Create adequate air circulation in the fertilizer warehouse building to minimize the risk of exposure from fertilizers in the form of flour.</p> <p>2. Found used motorcycle oil (hazardous waste) packaging at the Division III landfill; Found plastic waste behind the housing of Division I, behind the housing of Division III and behind the housing of Division IV (riverside of Air Bikuk). <b>Action Plan:</b> Dissemination to workers not to dispose hazardous waste into domestic waste</p>	
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		<p>storage; Conduct intensive dissemination of clean living habits so that waste is not disposed randomly.</p> <p>Record of monitoring in Air Buluh Estate are available under documents Action Plan Air Buluh Estate as result internal audit visit. Description of monitoring result and action plan based on internal audit are as follows:</p> <ol style="list-style-type: none"> <li>1. Air Buluh Estate has identified sources of waste and created a management plan that is presented in the environmental aspects and impact document. However, the document has not been reviewed due to the following recent changes: Management of domestic waste that has been done with a closed installation; There are listed quarry activities, but there are no facts in the field; There is listed peat management while the fact is that in the field, there is no peat. <b>Action Plan:</b> Review documents on environmental aspects and impacts by revising the management of domestic liquid waste (grey water) and eliminating inappropriate activities / conditions in the field; Clean the trash scattered around the emplacement; Conduct intensive socialization to increase awareness of clean and healthy living habits.</li> <li>2. The warning sign of prohibition from entering the pesticides application area is installed, however the colour is green, so it is not clearly visible. <b>Action Plan:</b> Make the warning sign clear, using white base and red writing).</li> </ol> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Regular visit to Sungai Teramang Estate by Top Management has been conducted for example Regional Director (RD) and Senior Manager (SM) on 31 August 2021. <b>Action plan:</b> consist of road maintenance, sanitasion, and consolidation.</p>	
<p><b>Criteria 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p><b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment</p>	<p>PT Agromuko – Bunga Tanjung POM has demonstrated the document of Social-Environment Impact Assessment (SEIA) as per government document “Analisis Dampak Lingkungan (ANDAL) dan Rencana Pengelolaan dan Pemantauan Lingkungan (RKL-RPL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan</p>	Complied

	<p>from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Sugu, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005” - it was found that the document prepared with public consultation process, involving stakeholders from surrounding community, government bodies, traditional leaders.</p> <p>Aside from that, certificated holder has prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI), in 2010 and 2011. The scope of social impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>PT Mukomuko Agro Sejahtera has also prepared the document, identifying Social-Environment Impact Assessment (SEIA) under document: “Dokumen AMDAL untuk Kegiatan Perkebunan Kelapa Sawit seluas 6,298 Ha di Kecamatan Malin Deman, Kecamatan Ipuh dan Kecamatan V Koto, Kabupaten Mukomuko, Provinsi Bengkulu”. The document was approved by “Surat Keputusan Gubernur Bengkulu No. M.288.XXX Tahun 2011” dated 9 September 2011.</p> <p>Aside from that, company has prepared a social-environment impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The report under Dokumen Laporan Final Penilaian Dampak Sosial dan Lingkungan yang dilaksanakan oleh Yayasan Kelapa Sawit Berkelanjutan (YASBI) pada tahun 2011 yang dilakukan terhadap dampak sosial dari pembangunan kebun inti dan rencana pembangunan Kebun Masyarakat Desa (KMD)”.</p> <p>For Kebun Masyarakat Desa, in 2010, the certificated holder has also prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social-environment impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.</p> <p>In 2017, social-environment impact assessment held in cooperation by Kompas Enviro Institute for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).</p>	
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3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring	The social impact management plan from documents have lined out program to manage and monitors social-environment impact (e.g: Rencana Pengelolaan	Complied

	<p>have been developed with participation of affected stakeholders.</p>	<p>Lingkungan dan Rencana Pemantauan Lingkungan (RKL-RPL for period first semester year 2019), timeframe and person in charge. The plan was consulted through questionnaire/survey to surrounding communities on 6-monthly basis. Progress of implementation was monitored, evaluated and reported to government on 6-monthly basis.</p> <p>Within the AMDAL documents, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document has lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development. Under the document, the social aspect identified covers source of livelihood, community's revenue, community ability, community perception on company activity, social conflict, social-cultural changes, community health status.</p> <p>The Social-Environment Impact Assessment documents have explained the recommendation that should be done by company to minimize negative impact and promote positive impact from social impact management.</p> <p>As commitment to reduce negative impacts in social aspect, the certificate holder created management and monitoring program of social impact annually.</p> <p>Documented sample of management and monitoring program social-environment impact PT Agromuko – Bunga Tanjung POM report in July 2020. There are six (6) major program where focused on, such as:</p> <ul style="list-style-type: none"> <li>• Tenure</li> <li>• Communication with Affected Parties,</li> <li>• Community Empowerment</li> <li>• Economic,</li> <li>• Fire and Haze Prevention,</li> <li>• Environmental Management</li> <li>• Scheme Smallholders (KMD) management (e.g: socialization of KMD development plans; review the location of smallholder plantation location – to ensure consensus</li> </ul>	
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		<p>and involvement of all parties within village scope; coordination with government related to SPPL.</p> <p>Those program are documented and timetable with specific target and strategy of each activities.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Managed area of Sungai Teramang Estate previously is owned by PT Asririmba Wirabhakti. In 13 August 2018, as per Act No.08, PT Asririmba Wirabhakti has been took over by PT Mukomuko Agro Sejahtera (SIPEF). Prior to acquired by SIPEF, PT Asririmba Wirabhakti already have Environmental Permit according to "Surat Keputusan Kepala Kantor Pelayanan Terpadu Satu Pintu Kab. Mukomuko Nomor: 503/05/KPTSP/IL/III/2016", dated 2 March 2016.</p> <p>As required by Environmental Permit, plantation management unit of Sungai Teramang Estate establish environmental management and monitoring plan that documented in "Dokumen Rencana Pengelolaan Lingkungan Hidup dan Rencana Pemantauan Lingkungan Hidup (RKL-RPL)", 2019. This document is amalgamation of environmental management and monitoring plan from Environmental Document of "AMDAL" PT MMAS (6,298 Ha) in 2011 and Environmental Permit of PT Asririmba Wirabhakti (1,770 Ha) in 2018. The document is approved by Environmental Agency of Mukomuko Regency in 28 October 2019, Number: 660/1138/DIS/X/2019.</p> <p>Several impacts should be monitor by unit of certification are available in matrix, such as:</p> <ol style="list-style-type: none"> <li>1. Increasing of Soil Erosion</li> <li>2. Degradation of water quality</li> <li>3. Degradation of soil fertility</li> <li>4. Changes of land vegetation</li> <li>5. Wildlife issues</li> <li>6. Changes of aquatic life</li> <li>7. Job opportunities</li> </ol>	
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		<p>8. Increasing of community's income            9. Social conflict issues            10. Public health issues</p>	
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Certificate holder have carried out social impact evaluation on annual basis through social survey. The survey was conducted by ENC-AM/MMAS and being part of environment management and monitoring report - "Laporan Pelaksanaan RKL-RPL".</p> <p>Review on social-environment management and monitoring has conducted for 2020 under "Laporan Hasil Kuisisioner dengan Masyarakat untuk Aspek Sosial" PT Agromuko – 2020.</p> <p>Survey was conducted on 15 to 30 March 2020 total respondent is 160 people in 40 villages in surrounding the company.</p> <p>Aspect for the survey such as:</p> <ul style="list-style-type: none"> <li>• Livelihood</li> <li>• Local community perception of employment opportunities</li> <li>• Income per month</li> <li>• Mobility</li> <li>• Local community perception related to operational activities in PT Agromuko</li> </ul> <p>Interview result have been summarized and recorded onto "Laporan Pelaksanaan RKL-RPL period first semester year 2020".</p> <p>For management plans in Kebun Masyarakat Desa/KMD, the social impact was carried out as part of company activity, because the smallholder plantation was managed by company. As explained from PT. Agro Muko and PT. Mukomuko Agro Sejahtera's social monitoring, the current management plan is still relevant – in terms of smallholder management.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Environmental management and monitoring plan that documented in "Dokumen Rencana Pengelolaan Lingkungan Hidup dan Rencana Pemantauan Lingkungan Hidup (RKL-RPL)", 2019 has been implemented and reported regularly by unit of certification.</p>	<p>Complied</p>

		<p>The report "Laporan Hasil Pelaksanaan RKL-RPL" submit to Environmental Agency periodically. In example: "Laporan Hasil Pelaksanaan RKL-RPL PT Muko Muko Agro Sejahtera" period Jul-Dec 2021 has been submitted to environmental agency "Dinas Lingkungan Hidup" of Mukomuko Regency on 15 March 2022. Several aspects contained in the report are in accordance with the RKL-RPL document which is required to be monitored and managed.</p> <p>For example:</p> <p>During field visit to Sungai Teramang Estate in Block 20B02, implementation of soil control erosion sighted in good treated. The prevent erosion control, unit of certification implement terracing in slightly slope area and covers by legume cover crops.</p>	
<p><b>Criteria 3.5:</b> A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>In general, the unit of certification has issued "Human Resources Department Manual" Second Edition – 2019 signed by President Director. Document available at the OU office, and accessible. The HRD Manual consist of 30 Standard Operating Procedure, among others:</p> <ul style="list-style-type: none"> <li>• General (Doc. No. HRD-00-01/01-02-2019/Rev.1) dated 8 April 2019.</li> <li>• Organization Chart (Doc. No. HRD-00-02/01-02-2019/Rev.1) dated 5 April 2019.</li> <li>• Objective and KPI (Doc. No. HRD-00-03/01-04-2019/Rev.1) dated 8 April 2019</li> <li>• Risk and Opportunities (Doc. No. HRD-00-04/01-04-2019/Rev.1) dated 8 April 2019.</li> <li>• Recruitment in General (Doc. No. HRD-01-00/01-04-2019/Rev.1) dated 5 April 2019.</li> <li>• Internal Recruitment (Doc. No. HRD-01-01/01-04-2019/Rev.1) dated 8 April 2019.</li> </ul> <p><b><u>Extension to scope Sungai Teramang Estate:</u></b></p> <p>All those procedures developed by SIPEF also adopted by Sungai Teramang Estate.</p>	<p>Complied</p>

3.5.2	Employment procedures are implemented and records are maintained.	<p>During onsite audit, employment procedure was implemented consistently. Records of employment also well maintained by the system and responsible by Head of Administration at each unit (Estate/Mill).</p> <p><b><u>Extension to scope Sungai Teramang Estate:</u></b></p> <p>Record verification:</p> <ul style="list-style-type: none"> <li>Request for recruitment coming from Sungai Teramang Estate to Senior Manager in Regional Management Office Bengkulu, 163/STRGE-RO/II/2022 dated 11 February 2022. Position request for Driver Jeep</li> <li>Assessment Review, namely Mr Antoni dated 2 February 2022 Purpose: This evaluation is to standardize the recording of information collected during an interview and assist in evaluating dan comparing different applications when interview was completed.</li> </ul> <p>Contract Document: Perjanjian Kerja Waktu Tertentu, No: 02/STGE/II/2022 dated 1<sup>st</sup> March 2022. Namely Mr Josua Manurung. The contract valid until 1 year.</p>	Complied
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Agromuko – Bunga Tanjung POM as subsidiary of PT Tolan Tiga Indonesia (SIPEF Group) has established an Occupational Health and Safety Policy that was signed by President Director dated 27<sup>th</sup> March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev.</p> <p>In point 1 was mentioned PT Tolan Tiga Indonesia Support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety.</p> <p>In point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>The company has prepared the procedure for OHS under document of Occupational Health and Safety Manual for second edition – 2019, published date 13<sup>th</sup> March 2019.</p> <p>The document of procedure consisted of:</p>	Complied

		<ol style="list-style-type: none"> <li>1. Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01</li> <li>2. Procedure of Hot Work – No: OHS-01-02</li> <li>3. Procedure of Potential Hazard Report – No: OHS-01-03</li> <li>4. Procedure of P3K (First Aid) – No: OHS-01-04</li> <li>5. Procedure of Confined Space - No: OHS-01-06</li> <li>6. Procedure of Working at Heights – No: OHS-01-06</li> <li>7. Procedure of Gas Pressure Management - No: OHS-01-07</li> <li>8. Procedure of Incident Reporting - No: OHS-01-08</li> <li>9. Procedure of Standard for Installation of Safety Sign - No: OHS-01-09</li> <li>10. Procedure of Personal Protective Equipment - No: OHS-01-10</li> </ol> <p>The certificate holder has prepared the document of risk assessment available under "Penilaian Risiko (Hazard Identification Risk Assessment and Control", last review in September 2020. The document has covered for all activities in Estate and Mill, e.g: general activities, central clinic, fertilizer storage, temporary storage of hazardous waste, security, chemical shed, office, workshop, field (spraying, manuring, harvesting, transport FFB, IPM), emplacement, laboratory, weighbridge, grading station, loading ramp, sterilizer station, chain capstan, pressing station, boiler station, kernel station, static crane, workshop.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate has demonstrated the document of risk assessment available under "Penilaian Risiko (Hazard Identification Risk Assessment and Control", last review 7<sup>th</sup> March 2022.</p> <p>The HIRADC document has socialized to related workers, dated 18<sup>th</sup> February 2022 – location in Sungai Teramang Inti, was attended by 24 workers.</p> <p>Mitigation plan of risk assessment has implemented, e.g: in warehouse of fertilizer has sets the maximum height at 2.5 meters for fertilizer bag stacking, fire extinguisher has</p>	
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		installed in fuel station and temporary hazardous waste, and all workers has provided PPE.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>During onsite visit at Estate activities (manuring, pesticide application, harvesting) and Mill operation, Health and Safety plan of each activity was implemented effectively.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate has demonstrated the document of OHS Program as per "Program P2K3 – 2022", prepared on 3rd January 2022. The program consists of:</p> <ul style="list-style-type: none"> <li>• OHS meeting -&gt; monthly</li> <li>• Report of OHS performance to Manpower Agency in Mukomuko Regency -&gt; 3 months base</li> <li>• Monitoring of emergency response equipment (APAR, hydrant, sirine) -&gt; monthly</li> <li>• MCU check-up -&gt; annually, plan in December 2021</li> <li>• Special MCU for workers in high-risk area / operations -&gt; 3 months base.</li> </ul> <p>Record of implementation the OHS program year 2021, such as:</p> <ul style="list-style-type: none"> <li>• Sample record of OHS meeting dated 2<sup>nd</sup> February 2022, agenda: discussion of sick pay day, report of OHS inspection and accident report. The meeting was attended by Senior Estate manager, head assistant, workshop assistant, OHS expert.</li> <li>• Report of OHS performance period October – December 2021. Has submitted to Dinas Tenaga Kerja dan Transmigrasi Mukomuko Regency. Report number: 05/RMO-02/2022 dated 9<sup>th</sup> February 2022.</li> <li>• Special Medical Check Up 2021 – for worker in Sungai Teramang, dated 27<sup>th</sup> October 2021 conducted by Klinik Spesialis Anugerah Ibu, was attended by 10 workers.</li> </ul> <p>Inspection report for using of PPE dated 16<sup>th</sup> March 2022 during Muster Chit Field, was attended by 23 workers.</p>	Complied
<b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme	PT Agromuko – Bunga Tanjung POM has shown the document of Training Program year 2020.	Complied

	<p>smallholders, and outgrowers taking into account gender-specific needs, and which covers applicable aspects of P&amp;C Principles, in a form they understand and includes assessment of the training.</p>	<p>Air Buluh Estate and Malin Deman Estate, Training program provided as per "Program Pelatihan/Training Tahun 2019", prepared on 4<sup>th</sup> January 2019, such as:</p> <ul style="list-style-type: none"> <li>• Training on harvesting (including for OHS aspect and harvesting quality criterion), was conducted on 2<sup>nd</sup> March 2019 in Air Buluh Estate and on 15<sup>th</sup> January 2019 in Malin Deman Estate</li> <li>• Training for spraying applicator (including for OHS training and environment) and Calibration for Spraying tools, was conducted on 9<sup>th</sup> March 2019 location in Air Buluh Estate</li> <li>• Training for manuring application (including OHS and environmental aspect), dated 6 &amp; 7 February 2019 location in Malin Deman Estate; dated 9<sup>th</sup> April and 2<sup>nd</sup> November 2019 location in Air Buluh Estate</li> <li>• First Aid training, conducted on 10<sup>th</sup> and 11<sup>th</sup> October 2019 location in Malin Deman Estate and Air Buluh Estate</li> <li>• Refreshment training on implementation of RSPO requirement, date 1<sup>st</sup> July 2019, location in Air Buluh Estate</li> <li>• Training on handling of hazardous waste (including MSDS and hazard label), dated 14<sup>th</sup> March 2019 location in Malin Deman Estate and on 7<sup>th</sup> November 2019 location in Air Buluh Estate</li> <li>• Training on emergency respond (training on land fire emergency), dated 9<sup>th</sup> February and 19<sup>th</sup> September 2019, location in Malin Deman Estate and Air Buluh Estate.</li> </ul> <p>Bunga Tanjung Estate: Estate has shown the document of Training Program year 2019, consisted of:</p> <ul style="list-style-type: none"> <li>• Training for harvester (including: OHS aspect in harvesting activities) planned in March 2019; actual realization in 2<sup>nd</sup> April 2019. Attended by harvester</li> <li>• Training for first aider; planned in October 2019</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Training on fertilizer application dated 24<sup>th</sup> September 2021 was attended by 10 workers</li> <li>• Training on ablation dated 23<sup>rd</sup> January 2021, was attended by 6 workers.</li> <li>• Training on using of fire extinguisher dated 5<sup>th</sup> November 2021, was attended by 7 workers.</li> </ul>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p>Air Buluh Estate,  Namely Mrs Mimarni (spraying applicator) – 35 years old; training record:</p> <ul style="list-style-type: none"> <li>• Dated 23<sup>rd</sup> January 2018; training on preparedness of emergency response for land fire</li> <li>• Dated 19<sup>th</sup> February 2018; training on calibration of sprayer equipment</li> <li>• Dated 7<sup>th</sup> March 2018; training on pesticides handling</li> <li>• Dated 12<sup>th</sup> Apeil 2018; training for MSDS</li> <li>• Dated 8<sup>th</sup> May 2018; training of OHS</li> <li>• Dated 20<sup>th</sup> October 2018; training pesticides handling</li> <li>• Dated 9<sup>th</sup> February 2019; training on emergency response for land fire</li> <li>• Dated 21<sup>st</sup> February 2019; Refresh training for MSDS</li> <li>• Dated 7<sup>th</sup> October 2019; Training for IPM</li> <li>• Dated 25<sup>th</sup> October 2019; Refresh training on chemical application</li> </ul> <p>Namely Mr Teguh A (harvester) – 24<sup>th</sup> years old; training record:</p> <ul style="list-style-type: none"> <li>• Dated 8<sup>th</sup> February 2018; training on quality of FFB</li> <li>• Dated 4<sup>th</sup> April 2018; Refresh training of OHS in harvesting activity</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Dated 24<sup>th</sup> October 2019; Refresh training on implementation of harvesting procedure</li> </ul> <p>Namely Mrs Sulasmi (reference number: 0547 – pesticides applicator/sprayer), division F.4 in Bunga Tanjung Estate; training record:</p> <ul style="list-style-type: none"> <li>• Dated 24<sup>th</sup> March 2012; training or socialization of HCV area</li> <li>• Dated 16<sup>th</sup> January 2013; training on fertilizer application</li> <li>• Dated 1<sup>st</sup> July 2014; refresh training on fertilizer application</li> <li>• Dated 4<sup>th</sup> March 2015; training for pesticides application</li> <li>• Dated 22<sup>nd</sup> February 2017; training on calibration of kap/SA15</li> <li>• Dated 7<sup>th</sup> November 2017; refresh training on application of pesticides and calibration</li> <li>• Dated 13<sup>th</sup> August 2018; refresh training on application of pesticides and calibration</li> <li>• Dated 23<sup>rd</sup> April 2019; refresh training on application of pesticides and calibration</li> </ul> <p>Employee training and education record namely Mrs Nusryasin (supervisor in pesticides applicator), e.g:</p> <ul style="list-style-type: none"> <li>• Dated 18<sup>th</sup> September 2019; refresh training on handling of pesticides including OHS aspect in chemical application</li> <li>• Dated 26<sup>th</sup> February 2019; refresh training of MSDS for chemical material</li> <li>• Dated 7<sup>th</sup> February 2019; refresh training on calibration of spraying equipment</li> <li>• Dated 8<sup>th</sup> March 2019; training on earthquake simulation and preparedness</li> <li>• Dated 17<sup>th</sup> April 2018; training of awareness of HCV</li> <li>• Dated 14<sup>th</sup> May 2018; socialization of company’s policy</li> <li>• Dated 17<sup>th</sup> January 2019; training on environmental impact in plantation.</li> </ul> <p>Due to Covid-19 pandemic, training program 2020 is not carried out yet. However dissemination of Work Instruction and SOP are routinely conducted during morning briefing.</p>	
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		<p><b>Extension to scope Sungai Teramang Estate:</b>          ecord of employee training record and education records namely Mr Darlin – Supervisor of pesticides application:</p> <ul style="list-style-type: none"> <li>• 19<sup>th</sup> July 2019 – training of spraying</li> <li>• 5<sup>th</sup> November 2019 – training on using and handling of agrochemical and weed control</li> <li>• 31<sup>st</sup> January 2020 – training of spraying</li> <li>• 11<sup>th</sup> February 2020 – fire drill training</li> <li>• 15<sup>th</sup> July 201 – training on handling of hazardous waste, MSDS.</li> </ul> <p>Training records namely Mr Slamet R – (supervisor of harvesting)</p> <ul style="list-style-type: none"> <li>• 19<sup>th</sup> July 2019 – training on harvesting</li> <li>• 11<sup>th</sup> February 2020 – fire drill training</li> <li>• 5<sup>th</sup> November 2021– fire drill training</li> </ul>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Latest refreshment training of Supply Chain conducted by ENC Department on 26 June 2020. During onsite visit at Bunga Tanjung POM and interview with personnel who involved in Supply Chain, they can demonstrate the effectiveness of the training by explaining in details of Supply Chain flow. Such as Weighbridge operator and Mill Manager. The responsible person understood that before Sungai Termang Estate is certified, the FFB are not allowed to enter BT POM.	Complied
<p><b>Criteria 3.8:</b> Supply chain requirements for mills.          Procedure note: all requirements are classified as <b>Critical Indicators</b>. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	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.	Management decided PT Agro Muko – Bunga Tanjung POM, to implement RSPO Supply Chain module Identity Preserved. With the implementation of Module Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified smallholder/KMD.	Complied

	<p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is only receiving CPO from certified palm oil mills under PT Agromuko, which is Mukomuko POM and Bunga Tanjung POM.</p> <p>Bunga Tanjung POM and AMTT implemented the procedure of supply chain and traceability. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager, whilst in the tank terminal is the storage tank manager.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Currently FFB from Sungai Teramang Estate are delivered to other palm oil mill, e.g. PT Daria Dharma Pratama and PT Karya Agro Sawitindo, evidence verified:</p> <ul style="list-style-type: none"> <li>- Delivery of FFB from Field "SPB" No. STGE/000507 dated 24/03/2022 from Sungai Teramang Estate, Block 19A04; planting year 2019, total 1,378 bunches.</li> <li>- Receiving slip/weighbridge ticket PT Daria Dharma Pratama (Desa Lubuk Bento Kec. Mukomuko Selatan) No. SF120220311906, dated 24/03/2022; Vehicle No. BD 8314 N; Driver Yudi; gross 5,460 kg; net 5,187 kg; Supplier PT MMAS.</li> </ul>	
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The certification unit implemented Identity Preserved, this clause is not applicable.</p>	<p>Not Applicable</p>
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be</p>	<p>The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment.</p>	<p>Complied</p>

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	<p>recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The FFB tonnage received from all certified supply bases. Bunga Tanjung POM received certified raw material (Fresh Fruit Bunch) from its own estate: Air Bikuk Estate, Bunga Tanjung Estate, Air Buluh Estate; Malin Deman Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU; Koperasi Produksi Plasma.</p> <p>Kebun Masyarakat Desa/KMD, Koperasi Serba Usaha/KSU and Koperasi Produksi Plasma are fully managed by PT. Agro Muko, under each estate.</p> <p>The certification of Estates and Scheme Smallholders are fall under PT. Agro Muko – Bunga Tanjung POM with certificate number RSPO 646338, first certification start on 22 February 2011, second certification start on 22 February 2016 and expired on 21 February 2021.</p> <p>PT. Agro Muko – Bunga Tanjung Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000001279.</p>	
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. Agro Muko – Bunga Tanjung Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000001279. The mill has registered its sales of certified product in PalmTrace, e.g.:</p> <ul style="list-style-type: none"> <li>Shipping Announcement, with transaction ID No. TR-2e65d9c3-1531 for 499.77 MT CSPO SG; from PT Agro Muko – Bunga Tanjung POM (RSPO_PO1000001279) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2020/LTC-CPO/AM-BT/06; Status: Announced on 22/06/2020.</li> <li>Shipping Announcement, with transaction ID No. TR-046805dc-f0db for 2,499.93 MT CSPO SG; from PT Agro Muko – Bunga Tanjung POM (RSPO_PO1000001279) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2020/LTC-CPO/AM-BT/07; Status: Announced on 13/07/2020.</li> </ul>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p>	<p>PT. Agro Muko has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedures are complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p>	Complied

	<ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<ul style="list-style-type: none"> <li>a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism;</li> <li>b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill;</li> <li>c. Process at Palm Oil Mill, covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording.</li> </ul> <p>Based on the SOP Supply Chain, the Mill Manager is the person having overall responsibility for and authority over the implementation of RSPO Supply Chain and compliance with all applicable requirements in the palm Oil Mill.</p> <p>Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is receiving CSPO from certified palm oil mills under PT. Agro Muko, which is Mukomuko POM and Bunga Tanjung POM.</p> <p>AMTT uses the same procedure with Bunga Tanjung POM.</p> <p>Training regarding implementation of RSPO SCCS in Bunga Tanjung POM has been conducted on 26 Jun 2020. Training record are available such as attendance list and training module.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b) Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at</li> </ul>	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit (No.ENC-01-02/04-03-2019/Rev.2) date 18 March 2019.</p> <p>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p> <p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p>	Complied

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	least annually. The mill shall maintain the internal audit records and reports.	Internal audit of PT Agro Muko-Bunga Tanjung POM has been conducted on 25 – 26 Jun 2020 against RSPO P&C 2018 that include supply chain requirements. Internal audit records are available, such as Audit Visit Report and audit checklist. Corrective actions have been determined for all non-conformities, however there is no non-conformity found against RSPO supply chain requirements.	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT. Agro Muko has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT. Agro Muko – Bunga Tanjung POM, with certificate number RSPO 646338. Bunga Tanjung POM received certified FFB from sustainable source: Air Bikuk Estate, Bunga Tanjung Estate, Air Buluh Estate; Malin Deman Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD, Koperasi Serba Usaha/KSU and Koperasi Produksi Plasma. There is no FFB received from other source.</p> <p>Bunga Tanjung POM does not need to check the certificate validity of the FFB source on the RSPO website, because the certification of the FFB suppliers is fall under PT Agro Muko – Bunga Tanjung POM.</p> <p>PT Agro Muko – Bunga Tanjung POM has demonstrated SOP Supply Chain and Traceability of Palm Products (No.MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print “Receiving Slip” based on FFB Delivery Note, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>The procedure explains Operating Unit can communicate to CB regarding certified product volume in PalmTrace. During this year assessment period, there is no significant overproduction of CPO or PK in Bunga Tanjung POM.</p> <p>The procedure also explains mechanism for handling non-conforming FFB and/or documents refer to Marketing Department Manual - SOP Customer Complaint Handling (No.MKT-03-02/26-04/2018/rev.1) dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible person is Operating</p>	Complied

		<p>Unit Manager and Senior Manager Marketing. Based on this assessment, Bunga Tanjung POM only receive and processed sustainable FFB from certified supplier and there have been no complaint from buyer.</p> <p>Incoming FFB records available:</p> <ol style="list-style-type: none"> <li>1. Delivery of FFB from Field "SPB" No. BTE/048711 dated 10/10/2020 from Bunga Tanjung Estate, block 98M01A; planting year 1998, total 230 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB20019670W, Bunga Tanjung Estate dated 10/10/2020; D/O No. BTE/048711; block ID 98M01A; planting year 1998; total bunches 230; nett weight 5,720 kg. Stamp Sustainable Product-IP.</li> <li>2. Delivery of FFB from Field "SPB" No. ABE/212491 dated 11/11/2020 from Air Buluh Estate, block 99I02A; planting year 1999; total 336 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB20015214W, Air Buluh Estate dated 11/11/2020; D/O No. ABE/212491; block ID 99I02A; planting year 1999; total bunches 336; nett weight 8,770 kg. Stamp Sustainable Product-IP.</li> <li>3. Delivery of FFB from Field (SPB) No. BTE/085907 dated 28/03/2022, from Bunga Tanjung Estate, Division F5, Block 06N01A (115 bunches), 06N03A (100 bunches) planting year 2006, total 215 bunches; Truck No. BD 8446 N; Stamp Sustainable Product-IP. Receiving Slip/Weighbridge ticket No. FFB22003268W dated 28/03/2022, based on DO No. BTE/085907, from Bunga Tanjung Estate, Division F5, Block 06N01A (115 bunches), 06N03A (100 bunches) planting year 2006, total 215 bunches; Truck No. BD 8446 N; nett weight 3,800 kg. Stamp Sustainable Product-IP.</li> <li>4. Delivery of FFB from Field No. MDE/002541 dated 28/03/2022, from Malin Deman Estate (PT MMAS), Nucleus Division, Block 15C03 (445 bunches), 13B02 (218 bunches), 12H02 (233 bunches), total 896 bunches; Truk No. BD 8672 N; Stamp Sustainable Product-IP. Receiving Slip/Weighridge ticket No. FFB22003287W dated 28/03/2022, based on DO No. MDE/2541, from Malin Deman Estate (PT MMAS), Nucleus Division, Block 15C03 (445 bunches), 13B02 (218 bunches), 12H02 (233</li> </ol>	
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		<p>bunches), total 896 bunches; Truk No. BD 8672 N; nett weight 12,530 kg; Stamp Sustainable Product-IP.</p> <p>During field visit to Bunga Tanjung POM, verified that FFB from Sungai Teramang Estate is not processed at Bunga Tanjung POM. Due to the Estate is not certified yet, currently FFB from Sungai Teramang Estate sold to another palm oil mill out of SIPEF Group.</p>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> <li>Any related transport documentation;</li> <li>A unique identification number.</li> </ol>	<p>The SOP Supply Chain and Traceability of Palm Products (No.MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019 regulated minimum information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <ul style="list-style-type: none"> <li>Contract No. 2020/LTC-CPO/AM-BT/06 dated 14 Mei 2020; Seller PT. Agro Muko, Gedung Forum Nine Lt.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia; Buyer: PT. Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; Product CPO; volume: 499.769 MT; module RSPO SG; handover location AMTT Teluk Bayur, Padang.</li> <li>Contract No. 2020/LTC-CPO/AM-BT/07 dated 2 Jun 2020; Seller PT. Agro Muko, Gedung Forum Nine Lt.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia; Buyer: PT. Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; Product CPO; volume: 2,500 MT; module RSPO SG; handover location AMTT Teluk Bayur, Padang.</li> <li>Statement of Delivery dated 9 September 2020; shipper is PT Agro Muko; Description goods is CPO/RSPO SG; shore tank No. T-6 Ex BT POM; name of buyer is PT Wira Inno Mas (PT WIM – Padang); loading system is tank to tank; tank destination is Factory PT WIM (T-8); sources of goods is PT Agro Muko Tank Terminal; commenced loading on 08/09/2020 at 18.00 hrs; completed loading on 09/09/2020 at 07.48 hrs; B/L quantity is 2,499,985 kgs; contract No. 2020/LTC-CPO/AM-BT/08 dated 14/07/2020 (RSPO SG).</li> <li>“Berita Acara Penyerahan CPO” (minutes of CPO transfer handover); dated 09/09/2020 based on Contract No. 2020/LTC-CPO/AM-BT/08 dated 14/07/2020. Whereby PT. Agro Muko assigned Agro Muko Tank Terminal to transfer: product</li> </ul>	<p>Complied</p>

		<p>CPO; volume: 2,499,985 kgs; module RSPO SG; seller: PT. Agro Muko Bunga Tanjung; buyer PT. Wira Inno Mas; from tank T-6 (PT AMTT) to tank T-8 (PT WIM – Factory Padang); volume recorded shore tank 2,499,985 kgs; signed by both parties.</p> <ul style="list-style-type: none"> <li>• PalmTrace Shipping Announcement: TR-cc002927-07a0; date 10/09/2020; seller PT. Agro Muko-Bunga Tanjung POM; member ID RSPO_PO1000001279; buyer PT. Wira Inno Mas; member ID RSPO_PO1000006779; product CSPO; program Segregation; volume 2,499.99 MT; last update 14/09/2020.</li> </ul> <p>The information completely available in the documents:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer: PT. Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241;</li> <li>• The name and address of the seller: PT. Agro Muko, Gedung Forum Nine It.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia;</li> <li>• The loading or shipment/ delivery date: 9 September 2020 from PT AMTT to PT. Wira Inno Mas;</li> <li>• The date on which the documents were issued: 9 September 2020 from PT AMTT to PT. Wira Inno Mas;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil – RSPO SG;</li> <li>• The quantity of the products delivered; 2,499,985 MT on - Statement of Delivery and "Berita Acara Penyerahan CPO";</li> <li>• Any related transport documentation: Contract No. 2020/LTC-CPO/AM-BT/08 dated 14/07/2020;</li> <li>• Supply chain certificate number of the seller; RSPO Certificate No. RSPO 646338 on "Berita Acara Penyerahan CPO";</li> <li>• A unique identification number: No. 2020/LTC-CPO/AM-BT/08 on contract.</li> </ul>	
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<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations,</p>	<p>Bunga Tanjung POM does not outsource milling activities, the mill only outsourced transport of CSPO. Whilst Palm Kernel are sold at the mill, therefore transport activity are instructed by the buyer.</p> <p>During transport, legal ownership of CSPO are under PT Agro Muko. This is evident by sales contract that between PT Agro Muko and the buyer.</p> <p>The transport for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT. Agro Muko. The transport contractors are:</p> <ul style="list-style-type: none"> <li>• PT Usaha Jaya Express, address Jalan Olo Ladang No. 3 – Padang, contact name Mr. Freddy Johan/Ibu Siska, contact number 08535596****.</li> <li>• PT Genta Perdana Diandra, address Gang Sehati No.54A RT.003 RW.002 Lubuk Begalung Nan XX – Padang, contact name Mr. Suhardiman, SE./Ibu Wiwik, contact number 08137427****.</li> <li>• PT Bersama Sejahtera Mandiri, address Komplek Pertokoan Sakura – Jl. Raya By Pass KM.6 Padang, contact name Mr. H. Sengaja Budi Syukur, SH./Ibu Sri, contact number 08137283****.</li> <li>• PT Mutia Mulia, address Jl. Raya Bypass KM.6 Simpang Arai Pinang - Padang, contact name Mr. Novi Andres/Mrs. Fitri, contact number 08137433****.</li> </ul> <p>All contractors have signed Statement Letter dated 22 November 2018, that they are all ready to comply with RSPO Supply Chain Standard and ready to be audited by CB if it is deemed necessary. The Statement letter is completed with compliance checklist against RSPO Supply Chain Standard.</p>	<p>Complied</p>

	systems, and all information, when this is announced in advance.																						
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>CPO Transporter of PT. Agro Muko:</p> <table border="1"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Telephone</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>PT. Usaha Jaya Express</td> <td>Ibu Siska</td> <td>08535596** **</td> <td>Jl. Olo Ladang No.3 Padang</td> </tr> <tr> <td>PT. Genta Perdana Diandra</td> <td>Ibu Wiwik</td> <td>08137427** **</td> <td>Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat</td> </tr> <tr> <td>PT. Bersama Sejahtera Mandiri</td> <td>Ibu Sri</td> <td>08137283** **</td> <td>Kompleks Pertokoan Sakura Jaya Jalan Raya Bypass KM.6, Padang</td> </tr> <tr> <td>PT. Mutia Mulia</td> <td>Ibu Fitri</td> <td>08526317** **</td> <td>Jalan Raya Bypass, Arai Pinang KM.6, Batung Taba, Lubuk Begalung, Kota Padang 25223</td> </tr> </tbody> </table>	Contractor	Contact Person	Telephone	Address	PT. Usaha Jaya Express	Ibu Siska	08535596** **	Jl. Olo Ladang No.3 Padang	PT. Genta Perdana Diandra	Ibu Wiwik	08137427** **	Jl. Raya Lubuk Begalung, Gang Sehati 54A, Lubuk Begalung, Padang, Sumatera Barat	PT. Bersama Sejahtera Mandiri	Ibu Sri	08137283** **	Kompleks Pertokoan Sakura Jaya Jalan Raya Bypass KM.6, Padang	PT. Mutia Mulia	Ibu Fitri	08526317** **	Jalan Raya Bypass, Arai Pinang KM.6, Batung Taba, Lubuk Begalung, Kota Padang 25223	Complied
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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Based on communication from the certification unit through Pre-Audit Information Checklist, there is no addition of new contractor used by PT Agro Muko.	Complied																				

<p>3.8.12</p>	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Bunga Tanjung POM has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT Agro Muko:</p> <ul style="list-style-type: none"> <li>• FFB harvesting, harvest recording and delivery to Palm Oil Mill;</li> <li>• FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export;</li> <li>• Shipping instruction and preparation;</li> <li>• CPO and PK stock balancing post-shipping.</li> </ul> <p>The procedure of Supply Chain and Traceability stipulates that "Storage and control of recordings related to production process in the mill are kept a shelf life of at least 5 (five) years or determined by Operation Unit. Records can be stored in the hardcopy and/or softcopy".</p> <p>PT Agro Muko – Bunga Tanjung POM can provide record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <table border="1" data-bbox="965 943 1877 1390"> <thead> <tr> <th>Month</th> <th>FFB received (MT)</th> <th>CPO production (MT)</th> <th>PK production (MT)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>11,768</td> <td>2,557.99</td> <td>569.56</td> </tr> <tr> <td>Feb 2021</td> <td>10,623</td> <td>2,376.24</td> <td>514.99</td> </tr> <tr> <td>Mar 2021</td> <td>12,482</td> <td>2,827.00</td> <td>594.41</td> </tr> <tr> <td>Apr 2021</td> <td>12,433</td> <td>2,837.21</td> <td>590.60</td> </tr> <tr> <td>May 2021</td> <td>10,101</td> <td>2,247.03</td> <td>464.51</td> </tr> <tr> <td>Jun 2021</td> <td>13,955</td> <td>3,096.96</td> <td>652.39</td> </tr> <tr> <td>Jul 2021</td> <td>14,067</td> <td>3,195.80</td> <td>684.25</td> </tr> <tr> <td>Aug 2021</td> <td>13,738</td> <td>2,887.45</td> <td>646.68</td> </tr> </tbody> </table>	Month	FFB received (MT)	CPO production (MT)	PK production (MT)	Jan 2021	11,768	2,557.99	569.56	Feb 2021	10,623	2,376.24	514.99	Mar 2021	12,482	2,827.00	594.41	Apr 2021	12,433	2,837.21	590.60	May 2021	10,101	2,247.03	464.51	Jun 2021	13,955	3,096.96	652.39	Jul 2021	14,067	3,195.80	684.25	Aug 2021	13,738	2,887.45	646.68	<p>Complied</p>
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3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rates are applied to provide reliable estimation of CPO and PK produced. For year 2021, the budget for conversion from FFB into CPO is 23.20%, whilst from FFB to PK is 5.00%.</p> <p>Based on Daily production figure dated 31 December 2021 which described OER and KER accumulated for January to December 2021, actual conversion ratios in Bunga Tanjung POM from FFB into CPO is 22.23%, whilst from FFB to PK is 4.68%.</p>	Complied																				
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) is monitored on daily basis through sounding result and documented in Daily Production Report, then recapitulated in Mill monthly production records, as seen for period of Nov 2019 – Oct 2020.</p>	Complied																				

<p>3.8.15</p>	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>PT. Agro Muko – Bunga Tanjung POM does not receive any non-certified FFB. Therefore, no non-certified FFB entering the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified palm oil. Silo for PK used to store certified product.</p> <p>Agro Muko Tank Terminal (AMTT) has three dedicated tanks to received CPO from Mukomuko and Bunga Tanjung POM. Currently Tank uses for RSPO certified CPO are Tank No.3, No.7 and No.8 (capacity 3,000 MT each). To prevent contamination with other CPO, AMTT has a designated piping system to pump the CPO from Agro Muko to the tanks. Receiving station using dedicated pipe number 3, 4 and 5 for CSPO IP, whilst pipe number 1 and 2 are for another source CPO.</p> <p>The certification unit is able to reach 100% segregated material through ensuring that certified material will always be segregated from non-certified material including during transport and storage.</p> <p>There are two weighbridges operated in Bunga Tanjung POM, both have been calibrated based on evidence below:</p> <ul style="list-style-type: none"> <li>- "Surat Keterangan Hasil Pengujian" No. 510/367/TJ/SKHP/B.8/DISDAG/ X/2021 dated 26 October 2021 for Avery Weigh Tronix; type E1205; S/N 094050205; capacity 40,000 kg; valid until 1 October 2022.</li> <li>- "Surat Keterangan Hasil Pengujian" No. 510/366/TJ/SKHP/B.8/DISDAG/ X/2021 dated 26 October 2021 for Avery Weigh Tronix; type E1205; S/N 102750216; capacity 40,000 kg; valid until 1 October 2022.</li> </ul> <p>Bunga Tanjung POM has two storage tanks. Storage Tank No.1 has been cleaned on 15 – 23 December 2021, and Storage Tank No.2 has been cleaned on 6 – 28 September 2021.</p>	<p>Complied</p>
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the</p>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Agro Muko – Bunga Tanjung POM has made Shipping Announcement for certified CSPO and CSPK sold, for example:</p> <ul style="list-style-type: none"> <li>• Shipping Announcement, with transaction ID No. TR-2e65d9c3-1531 for 499.77 MT CSPO SG; from PT Agro Muko – Bunga Tanjung POM (RSPO_PO1000001279)</li> </ul>	<p>Complied</p>

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	<p>dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2020/LTC-CPO/AM-BT/06; Status: Announced on 22/06/2020.</p> <ul style="list-style-type: none"> <li>Shipping Announcement, with transaction ID No. TR-046805dc-f0db for 2,499.93 MT CSPO SG; from PT Agro Muko – Bunga Tanjung POM (RSPO_PO1000001279) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2020/LTC-CPO/AM-BT/07; Status: Announced on 13/07/2020.</li> <li>Shipping Announcement, with transaction ID No. TR-1cab1303-dc08 for 300 MT CSPK IP; from PT Agro Muko – Bunga Tanjung POM (RSPO_PO1000001279) as Seller to buyer PT Usaha Inti Padang (RSPO_PO1000002323); Seller Contract No. 2020/BT-PK/04; Status: Announced on 09/04/2020.</li> </ul> <p>PT Agro Muko – Bunga Tanjung POM has done “remove” in PalmTrace for certified product sold as other scheme, conventional, or in case of underproduction, loss or damage, for examples:</p> <ul style="list-style-type: none"> <li>Stock Transaction ID: ST-TR-3f3a0581-ae13; dated 26/03/2020; Product CSPO; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 1.87 MT.</li> <li>Stock Transaction ID: ST-TR-f6a1e587-2036; dated 09/04/2020; Product CSPO; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 2.64 MT.</li> <li>Stock Transaction ID: ST-TR-c1e2a4e9-465b; dated 24/02/2020; Product CSPK; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 278.07 MT.</li> <li>Stock Transaction ID: ST-TR-4e83c822-20ee; dated 26/03/2020; Product CSPK; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 21.93 MT.</li> </ul>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. PT Agro Muko – Bungo Tanjung POM delivered RSPO certified CPO and PK in bulk, the Mill has made no claim regarding the use of or support of RSPO certified oil palm products, e.g. in company</p>	Complied

		letter head, business card or email template. Description of RSPO certified product only made in shipping documentation, e.g. Sales Contract, Delivery Order and Weighbridge Card.	
<b>General corporate communications</b>			
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 communication in <a href="https://www.sipef.com/">https://www.sipef.com/</a> states that all products are 100% traceable to the source and 100% compliant with all criteria for processing RSPO certified oil palm products in the Group.	Complied
4.2	In corporate communications a member is allowed to: <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (www.rspo.org)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member's history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> 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 communication in <a href="https://www.sipef.com/">https://www.sipef.com/</a> 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
4.3	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 <a href="https://www.sipef.com/">https://www.sipef.com/</a> is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own 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.	There is no RSPO corporate logo has been used in the website, official documents or official letterhead template.	Complied

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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.	The communication in <a href="https://www.sipef.com/">https://www.sipef.com/</a> states that all products are 100% traceable to the source and 100% compliant with all criteria for processing RSPO certified oil palm products in the Group.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	The only 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 only 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	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, 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.	PT Agro Muko – Bunga Tanjung POM is not a distributor or wholesaler. Not Applicable.	Not Applicable

	b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Agro Muko – Bunga Tanjung POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	Not Applicable
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

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6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

	certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	PT Agro Muko – Bunga Tanjung Palm Oil Mill (POM) physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Bunga Tanjung POM does not process non-certified FFB, therefore all product are 100% RSPO IP certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT Agro Muko – Bunga Tanjung POM is certified against RSPO P&C and comply to the RSPO SCCS Module Identity Preserved. Whenever PT Agro Muko made an SG claims, it was combination of IP from Bunga Tanjung POM. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved module. During sales of CSPO and CSPK, PT Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between Certificate Holder’s palm oil mills.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	PT Agro Muko managed to demonstrated that the traceability is intact throughout the supply chain. There is no percentage of non-certified oil palm contaminating/ commingling with the certified product.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> </ul>	PT. Agro Muko – Bunga Tanjung POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	Not Applicable

	<ul style="list-style-type: none"> <li>RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>		
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	<p>Up to this moment, PT Agro Muko – Bunga Tanjung POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	<p>Not Applicable</p>

	<ul style="list-style-type: none"> <li>References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b></p>			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>PT Agro Muko – Bunga Tanjung POM has policies related to Human Rights as outlined in Policy No. QMM-40-01-P02 (Human Right Policy) dated 27 March 2019 which stated the company recognizes that Human Rights are universal and apply to all, without any form of distinction. The company supports the implementation of the international of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at work, as they are transcribed into the laws and regulations of the Republic of Indonesia.</p> <p>Based on document verification, it shows that Management has disseminate Human Rights policies through:</p> <ul style="list-style-type: none"> <li>Post the policy on the bulletin board in each estate/mill office.</li> <li>Conducting direct dissemination to workers, especially to security contractors (SSI).</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera – Sungai Teramang Estate has policies related to Human Rights as outlined in Policy No. QMM-40-01-P02 (Human Right Policy) dated 27 March 2019 which stated the company recognizes that Human Rights are universal and apply to all, without any form of distinction. The company supports the implementation of the international of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at work, as they are transcribed into the laws and regulations of the Republic of Indonesia.</p> <p>Based on document verification, it shows that Management has disseminate Human Rights policies through:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>Dissemination of the policy to the estate worker on 7 March 2022. Attended by 65 participants such as upkeep and harvesting gang and the respective field supervisor.</li> <li>Conducting direct dissemination to workers, especially to security contractors (SSI) on 1 February 2022. Attended by 9 participants.</li> </ul>	
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.	<p>Based on interview by phone with sample of stakeholders contacted (including workers), violence or any harassment are not proven within Unit of Certification.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on interview with government agencies, communities' representatives and labour union obtained information that there is no violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. For security, the company only use security services from Safeguarding Solution Indonesia (appointed security outsourcing company).</p>	Complied
<b>Criteria 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>Unit of Certification already has a mechanism for resolving disputes consisting of:</p> <p>a. Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows:</p> <ul style="list-style-type: none"> <li>The company disseminates company location permits/HGU to the public.</li> <li>If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership.</li> <li>Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out.</li> <li>Field surveys and land measurements involve companies, claimants and government representatives.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties.</li> <li>- Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims.</li> <li>- If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation.</li> <li>- If a compensation price agreed, the company will pay the compensation to the land owner.</li> </ul> <p>b. Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019.</p> <p>c. Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019.</p> <p>d. Wistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019.</p> <p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>All these procedures also adopted by Sungai Teramang Estate.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties.</p> <p>Company have disseminated the policy related to quality; human rights; equal work opportunity policy; occupational health and safety policy; environmental policy; anti-corruption policy; supplier integrity policy; child worker policy; forced labour policy and trafficked labor policy; sexual harassment policy; grievance handling policy; freedom of association policy; free of smoking policy; free of drug and alcohol policy; whistleblowing policy; IT security policy; use of IT hardware and computer use policy;</p>	Complied

		<p>code of ethical conduct policy; training policy; IT server room policy; general access control procedures – method by reading them.</p> <ul style="list-style-type: none"> <li>• Being disseminated to PT. Usaha Jaya Express on 1 November 2019;</li> <li>• Being disseminated to PT. Mutia Mulia on 31 October 2019;</li> <li>• Being disseminated to PT. Genta Perdana Diandra on 31 October 2019;</li> <li>• Being disseminated to PT. Bersama Sejahtera Mandiri on 30 October 2019;</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on interview with village leader from Batu Ejung and Teramang Jaya Village obtain information that the top management of Sungai Teramang Estate has disseminated the company procedure to the respective stakeholders. Especially in grievance procedure and information request.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>The company already has a mechanism for resolving disputes consisting of:</p> <ul style="list-style-type: none"> <li>• Land dispute refers to the mechanism of land dispute resolution as stipulated in "Land and Planting Compensation inside Location Permit of the Company" No. LCA-01-01/01-02-2018/Rev.0, dated 18 February 2018, it shows that the company has provided effective resolution of land dispute resolution as follows: <ul style="list-style-type: none"> <li>- The company disseminates company location permits/HGU to the public.</li> <li>- If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership.</li> <li>- Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out.</li> <li>- Field surveys and land measurements involve companies, claimants and government representatives.</li> <li>- Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties.</li> <li>- Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims.</li> </ul> </li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation.</li> <li>- If a compensation price agreed, the company will pay the compensation to the land owner.</li> <li>• Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019.</li> <li>• Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019.</li> <li>• Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019.</li> </ul> <p>Based on document verification, it shows that the Management has disseminate the mechanism of land dispute resolution, Internal Grievance, External Grievance and Whistleblowing Policy mechanisms through:</p> <p>Post the policy on the bulletin board in each estate/mill office.</p> <p>Conducting direct dissemination to workers, especially to security contractors (SSI).</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Since the land is managed by PT Mukomuko Agro Sejahtera in 2017, there is no grievance received by the company from affected nor interested parties. Auditor team has made consultation process to ensure that affected parties/stakeholders is understood on grievance mechanism including its process and agreed timeframe. According to phone interview with National Land Office, Plantation Office, Manpower Office and Environmental Office there is no land conflict or grievance received during Sungai Teramang Estate acquired by SIPEF Group.</p> <p>Based on interview with village leader from Batu Ejung and Teramang Jaya Village obtain information that the top management of Sungai Teramang Estate has disseminated the company procedure to the respective stakeholders. Especially in grievance procedure and information request.</p>	
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<p>4.2.4</p>	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>At the moment the company does not made any compensation process to the surrounding community. All of the land used by Bunga Tanjung POM &amp; Supply Base is free land controlled by the state, however, some of them have been cultivated in form of plantations and agriculture. Based on the document verification, it shows that the records of the completion of the arable land compensation are well documented by the Legal department, where each document has been completed with maps of joint measurements results, for example;</p> <ol style="list-style-type: none"> <li>1. GRTT document (Compensation for Growing Crops) that was carried out in 2013 has been implemented to Mr. Amin S. who owns an area of 1.14 Ha and Mr. Zakaria who has a land area of 1.36 Ha, both of whom are residents of Air Merah Village. The Document includes a Certificate of Land Ownership that is known by the Village Head and Sub-District Head; a Land Compensation Statement made by both parties and witnessed by each parties and known by the Head of the Village and Sub-District Head; Letter of release made by both parties, known by the Head of Air Merah Village and Sub-District Head Malin Deman; Map of measurement results with a scale of 1:2500 known by the Head of Air Merah Village. The process of compensation negotiation is outlined in the Land Acquisition Compensation Certificate including the agreed compensation value. Payment to the recipient is carried out through "Bank Bengkulu", Ipuh Sub-Branch on 15 July 2013 with No. A/C; 501-01.07.00030-6 worth Rp. 37,620,000, - for Mr. Amin S. and worth Rp. 44,880,000 for Mr. Zakaria. The document also comes with photos of the compensation handover process.</li> <li>2. Document of land compensation process that carried out in 2016 was documented in GRTT Document (Compensation for Growing Crops) No.30, carried out to Mr. Ali Mikir with an area of 2.51 Ha, villagers of Talang Baru village. The Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Realease on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results with a scale of 1: 1,500 known by the Village Head of Talang Baru, 27 January 2016. The Negotiation Process of compensation is outlined in the</li> </ol>	<p>Complied</p>
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<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>There is a program to improve the quality of life and beneficial environment, both for Plantation Companies or local and general communities as stipulated in the Community Development and Corporate Social Responsibility program of each Estate, for example "Community Development and Corporate Social Responsibility Program" Bunga Tanjung Estate 2020 consists of 9 types of activities, namely:</p> <ol style="list-style-type: none"> <li>1. Education</li> <li>2. Health</li> <li>3. Infrastructure; Repair of public facility buildings, repair of village trenches, construction of public toilets in schools, renovation of worship facilities</li> <li>4. Agriculture</li> <li>5. Micro and Small Enterprises</li> <li>6. Sports; Maintenance of sports facilities, provision of facilities by the surrounding village sports facilities</li> <li>7. Art</li> <li>8. Religious; Religious assistance, breaking the fast and Ramadan gifts</li> <li>9. Socio-economic</li> </ol> <p>Due to Covid-19 pandemic, some program was postponed or cancelled.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Sungai Teramang Estate and Bunga Tanjung Estate are under the same Estate Manager. Based on that, the community development program both Sungai Teramang and Bunga Tanjung are the same program.</p> <p>There is a program to improve the quality of life and beneficial environment, both for Plantation Companies or local and general communities as stipulated in the Community Development and Corporate Social Responsibility program of each Estate, for example "Community Development and Corporate Social Responsibility Program" Bunga Tanjung and Sungai Teramang Estate 2021 consists of 9 types of activities, namely:</p>	Complied

		<ol style="list-style-type: none"> <li>1. Education</li> <li>2. Health</li> <li>3. Infrastructure; Repair of public facility buildings, repair of village trenches, construction of public toilets in schools, renovation of worship facilities</li> <li>4. Agriculture</li> <li>5. Micro and Small Enterprises</li> <li>6. Sports; Maintenance of sports facilities, provision of facilities by the surrounding village sports facilities</li> <li>7. Art</li> <li>8. Religious; Religious assistance, breaking the fast and Ramadan gifts</li> <li>9. Socio-economic</li> </ol> <p>Based on interview with village leader of Batu Ejung and Teramang Jaya obtained information that the company usually help the surrounding communities in form of heavy weight loan for road maintenance, renovation of worship and sport facilities based on the communities-need. Usually through direct/indirect propose from the surrounding communities.</p>	
<p><b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>FPIC process already stated within Procedure of New Development Area (ESD-02-01/11-03-2019/Rev.1).</p> <p>Based on information collected during stakeholder consultation with statutory body and local communities, there is no land compensation made it since 2018.</p> <p>While, unit of certification within scope of Bunga Tanjung POM are still have and valid for documents that showing legal ownership for the Own Estates.</p> <p><u>HGU Holder:</u></p> <p>Air Buluh Estate: Certificate No. 21, based on SK BPN No. 7/HGU/990, dated 3 May 1990. Validity period: 31 December 2020. Hectarage: 2,500 Ha.</p>	<p>Complied</p>

		<p>Air Bikuk Estate: Certificate No. 45, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 1,410 Ha.</p> <p>Bunga Tanjung Estate: Certificate No. 47, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 2,903 Ha.</p> <p>For KMD's, Progress of land ownership certificate submission for smallholders land (KMD's) is according to decree of Kementerian Agraria dan Tata Ruang Nomor: 455/100-17.16/X/2019, dated 29 October 2019. This letter concern to submission of smallholders certificate upon renewal Land Title or "HGU" Nomor 00014 (previous HGU Number 00002).</p> <p>Scope of submission land owner certificate for smallholders are KMD Air Buluh (14.77 Ha); KMD Nelan Indah (10.04 Ha); KMD Bukit Harapan (9.49 Ha); KMD Air Berau (10.19 Ha); KMD Tanjung Harapan (8.68 Ha); KMD Mundam Marap (1.04 Ha).</p> <p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>However, total managed area since PT Asririmba Wira Bhakti established upto acquired by PT Muko Muko Agro Sejahtera is only 375.16 Ha (refer to Area Statement March 2022) which consist of:</p>	
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4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has documented all land compensation process since the beginning. The process includes evidence of consultation, statement of transfer of rights, evidence of compensation to demonstrate free, prior and informed consent.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</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>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p>	

		<p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</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>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p>	

		<p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</p>	
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Certificate Holder maintaining the legal boundaries based on legal documentation. All the boundary pegs are mapped out in appropriate scale.</p> <p>Air Buluh Estate (ABE): "Peta Patok HGU Air Buluh Estate" Scale 1:44,458. During field observation at boundary pegs No. 053 (Block 00W02a, Div. 5); No. 081 (Block 02X03A, Div. 5); No. 515 (Block 98P01A, Div. 4).</p> <p>Malin Deman Estate (MDE): "Peta Point Patok BPN Malin Deman Estate" Scale 1:15,000.</p> <p>KMD Bukit Harapan: "Peta General Map" Scale 1:71,436. During field observation at KMD's area, legal boundary developed in form of "parit boundary".</p> <p>KMD Tanjung Harapan: "Peta General Map" Scale 1:80,000.</p> <p>KMD Mundam Marap: "Peta General Map" Scale 1:50,000.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p>	Complied

		Boundary map of legal and managed area by Sungai Teramang Estate is available in "Peta Patok Sungai Teramang Estate" Scale 1 : 62,350.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	<p>Due to unit of certification is one of long establish company, therefore all relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements are available in Head Office Medan.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>            Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>However, total managed area since PT Asririmba Wira Bhakti established up to acquired by PT Muko Muko Agro Sejahtera is only 375.16 Ha (refer to Area Statement March 2022). Consist of:</p> <ol style="list-style-type: none"> <li>1. Mature: 103.69 Ha</li> <li>2. Immature: 234.01 Ha</li> <li>3. Working compound: 1.56 Ha</li> <li>4. Conservation: 35.90 Ha</li> <li>5. Reserved land (outside managed area, inside HGU) occupied by communities: 1,394.84 Ha.</li> </ol>	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the</p>	Complied

		<p>company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</p>	
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p>	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p>	Complied

		<p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</p>	
<p><b>Criteria 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.5.1</p>	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Unit of Certification has had legal document, as follow:</p> <p>Supply bases Bunga Tanjung POM consist of Own Estates, Smallholders (KMD's) and Smallholders Cooperative. During Surveillance-1.4 in 2019, sample of KMD's located Air Buluh Estate (ABE) are KMD Tanjung Harapan, KMD Bukit Harapan, KMD Mundam Marap.</p> <p><u>HGU Holder:</u></p> <p>Air Buluh Estate: Certificate No. 21, based on SK BPN No. 7/HGU/990, dated 3 May 1990. Validity period: 31 December 2020. Hectarage: 2,500 Ha.</p>	<p>Complied</p>

		<p>Air Bikuk Estate: Certificate No. 45, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 1,410 Ha.</p> <p>Bunga Tanjung Estate: Certificate No. 47, based on SK BPN No. 4/HGU/BPN/94, dated 2 February 1994. Validity period: 31 December 2028. Hectarage: 2,903 Ha.</p> <p><u>KMD's:</u></p> <p>Progress of land ownership certificate submission for smallholders land (KMD's) is according to decree of Kementerian Agraria dan Tata Ruang Nomor: 455/100-17.16/X/2019, dated 29 October 2019. This letter concern to submission of smallholders certificate upon renewal Land Title or "HGU" Nomor 00014 (previous HGU Number 00002).</p> <p>Scope of submission land owner certificate for smallholders are KMD Air Buluh (14.77 Ha); KMD Nelan Indah (10.04 Ha); KMD Bukit Harapan (9.49 Ha); KMD Air Berau (10.19 Ha); KMD Tanjung Harapan (8.68 Ha); KMD Mundam Marap (1.04 Ha).</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be</p>	
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		<p>decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</p>	
<p>4.5.2</p>	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to</p>	<p>Complied</p>

		<p>the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</p>	
<p>4.5.3</p>	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future</p>	<p>Complied</p>

		<p>as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</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>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally,</p>	<p>Complied</p>

		<p>the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</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>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asirimba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asirimba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local</p>	<p>Complied</p>

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		<p>communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</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>FPIC process is already implemented prior to development of the plantation.</p> <p>During direct interview with previous land owner at Bantal Village and Air Bikuk Village, their land use before compensated to the company is local cultivation with coffee, rubber, cinnamon, rice field and fruits. In 1991, company team and community team made collaboration to form an integrated team, which is assigned to socialize of oil palm plantation development. Process for compensation is optional to the villagers, there is no forced to release the land. The land owner are very thankful with the company, because the local economic is growth since the oil palm plantation are entering their village.</p> <p>Due to unit of certification is one of long establish company, therefore all copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available in Head Office Medan.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p>	<p>Complied</p>

		<p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p> <p>During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>There is no new plantings/new development/new land acquired for supply base of Bunga Tanjung POM since 15 November 2018.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not obtained the occupied area from the communities.</p> <p>NPP verification for Sungai Teramang Estate was conducted in 2021 and there is no comments from any stakeholders. Since SIPEF Group acquired the land, there is no new plantings/new development or extension new land of Sungai Teramang Estate since 15 November 2018. They only conduct replanting for agronomy reason to replace unproductive palm.</p>	Complied
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>There is no new plantings/new development/new land acquired for supply base of Bunga Tanjung POM since 15 November 2018.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Please refer the explanation to indicator 4.5.7 above.</p>	Complied

<p><b>Criteria 4.6:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
<p>4.6.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Based on document verification, PT. Agro Muko and PT. Mukomuko Agro Sejahtera have a mechanism for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015.</p> <p>Internal complaint will be settled as per "Prosedur Keluh Kesah dengan Pihak Internal" No.SOP/025/Dept dated 27 March 2015.</p> <p>Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate area is the land acquired by PT Asirimba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.</p> <p>Land title of Sungai Teramang Estate is under previous company PT Asirimba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.</p> <p>Currently, Sungai Teramang Estate (PT Mukomuko Agro Sejahtera) committed to managed 375.16 Ha and the rest of area 1,394.84 Ha is given access to local communities to managed by their own without any coercion to release it. But as legally, the total HGU 1,770 Ha is still belongs to PT Mukomuko Agro Sejahtera. In the future as time goes by, if the local communities want to release the land for compensated to the company or request for smallholders program development, then it might be decision changes by company with FPIC mechanism are to implement. Thereof, the NPP submitted in 2021 covers total HGU 1,770 Ha.</p>

		During stakeholder consultation with sample of local community, there is no land conflict since the land took over by PT Muko Muko Agro Sejahtera (SIPEF Group).	
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	There is no compensation made by the unit of certification for the last three years. procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. Including equal opportunities for men and women, already included within the unit of certification procedure. <b>Extension Scope Sungai Teramang Estate</b> Please refer the explanation to indicator 4.6.1 above.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	There is no compensation made by the unit of certification for the last three years. procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. Including equal opportunities for men and women, already included within the unit of certification procedure. <b>Extension Scope Sungai Teramang Estate</b> Please refer the explanation to indicator 4.6.1 above.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	There is no compensation made by the unit of certification for the last three years. procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. Including equal opportunities for men and women, already included within the unit of certification procedure. <b>Extension Scope Sungai Teramang Estate</b> Please refer the explanation to indicator 4.6.1 above.	Complied
<b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	The company has a mechanism for identifying people entitled to compensation as stipulated in "Land and Planting Compensation Procedure inside of the Company"	Complied

		<p>No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation. The dispute resolution mechanism according to the procedure above is as follows:</p> <ul style="list-style-type: none"> <li>• The company disseminates company location permits/HGU to the public.</li> <li>• If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership.</li> <li>• Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out.</li> <li>• Field surveys and land measurements involve companies, claimants and government representatives.</li> <li>• Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties.</li> <li>• Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims.</li> <li>• If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation.</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Sungai Teramang Estate and Bunga Tanjung Estate are under the same Estate Manager. Based on that, there is a same procedure in land acquisition process (such as identification of compensated people) with another unit of certification.</p> <p>If a compensation price agreed, the company will pay the compensation to the land owner.</p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti</p>	
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		<p>has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquire the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p>	
<p>4.7.2</p>	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>The company has a mechanism for calculating and distributing fair compensation as stipulated in "Land and Planting Compensation Procedure inside of the Company" No.LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. Even though the disputed land is the legal property of the company contained in the HGU, but because it is still controlled by the community and has never been made to compensate, the company has taken steps to deliberate with those who claim and offer adequate compensation.</p> <p>The dispute resolution mechanism according to the procedure above is as follows:</p> <ul style="list-style-type: none"> <li>• The company disseminates company location permits/HGU to the public.</li> <li>• If there is a claim from the community, the company will accept the claim if accompanied by proof of land ownership.</li> <li>• Verification of the land status, if proof of land ownership is acceptable, a field survey and land measurement will be carried out.</li> <li>• Field surveys and land measurements involve companies, claimants and government representatives.</li> <li>• Based on land observations and measurements, a Minutes of Land Measurement is made, covers area wide and coordinates of the land claimed and signed by the parties.</li> <li>• Final verification based on measurement results and maps to ensure that the land does not overlap with the other ownership/rights/claims.</li> <li>• If the final verification results show that the land being acquired does not overlap with other ownership/rights/claims, the company will negotiate prices for compensation.</li> <li>• If a compensation price agreed, the company will pay the compensation to the land owner.</li> </ul>	<p>Complied</p>

		<p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Sungai Teramang Estate and Bunga Tanjung Estate are under the same Estate Manager. Based on that, there is a same procedure in land acquisition process (such as identification of compensated people) with another unit of certification.</p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquired the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p>	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	<p>Communities that have lost access and rights to land are given opportunities to benefit from plantation development by development of smallholder plantation, e.g. KMD and Koperasi Plasma. Partnership in development of KMD/Koperasi are stated in the Work Agreement Letter.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquired the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p>	Complied
<p><b>Criteria 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
4.8.1	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,	Based on stakeholder consultation with relevant agencies and local communities, there is no land conflict or land disputes presence for the last three years within unit of certification.	Complied

	<p>customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>If there is any disputes or conflict, the unit of certification has had mechanism and procedure to resolve this. The procedure for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquired the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p> <p>According to the public consultation result with the surrounding village leaders near the Sungai Teramang Estate and related government agencies obtained information that there is no land dispute or grievance in Sungai Teramang Areas.</p>	
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Based on stakeholder consultation with relevant agencies and local communities, there is no land conflict or land disputes presence for the last three years within unit of certification.</p> <p>If there is any disputes or conflict, the unit of certification has had mechanism and procedure to resolve this. The procedure for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015.</p> <p>However, for the land conflict the unit of certification had Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement.</p>	Complied

		<p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquired the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p> <p>According to the public consultation result with the surrounding village leaders near the Sungai Teramang Estate and related government agencies obtained information that there is no land dispute or grievance in Sungai Teramang Areas.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>According information collected during stakeholder consultation with relevant statutory bodies and local community, there is no new acquisition within the scope of certification unit.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquired the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p> <p>According to the public consultation result with the surrounding village leaders near the Sungai Teramang Estate and related government agencies obtained information that there is no land dispute or grievance in Sungai Teramang Areas.</p>	Complied

<p>4.8.4</p>	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>Based on stakeholder consultation with relevant agencies and local communities, there is no land conflict or land disputes presence for the last three years within unit of certification.</p> <p>If there is any disputes or conflict, the unit of certification has had mechanism and procedure to resolve this. The procedure for external complaint/grievance, as per "Prosedur Keluh Kesah dengan Pihak Eksternal" Doc. No. SOP/025/Dept, dated 27 March 2015.</p> <p>However, for the land conflict the unit of certification had Mechanism to resolve land disputes as in "Prosedur Ganti Rugi Lahan" No.SOP/CA/02, dated 1 July 2012. The procedure shows company has prepared effective land dispute resolution mechanism: Company being transparent on permits, licenses including land title to the community; In case of claim from community, company will cater as long as valid land ownership evidence presented; Status verification – when valid land ownership evidence presented, continued with field visit/survey and measurement.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not acquired the occupied area from them. There is no land compensation conducted by the PT Mukomuko Agro Sejahtera – SIPEF Group.</p> <p>According to the public consultation result with the surrounding village leaders near the Sungai Teramang Estate and related government agencies obtained information that there is no land dispute or grievance in Sungai Teramang Areas.</p>	<p>Complied</p>
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**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.	<p>FFB price has been made publicly available by the company, as evidence in "Harga Pembelian TBS dari KMD" and "Harga Pembelian TBS dari Plasma". For example, dated 29 Sep 2020, for FFB price period 21 – 27 Sep 2020, as follow:</p> <ul style="list-style-type: none"> <li>a. Category A = Rp 1,889/kg (≥ 94% ripeness)</li> <li>b. Category B = Rp 1,874/kg (86 – 93% ripeness)</li> <li>c. Category C = Rp 1,859/kg (≤ 85% ripeness).</li> </ul> <p>FFB price period 28 Sep – 4 Oct 2020, as follow:</p> <ul style="list-style-type: none"> <li>a. Category A = Rp 1,889/kg (≥ 94% ripeness)</li> <li>b. Category B = Rp 1,874/kg (86 – 93% ripeness)</li> <li>c. Category C = Rp 1,859/kg (≤ 85% ripeness).</li> </ul> <p>FFB price period 12 – 25 Oct 2020, as follow:</p> <ul style="list-style-type: none"> <li>a. Category A = Rp 1,802/kg (≥ 94% ripeness)</li> <li>b. Category B = Rp 1,787/kg (86 – 93% ripeness)</li> <li>c. Category C = Rp 1,772/kg (≤ 85% ripeness).</li> </ul> <p>The company has shown the procedure and formula to calculate FFB price. FFB price is affected by market CPO and PK price and "K" index. The calculation for "K" index is available.</p> <p>The company disseminated FFB price to each smallholder by sending the FFB price paper "Harga Pembelian TBS dari KMD" and "Harga Pembelian TBS dari Plasma". The representatives of the smallholder then sign the receive notes. Receive note of FFB price handover are evident.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Evidence verified that all KMD under Air Buluh Estate have signed the FFB price period 12 – 25 Oct 2020 that informed by the company, on 20 Oct 2020, e.g. KMD Semundam, KMD Medan Jaya, KMD Mundam Marap, KMD Air Buluh and KMD Talang Arah. KMDs	Complied

		<p>under Air Bikuk Estate have signed the FFB Price on 20 Oct 2020, e.g. KMD Air bikuk, KMD Pondok Suguh and KMD Air Berau. KMDs under Bunga Tanjung Estate have signed the FFB Price on 20 Oct 2020, e.g. KMD Bunga Tanjung, KMD Pondok Baru, KMD Nenggalo and KMD Nelan Indah. Smallholder under Malain Deman Estate have signed the FFB Price on 20 Oct 2020, e.g. KOPABA (Koperasi Perkebunan Desa Air Buluh Agro Muko).</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	
5.1.3	<p><b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p>	<p>During onsite visit to KMD sample, FFB pricing is fairly and regularly informed. History of FFB pricing also documented by each KMD's.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied
5.1.4	<p><b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p>	<p>During onsite visit to sample, all KMD's is fully managed by the company. Share-profit of KMD's yield are very transparent, including deductions within. Mostly, structure of KMD's are dominated by male, but for decision making process are not limited to gender, women and independent representative also involved.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p>	<p>It was evidence MoU between PT Agro Muko and KMD Air Berau, called "Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit" (MoU regarding development and upkeep of oil palm plantation) dated 23 June 2014. Addendum No.1 "Perjanjian Kerjasama KMD Desa Pondok Suguh dengan PT Agro Muko", dated 1 Nov 2020. Addendum No.1 "Perjanjian Kerjasama KMD Desa Air Bikuk dengan PT Agro Muko", dated 15 Feb 2014.</p> <p>All MoU / contracts are fair, legal and transparent and have an agreed timeframe.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied

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5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p>	<p>Based on review on payment documents, agreed payments are made in a timely manner, and receipts specifying price, weight, deductions and amount paid are given. Payment documents verified:            Invoice KMDBT No.22 Desa Bunga Tanjung, Doc.No.KM20050099 for Fiscal Year 2020, Month May.</p> <table border="1" data-bbox="965 555 1883 1362"> <thead> <tr> <th>Description</th> <th>Quantity</th> <th>Rate (Rp)</th> <th>Amount (Rp)</th> <th>Deduction (Rp)</th> </tr> </thead> <tbody> <tr> <td>FFB Sales</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>- 28/05/2020 (Class C)</td> <td>3,250</td> <td>1,487</td> <td>4,832,750</td> <td>-</td> </tr> <tr> <td>- 27/05/2020 (Class C)</td> <td>4,820</td> <td>1,487</td> <td>7,167,340</td> <td>-</td> </tr> <tr> <td>- 14/05/2020 (Class C)</td> <td>6,970</td> <td>1,487</td> <td>10,364,390</td> <td>-</td> </tr> <tr> <td>Sub Total</td> <td>15,040</td> <td></td> <td>22,364,480</td> <td>-</td> </tr> <tr> <td>PPH deduction</td> <td></td> <td></td> <td>-111,822</td> <td>-</td> </tr> <tr> <td><b>FFB sales nett</b></td> <td></td> <td></td> <td><b>25,252,658</b></td> <td>-</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Loan instalment</b></td> <td></td> <td><b>7,000,000</b></td> <td>-</td> <td><b>7,000,000</b></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Afrekening (Contractor &amp; Estate):</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Vehicles &amp; Transport</td> <td>11,790</td> <td>93</td> <td>-</td> <td>1,096,470</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Others</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Supervision</td> <td>1</td> <td>592,750</td> <td>-</td> <td>592,750</td> </tr> </tbody> </table>	Description	Quantity	Rate (Rp)	Amount (Rp)	Deduction (Rp)	FFB Sales					- 28/05/2020 (Class C)	3,250	1,487	4,832,750	-	- 27/05/2020 (Class C)	4,820	1,487	7,167,340	-	- 14/05/2020 (Class C)	6,970	1,487	10,364,390	-	Sub Total	15,040		22,364,480	-	PPH deduction			-111,822	-	<b>FFB sales nett</b>			<b>25,252,658</b>	-						<b>Loan instalment</b>		<b>7,000,000</b>	-	<b>7,000,000</b>						Afrekening (Contractor & Estate):					Vehicles & Transport	11,790	93	-	1,096,470						Others					Supervision	1	592,750	-	592,750	Complied
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5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>Weighbridge are verified by government agency in annual basis. Latest certificates of verification were observed for weighbridge in Bunga Tanjung POM, issued by "Dinas Perindustrian dan Perdagangan Kota Bengkulu", as follows:</p> <ul style="list-style-type: none"> <li>• Calibration Certificate No.084/DPP-UPTDML/XI/2019 dated 29 Nov 2019; for Avery Weight Tronix type E-1205; S/N 094050205; maximum capacity 50,000 kg.</li> <li>• Calibration Certificate No.085/DPP-UPTDML/XI/2019 dated 29 Nov 2018; for Avery Weight Tronix type E-1205; S/N 72650167; maximum capacity 40,000 kg.</li> </ul> <p>Bunga Tanjung POM has done process for 2020 verification based on minutes "Berita Acara Pemeriksaan dan Pengujian" dated 26 Oct 2020, issued by Unit Metrologi Legal Kabupaten Mukomuko.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied																																			

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5.1.8	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.	During onsite visit to KMS Sample, PT Agro Muko and PT Mukomuko Agro Sejahtera are very support for smallholders. <b>Extension Scope Sungai Teramang Estate</b> Sungai Teramang Estate have no smallholders program development.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	It was available procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. The company has also established Grievance Policy (QMM-40-01-P12/27-03-2019/Rev.0) dated 27 March 2019. The company recognize the right of all stakeholders (external and internal) to express their concern or grievances about the company activities, and to see such concerns and grievance addressed in a prompt and fair manner. Complainants can submit their complaints via email at <a href="http://www.tolantiga.co.id">http://www.tolantiga.co.id</a> or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah" e.g. KMD Nenggalo, KMD Pondok Baru, KMD Bunga Tanjung, KMD Nelan Indah, KMD Air Bikuk, KMD Air Berau, KMD Pondok Suguh, KMD Air Buluh, KMD Talang Baru, KMD Talang Arah, KMD Semundam, KMD Dusun Pulau, KMD Pulau Baru, KMD Medan Jaya, KMD Tanjung Harapan, KMD Bukit Harapan, KMD Mundam Marap and Koperasi Harapan Jaya Lubuk Talang. <b>Extension Scope Sungai Teramang Estate</b> Sungai Teramang Estate have no smallholders program development.	Complied
<b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	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.	Based on interview with sample of KMD's, the company now is concern to maintain the KMD's area. However, the company also preparing for independent smallholders support in form of oil palm seeds provision with price 50% cheaper. This program is allocated to independent smallholders surrounding the Certified Area and to support livelihoods, because most of communities has own oil palm plantation.	Complied

		<p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	
5.2.2	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>Based on interview with sample of KMD's, the company now is concern to maintain the KMD's area. However, the company also preparing for independent smallholders support in form of oil palm seeds provision with price 50% cheaper. This program is allocated to independent smallholders surrounding the Certified Area and to support livelihoods, because most of communities has own oil palm plantation.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Based on interview with sample of KMD's, the company now is concern to maintain the KMD's area. However, the company also preparing for independent smallholders support in form of oil palm seeds provision with price 50% cheaper. This program is allocated to independent smallholders surrounding the Certified Area and to support livelihoods, because most of communities has own oil palm plantation.</p> <p>Requirements for getting price 50% cheaper is land ownership, therefore the company support to promote legal FFB produced from legal ownership.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Based on interview with Dinas Pertanian, that PT Agro Muko has collaborative program with agriculture extension officer to give simply training for independent smallholders, including best practice agronomy.</p> <p><b>Extension Scope Sungai Teramang Estate</b>  Sungai Teramang Estate have no smallholders program development.</p>	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Unit of Certification made Transparency of Village Community Plantation/Smallholder Partnership Share Value (KMD) in Public Media (Radar Mukomuko newspaper) in daily basis. The updated value is monthly basis, example: Radar Mukomuko dated 2 October 2021. Information of share value KMD's is on page 6.</p>	Complied

		<b>Extension Scope Sungai Teramang Estate</b> Sungai Teramang Estate have no smallholders program development.	
<b>Principle 6: respect workers' rights and conditions</b> Protect workers' rights and ensure safe and decent working conditions.			
<b>Criteria 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly 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>The company has a policy to provide equal opportunities and training to obtain employment opportunities that are approved in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the Human Resources Department Manual signed by Management on 8 April 2019. The document has regulates equal opportunity without discrimination (Non-Discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, recruitment, transfer, promotion, training, renewal, employment and remuneration.</p> <p>Evidence of the policy implementation is announcing any vacancies at "Radar Muko Muko" (local newspaper) and the company's website (PT Tolan Tiga Indonesia) so that they can be accessed by everyone. E.g. Vacancies for the CW module at Air Buluh Estate on 1 January 2019; Vacancies for Kindergarten/PAUD Teachers at Air Buluh Estate on 1 July 2019.</p> <p>Based on the results of public consultations with the Mukomuko Regency Manpower Office and the results of interviews with workers, it was agreed that there was no indication of discrimination during job recruitment of promotion. Every year, employees conduct performance appraisals as an assessment of promotions.</p> <p>Based on verification of employee documents as of October 2019 shows that there are variety of origin, ethnic and religious beliefs, which can reflect that every citizen have the same opportunity to work.</p>	Complied

		<p>Based on verification of employee appointment documents, employee transfers, wages documents, employee appraisals in 2019 showed that there were no indications of discrimination practices.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>The company has a policy to provide equal opportunities and training to obtain employment opportunities that are approved in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the Human Resources Department Manual signed by Management on 8 April 2019. The document has regulates equal opportunity without discrimination (Non-Discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, recruitment, transfer, promotion, training, renewal, employment and remuneration.</p>	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>According to interview with sample of workers at Air Buluh Estate, Malin Deman Estate, Air Bikuk and Bunga Tanjung Estate, no discrimination are presence in the company. All workers are locals and they are treated in fair. This statement is strengthened by worker union and local communities.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on public consultation with labour agency of Mukomuko Regency, chairman of labour union and random worker in during field visit obtained information that there is no record of discrimination on worker based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age since the recruitment process until the pension. All workers are equal.</p>	Complied.
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>The company has a policy to provide equal opportunity and treatment for employment as stated in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the "Human Resources Department Manual" signed by Management on 8 April 2019. The document has set equal opportunity without discrimination (Non-discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender</p>	Complied

		<p>identity, union membership, political affiliation or age starting from the recruitment process, permanent employment, transfer, promotion, training, workforce assessment, and remuneration.</p> <p>Evidence of the implementation of this policy is to publicly announce every vacancy in the local newspaper "Radar Muko Muko" and the company's website (PT Tolan Tiga Indonesia) so that everyone can access it.</p> <p>Based on the results of public consultations with Mukomuko District Manpower Office and the results of interviews with workers, stated that there was no indication of discrimination in employment opportunities. Every year, employees are assessed for performance as part of their consideration for level promotion.</p> <p>Based on documents verification, shows that results of employee appraisal are documented in Form "Penilaian Karyawan SKU" which outlines assessment parameters such as ability, responsibility, cooperation with others, hard working, able to receive input, trustworthy/honest, discipline, timeliness in carrying out job, administration and Loyalty. The form also describes direct supervisor's comments and proposals for promotions to higher level, for example: "Penilaian Karyawan SKU", which promoted from Grade P2 to become Grade P3.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on public consultation with labour agency of Mukomuko Regency, chairman of labour union and random worker in during field visit obtained information that there is no record of discrimination on worker based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age since the recruitment process until the pension. All worker is equal.</p> <p>All worker has the same treatment during the recruitment process. Sighted the record of personal profile (recruitment process, annual performance record and grade promotion) on behalf of S****O (harvester) that received the same salary and career opportunity same as the other employee.</p>	
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6.1.4	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.	Based on interview with nurse and female workers, pregnancy testing is applicable for all female workers without discrimination. <b>Extension Scope Sungai Teramang Estate</b> The company has a procedure to conducted pregnancy test for chemical handling worker (pesticide or fertilizer). The test conducted regularly to prevent the pregnant workers working under chemical station. Moreover, based on interview with women workers, obtained information that there was no discrimination on this matter.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Based on document verification and interviews with management and Gender Committee, each Estate and Mill has formed a Gender Committee, for example: <ul style="list-style-type: none"> <li>• Organization Structure of Mukomuko Estate Gender Committee (Gender Committee Contact Group) which was ratified on 1 October 2019, chaired by the Estate Manager with 1 Secretary and 4 committee members.</li> <li>• Organization Structure of Talang Petai Gender Committee (Gender Committee Contact Group) which was ratified on 15 November 2019, chaired by the Estate Manager with 3 committee members.</li> </ul> <b>Extension Scope Sungai Teramang Estate</b> Each estate or mill unit under SIPEF Group has had the gender committee structure. Its structure has a specific job to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Moreover, the gender committee also conduct dissemination for zero harassment for women. The last dissemination conduct by Gender Committee of Sungai Teramang and Bunga Tanjung Estate was on 7 February 2022. Attended by 15 participants.	Complied
6.1.6	There is evidence of equal pay for the same work scope.	Based on verification of salary documents for period September and October 2020 at each Estate and Bunga Tanjung POM, shows that workers at the same level and year of work, get same basic salary, which is in accordance with the provisions issued by the company and remuneration system which is updated annually adjusted to the Management Decree. Determination of Provincial Minimum Wages by the government and negotiations with SPAM (Workers Union). In 2020 there was an agreement between SPAM and PT Agromuko's Management regarding the Establishment of Wages	Complied

		<p>in 2020 for Daily SKU Levels and Monthly SKUs as outlined in the Joint Agreement between PT Agromuko's Management and Workers Union..</p> <p>The agreed payroll structure is divided into 2 categories, which is daily and monthly SKU. For monthly employees, the payroll system is based on Grades (P, Q, R, S, T, U, EL) whose appraisals are conducted annually by each direct supervisor. The results of the employee appraisal are outlined in the Form "Penilaian Karyawan SKU" which describes the assessment parameters such as ability, responsibility, cooperation with others, hardworking, able to receive input, trustworthy/honest, discipline, timeliness in carrying out work, administrative and loyalty. The form also describes direct supervisor's comments and proposals/promotions to a higher level.</p> <p>Bengkulu Provincial Government, has set the provincial minimum wage (UMP) in 2020 in accordance with the Decree of the Governor of Bengkulu No.G.480.DISNAKER dated 31 October 2019. Minimum wage in the unit of certification are in accordance with the Governor Decree.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on public consultation with labour agency of Mukomuko Regency, chairman of labour union and random worker in during field visit obtained information that there is no record of discrimination on worker based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age since the recruitment process until the pension. All worker is equal.</p> <p>All worker has the same treatment during the recruitment process. Sighted the record of personal profile (recruitment process, annual performance record and grade promotion) on behalf of S****O (harvester) that received the same salary and career opportunity same as the other employee. Sighted the last salary of him for period December 2021.</p> <p>Other sample of payslip record December 2021 that been verified:</p> <ol style="list-style-type: none"> <li>1. Mr. W****o (loose fruit picker) <ul style="list-style-type: none"> <li>• Basic salary: Rp 2,165,000</li> </ul> </li> </ol>	
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<p><b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p><b>(C)</b> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>PT Agro Muko:</p> <p>The company has a Collective Work Agreement (PKB) which has been signed jointly by Management and Worker Union on 19 October 2018 and is recognized by Kepala Dinas Penanaman Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja (Manpower Office) of Mukomuko Regency. This PKB is effective from October 2018 to October 2020. Due to pandemic Covid-19, there has been no meeting held to revise the Collective Work Agreement, therefore the existing PKB is still applicable until this assessment.</p> <p>The document regulates the recognition of worker union, provisions regarding working time, salary system, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods and the Termination of Collective Labour Agreements.</p> <p>Article IV (Wages) regulates:</p> <ul style="list-style-type: none"> <li>• Wages in the form of money: Daily and Monthly Workers of PT Agro Muko's wages are negotiated between the company and worker union that refers to the</li> </ul>	<p>Complied</p>

		<p>applicable provisions, and the wage negotiation must be completed not later than April in the current year.</p> <ul style="list-style-type: none"> <li>• Wages in the form of Natura: Worker gets 15 kg rice, unemployed wife/husband gets at most 9 kg, children gets 7.50 kg (maximum 3 children).</li> </ul> <p>PT Muko Muko Agro Sejahtera (MMAS):</p> <p>Previously, PT MMAS had a Company Regulation that was approved by Kepala Dinas Penanaman Modal, Pelayanan, Perizinan dan Tenaga Kerja Kabupaten Mukomuko on 8 December 2016 and valid until 7 December 2018. PT MMAS had sent an application for the Ratification of the Company Regulation (PP) through Manager Letter No.64/RMO-G/XI/19 dated 15 November 2019. PT MMAS Company Regulation has been approved by Kepala Dinas Penanaman Modal, Pelayanan, Perizinan dan Tenaga Kerja Kabupaten Mukomuko as on Decree No.01/2019 dated 18 November 2019 and valid until 15 November 2021. Based on the verification of Company Regulation (PP) document, there is no content change from the previous PP. The document regulates the provisions regarding working time, wage system, sick days, absent, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article III (Wages) regulates:</p> <ul style="list-style-type: none"> <li>• Wages in the form of money: Daily and Monthly Workers of PT MMAS wages are negotiated between the company and worker union that refers to the applicable provisions, and the wage negotiation must be completed not later than April in the current year.</li> <li>• Wages in the form of Natura: Worker gets 15 kg rice, unemployed wife/husband gets at most 9 kg, children gets 7.50 kg (maximum 3 children).</li> </ul> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The Collective Labor Agreement (Perjanjian Kerja Bersama) has been registered to Manpower Agency in Mukomuko Regency – was Signed by Head of Dinas Penanaman</p>	
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		<p>Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja Kabupaten Mukomuko, dated 24<sup>th</sup> February 2022.</p> <p>The document regulates the provisions regarding working time, wage</p>	
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for 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>Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods.</p> <p>Based on document verification and interviews with workers, stated that each worker has a Work Agreement with companies made in Bahasa Indonesia as a language understood by all ethnicities in PT Agro Muko and PT MMAS. The Work Agreement Letter regulates position, validity period and expiration of work agreement, obligations of workers, placement/transfer, payroll, medical, annual leave, insurance, and termination of employment.</p> <p>Available employment contract as in "Surat Perjanjian Kerja".</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The Work Agreement Letter verification, sample:</p> <ul style="list-style-type: none"> <li>• Perjanjian Kerja Waktu Tertentu, no: 20/STGE/X/20 dated 1<sup>st</sup> October 2020 namely Mr Prino Sihotang (dated 1<sup>st</sup> October 2020 – 30<sup>th</sup> September 2022)</li> <li>• Perjanjian Kerja Waktu Tertentu, no: 15/STGE/VII/21 dated 1<sup>st</sup> July 2021 namely Mrs Karmila Yulistiana (dated 1<sup>st</sup> July 2021 – 30<sup>th</sup> June 2023)</li> </ul> <p>The Work Agreement Letter regulates position, validity period and expiration of work agreement, obligations of workers, placement/transfer, payroll, medical, annual leave, insurance, and termination of employment.</p>	Complied
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday</p>	<p>Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being</p>	Complied

	<p>entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods.</p> <p>Based on interview with SPAM (worker union) and worker, stated that the company has realized normative obligation on industrial relation that regulated in Collective Work Agreements (PKB) and Company Regulation (PP).</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under PKB. The Collective Labor Agreement (Perjanjian Kerja Bersama) has been registered to Manpower Agency in Mukomuko Regency – was Signed by Head of Dinas Penanaman Modal, Pelayanan Perizinan Terpadu dan Tenaga Kerja Kabupaten Mukomuko, dated 24<sup>th</sup> February 2022.</p> <p>As per Indonesia legal labour requirements refer to Manpower Act No. 13 Year 2013, regular working hours divided into two types, i.e: 7 hours/day or 40 hours/week (6 working days) and 8 hours/day or 40 hours/week (5 working days). Unit of certification applied 6 working days, which is 7 hours/day.</p> <p>For overtime, unit of certification applying calculation as per Ministry of Manpower Decree "SK Menakertrans No: KEP-102/MEN/VI/2004", as below:</p> <ul style="list-style-type: none"> <li>• (Nett income per month + price of primary food/rice per month): 173</li> <li>• Daily working days: 1st hour of overtime will paid 1.5 x wage per hour. Next hour of overtime will be paid 2 time per hour.</li> <li>• Working on holiday (6 working days): First of 7 hours will be paid twice. Hour 8 will be paid 3 times; Hour 9 to 10 will be paid 4 times</li> </ul> <p>The minimum wage of Mukomuko Regency in 2022 is Rp. 2,522,936 based on degree number: "D566.DKTRANS tentang Penetapan Upah Minimum Kabupaten Mukomuko Tahun 2022", issued by Manpower Agency in Mukomuko Regency.</p>	
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		<p>Payslip record verification, month February 2022:          Namely Mrs P*** (register number 00101)</p> <ul style="list-style-type: none"> <li>• Basic salary: Rp 2,165,000</li> <li>• BPJS Tk: Rp 105,306</li> <li>• BPJS Kes: Rp 86,600</li> <li>• Overtime: Rp 1,446,739</li> <li>• THP: Rp 4,218,585 (above than minimum wage in Mukomuko Regency year 2022)</li> </ul> <p>Namely Mrs M**** R** (register number BL098)</p> <ul style="list-style-type: none"> <li>• Basic salary: Rp 1,956,750</li> <li>• BPJS Tk: Rp 88,836</li> <li>• BPJS Kes: Rp 78,270</li> <li>• Overtime: 1,108,490</li> <li>• THP: Rp 3,232,346 (above than minimum wage in Mukomuko Regency year 2022)</li> </ul>																					
<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>During onsite visit to workers compound at Air Buluh Estate, Malin Deman Estate, Air Bikuk Estate and Bunga Tanjung Estate, all workers facilities was provide by the company freely.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>          Sungai Teramang Estate provides adequate housing. List of facilities updated in March 2022:</p> <table border="1" data-bbox="965 1114 1912 1374"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Mosque</td> <td>1</td> <td>Volley-ball court</td> <td>1</td> </tr> <tr> <td>Employee Hall</td> <td>1</td> <td>School bus</td> <td>1</td> </tr> <tr> <td>Clinic</td> <td>1</td> <td>Fertilizer store</td> <td>1</td> </tr> <tr> <td>Employee houses</td> <td>56 (existing), 20 unit (under development)</td> <td>Chemical store</td> <td>1</td> </tr> </tbody> </table>	Facility	Unit	Facility	Unit	Mosque	1	Volley-ball court	1	Employee Hall	1	School bus	1	Clinic	1	Fertilizer store	1	Employee houses	56 (existing), 20 unit (under development)	Chemical store	1	<p>Complied.</p>
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Staff house	1	Hazardous waste store	1												
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>During interview with sample of workers at Air Buluh Estate, Malin Deman Estate, Air Bikuk Estate and Bunga Tanjung Estate, they stated that company provide vehicle for shopping once a week, to buy affordable food. Because this Estates located far from traditional market or shopping area.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>  Field visit (dated 28/03/2022) to housing area of Sungai Teramang Estate and interview with the housewives in the premise. Audit team found</p> <ul style="list-style-type: none"> <li>• Sungai Teramang Estate works together with employee cooperative in provision of rice, as part of in-kind benefit for worker. Koperasi Serba Usaha Agromuko – location in Bunga Tanjung Estate is distributing rice for all workers.</li> <li>• Sungai Teramang Estate allows food seller to enter the housing compound.</li> <li>• Nearest market selling staple food, vegetables, meat, fish located Brangan Mulya Market.</li> </ul>	Complied												
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>PT. Agro Muko and PT. Mukomuko Agro Sejahtera has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> <li>- Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2018)</li> <li>- Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2018);</li> <li>- Food cost (with 2100 calory, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice</li> <li>- Housing cost (provided by company)</li> </ul>	Complied												

		<ul style="list-style-type: none"> <li>- Non-Food Non-Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company)</li> <li>- Mandatory deduction (from tax and BPJS levy)</li> </ul> <p>Gross Living Wage at Rp.2,405,295          Prevailing wage at Rp.2,859,333          Gap at Rp.454,039 (positive)</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> <li>• Reference Family Size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2020). <i>Total Fertility Rate for Indonesia, year 2020 at 2.28 (BPS); Child Mortality Rates for Indonesia, year 2020 at 17.7/1000 births.</i> Reference Family Size at 4.23.</li> <li>• Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2020). <i>Labour Participation Force Rate for Indonesia, year 2020 at 69.32% (BPS); Unemployment Rate for Indonesia, year 2020 at 4.99% (BPS); People Working Part Time for Indonesia, year 2020 at 23.74% (BPS).</i> Full Time equivalent per family at 1.5802.</li> <li>• Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice</li> <li>• Housing cost at 0 (provided by company)</li> <li>• Non-food Non-ousing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company) based on sampling in Sungai Teramang Estate.</li> <li>• Mandatory deduction (from tax and BPJS levy)</li> </ul> <p>Sample of DLW calculation at</p> <ul style="list-style-type: none"> <li>• Minimum Wage of Mukomuko Regency in 2022 is Rp. 2,522,936 (Degree number</li> </ul>	
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		<p>D566.DKTRANS Tahun tentang Penetapan Upah Minimum Kabupaten Mukomuko).</p> <ul style="list-style-type: none"> <li>Gross Living Wage at Rp 2,785,624</li> <li>Prevailing wage at Rp 3,356,667</li> <li>Living Wage Gap at Rp 571,042 (positive);</li> </ul>	
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>Based on verification onsite visit, Certificate Holder using permanent worker for all core work and specified contracted worker (PKWT) for maintenance work.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Core work in Sungai Teramang Estate such as harvesters.</p> <p>Sample seen: Contract Document: Perjanjian Kerja Waktu Tertentu, No: 02/STGE/II/2022 dated 1<sup>st</sup> March 2022. Namely Mr Josua Manurung. The contract valid until 1 year.</p>	<p>Choose an item.</p>
<p><b>Criteria 6.3:</b> The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment". The existence of worker union has been recognized under "Serikat Pekerja Agromuko Mandiri (SPAM)" which has been registered to the Manpower Office of Mukomuko regency under registration No. D.3/560/16/PC-F.SPPP. SPSI/IV/2011, dated 18 February 2011.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment". The existence of worker union has been recognized under "Serikat</p>	<p>Complied</p>

		<p>Pekerja Mandiri - PT. Mukomuko Agro Sejahtera” which has been registered to the Manpower Office of Mukomuko regency under registration No. D.3/560/16/PC-F.SPPP. SPSI/IV/2011, dated 18 February 2011.</p> <p>Based on the results of a public consultation with the Serikat Pekerja Mukomuko Agro Sejahtera Mandiri (SP-MMAS) chairman, the auditors obtained information that almost all of Sungai Teramang Estate's employees have been registered as labour union members. However, they have not yet established an internal organizational structure and are still under the central SP-MMAS's structure. So far, there have been no complaints or social restrictions from management to employees. The company actually provides office space for organizational purposes.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>The Workers Union (SPAM) regularly holds meetings with the company. Latest dissemination of union policy including minutes of meeting based on sample are:</p> <ul style="list-style-type: none"> <li>a. Air Buluh Estate. MoM dated 26 Februari 2020, attended by 18 persons.</li> <li>b. Bunga Tanjung Estate. MoM dated 13 Januari 2020, attended by 35 persons.</li> <li>c. Bunga Tanjung POM. MoM dated 10 July 2020, attended by 22 persons.</li> </ul> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on the results of a public consultation with the Serikat Pekerja Mukomuko Agro Sejahtera Mandiri (SP-MMAS) chairman, the team of auditors obtained information that the latest meeting with the management holds on 20 January 2022, attended by 35 personnel representatives from both.</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 unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that “the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment”.</p> <p>Based on interviews with the parent Worker Union and Estate coordinator, it was stated that the Management did not intervene in the formation/selection of the management of the Workers Union, although the office facilities were provided by company Management. The unit of certification also gives concessions to Workers Union</p>	Complied

		<p>management to hold events related to the Union, e.g. permit to hold management meetings.</p> <p>For PT MMAS which until now there has not been formed a Workers Union, the discussion related to manpower, a Bipartite Cooperation (LKS) has been formed and holds a meeting with management once a month.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Based on the results of a public consultation with the Serikat Pekerja Agromuko Mandiri (SPAM) chairman, the team of auditors obtained information that almost all of Sungai Teramang Estate's employees have been registered as union members. However, they have not yet established an internal organizational structure and are still under the central SPAM structure. So far, there have been no complaints or social restrictions from management to employees. The company actually provides office space for organizational purposes.</p>	
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on evidence such as attendance list and minutes of meeting, it was stated that PT Agromuko – Bunga Tanjung POM committed to not employ underage workers required by national legislation.</p> <p>Based on document review as listed in "Daftar Pekerja tahun 2021" and based on field observation there are no underage workers.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Based on document review of "Daftar Pekerja" Sungai Teramang Estate, updated per March 2022. Youngest worker namely Dian Pramana Yudha – Warehouse Clerk, date of birth 20 February 2003 – dated on join on 1<sup>st</sup> February 2022 (19 years old).</p>	Complied

6.4.2	<p><b>(C)</b> Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years old, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on evidence such as attendance list and minutes of meeting, it was stated that PT Agromuko – Bunga Tanjung POM committed to not employ underage workers required by national legislation.</p> <p>Based on document review as listed in "Daftar Pekerja tahun 2021" and based on field observation there are no underage workers.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate demonstrated document Manpower establishment. Based on document review of "Daftar Pekerja" Sungai Teramang Estate, updated per March 2022. Youngest worker namely Dian Pramana Yudha – Warehouse Clerk, date of birth 20 February 2003 – dated on join on 1<sup>st</sup> February 2022 (19 years old).</p>	Complied
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years old and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on evidence such as attendance list and minutes of meeting, it was stated that PT Agromuko – Bunga Tanjung POM committed to not employ underage workers required by national legislation.</p> <p>Based on document review as listed in "Daftar Pekerja tahun 2021" and based on field observation there are no underage workers.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>No worker under 18 years old employed by Sungai Teramang Estate. Sungai Teramang Estate demonstrated document Manpower establishment. Based on document review of "Daftar Pekerja" Sungai Teramang Estate, updated per March 2022. Youngest</p>	Complied

		worker namely Dian Pramana Yudha – GodDown Clark, date of birth 20 February 2003 – dated on join on 1 <sup>st</sup> February 2022 (19 years old).	
6.4.4	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>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019, stated that "PT Agro Muko is committed not to employ children under 18 years old and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on evidence such as attendance list and minutes of meeting, it was stated that PT Agromuko – Bunga Tanjung POM committed to not employ underage workers required by national legislation.</p> <p>Based on document review as listed in "<i>Daftar Pekerja tahun 2021</i>" and based on field observation there are no underage workers.</p> <p><b><u>Extension to scope Sungai Teramang Estate:</u></b></p> <p>Socialization of this policy for Sungai Teramang Estate has conducted. For example, sighted the record of company's socialization on "Kebijakan Pekerja Anak" socialization on 2<sup>nd</sup> March 2022. The socialization attended by 26 workers (harvesters, P&amp;D census, waterman, pesticides applicator, manuring)</p> <p>During interview in Sungai Teramang Estate (dated 28/03/2022), block 11B02 with 2 harvesters they understand the implementation as prohibit accepting worker under 18 years old or still in school</p>	Complied
<b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	The unit of certification has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019. Based on interview with female workers and Gender Committee, shows that they have understood the company's policies on prevention of sexual harassment. During 2019 there had never been complaints from employees related to sexual harassment/violence at work, however there were reports of affair between employees in Tanah Rekah Estate and has been processed using the Company Code of Ethics.	Complied

		<p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>SIPEF has a Responsible Plantation Policy (last revision on 22 November 2019) as the highest level of policy that implemented in all country operated. As written in their website (<a href="https://www.sipef.com/hq/sustainability/policies/sexual-harassment-policy/">https://www.sipef.com/hq/sustainability/policies/sexual-harassment-policy/</a>), SIPEF is committed to ensuring a harmonious and productive work environment for its employees. This commitment recognises that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome and offensive behaviour and will not be tolerated under any circumstances.</p> <p>The unit of certification also has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019.</p> <p>Based on the results of a public consultation with the Serikat Pekerja Mukomuko Agro Sejahtera Mandiri (SP-MMAS) chairman and Gender Committee representative, the auditors obtained information there is no sexual harassment issue in Sungai Teramang Estate at least since the SIPEF's took over the previous management.</p> <p>The management through the gender committee also disseminated the company policy on sexual harassment routinely. For example, during the meeting with Serikat Pekerja Mukomuko Agro Sejahtera Mandiri (SP-MMAS) and Gender Committee representatives on 20 January 2022. The field supervisor also disseminated this policy routinely to the field worker during the morning call. Violations of this policy will be subject to severe penalties up to dismissal.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>The unit of certification has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with female workers and gender committee, show that they have understood the company's policy on protection of reproductive rights. The unit of certification have implemented protection of reproductive rights, for example:</p> <ol style="list-style-type: none"> <li>1. Give 90 days of maternity leave.</li> </ol>	Complied

		<ol style="list-style-type: none"> <li>2. Give menstrual leave (H1) rights to female workers who are sick during menstruation for 2 days with the consideration from medical personnel.</li> <li>3. Conduct pregnancy test for to female workers who work at high-risk stations such as spraying and fertilizing. Transferring pregnant workers to other types of work that are not at risk for pregnancy.</li> <li>4. Give special time for female workers who are breastfeeding at 10:00 to 11:00 and at 15:00 to 15:30.</li> </ol> <p>All policies on the protection of reproductive rights are also regulated in Collective Labor Agreements or Company Regulations.</p> <p>The policy has been disseminated to employees through posting the policies on the notice board (Estate/Mill Office) and conduct verbal dissemination to employees.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>SIPEF has a Responsible Plantation Policy (last revision on 22 November 2019) as the highest level of policy that implemented in all country operated. As written in their website (<a href="https://www.sipef.com/hq/sustainability/policies/protection-of-reproductive-rights-policy/">https://www.sipef.com/hq/sustainability/policies/protection-of-reproductive-rights-policy/</a>), SIPEF is committed to protect the reproductive rights.</p> <ol style="list-style-type: none"> <li>1. To this effect, and within the laws and regulations of countries where it operates, SIPEF will:             <ul style="list-style-type: none"> <li>• Ensure that couples and individuals seeking medical services related to reproductive and sexual health are accommodated;</li> <li>• Ensure that couples or individuals can freely decide when and how many children they want, and guarantee the right to information on contraception.</li> </ul> </li> <li>2. Programs and services supporting this policy will preferably be based on government-approved Family Planning and Mother-and-Child health care services.</li> <li>3. SIPEF recognises the main components of reproductive health as being:             <ul style="list-style-type: none"> <li>• Counselling on sexuality, pregnancy, contraception, infertility, and the related diseases</li> <li>• Education on sex and gender</li> </ul> </li> </ol>	
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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>The unit of certification has implemented policy to give special time to female workers who are breastfeeding for breastfeeding their children at 10:00 - 11:00 and 15:00 - 15:30 as stipulated in the Collective Labor Agreement or Company Regulations. However the company can reassess the needs of female worker who just given birth by involving Gender Committee Contact Group.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>The unit of certification has implemented policy to give special time to female workers who are breastfeeding for breastfeeding their children at 10:00 - 11:00 and 15:00 - 15:30 as stipulated in the Collective Labor Agreement or Company Regulations. However, the company can reassess the needs of female worker who just given birth by involving Gender Committee Contact Group. The breastfeeding time can be different for each worker and can be re-arranged based on the baby's need.</p>	Complied

		<p>During this audit, there is no breastfeeding women worker existed in Sungai Teramang Estate.</p> <p>Sungai Teramang Estate has questionnaire "Formulir Interview dengan Ibu Baru Bersalin/Menyusui", dated 5 November 2021. This questionnaire spreads to all female workers and the documents is not filled in because no new mother/breastfeeding period. Only filled name, division and ID number.</p> <p>The questionnaire: status of work? presence of children needing breastfeeding? exclusive breastfeeding? breastfeeding frequency? breastfeeding timeframe? permission from company for breastfeeding time? breastfeeding frequency during working hour? breastfeeding time adequate? provision of specific place for breastfeeding? pay deduction for time used during breastfeeding time? Provision of access to information related to breastfeeding consultation, baby health and vaccination?</p>	
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>Specific Grievance mechanisms for complaints related to sexual harassment/ violence are set out in the Sexual Harrassment/Violence Prevention Policy (QMM-40-01-P10, Rev 1) dated 27 March 2019. The complaint mechanism refers to the Grievance Policy (QMM-40-01-P12) dated 1 March 2014.</p> <p>Based interview with female workers and Gender Committee, they have understood the company's policy related Prevention of Sexual Harassment / Violence.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Specific Grievance mechanisms for complaints related to sexual harassment/ violence are set out in the Sexual Harrassment/Violence Prevention Policy (QMM-40-01-P10, Rev 1) dated 27 March 2019. The complaint mechanism refers to the Grievance Policy (QMM-40-01-P12) dated 1 March 2014.</p> <p>During the field visit and interview with women worker, audit team obtained information that the women worker has a good knowledge on the company policy on reproductive rights and can described their knowledge with the others.</p>	Complied
<p><b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.</p>			

<p>6.6.1</p>	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker’s consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p>Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Based on interview with workers, worker union representative, and Dinas Ketenagakejaan (Manpower Agency) in Mukomuko Regency (on 29/03/2022), stated that the Sungai Teramang Estate does not practiced forced labour:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports: Interview with PKWT worker in Sungai Teramang Estate, his ID card was not hold by company.</li> <li>• Payment of recruitment fees: Interview with PKWT worker in Sungai Teramang Estate, during his application and recruitment in December 2021, not paying any recruitment fees.</li> <li>• Contract substitution: Interview with PKWT worker in Sungai Teramang Estate, his contract with company under PKWT, signed 1<sup>st</sup> January 2022 was consistently implemented.</li> <li>• Involuntary overtime: Interview with harvesters in Sungai Teramang Estate offers overtime/additional harvesting work during peak crop (usually on Sunday), but it was up to individual worker to decide whether they joined overtime.</li> </ul>	<p>Complied</p>
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6.6.2	<p><b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>There is no casual worker works at the unit of certification. All workers have status of permanent workers (SKU-B or SKU-H) of temporary worker (PKWT). PKWT is only applicable for probation period. Gradually the status of PKWT has been upgraded to be Permanent Workers (SKU-H), as evidence:</p> <ol style="list-style-type: none"> <li>1. Appointment Letter of PKWT became SKU-H No.03/RMO-MME/IV/2019 dated 1 April 2019 for 14 harvester in Bunga Tanjung Estate.</li> <li>2. Appointment letter of PKWT became SKU-H No.20/RMO-MME/X/2019 dated 2 October 2019 for 7 harvester in Bunga Tanjung Estate.</li> <li>3. Appointment letter from SKU-H to SKU-B No.209/JWB-RMOBG/IX/2019 dated 16 November 2019 for 3 workers of Sungai Kiang Estate, Air Buluh Estate and CWAM (Central Workshop).</li> <li>4. Appointment letter of PKWT became SKU-H No.31/TRE-RMO/VI/2019 dated 20 June 2019 for 2 workers in Tanah Rekah Estate.</li> </ol> <p>For other types of work, PT Agromuko collaborates with local labor service providers to do seasonal work such as Replanting.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>  Sungai Teramang Estate has established a set of procedure for recruitment of temporary worker (Specified Time Work Agreement/PKWT).</p>	Complied

		<p>There is no migrant worker in Sungai Teramang Estate – confirmed with Manpower Service of Mukomuko Regency and Worker Union.</p> <p>SOP Recruitment for PKWT No.HRD-01-03/09-03/2020/Rev.2 dated 17 March 2020. This SOP regulates the recruitment process for temporary worker are done according to valid procedures and approved manpower plan. The SOP stated:</p> <ul style="list-style-type: none"> <li>• Office Assistant/ Field Assistant/ Mill Assistant prepare a proposal for PKWT based on budget available, work experience, achievements.</li> <li>• Proposal verified by Field Head Assistant/ Mill Head Assistant/ Technical Head Assistant and sent to Regional Manager Office.</li> <li>• General Manager/ Regional Director verified and approved the employee request.</li> <li>• Office Assistant create work agreement which is signed by Estate Manager/ Mill Manager and PKWT.</li> <li>• Section 10 of the SOP stipulates that Free Labour and PKWT are not allowed to do the main work such as harvesting and processing.</li> <li>• PKWT can only be implemented for a maximum 2 (two) years with following conditions: first PKWT no longer than 1 year.</li> <li>• The second PKWT no longer than 1 year. Furthermore, if approved by BOD, renewal of extension of PKWT can only held after exceeding 30 (thirty) days grace period since the end of second PKWT and may only be done 1 (one) time and a maximum of 2 (two).</li> <li>• PKWT shall be registered with BPJS Ketenagakerjaan and BPJS Kesehatan program.</li> <li>• The basis of payment for PKWT wages per day is UMP/UMSP/UMK/UMSK divided by 25 if working time is 6 days a week or divided by 21 if working time is 5 days a week.</li> </ul> <p>Evidence verification:</p> <ul style="list-style-type: none"> <li>• Contract Document: Perjanjian Kerja Waktu Tertentu, No: 02/STGE/II/2022 dated 1<sup>st</sup> March 2022. Namely Mr Josua Manurung. The contract valid until 1 year. Clause 1: PKWT for Ebert as upkeep mill; PKWT period 1 September 2021 – 31 August 2022 (1 year);</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company. Employee entitled for the salary including rice 15kg/month.</li> <li>• Clause 5: Company provides medical treatment for employee as per regulation.</li> <li>• Clause 7: Company will register employee to BPJS Ketenagakerjaan</li> </ul>	
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Agromuko – Bunga Tanjung POM has appointed the responsible person(s) for H&amp;S is identified, such as:</p> <p>Air Buluh Estate:</p> <ul style="list-style-type: none"> <li>• OHS expert namely Mr Sudiro as Degree Letter from Manpower Ministry Republic of Indonesia Nomor: KEP.3796/NAKER-BINWASK3/V/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued dated 31<sup>st</sup> May 2017 – valid until 3 years</li> <li>• Surat Permohonan Pendaftaran Kepengurusan P2K3LHS No 349/ABE/XI/2019, dated 5<sup>th</sup> November 2019</li> </ul> <p>Malin Deman Estate:</p> <ul style="list-style-type: none"> <li>• OHS expert namely Mr Mugiono as Degree Letter from Manpower Ministry Republic of Indonesia Nomor: KEP.P.6195/NAKER-BINWASK3/IX/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued dated 20<sup>th</sup> September 2017 – valid until 3 years.</li> <li>• Surat Permohonan Pendaftaran Kepengurusan P2K3LHS No 54/RMO-G/X/19, dated 28<sup>th</sup> October 2019</li> </ul> <p>Bunga Tanjung Estate:</p> <ul style="list-style-type: none"> <li>• Berita Acara Perubahan Susunan Kepengurusan P2K3LHS dated 1 October 2019</li> <li>• OHS expert namely Mr Samuel Sihombing as Degree Letter from Manpower Ministry Republic of Indonesia Nomor: KEP.P.3795/NAKER-BINWASK3/V/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued dated 31<sup>st</sup> May 2017 – valid until 3 years.</li> </ul>	Complied

		<p>Air Bikuk Estate:</p> <ul style="list-style-type: none"> <li>OHS expert (Ahli K3) namely Mr Frisai Hafiz Marpaung – license as OHS expert candidate number. KEP.17541/NAKER-BINWASK3/V/2018, valid until 3 years.             <ul style="list-style-type: none"> <li>Minute of Meeting of the OHS committee (monthly), last meeting was conducted on 29<sup>th</sup> October 2019 – location in Meeting Room Air Bikuk Estate. Agenda: review on progress of follow up action from previous meeting issues, review on the OHS inspection report, review of accidents in month October 2019 and other issues.</li> </ul> </li> </ul> <p><b>Extension to scope Sungai Terawang Estate:</b></p> <p>Safety Committee has registered to Manpower Agency as per "Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Mukomuko Nomor: 503/09.28.50/003/DPMPTSP-P1/2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan Sungai Terawang Estate, dated 1<sup>st</sup> January 2022.</p> <p>OHS Committee Meeting:</p> <ul style="list-style-type: none"> <li>Sample record of OHS meeting dated 24<sup>th</sup> January 2022, agenda: discussion of sick pay day, report of OHS inspection and accident report. The meeting was attended by Estate manager, head assistant, OHS expert.</li> </ul> <p>Report of OHS performance period October – December 2021. Has submitted to Dinas Tenaga Kerja dan Transmigrasi Mukomuko Regency, dated 21<sup>st</sup> February 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>PT Agromuko – Bunga Tanjung POM has prepared the procedure of accident and emergency as per document of Incident Report, No: OHS-01-08, issued date 4<sup>th</sup> February 2019 version 0.</p> <p>Steps to Report Incidents:</p> <ol style="list-style-type: none"> <li>Applies to all accidents, diseases and incidents that occur in the PT TTI environment</li> <li>The initial date that must be given if an incidents occur is:             <ul style="list-style-type: none"> <li>Date and time occur</li> <li>Location of the incidents</li> <li>Name and or number of victims</li> </ul> </li> </ol>	Complied

		<ul style="list-style-type: none"> <li>• Activity at the time of incidents</li> <li>• The is injury or death</li> </ul> <p>The procedure available in appropriate language of the workforce and has been socialization to all workers, e.g: Attendance list on socialization of accidents procedure dated 15<sup>th</sup> June 2019.</p> <p>Bunga Tanjung Estate has assigned operatives trained in First Aid are present in both field and other operations, e.g: namely Mr Jhon Hartoni (license as first aider No: 560/027/D.3/IV/P3K/2015 – issued by Manpower Agency in Mukomuko Regency) and Mr Yanto (license as first aider No: 560/024/D.3/IV/P3K/2015 – issued by Manpower Agency in Mukomuko Regency).</p> <p>Record of all accident has kept and periodically review under OHS committee meeting (P2K3LHS) each month.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• Total accident in year 2019 is 2 cases (category: medium). Each accident has conducted the investigation, e.g: "Report of Accidents Investigation – No 01-BTE-2019-07-AC-WP, dated 11<sup>th</sup> July 2019 for namely Mr John Pranata (Supervisor in Harvesting), location in block C2 in division 01. Recommendation of corrective action has followed up.</li> <li>• List of first aid equipment as monitored in "Daftar Kotak P3K", there was 15 porable first aid and 3 first aid in office, chemical storage and temporary storage hazardous waste</li> <li>• License for first aider number 560/012/D.3/IV/P3K/2015 namely Mr H.M Sianturi, number 560/062/D.3/IV/P3K/2015 namely Mr Tohidan</li> </ul> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>In Sungai Teramang Estate - "Kebijakan Kesehatan dan Keselamatan Kerja" policy has been disseminated to 28 workers dated 27<sup>th</sup> January 2022.</p> <p>During interview in in Sungai Termanag Estate 28/03/2022, block 11B02 with 2 harvesters, they understand the implementation as identification of hazard and risk,</p>	
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		provision of PPE, standing by first aider (mandors); BPJS Ketenagakerjaan and BPJS Kesehatan; referral to hospital when accident occurs	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>Based on onsite visit at Air Buluh Estate, Air Bikuk Estate, and Bunga Tanjung Estate, all workers using PPE as required by HIRADC. If broken, PPE will replace with new one freely.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>  Sungai Teramang Estate have provided training related to OHS and PPE in accordance with the result of risk assessment year 2022.</p> <p>The PPE which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, 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>Record on appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations:</p> <ul style="list-style-type: none"> <li>• Record of handover of PPE (AP boot, mask, apron, gloves) for spraying team dated 17<sup>th</sup> October 2021 for 10 workers/pesticides applicators.</li> <li>• Record of handover of PPE (AP boot), e.g: dated 17<sup>th</sup> October 2021 for 10 harvesters, 5 fertilizer applicators.</li> <li>• Report of inspection of using of PPE (monthly bases), e.g: dated 6<sup>th</sup> December 2021 division I reported OK.</li> <li>• Checklist on monitoring of PPE use for workers in - monthly, e.g: October to December 2021, the result reported OK</li> </ul> <p>Implementation in Tolan Estate, PPE provided by company to workers for free.</p>	Complied
6.7.4	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	<p>Based on direct interview with sample of workers at Air Buluh Estate, Air Bikuk Estate, and Bunga Tanjung Estate, all workers already covered by accident insurance (BPJS Tenaga Kerja) including its facilities, such as clinic.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p>	Complied

	<p>certification if applicable regulations do not provide protection.</p>	<p>Sungai Teramang Estate provide all workers will medicalcare, and covered by accidents insurance, the statement as mentioned in Memorandum No: 436/MED-CIR/XII/2015, dated 2<sup>nd</sup> December 2015 was signed by Company Doctor.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers are provided with medical care and accident under BPJS Kesehatan and PBJS Ketenagakerjaan. An accident insurance is covered under "BPJS Ketenagakerjaan" with Accident and Life Program (JKK and JK).</p> <p>Sungai Teramang Estate has shown the record of injuries using lost time accident (LTA) metrics as in "Rekapitulasi Kejadian Kecelakaan Kerja- LTA" year 2021. There was no accident reported.</p>	
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>PT Agromuko – Bunga Tanjung POM has shown the record of injuries using lost time accident (LTA) metrics as in "Laporan Kehilangan Waktu Kerja – LTA" year 2020.</p> <ul style="list-style-type: none"> <li>• Malin Deman Estate, up to October 2021 there was reported 2 cases of accidents, total LTA 6 mandays</li> <li>• Air Buluh Estate, up to October 2021 there was reported 1 cases of accidents, total LTA 2 mandays.</li> <li>• Bunga Tanjung Estate - up to October 2021 total accident is 0 cases total LTA is 0 mandays. Each accident has conducted the investigation and followed up with corrective action.</li> </ul> <p>Each accident has been followed up with investigation and followed up with corrective action.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate has shown the record of injuries using lost time accident (LTA) metrics as in "Rekapitulasi Kejadian Kecelakaan Kerja- LTA" year 2021. There was no accident reported.</p> <p>However, if there any accident, will have to followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p>	<p>Complied</p>

<b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b>			
<b>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</b>			
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<p>It was available documented IPM Program under “Program Pengendalian Hama Terpadu Tahun 2020” for each Estate and Scheme Smallholders. IPM Plans of Air Buluh Estate include smallholders consist of monitoring of installed barn-owl nest; installation of new barn-owl nest; identification of beneficial weeds; Ganoderma census; monitoring of beneficial weeds; identification of natural predator of leaf-eater caterpillar. IPM Plans of Air Bikuk Estate include Smallholders consist of monitoring of installed barn-owl nest; bird-perch at replanting area; identification of beneficial weed; planting of turnera, antigonon and Casiatora; monitoring of <i>Tyto alba</i>; census of pest (nettle caterpillar and bagworm). IPM Plans of Bunga Tanjung Estate include Smallholders consist of monitoring of installed barn-owl nest; identification of beneficial weed; census of nettle caterpillar and Ganoderma; planting / upkeep of Turnera, Antigonon and Casiatora. IPM Plans of Malin Deman Estate include Smallholders consist of monitoring of beneficial weeds, census of pest and disease; upkeep of Turnera, Antigonon and Casiatora.</p> <p>Dissemination and education to workers and smallholder regarding IPM has been done recently on 29 Aug 2020 in Air Buluh Estate; on 22 Apr 2020 and 29 Jun 2020 in Air Bikuk Estate.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Record of IPM implementation in Sungai Teramang Estate, Barn Owl Census dated 4 January 2022, there are 6 barn-owl box located in 19A01, 19A02, 19A04, 20B01, 20B02 and 20B03, all barn-owl box are 100% occupied. During field visit barn-owl box at 20B01, 20B02 and 20B03 are verified in good condition</p>	Complied
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The company can provide “100 of the World’s Worst Invasive Alien Species” a selection from the Global Invasive Species Database, published by Invasive Species Specialist Group (ISSG) in association with IUCN, Species Survival Commission and Bionet. There is no species listed in the document used in whole area of PT Agro Muko.	Complied

7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	During onsite, no implementation of fire used for pest control. The company uses agrochemical for pest control. <b>Extension to scope Sungai Teramang Estate:</b> During onsite, no implementation of fire use for pest control including in Sungai Teramang Estate. The company uses agrochemical for pest control.	Complied																				
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																							
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	During onsite visit to spraying activities at Bunga Tanjung Estate and visit to chemical storage, Certificate Holder using selective products to apply pesticides/herbicides. <b>Extension to scope Sungai Teramang Estate:</b> During onsite visit to chemical storage and mixing area, Certificate Holder were using selective products to apply pesticides/herbicides. There was no spraying activity during extension to scope audit due to spraying program for March 2022 has been completed.	Complied																				
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	Record of LD50 for each pesticides/herbicides is available in place. <b>Extension to scope Sungai Teramang Estate:</b> Record of pesticides use in Sungai Teramang Estate; <table border="1" data-bbox="965 963 1671 1198"> <thead> <tr> <th>Pesticides</th> <th>UoM</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Supremo (Amonium glufosinate)</td> <td>liter</td> <td>-</td> <td>220.00</td> </tr> <tr> <td>Smart (Amonium glufosinate)</td> <td>liter</td> <td>940.00</td> <td>-</td> </tr> <tr> <td>Basta (Amonium glufosinante)</td> <td>iter</td> <td>260.00</td> <td>-</td> </tr> <tr> <td>Metsulindo (Metil metsulfuron)</td> <td>Kg</td> <td>28.25</td> <td>7.25</td> </tr> </tbody> </table>	Pesticides	UoM	2021	2022	Supremo (Amonium glufosinate)	liter	-	220.00	Smart (Amonium glufosinate)	liter	940.00	-	Basta (Amonium glufosinante)	iter	260.00	-	Metsulindo (Metil metsulfuron)	Kg	28.25	7.25	Complied
Pesticides	UoM	2021	2022																				
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Basta (Amonium glufosinante)	iter	260.00	-																				
Metsulindo (Metil metsulfuron)	Kg	28.25	7.25																				
7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Certificate Holder also implement IPM to reduce pesticides/herbicides application, such as Barn Owl. <b>Extension to scope Sungai Teramang Estate:</b> Based on field visit to Sungai Teramang Estate, verified that the Estate has planted vetifer grasss, <i>Turnera subulatta</i> and <i>Antigonon leptopus</i> , installed barn-owl box as	Complied																				

		well. From the video of monitoring, verified that barn-owl box at Block B01, B02, B03 are occupied.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	<p>Certificate Holder no using prophylactic use of pesticides. Pesticides/herbicides use is selective products and application methods that are specific to the target pest, weed or disease.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>            During field visit to Sungai Teramang Estate, spraying activity is stopped due chemical weeding program for March 2022 is fulfilled. There is no prophylactic use of pesticide in managed area.</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.</p> <p>The due diligence refers to:            7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>PT Agro Muko and PT Mukomuko Agro Sejahtera including the smallholders are not using pesticide categorized as WHO Class 1A and Class 1B, or that listed by the Stockholm or Rotterdam Conventions. Despite paraquat is not prohibited in Indonesia, company committed to avoid use of Paraquat.</p> <p>The company has commitment to eliminated using Paraquat since 1 January 2017 based on General Manager letter No.35/GMAM-Est/XII/2015, dated 8 December 2017. Based on "Rekaman Penggunaan Pestisida Per Metric Ton FFB tahun 2020" shows company chemical product for specific target species (weed), and no paraquat.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>            Based on "Rekaman Penggunaan Pestisida Per Metric Ton FFB" for period 2021 and 2022 shows company chemical product for specific target species (weed), and no paraquat.</p>	Complied
	7.2.5b Why there is no other alternative which can be used.	There are no use of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera including the smallholders that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There are no use of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera including the smallholders that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat.	

	7.2.5d Process to limit the negative impacts of the application.	There are no use of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera including the smallholders that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There are no use of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera including the smallholders that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat.	
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>PT Agro Muko and PT Mukomuko Agro Sejahtera has provided training for all workers that performs chemical spraying including for Scheme Smallholders (KMD and Plasma), as evidence in "Hasil Pelatihan Spraying dan Kalibrasi Alat Semprot" dated 22 Mar 2019 in Malin Deman Estate. The training was attended by: Field Head Assistant, all Field Assistant, all Spraying workers and supervisors including that apply spraying in KMDs.</p> <p>Training of spraying and chemical handling in Tanah Rekah Estate was conducted on 1 Nov 2019 located at Block 90B14A Division 2. Training attended by 25 spraying workers, Supervisor and Field Assistant. Summary of training was flowrate 220 cc/minutes; spraying wide 165 cm; walking speed 2700 cm/minutes; spraying volume 50 Lt/Ha. Training module, evaluation result and attendance list were available.</p> <p>Pesticides are only handled, used and 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. Personnel applying pesticides has demonstrated evidence of knowledge about the activity they conduct.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>During interview with spraying worker of Sungai Teramang Estate, verified that they all understood all steps of spraying activities such as circle and path, selective weeding andalang eradication, including precautions attached to the products. Each morning they got dissemination of knowledge from Mandor regarding activity they conducted. Necessary PPE are used during spraying works, and it all supplied by the company. First aid kit was available at the working location, brought by Mandor.</p>	Complied

<p>7.2.7</p>	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.</p>	<p>During onsite visit to chemical storage at Bunga Tanjung Estate, all pesticides are kept securely in accordance with recognized best practices.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The storage for all pesticide is in good condition.</p> <p>Based on filed visit (dated 28<sup>th</sup> March 2022) in storage of pesticides and interview with storage keepers both in Sungai Teramang Estate; there was found the storage for all pesticide is in good condition.</p> <p>A standard storage system appears to be implemented across by the organization. The storage is equipped with sufficient air ventilation to provide air circulation.</p> <p>Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron, and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking, and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field are pre-mixed in designated mixing area.</p> <p>Awareness training for MSDS dated 20 November 2021 was attended by 5 workers in chemical storage.</p>	<p>Complied</p>
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7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All pesticide containers are categorized as "Limbah B3". Each Estate has storage for hazardous waste/containers with valid license.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>In Sungai Teramang Estate - all chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 90 days prior disposal.</p> <p>Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3".</p> <p>Record of disposal all of pesticides container as per "Berita Acara Serah Terima Barang Limbah Bahahn Berbahaya dan Beracun (B3) – No: 017/STGE-ENC-B3/CV.AB/2022" dated 18<sup>th</sup> February 2022, delivered to PT Amindy Barakah Sumut, consisted of:</p> <table border="1" data-bbox="965 799 1868 932"> <thead> <tr> <th>Type of B3</th> <th>Volume (MT)</th> <th>Manifest Electronic</th> </tr> </thead> <tbody> <tr> <td>Kemasan Bekas B3 (B104d) - pesticides</td> <td>0.0177</td> <td>KLHK-1638652346</td> </tr> </tbody> </table>	Type of B3	Volume (MT)	Manifest Electronic	Kemasan Bekas B3 (B104d) - pesticides	0.0177	KLHK-1638652346	Complied
Type of B3	Volume (MT)	Manifest Electronic							
Kemasan Bekas B3 (B104d) - pesticides	0.0177	KLHK-1638652346							
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	<p>There is no aerial application of pesticide in PT Agro Muko and PT Mukomuko Agro Sejahtera.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate applying pesticides through manual by persons/sprayer. Therefore, no aerial spraying is available. Not applicable</p>	Complied						
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>Specific annual medical surveillance for pesticide operators are conducting in annually. All records are maintained in Regional Management Office.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The special annual medical surveillance for pesticides operators and workers consisted of pesticides applicators, chemical storage keeping, generator (electrical) operator. Last medical check-up conducted on 29<sup>th</sup> September 2021.</p>	Complied						

		Data verified: "Laporan Hasil Pemeriksaan Kesehatan – Pekerja dengan Resiko Tinggi" (result of medical test has communicated to related workers)	
7.2.11	<b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	All female sprayers operators that interviewed during onsite visit are not currently pregnant or breastfeeding. <b>Extension to scope Sungai Teramang Estate:</b> Sungai Teramang Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under "Data Karyawan Tidak Hamil dan Menyusui – period January – March 2022". The record shows 3 female workers (sprayers and fertilizer applicators), but no pregnant or breastfeeding female workers.	Complied
<b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	The unit of certification has shown the document of waste management plan as documented in procedure "Pengelolaan Sampah" and "Rencana Pengelolaan Limbah". Waste management which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, such as: <ul style="list-style-type: none"> <li>• Domestic waste, to reduce pollution to the environment.</li> <li>• Organic and inorganic waste sent to landfill and then covered with soil.</li> <li>• Medical waste, and other type hazardous waste (used oil, empty chemical container, contaminated material, battery) regulated as per procedure "Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3) dan Tanggap Darurat".</li> <li>• The hazardous waste stored in a dedicated storage completed with alarm, spill kit, secondary containment, and PPE for operation.</li> </ul> <b>Extension to scope Sungai Teramang Estate:</b> All pesticide and agrochemical containers that produced from Sungai Teramang Estate was disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3). Permit of hazardous and toxic substances waste temporary storage (TPS LB3) as referred No.503/01/D10/IPLB3/III/2020, dated March 2020. Validity for 5 years. Source of waste form Sungai Teramang Estate.	Complied

		<p>The Auditor Team has conducted a visit to the location of the temporary storage of hazardous and toxic waste. The conditions for the hazardous waste warehouse are in accordance with the permits they have, and the requirements stated in the Decree of the Head of Bapedal No.Kep-01/Bapedal/09/1995.</p> <p>In addition, housing compound unit has had permitted wastewater treatment installation. For degradable waste, unit of certification has certain location for landfill with dumping system.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>All pesticide containers are categorized as "Limbah B3". Each Estate has storage for hazardous waste/containers with valid license.</p> <p>Each estate also has Landfill for domestic waste disposal. Workers during interview are clearly understand the procedure of domestic waste management.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate has shown the document of waste management plan is documented in procedure "Pengelolaan Sampah" and "Rencana Pengelolaan Limbah", last updated on 18/01/2022. In point 3 was mentioned that the domestic waste disposed to land fill. All domestic waste has been segregated (organic and inorganic waste).</p> <p>Domestic waste from workers compound in Sungai Teramang Estate was disposed in landfill and located in specific Block no 20B02 (the distance is about 3 km from workers compound).</p> <p>Based on field visit dated 28/03/2022 to landfill, there are two holes (organic and inorganic), type of waste is sighted only for inorganic waste, mostly plastic waste.</p> <p>In addition, the organic wastes (such as: food wastes) are buried at the backyard of worker's compound (+/- 30 meter from houses) following company procedure "Pengelolaan Sampah" and "Rencana Pengelolaan Limbah"..</p> <p>In workers compound at Sungai Teramang Estate, organic waste consist of litter, fruit rind and food wastes. For litter and fruit rind, is disposed to landfill. But for food waste is very small volume and disposed/buried approximate 30 meter from backyard/houses. Each compound has appointed supervisor to control condition,</p>	Complied

		including waste management. During interview with sample of workers/settler at compound, there is no hygiene or health issues occurs.	
7.3.3	The unit of certification does not use open fire for waste disposal.	Each estate also has Landfill for domestic waste disposal. No fire use founded for waste disposal. <b>Extension to scope Sungai Teramang Estate:</b> Domestic wastes from workers compound at Estate are disposed in landfill and located in specific Block no 20B02 location in Sungai Teramang Estate. Based on field visit dated 28/03/2022 to landfill, type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.	Complied
<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	PT Agro Muko and PT Mukomuko Agro Sejahtera has established SOP to managed soil fertility in whole plantation area include Scheme Smallholder to gain optimum yield and minimising environmental impact. The SOPs are as follows: <ul style="list-style-type: none"> <li>• OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik.</li> <li>• OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik</li> <li>• OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman.</li> <li>• OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</li> </ul> The company has conduct Leaf Sample analysis, as basic of fertilizer recommendation. Estates and Scheme Smallholder conduct fertilizer application based on fertilizer recommendation. <b>Extension Scope Sungai Teramang Estate:</b> All these procedures also adopted by Sungai Teramang Estate.	Complied
7.4.2	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.	Leaf and rachis analysis in Air Bikuk Estate was evident based on "Lembar Hasil Pengujian Analisa LSU dan RSU" No. 12701A0820 issued by Verdant Bioscience PT Timbang Deli Indonesia (Sipef Group); Ref. --; PO No. PTAM042572; receive date 9	Complied

		<p>Dec 2019; amount 172 samples (86 leaf &amp; 86 rachis); analysis date 12 Feb – 3 Apr 2020. Sample of analysis result: Lab No. B5460; Leaf; Estate MME; Division 5; Block 12F06A (12F01-F03); 32.72 Ha; Progeny Socfindo; YOP 2012; sampling date 26 Oct 2019; 2.54% N; 0.147% P; 0.68% K; 0.16% Mg; 0.51% Ca; 17 ppm B; 3 ppm Cu; 7 ppm Zn.</p> <p>Leaf and rachis analysis in Bunga Tanjung Estate was evident based on “Lembar Hasil Pengujian Plant Tissue Analysis” No. 21703B0520 issued by Verdant Bioscience PT Timbang Deli Indonesia (Sipef Group); Ref. No. RMO-BKL/RMO/49/2020; PO No. PTAM040938; receive date 19 Mar 2020; amount 4 samples (2 leaf &amp; 2 rachis); analysis date 15 – 19 Jun 2020. Sample of analysis result: Lab No. C315; Leaf; Estate SBE; Division 3; Block 01J01A-01J02A; 62.72 Ha; Progeny BLRS; YOP 2001; sampling date 17 Feb 2020; 2.47 N; 0.153% P; 0.70% K; 0.15% Mg; 0.63% Ca; 15 ppm B.</p> <p>Based on JH Agriculture Services, soil series in Plasma Sungai Tenang is Berlian Jaya series (BJA); Typic kandiudults; sub soil brownies yellow to yellowish brown to strong brown; fine sandy clay to clay; 35-60% clay; deep to very deep soil; well drained; mainly undulating to very steep terrain. The latest soil survey in Tanah Rekah Estate was conducted by “Laboratorium Ilmu Tanah, Fakultas Pertanian - Universitas Bengkulu” in August 2017. The result reported under “Laporan Akhir dan Reklasifikasi Tanah Gambut PT Agromuko di Tanah Rekah Estate – Agustus 2017”. The report summarized the changes in land area between period 2008 to 2017.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>During this scope extension audit, tissue sampling analysis at Sungai Termang has not conducted yet, due to the planting year is still relatively young. Tissue sampling analysis for planting year 2019 is scheduled to be carried out next year. Curently, Estate Fertilizer recommendation for Sungai Teramang Estate is based on Memorandum from Regional Director Bengkulu No. RDBG/RMO/64/2020 dated 9 March 2020 regarding Immature Oil Palm Fertilizer Schedule.</p>	
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill	EFB application in Bunga Tanjung Estate in 2020 were recorded in Block 98D02A; EFB applied in Jan 63 ton; Jun 197 ton; Jul 54 ton; Aug 25 ton; total area applied 5.78 Ha. In Block 01A01A; EFB applied 44 ton; area applied 1 Ha. In Block 98E01A; EFB applied	Complied

	<p>Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>41 ton; area applied 1 Ha. EFB application in Air Bikuk Estate in 2020 were recorded in Block 19G01; EFB applied in May 396.00 ton; Jun 171.94 ton; total 567.94 ton. In Block 19G02; EFB applied in Jun 94.82 ton; Jul 70.80 ton; Aug 98.10 ton; Sep 120.00 ton.</p> <p>There is no POME application in all plantation estates, waste from Bunga Tanjung Palm Oil Mill are used for biogas plant.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>          EFB Application in Sungai Teramang Estate are recorded, e.g. in 2021 there was 2,648.12 tons applied in 91.96 Ha of immature 2020. In 2022 there was 309.80 tons applied in 12.39 Ha of replanting 2021 area.</p> <p>There is no POME application in all plantation estates including Sungai Teramang Estate, waste from Bunga Tanjung Palm Oil Mill are used for biogas plant.</p>																								
7.4.4	<p>Records of fertilizer inputs are maintained.</p>	<p>Every estate has maintained records of fertilizer use.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>          Fertilizer recommendation for Sungai Teramang Estate is based on Memorandum from Regional Director Bengkulu No. RDBG/RMO/64/2020 dated 9 March 2020 regarding Immature Oil Palm Fertilizer Schedule.</p> <table border="1" data-bbox="960 986 1664 1382"> <thead> <tr> <th>Month</th> <th>Fertilizer</th> <th>Dosage (gr/palm)</th> </tr> </thead> <tbody> <tr> <td>Plant hole</td> <td>Rock Phosphate</td> <td>800</td> </tr> <tr> <td>1</td> <td>CPD 19.9.19</td> <td>400</td> </tr> <tr> <td>4</td> <td>CPD 19.9.19</td> <td>800</td> </tr> <tr> <td rowspan="2">8</td> <td>Kieserite</td> <td>500</td> </tr> <tr> <td>HGFB</td> <td>75</td> </tr> <tr> <td>12</td> <td>CPD 19.9.19</td> <td>1,250</td> </tr> <tr> <td>16</td> <td>MOP</td> <td>500</td> </tr> </tbody> </table>	Month	Fertilizer	Dosage (gr/palm)	Plant hole	Rock Phosphate	800	1	CPD 19.9.19	400	4	CPD 19.9.19	800	8	Kieserite	500	HGFB	75	12	CPD 19.9.19	1,250	16	MOP	500	<p>Complied</p>
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20	CPD 19.9.19	2,500																							
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<p><b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>																									
<p>7.5.1</p>	<p><b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.</p>	<p>Available soil map of Bunga Tanjung Estate dated 17 November 2016, with scale 1:50,000. Based on soil map, the predominant soil map in Bunga Tanjung Estate comprise of <i>Dystrudepts Hapludults</i> with material sediment (mineral) and <i>Dystrudepts Haplohumults</i> with material Alluvium (mineral). The landscape is range from rolling to undulating. From the information available, there is no fragile soil. Bunga Tanjung Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope ≥ 25° sets aside as HCV area.</p> <p>Air Buluh Estate demonstrates soil type consist of: <i>Dystropepts, Tropodults, Humitropepts</i> (mineral). Slope class for Air Buluh Estate: 2-12° estimated 230 Ha; 6-20° estimated 1,742 Ha; 12-25° estimated 343 Ha; 20- 25° estimated 219 Ha. The limitation slope ≥25°. No peat soil in Air Buluh Estate.</p> <p>Malin Deman Estate demonstrates soil type consist of Berlian Jaya Series (1,382 Ha) and Mukomuko Series (481 Ha).</p>			<p>Complied</p>																				

		<p>KMD Nenggalo have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Nenggalo indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Bunga Tanjung have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Bunga Tanjung indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Nelan Indah have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Nelan Indah indicates the slope between 0-5° up to 20-25°.</p> <p>KMD Bantal have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i>, with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Bantal indicates the slope between 0-5° up to 20-25°.</p> <p>Plasma Air Buluh have soil map scale 1:35,000. The soil type consists of Berlian Jaya series (125 Ha), Mukomuko series (73 Ha), Kaladan/Tolan series (72 Ha) and Binti series/peat soil (31 Ha).</p> <p>Plasma Air Merah have soil map scale 1:35,000. The soil type consists of Berlian Jaya series (482 Ha) and Mukomuko series (198 Ha).</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Soil map of Sungai Teramang Estate scale 1:32,000, issued date 26 June 2019 is available in place. Soil characteristic of Sungai Teramang Estate is Hapludults and Dystrudepts or mineral soil.</p>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	<p>Replanting activities only at Bunga Tanjung Estate. Certificate Holder consistently implement that replanting are not conducted on steep terrain.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p>	Complied

		Slope map of Sungai Teramang Estate scale 1:32,000, issued date 26 June 2019 is available in place. Slope level of Sungai Teramang Estate is 0% - 25%, mostly undulating and no steep terrain is available.	
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.  <b>Extension Scope Sungai Teramang Estate</b> No new planting since Sungai Teramang took over by SIPEF.	Complied
<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	PT Agro Muko and PT Mukomuko Agro Sejahtera has carried out soil surveys identifying marginal and fragile soils, including steep terrain, these are taken into consideration in plans and operation. In Bunga Tanjung Estate, soil map is available dated 17 November 2016, with scale 1:50,000. Based on soil map, the predominant soil map in Bunga Tanjung Estate comprise of <i>Dystrudepts Hapludults</i> with material sediment (mineral) and <i>Dystrudepts Haplohumults</i> with material Alluvium (mineral). The landscape rolling to undulating. From the information, there is no fragile soil. Bunga Tanjung Estate demonstrates topographic map, indicating the area varies between 0-5° up to 15-25°. Area with slope ≥ 25° sets aside as HCV area.  Air Buluh Estate demonstrates soil type consist of: <i>Dystropepts, Tropodults, Humitropepts</i> (mineral). Slope class for Air Buluh Estate: 2-12° estimated 230 Ha; 6-20° estimated 1,742 Ha; 12-25° estimated 343 Ha; 20- 25° estimated 219 Ha. The limitation slope ≥25°. No peat soils in Air Buluh Estate.  Malin Deman Estate demonstrates soil type consist of Berlian Jaya Series (1,382 Ha) and Mukomuko Series (481 Ha).  KMD Mundam Marap have soil map with scale 1:4,000, indicating the whole oil palm plantation fall under <i>Hapludults Dystrudepts</i> , with material alluvium. The landscape relief is undulating (mineral). The topographic map in KMD Mundam Marap indicates the slope between 0-5° up to 20-25°.	Complied

		<p>Plasma Air Buluh have soil map scale 1:35,000. The soil type consists of Berlian Jaya series (125 Ha), Mukomuko series (73 Ha), Kaladan/Tolan series (72 Ha) and Binti series (31 Ha).</p> <p>Plasma Air Merah have soil map scale 1:35,000. The soil type consists of Berlian Jaya series (482 Ha) and Mukomuko series (198 Ha).</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Soil map of Sungai Teramang Estate scale 1:32,000, issued date 26 June 2019 is available in place. Soil characteristic of Sungai Teramang Estate is Hapludults and Dystrudepts or mineral soil.</p>	
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.	<p>Certificate Holder consistently implement that replanting are not conducted on steep terrain or fragile soil.</p> <p>No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Soil map of Sungai Teramang Estate scale 1:32,000, issued date 26 June 2019 is available in place. Soil characteristic of Sungai Teramang Estate is Hapludults and Dystrudepts or mineral soil.</p>	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>Holder consistently implement that replanting are not conducted on steep terrain or fragile soil.</p> <p>No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Since Sungai Teramang Estate (PT. MMAS) took over by SIPEF on August 2018, soil surveys were not conducted yet. However, soil type has been determined and part of HCV Report Final 31 October 2020. The soil type was determined based on remote sensing 2017 and conducted by "Seminar Nasional Penginderaan Jauh Badan Meteorologi Klimatologi dan Geofisika". Soil type within Sungai Teramang managed area are:</p>	Complied

		<ul style="list-style-type: none"> <li>- Tropaquepts, Tropofluents, Eutropepts (262.49 Ha)</li> <li>- Tropudults, Dystropepts, Eutropepts (1,487.63 Ha)</li> </ul>	
<b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	<p>Based on soil map dated 17 November 2016, scale 1:50,000, there is no peat soil are presence within the scope of Bunga Tanjung POM's supply bases.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Since Sungai Teramang Estate (PT. MMAS) took over by SIPEF on August 2018, soil surveys were not conducted yet. However, soil type has been determined and part of HCV Report Final 31 October 2020. The soil type was determined based on remote sensing 2017 and conducted by "Seminar Nasional Penginderaan Jauh Badan Meteorologi Klimatologi dan Geofisika". Soil type within Sungai Teramang managed area are:</p> <ul style="list-style-type: none"> <li>- Tropaquepts, Tropofluents, Eutropepts (262.49 Ha)</li> <li>- Tropudults, Dystropepts, Eutropepts (1,487.63 Ha)</li> </ul>	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	<p>Based on soil map dated 17 November 2016, scale 1:50,000, there is no peat soil are presence within the scope of Bunga Tanjung POM's supply bases.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Since Sungai Teramang Estate (PT. MMAS) took over by SIPEF on August 2018, soil surveys were not conducted yet. However, soil type has been determined and part of HCV Report Final 31 October 2020. The soil type was determined based on remote sensing 2017 and conducted by "Seminar Nasional Penginderaan Jauh Badan Meteorologi Klimatologi dan Geofisika". Soil type within Sungai Teramang managed area are:</p> <ul style="list-style-type: none"> <li>- Tropaquepts, Tropofluents, Eutropepts (262.49 Ha)</li> <li>- Tropudults, Dystropepts, Eutropepts (1,487.63 Ha)</li> </ul>	Complied
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	Based on soil map dated 17 November 2016, scale 1:50,000, there is no peat soil are presence within the scope of Bunga Tanjung POM's supply bases.	Complied

7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program.	<b>Extension Scope Sungai Teramang Estate</b>	Complied
7.7.5	<b>(C)</b> Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.	Since Sungai Teramang Estate (PT. MMAS) took over by SIPEF on August 2018, soil surveys were not conducted yet. However, soil type has been determined and part of HCV Report Final 31 October 2020. The soil type was determined based on remote sensing 2017 and conducted by "Seminar Nasional Penginderaan Jauh Badan Meteorologi Klimatologi dan Geofisika". Soil type within Sungai Teramang managed area are: <ul style="list-style-type: none"> <li>- Tropaquepts, Tropofluents, Eutropepts (262.49 Ha)</li> <li>- Tropudults, Dystropepts, Eutropepts (1,487.63 Ha)</li> </ul>	Complied
7.7.6	<b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	During onsite visit at sample of Estate, no peat area was discovered. <b>Extension Scope Sungai Teramang Estate</b> Since Sungai Teramang Estate (PT. MMAS) took over by SIPEF on August 2018, soil surveys were not conducted yet. However, soil type has been determined and part of HCV Report Final 31 October 2020. The soil type was determined based on remote sensing 2017 and conducted by "Seminar Nasional Penginderaan Jauh Badan Meteorologi Klimatologi dan Geofisika". Soil type within Sungai Teramang managed area are: <ul style="list-style-type: none"> <li>- Tropaquepts, Tropofluents, Eutropepts (262.49 Ha)</li> <li>- Tropudults, Dystropepts, Eutropepts (1,487.63 Ha)</li> </ul>	Complied
7.7.7	<b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in		Complied

	Peatlands' (the latest version) along with relevant audit guidelines.		
<b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>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>The Company has prepared water management plan, for example in Bunga Tanjung Estate, water management plan available under "Program Pengelolaan Air" issued on 4 Jan 2019. The program consist of reporting of deep water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area. The Estate management monitor the progress monthly. The Estate has provide access to clean water for the communities. The Estate has eliminate potential pollution to the water course by conduct mixing of pesticide in the mixing area only.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>Water management programme 2022 consist of:</p> <ul style="list-style-type: none"> <li>- Underground of water quality analysis and surface water quality</li> <li>- Construction water pit in roadside</li> <li>- Water conservation pit in slope area/terrace contour</li> <li>- Mixing pesticide only located at mixing area</li> <li>- Water tank cleaning</li> <li>- Maintaining vetiver grass</li> </ul> <p>Water analysis conducted by accredited laboratory UPTD Laboratorium Lingkungan Dinas Lingkungan Hidup Kota Padang.</p> <ul style="list-style-type: none"> <li>- Clean Water Analysis for Housing complex result: No. 1468/LHU/UPTD-Lab/DLH/2021, dated 18 November 2021.</li> <li>- Surface water analysis of Teramang Kecil River, result: No. 1469/LHU/UPTD-Lab/DLH/2021, dated 18 November 2021.</li> </ul>	Complied
	7.8.1b Workers have adequate access to clean water.	The Estate has provide access to clean water for the workers by providing deep water. Domestic water usage are reported to the RMO monthly. Based on report of deep water	

		<p>usage in Bunga Tanjung Estate period Oct 2019, total usage of domestic water are as follow:</p> <ol style="list-style-type: none"> <li>1. Division F1 (EM House): 613 m<sup>3</sup>.</li> <li>2. Division F1 (Labour House): 912 m<sup>3</sup>.</li> <li>3. Division F5 (Labour House): 665 m<sup>3</sup>.</li> <li>4. Division F3 (Labour House): 645 m<sup>3</sup>.</li> <li>5. Division F4 (Labour House): 610 m<sup>3</sup>.</li> <li>6. Total 3,445 m<sup>3</sup>.</li> </ol> <p>Deep water analysis was conducted annually, as reported in "Laporan Hasil Uji" No.443.5/636b/Labkes.III dated 27 Dec 2018, issued by UPTD Laboratorium Kesehatan Daerah, Dinas Kesehatan Provinsi Bengkulu". Parameter checked consist of smell, taste, colour, DHL, TSS, temperature, Fe, F, Cu, Mn, NO<sub>3</sub>, NO<sub>2</sub>, pH, Al, SO<sub>4</sub>, BOD, COD, NH<sub>3</sub>, Cr, Zn and PO<sub>4</sub>. It was verified sample code 05.A/20.12.2018/AS/K and 05.B/20.12.2018/AS/K.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>According to interview with sample workers of Sungai Teramang Estate, workers have adequate access to clean water due to company provide clean water tank.</p>	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>Verification during onsite visit, all water course are well managed by the Certificate Holder.</p> <p><b>Extension Scope Sungai Teramang Estate</b></p> <p>According to Land Use Change Analysis Review Report – PT Muko Muko Agro Sejahtera-Sungai Teramang Estate version 2 February 2022, result of LUC Analysis methodology review is PASS.</p> <p>Based on LUCA report submitted on 30 September 2021, there is zero (0) liability but environmental remediation is available 76.3 Ha in form of riparian buffer.</p> <p>Remediation plan for this area was submitted to RSPO on 17 March 2022 and endorsed by RSPO on 13 June 2022, where the environmental remediation plan is available in</p>	Complied

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		<p>document "Rencana Mitigasi dan Restorasi Zona Riparian PT MMAS – Sungai Teramang Estate". The recommendation plan consisting:</p> <ul style="list-style-type: none"> <li>a. Publicize to local communities against HCV boundary and its function within the managed area. – 23 Feb 2022 to villagers that have land surrounding the managed area (Block 19A03), attended by 4 villagers;</li> <li>b. Collaborative partnership with stakeholders related program of protection and preservation riparian zone.</li> <li>c. Publicize and assistance of HCV borders to third party contractor during land preparation of replanting program. 7 Dec 2021 to Land Clearing contractor CV. Wijaya Wikrama Wardana (attended by 7 persons).</li> <li>d. Signboard installation related disallowing of pesticide application surrounding riparian area. – 14 Jan 2022 spraying workers at Block 20B03 (8 spraying workers)</li> <li>e. Implementation of Best Management Practice to preserved riparian water quality.</li> <li>f. Implementation of soil and water conservation, in regard to soil erosion control, like: terracing, planting of legume cover crops, water drainage.</li> <li>g. Enrichment planting with woody plants in riparian zone. – 25 March 2022, location Block 20B02, species of woody plants are: Durian, Kayu Pahit, Mahoni, Resak totally 120 stems.</li> <li>h. Preserve and conserve HCV area through maintaining HCV boundary and security patrol. – security patrol: 7 Mar 2022 patrol riparian area of Teramang Kecil river at Block 20B02.</li> </ul>	
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>Bunga Tanjung POM has monitored the mill effluent to be in compliance with national regulation as per document "Laporan Hasil Analisa Limbah Cair PT Agromuko – Bunga Tanjung POM year 2020.</p> <p>Measurement of mill effluent quality conducted by accredited environmental testing and laboratory PT Mutu Agung Lestari (registered number: LP-001-IDN). The national</p>	Complied

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regulation as reference is Decree Letter from Governor of Bengkulu Province No 92 / 2001 Attachment #1 regarding Quality Standard of Palm Oil Mill Effluent.

The result of monitoring in 2021 are as follows:

Month/Year	BOD (mg/L)	COD (mg/L)	TSS (mg/L)	N Total (mg/L)	pH
Jan 2021	45	87	6.7	3.43	7.78
Feb 2021	62	98	7.6	3.45	6,96
Mar 2021	94	70.9	7.8	4.34	7.19
Apr 2021	89	9.92	8.9	3.23	7.45
May 2021	95	239	23.5	3.65	7.34
Jun 2021	67	181	11	3.45	7.56
Jul 2021	89	148	23	3.23	6.21
Aug 2021	42	174	12	4.12	6.34

Based on the result of monitoring above, all of the parameters are compliance with national regulation.

Bunga Tanjung POM has shown the permit to dispose the water effluent as per "Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko, Nomor: 503/01/D.10/IPAL/I/2019 tentang Pemberian Perpanjangan Izin Pembuangan Air Limbah ke Sungai Kepada PT Agromuko Pabrik Pengolahan Minyak Kelapa Sawit Bunga Tanjung POM", dated 16<sup>th</sup> January valid until 5 years.

**Extension to scope Sungai Teramang Estate:**

The result of monitoring in 2022 are as follows (location in Bunga Tanjung POM):

Month/Year	BOD (mg/L)	COD (mg/L)	TSS (mg/L)	N Total (mg/L)	pH
Nov 2021	49.2	194	85	11.69	7.5

		Dec 2021	51.8	197	88	13.8	7.58																									
		Jan 2022	45	87	6.7	3.43	7.78																									
		Feb 2022	62	98	7.6	3.45	6,96																									
		Mar 2022	94	70.9	7.8	4.34	7.19																									
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>PT Agromuko – Bunga Tanjung POM has shown document of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2021 as per document “Laporan Pemakaian Air Pabrik per MT FFB Tahun 2021”, such as:</p> <table border="1"> <thead> <tr> <th>Months</th> <th>Water use per FFB (m<sup>3</sup>/ton FFB)</th> </tr> </thead> <tbody> <tr><td>January</td><td>0.91</td></tr> <tr><td>February</td><td>0.88</td></tr> <tr><td>March</td><td>0.98</td></tr> <tr><td>April</td><td>0.72</td></tr> <tr><td>May</td><td>0.70</td></tr> <tr><td>June</td><td>0.79</td></tr> <tr><td>July</td><td>0.82</td></tr> <tr><td>August</td><td>0.88</td></tr> <tr><td>September</td><td>0.91</td></tr> <tr><td>October</td><td>0.95</td></tr> <tr><td><b>Total</b></td><td><b>0.89</b></td></tr> </tbody> </table> <p>Bunga Tanung POM has shown the permit of water usage as per “Surat Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nmor 518/KPTS/M/2018 tentang Pemberian Perpanjangan Izin Pengusahaan Sumber Daya Air kepada Perseroan</p>						Months	Water use per FFB (m <sup>3</sup> /ton FFB)	January	0.91	February	0.88	March	0.98	April	0.72	May	0.70	June	0.79	July	0.82	August	0.88	September	0.91	October	0.95	<b>Total</b>	<b>0.89</b>	Complied
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		<p>Terbatas Agro Muko untuk semua Usaha Industri di Sungai Bantal, Kabupaten Mukomuko, dated 3<sup>rd</sup> August 2018 – valid until 5 years.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>“Laporan Pemakaian Air Pabrik per MT FFB Tahun 2022”, such as:</p> <table border="1" data-bbox="965 517 1664 762"> <thead> <tr> <th>Months</th> <th>Water use per FFB (m<sup>3</sup>/ton FFB)</th> </tr> </thead> <tbody> <tr> <td>November 2021</td> <td>0.78</td> </tr> <tr> <td>December 2021</td> <td>0.84</td> </tr> <tr> <td>January 2022</td> <td>0.83</td> </tr> <tr> <td>February 2022</td> <td>0.80</td> </tr> </tbody> </table>	Months	Water use per FFB (m <sup>3</sup> /ton FFB)	November 2021	0.78	December 2021	0.84	January 2022	0.83	February 2022	0.80									
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<p><b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																					
<p>7.9.1</p>	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented</p>	<p>Certificate holder has demonstrated the record on improving efficiency of the use of fossil fuels and to optimize renewable energy, e.g:</p> <p>HSD Oil usage per metric ton FFB in Bunga Tanjung POM 2021:</p> <table border="1" data-bbox="965 938 1507 1383"> <thead> <tr> <th>Month</th> <th>HSD Oil (ltr/ ton FFB)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>6.04</td> </tr> <tr> <td>February</td> <td>8.91</td> </tr> <tr> <td>March</td> <td>6.43</td> </tr> <tr> <td>April</td> <td>5.96</td> </tr> <tr> <td>May</td> <td>5.97</td> </tr> <tr> <td>June</td> <td>9.17</td> </tr> <tr> <td>July</td> <td>5.65</td> </tr> <tr> <td>August</td> <td>6.19</td> </tr> </tbody> </table>	Month	HSD Oil (ltr/ ton FFB)	January	6.04	February	8.91	March	6.43	April	5.96	May	5.97	June	9.17	July	5.65	August	6.19	<p>Complied</p>
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**Criteria 7.10:** Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p><b>(C)</b> GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>The unit of certification has procedure of Calculation and Mitigation of Green House Gas, whereby provide guidance to register source of emissions as a result of company operation, monitor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K<sub>2</sub>O), Rock Phosphate (P<sub>2</sub>O<sub>5</sub>), use of pesticide and use HSD fuel.</p> <p>Handling emission from steam boiler in Bunga Tanjung POM No.AMPOM-WI/PROD/009E, consist of guideline for minimizing soot pollution/particulate: ensure fibre and shell feed; minimize shell to prevent black smoke; setting air damper for ignition, avoid excess air; dumping grate on regular basis, to minimize unburn fuel; shoot blowing every 4 hours to clean heat exchanger pipes; ensure dust collector operating in good manner; monitor boiler exhaust emission through smoke density meter; monitor boiler emission every 6 months by independent laboratory; record any problem.</p> <p>Handling emission from engine generator No.AMPOM-WI/PROD/010D, consist of guideline for minimizing emission: ensure the generator operating at permitted load (80% from design); replace air filter element (every 1,250 hours), replace fuel filter (every 500 hours), replace oil filter (250 hours) – on regular basis; replace engine lubricant every 250 hours; should black smoke sighted – check engine load; should the black smoke sighted – check injection pump; monitor engine emission every 6 months by independent laboratory.</p> <p>GHG mitigation plan identified under “Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission)”:</p> <table border="1" data-bbox="958 1145 1966 1375"> <thead> <tr> <th>Stages/Activity type</th> <th>Mitigation Plan</th> <th>Implementation</th> </tr> </thead> <tbody> <tr> <td colspan="3">Preparation</td> </tr> <tr> <td rowspan="2">Land clearing/tree felling</td> <td>Zero burning</td> <td rowspan="2">- Memorandum from Director of Estate</td> </tr> <tr> <td>Planting trees to absorb emission</td> </tr> </tbody> </table>	Stages/Activity type	Mitigation Plan	Implementation	Preparation			Land clearing/tree felling	Zero burning	- Memorandum from Director of Estate	Planting trees to absorb emission	Complied
Stages/Activity type	Mitigation Plan	Implementation											
Preparation													
Land clearing/tree felling	Zero burning	- Memorandum from Director of Estate											
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			Identification of HCV and restore HCV area Implement oil palm best management practice River riparian/buffer zone management Planting trees in river riparian/buffer zone and critical area Socialization to all level of worker on GHG mitigation plan during land clearing	Department on zero burning - Restoration (tree planting) record - HCV map - Topographic map - HCV assessment - Land clearing SOP	
		Use of vehicle and heavy machinery	Maintenance the vehicle/ heavy machinery Vehicle emission test on regular basis Transportation arrangement (effective and efficient) Socialization to all level of worker on GHG mitigation plan related to use of fossil fuel	- Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl. fuel efficiency)	
		Planting on peat	Not recommended If needed, implement best management practices Manages the river riparian/buffer zone	- To manages the peat area as per regulation such as controlling the water level;	

			Planting trees in river riparian/buffer zone	- Avoid peat with depth >3 meters		
			Socialization to all level of worker on GHG mitigation plan related to land clearing on peat	- Restore river riparian/buffer zone as conservation/HCV - HCV map		
		Fertilizer application	Effective fertilizer application as per recommendation	- Leaf sampling analysis for accurate fertilizer recommendation - Implement SOP fertilizer application		
			No fertilizer application in rainy season			
			No fertilizer application on river buffer zone/riparian area			
			Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application			
		Upkeep and harvesting				
		Use of fossil fuel for transportation (FFB, fertilizer, manpower)	Maintenance the vehicle on regular basis	- Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl. fuel efficiency)		
			Planting trees			
			Transportation arrangement (effective and efficient)			
			Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel			

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		Fertilizer and pesticide application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> <li>- Leaf sampling analysis for accurate fertilizer recommendation</li> <li>- Implement SOP fertilizer application</li> <li>- Utilize recommended pesticide</li> </ul>
			No fertilizer and pesticide application in rainy season	
			No fertilizer and pesticide application on river buffer zone/riparian area	
			Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer and pesticide application	
		Housing		
Use of fossil fuel for electric generation		Maintenance the machinery (genset) on regular basis	<ul style="list-style-type: none"> <li>- Vehicle maintenance record</li> <li>- Planting record</li> <li>- Evaluation on Genset's fuel efficiency</li> </ul>	
		Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency		
		Emission monitoring on regular basis		
Waste decomposition in landfill		Waste collection to landfill	Landfill in each estate	
FFB processing in palm oil mill				

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		Waste management	Using methane capture and utilize the biogas Utilize EFB as boiler fuel	- Methane capture and biogas plant in POM - Install EFB shredder in POM	
		Use of fossil fuel for transportation (FFB, CPO, PK, EFB)	Maintenance the vehicle on regular basis Socialization to all level of worker on GHG mitigation plan related to electricity efficiency	- Vehicle maintenance record - Evaluation on electricity efficiency	
		Operation of POM's machinery including boiler	Maintenance the POM's machinery on regular basis Socialization to all level of worker on GHG mitigation plan related to emission Emission monitoring on regular basis	- Machinery maintenance record - Evaluation on boiler's efficiency - Emission monitoring report	
<p>Company have prepared the PalmGHG calculator, based on database period July 2019 to June 2020.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>GHG mitigation plan identified under "Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission) – Sungai Teramang Estate year 2022".</p> <p>Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K<sub>2</sub>O), Rock Phosphate (P<sub>2</sub>O<sub>5</sub>), use of pesticide, use HSD fuel, planted area, mature oil palm, FFB production, distance estate to POM.</p> <p>Fertilizer input in Sungai Teramang Estate are documented in Program &amp; Realisasi, e.g. Block 19A01 in 1<sup>st</sup> Semester 2022 get 4,677 kg (1.5 kg/palm) of Compound 19:9:19;</p>					

		<p>Block 20B01 get 2,484 kg (0.5 kg/palm) of MOP; Block 21C01 get 2,882 kg (0.8 kg/palm) of Compound 19:9:19.</p> <p>Record of pesticides use in Sungai Teramang Estate;</p> <table border="1" data-bbox="965 475 1738 724"> <thead> <tr> <th>Pesticides</th> <th>UoM</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Supremo (Amonium glufosinate)</td> <td>liter</td> <td>-</td> <td>220.00</td> </tr> <tr> <td>Smart (Amonium glufosinate)</td> <td>liter</td> <td>940.00</td> <td>-</td> </tr> <tr> <td>Basta (Amonium glufosinante)</td> <td>iter</td> <td>260.00</td> <td>-</td> </tr> <tr> <td>Metsulindo (Metil metsulfuron)</td> <td>Kg</td> <td>28.25</td> <td>7.25</td> </tr> </tbody> </table>	Pesticides	UoM	2021	2022	Supremo (Amonium glufosinate)	liter	-	220.00	Smart (Amonium glufosinate)	liter	940.00	-	Basta (Amonium glufosinante)	iter	260.00	-	Metsulindo (Metil metsulfuron)	Kg	28.25	7.25	
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7.10.2	<p><b>(C)</b> Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>Bunga Tanjung Estate:            There is no new development of after 2014 in Bunga Tanjung Estate.            In PT. Mukomuko Agro Sejahtera, From the "Hectare Statement", recording the land preparation and planting realization, no planting on primary forest and/or peat area for PT. Mukomuko Agro Sejahtera – Air Manjuntio Estate. HCV area and the vegetation are maintained.            PT. Agro Muko has provide complete information on planting plan for <i>Kebun Masyarakat Desa/KMD</i> – including avoiding area with high carbon stock for development. Based on interview with KMD committees and document review upon "Planting Approval" document, KMD have agreed on the approach. Based on soil survey, no peat soil identified in the smallholder land.            From the HCV report, carbon stock assessment stated area that contain high carbon stock was sets aside. No supply base to Bunga Tanjung POM categorized as HCS area.            KMD Pasar Bantal:            The smallholder planted oil palm in 2001/2002.            KMD Nelan Indah:</p>	Complied																				

		<p>The smallholder planted oil palm in 2014. The HCV have been checked internally by PT. Agro Muko. The assessment stated in the proposed area was ex-oil palm plantation, but due to bad crop, being replanted using seedling from company.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>In Sungai Teramang Estate, From the "Hectare Statement", recording the land preparation and planting realization, no planting on primary forest and/or peat area for PT. Mukomuko Agro Sejahtera – Sungai Teramang Estate. HCV area and the vegetation are maintained.</p>	
7.10.3	<p><b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p>	<p>The unit of certification has prepared strategy to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality and noise level. Plans to reduce or minimize them are implemented and monitored. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>Sungai Teramang Estate has demonstrated the document of significant pollutant identification results and plans to reduce or minimize them are implemented and monitored.</p> <p>The monitoring result is incorporated in RKL/RPL period July – December 2021 (environmental management and monitoring plan) and reported regularly to the government to Lingkungan Hidup Kabupaten Mukomuko, electrical ID: 1631159459-2961 dated 29 March 2022.</p>	Complied
<p><b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.</p>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p>	<p>No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.</p>	Not applicable

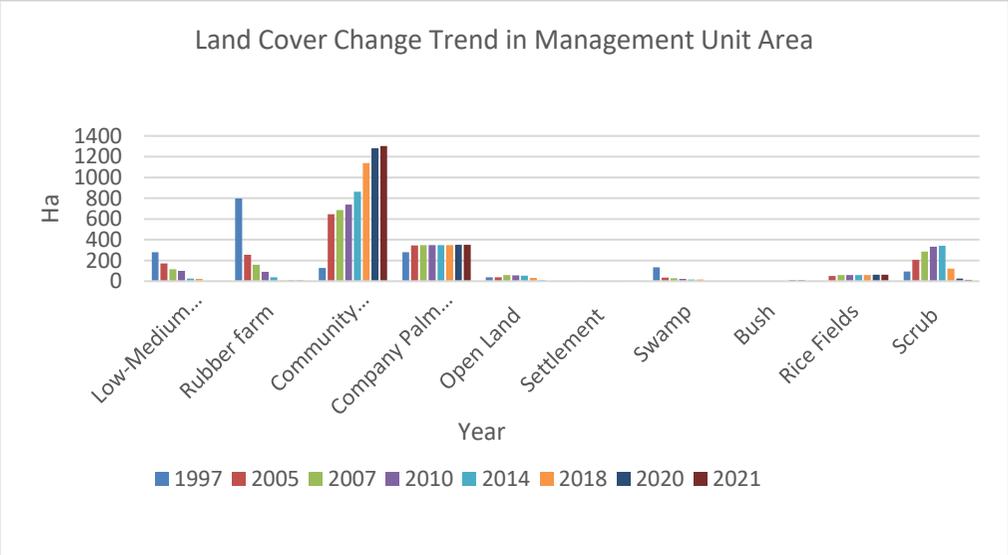
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7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<b>Extension to scope Sungai Teramang Estate:</b> PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not obtained the occupied area from the communities.	Not applicable
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	NPP verification for Sungai Teramang Estate was conducted in 2021 and there is no comments from any stakeholders. Since SIPEF Group acquired the land, there is no new plantings/new development or extension new land of Sungai Teramang Estate since 15 November 2018. They only conduct replanting for agronomy reason to replace unproductive palm.  During field observation in Sungai Teramang Estate Blok A02, land fire is not proven. Fire monitoring tower and land fire monitoring scale is available in the Estate.	Not applicable
<b>Criteria 7.12:</b> 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.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.  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).	The HCV assessment carried out in 2010 by “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified.  There is no land clearing after November 2005 that is not preceded with review against the HCV Assessment.  <b>Extension to scope Sungai Teramang Estate:</b> The HCV assessment at PT MMAS Sungai Teramang Estate was carried out by an independent consultant from PT Perencana Karya Hijau, April 2018 - July 2019, and received satisfactory status from HCVRN was in January 2021.  On a landscape scale, the area around PT MMAS Sungai Teramang Estate was a transmigration development program area in the former concession area for forest	Complied

		<p>management rights (HPH) in the 1969-2009 period. Rubber plants developed around 1980 from the community rubber program. The results of the cultivation of rubber have begun to be felt, so the community has started to penetrate forest areas - especially areas close to villages that were logged by companies with HPH. Commodities planted by the community are generally the same as those cultivated by neighbouring companies in terms of market access. Around 1983, the government developed the Transmigration Core People's Plantation (PIR) program with rubber plants. Around the 2000s, with the presence of several oil palm plantation companies and their plasma programs, providing lessons on oil palm cultivation, triggered the rapid development of community oil palm cultivation, and some communities also converted their rubber plantations into oil palm plantations independently.</p> <p>The former PT Asirimba (PT MMAS) HGU area was part of the forest concession area of the family company that owns PT Asirimba. In the early 1990s, it was converted to patchouli, then cocoa, and in 1994, it switched to oil palm plantations until obtaining a permit. The results of the analysis of land cover in the HGU permit area cover an area of 1,750.12 ha, from satellite imagery data starting in 1997 (when PT AW received the HGU permit) with plantation development and oil palm planting. The acquisition of PT AW by PT MMAS management occurred in 2018, so that the management of the HGU area in the 1997-2018 period was under the former management of PT Asirimba Wirabhakti (AW). The area actually controlled and managed by PT AW was only ± 364.88 ha<sup>1</sup>, while the rest was under the control and management of the local community.</p> <p>In 2005, the community's oil palm began to dominate around 644.75 ha or 36.8% (up 29.5%) and Company plantations around 345.66 ha or 19.8% (up 3.8%). Many of the community rubber gardens had been converted to only around 255.89 ha or 14.6% (down 30.9%), as well as forest with moderate density only 172.50 ha or 9.9% (down 6.0%). Conversion to oil palm plantations appears to have continued with the increase in scrub by around 204.15 ha or 11.7% (up 6.3%). Information from internal and external sources from surrounding villages states that PT AW was only able to carry</p>	
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<sup>1</sup> at the time of the HCV and LUCA assessment, this area had changed to 354.48 ha. there are several areas of oil palm released by PT MMAS to the community.

		<p>out limited GRTT to the location it had planted, then there was neglect of the community planting in its HGU permit. Public interest in planting oil palm increased dramatically after the presence of several oil palm plantation companies in the Mukomuko district.</p> <p>In 2007, the community oil palm still increased around 687.05 ha or 39.26% (up 5.4%) and company plantations increased to around 348.85 ha or 19.9% (up 0.1%). Conversion of community rubber still continued to 160.15 ha or 9.1% (down 5.47%), forest area also decreased to 114.10 Ha or 6.52 % (down 0.78%). Conversion to oil palm plantations appears to have continued with the increase in the scrub around 285.76 ha or 16.33% (up 4.67%).</p> <p>In 2010, the community oil palm dominated around 738.96 ha or 42.2% (up 2.96%) and company plantations stayed at 348.85 ha or 19.9% until 2018. Conversion of community rubber plantations has continued until only around 89.5 ha or 5.1% (down 4.04%), meanwhile the forest area also decreased to 100.43 ha or 5.7% (down 4.2%). Conversion to oil palm plantations appears to have continued with the increase in the scrub around 330.99 ha or 18.9% (up 2.58%).</p> <p>In 2014, dominated by community oil palm, it increased to around 857.99 ha or 49.0% and company plantations remained around 348.85 ha or 19.9%. Conversion of community rubber plantations continued until they were around 39.14 ha or 2.2%.</p> <p>In 2018, when it was taken over by the SIPEF group, dominated by community oil palm plants, it increased significantly to around 1,128.84 ha or 64.5% and Company plantations remained around 348.85 ha or 19.9%. Conversion of community rubber plantations was still ongoing until only around 9.97 ha or 0.5% (down 1.9%), as well as moderate density forest remaining 12.79 ha or 0.7%. Conversion to oil palm plantations appears to have continued in line with the decline in previously unplanted bush to 155.50 ha or 6.6%. This area, especially the remaining forest, is very small and fragmented so it tends to be lost. Since obtaining the HGU permit, PT Asririmba Wirabhakti was only able to plant around 348.85 ha or 19.9%, while the community planted up to 1,128.84 ha or 64.5% in the HGU area, and it is still ongoing.</p>	
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		<p>In 2021, community oil palm plants, it increased significantly to around 1,289.77 ha or 73.7%. The total area of rubber farm (7.35 ha or 0.42%), settlement (3.85 ha or 0.22%), scrub (20.73 ha or 1.18%), and bush (8,70 ha or 0.5%) declined this period. while the total area of rice fields (61.89 ha or 3.54%) has increased this period.</p>  <p>Graph of land cover change trends in 1997, 2005, 2010, 2014, 2018 and 2021 in the HGU permit area of PT MMAS STGE.</p>	
<p>7.12.2</p>	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows: 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>The HCV assessment carried out in 2010 by “Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)” using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified. The assessment team comprise of Ir. Purwo Susanto (lead assessor – RSPO approved HCV assessor); Dr. Kunkun Jaka Gurmaya (biodiversity – RSPO approved HCV assessor); Neny Indrayana Shut. MT (ecology – RSPO approved HCV assessor); Ir. Hery Prasetyo (social impact); M.</p>	<p>Complied</p>

		<p>Setyawan N (GIS); Amirul Ikhsan (GIS); Asep Ridwan Anaribowo (biodiversity); Abdillah Luhur Nuratmaja Ssi (biodiversity); Arief Wahyu Candra Susilo, Ssos. (social-cultural); Sofyan Ansori (anthropology).</p> <p>The HCV assessment report concluded that PT. Agro Muko has already set aside conservation areas of a total 2,304.9 Ha consisting of natural vegetation in between palm planting to provide habitat and corridors for wildlife.</p> <p>In addition, PT. Agro Muko conducted <i>penataan</i> HCV area by PT. Perencana Karya Hijau Konsultan, in 2018. The HCV Assessment team comprise of Sigit B Setyanto (Team Leader, ALS); Riswan (Remote sensing and environmental service, ALS provisional); Wibowo A Djatmiko (Conservation and biodiversity); Harry Kurniawan (GIS and mapping); Kodri Sitompul (Survey and GIS assistant).</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The HCV assessment at PT MMAS Sungai Teramang Estate was carried out by an independent consultant from PT Perencana Karya Hijau, April 2018 - July 2019, and received satisfactory status from HCVRN was in January 2021.</p> <p>Composition of the HCV assessment team at PT MMAS STGE are:</p> <table border="1" data-bbox="960 922 1964 1366"> <thead> <tr> <th>Name</th> <th>Position</th> <th>Expertise</th> <th>Experience</th> </tr> </thead> <tbody> <tr> <td>SIGIT BUDHI SETYANTO (ALS15024BS) Full Licence</td> <td>Team Leader (Expert HCV 5 &amp;6)</td> <td>Socio-cultural assessment of HCV, community empowerment, conflict mitigation, participatory mapping, FPIC, CSR, soil science, environment &amp; fertilisation.</td> <td>Assessment and verification work in Indonesia, Malaysia and Papua New Guinea. Language: Indonesia, English, Java, Madura and Malay</td> </tr> <tr> <td>RISWAN ZEN</td> <td>Member (HCV 4 &amp; GIS)</td> <td>GIS and Remote Sensing, and HCV Assessment for environmental services, participatory mapping and forest science</td> <td>Assessment and sustainability audit in Indonesia, Malaysia, Papua New Guinea and Africa. Language: Indonesia, English, Batak, and Malay</td> </tr> </tbody> </table>	Name	Position	Expertise	Experience	SIGIT BUDHI SETYANTO (ALS15024BS) Full Licence	Team Leader (Expert HCV 5 &6)	Socio-cultural assessment of HCV, community empowerment, conflict mitigation, participatory mapping, FPIC, CSR, soil science, environment & fertilisation.	Assessment and verification work in Indonesia, Malaysia and Papua New Guinea. Language: Indonesia, English, Java, Madura and Malay	RISWAN ZEN	Member (HCV 4 & GIS)	GIS and Remote Sensing, and HCV Assessment for environmental services, participatory mapping and forest science	Assessment and sustainability audit in Indonesia, Malaysia, Papua New Guinea and Africa. Language: Indonesia, English, Batak, and Malay	
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		<p>HARRY KURNIAWAN</p>	<p>Member (HCV 4 &amp; GIS)</p>	<p>GIS and Remote Sensing and HCV Assessment for environmental services, participatory mapping and forest science</p>	<p>Assessment and verification work in Indonesia Language: Indonesia, English, Batak, Java, and Malay</p>							
		<p>WIBOWO AGUNG DJATMIKO</p>	<p>Member (HCV 1,2, &amp; 3)</p>	<p>HCV Assessment for ecology, biodiversity, participatory mapping and forestry science</p>	<p>Assessment in Indonesia and Malaysia. Trainer for HCV 1,2 and 3. Language: Indonesia, English, Java and Sunda</p>							
		<p>IHSAN NUR HARAHAP</p>	<p>Member (HCV 1,2, &amp; 3)</p>	<p>Assistant HCV assessor for environmental ecology, biodiversity and forestry science and GIS</p>	<p>Assessment in Indonesia, Language: Indonesia, English, Batak and Malay</p>							
		<p>FADHLI</p>	<p>Member (HCV 5&amp;6)</p>	<p>Socio-cultural assessment of HCV, participatory mapping, FPIC, CSR, and forestry science</p>	<p>Assessment in Indonesia, Language: Indonesia, English, Minang and Malay</p>							
		<p>The HCS Assessment was conducted on period July – September 2020 by PT Koompasia Enviro Institute.</p>										
		<table border="1"> <thead> <tr> <th data-bbox="952 1069 1153 1117">Name</th> <th data-bbox="1153 1069 1467 1117">Role</th> <th data-bbox="1467 1069 1971 1117">Relevant expertise</th> </tr> </thead> <tbody> <tr> <td data-bbox="952 1117 1153 1251">Ryan Karida Pratama<sup>2</sup></td> <td data-bbox="1153 1117 1467 1251">Team Leader</td> <td data-bbox="1467 1117 1971 1251">Hidrologi, konservasi tanah dan air, perubahan tutupan lahan, <i>remote sensing</i>, GIS, <i>carbon stock assessment</i>, <i>HCS Patch Analysis (Registered Practitioner)</i></td> </tr> </tbody> </table>				Name	Role	Relevant expertise	Ryan Karida Pratama <sup>2</sup>	Team Leader	Hidrologi, konservasi tanah dan air, perubahan tutupan lahan, <i>remote sensing</i> , GIS, <i>carbon stock assessment</i> , <i>HCS Patch Analysis (Registered Practitioner)</i>	
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<sup>2</sup> <http://highcarbonstock.org/hcs-approach-quality-review-process/hcs-approach-registered-organisations/>

		Riswan Zen <sup>10</sup>	Eksositem, Jasa lingkungan, dan <i>HCS Patch Analysis</i>	Hidrologi, ekologi hutan, pengelolaan DAS, <i>remote sensing</i> , analisis spasial, <i>HCS Patch Analysis (Registered Practitioner)</i>		
		Heidei Putra Utama	Spatial analysis dan Pemetaan	Analisis spasial, <i>remote sensing</i> , <i>carbon stock assessment</i> , <i>HCS Patch Analysis</i>		
		Zakaria Al Anshori	Invetarisasi vegetasi dan identifikasi jenis tumbuhan	Identifikasi flora, ekologi hutan, <i>carbon stock assessment</i>		
		M. Ahda Agung Arifian	Invetarisasi vegetasi dan identifikasi jenis tumbuhan	Identifikasi flora, ekologi hutan, <i>carbon stock assessment</i>		
		Priyo Dwi Utomo	Invetarisasi vegetasi dan identifikasi jenis tumbuhan	Identifikasi flora, ekologi hutan, <i>carbon stock assessment</i>		
		Sigit Budhi Setyanto <sup>3</sup>	FPIC dan pemetaan partisipatif	Sosial ekonomi, dampak sosial, verifikasi FPIC, sosial budaya, pemetaan partisipatif		
		Fadhli	FPIC dan pemetaan partisipatif	Sosial ekonomi, dampak sosial, verifikasi FPIC, sosial budaya, pemetaan partisipatif		
		Wibowo Agung Djatmiko	Keanekaragaman hayati dan fauna	Identifikasi flora dan fauna, lanskap ekologi, konservasi satwa liar, pengelolaan ekosistem		
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p><b>Air Bikuk Estate:</b>            There is no new land clearing after 15 November 2018.</p> <p><b>Bunga Tanjung Estate:</b>            There is no new land clearing after 15 November 2018.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>            PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti</p>				

<sup>3</sup> Assesor License HCVRN (ALS15024BS)

		<p>has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not obtained the occupied area from the communities.</p> <p>NPP verification for Sungai Teramang Estate was conducted in 2021 and there is no comments from any stakeholders. Since SIPEF Group acquired the land, there is no new plantings/new development or extension new land of Sungai Teramang Estate since 15 November 2018. They only conduct replanting for agronomy reason to replace unproductive palm.</p>	
7.12.3	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>            Not Applicable in Indonesia</p>	Not applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT. Agro Muko – Bunga Tanjung POM and its supply base located in Bengkulu Province, Sumatera Island, Indonesia. Based on document “RSPO No Deforestation Consultancy: High Forest Cover Countries – Consultancy report on definitions and recommendations to the RSPO, June 2018” by Proforest;</p> <ul style="list-style-type: none"> <li>Indonesia fall into “High Remaining Forest, High Rate of Deforestation/HFHD”. Refer to “Section 4.6 Statistics on potential high forest cover countries” – Indonesia categorized to have 53% forest cover; 15% Intact Forest Landscape; 54.2% forest (national source); 5.4% Oil Palm Land Area; 0.7%/year deforestation rate (FAO); Increasing Deforestation Trend; 0.9%/year deforestation rate (national source); constant deforestation rate/trend.</li> </ul> <p>PT. Agro Muko’s NDPE policy:            General Information: New Development Area and Replanting No.OPM-03-00/02-10-2017, dated 20 November 2017. Stipulates “land clearing and replanting on peat land will be influenced by the type and depth of peat”.</p>	Complied

		<p>General Information: Survey and Mapping No.OPM-03-01/02-10-2017, dated 20 November 2017. Stipulates company views on peat: "Especially for extensive peat soil, the distribution, level of maturity and depth of peat must be explained"; company view on conservation area: "the presence or absence of national park, production forest and limited production forest. Whether or not there is riparian reserves and conservation area".</p> <p>SOP Planting Plant – Approval No.ESD-01-02/11-03-2019 dated 27 March 2019. The planting approval process will review information on planting material (incl. seed certificate), soil information (soil type, peat depth map, drainability assessment, water management plan, drainage and Watergate map), topographic and slope information, presence of conservation area, OHS requirement and fire risk.</p> <p>Based on HCV assessment document by YASBI, 2018 – there is no HCV area located on local community’s land, and/or local communities with legal or customary rights. Company demonstrated recognition of legal and customary lands based on participatory land use planning by preparing scheme smallholder plantation on clean-and-clear land. The local community proposed their plantation to become oil palm plantation (replanting).</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>The HCV assessment at PT MMAS Sungai Teramang Estate was carried out by an independent consultant from PT Perencana Karya Hijau, April 2018 - July 2019, and received satisfactory status from HCVRN was in January 2021.</p> <p>Based on the results of the HCV assessment in the PT MMAS STGE area, three types of HCV were found, namely HCV 1, HCV 4, and HCV 5. A summary of findings is presented below:</p> <ul style="list-style-type: none"> <li>- HCV1: Populations of multiple endemic or RTE (rare, threatened or endangered) species. There are still sun bears (<i>Helarctos malayanus</i>), Southern pig-tailed macaque (<i>Macaca nemestrina</i>) and bearded wild boar (<i>Sus barbatus</i>), black-crested Sumatran langur (<i>Presbytis melalophos</i>).</li> <li>- HCV4: PT MMAS is a part of the landscape which is an area that functions as a basic ecosystem service as a water provider and flood control for the community</li> </ul>	
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		<p>including protection of water catchments, control of soil erosion and vulnerable slopes. Riparian which identified are: Gajah Mati River, Teramang Kecil River, Terentang River and Teramang Jaya swamp, including its border.</p> <ul style="list-style-type: none"> <li>- HCV5: In Sungai Teramang Estate area there are sites and resources that are fundamental to meeting the basic needs of local communities or indigenous peoples (for example as sources of livelihood, protein and water). Identification is carried out through engagement with communities. Water sources necessary for drinking water and sanitation, family drinking water is generally obtained from wells (dug / drilled) and bottled water, each house has a bathroom for bathing, washing and toilet purposes. However, there are still some residents who use river water for washing purposes.</li> </ul>	
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>No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.</p> <p><b>Extension to scope Sungai Teramang Estate:</b></p> <p>PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not obtained the occupied area from the communities.</p> <p>NPP verification for Sungai Teramang Estate was conducted in 2021 and there is no comments from any stakeholders. Since SIPEF Group acquired the land, there is no new plantings/new development or extension new land of Sungai Teramang Estate since 15 November 2018. They only conduct replanting for agronomy reason to replace unproductive palm.</p> <p>The HCV assessment at PT MMAS Sungai Teramang Estate was carried out by an independent consultant from PT Perencana Karya Hijau, April 2018 - July 2019, and received satisfactory status from HCVRN was in January 2021. Based on the results of</p>	Complied

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		<p>the HCV assessment in the PT MMAS STGE area, three types of HCV were found, namely HCV 1, HCV 4, and HCV 5.</p> <p>Rights of local communities have been identified in HCV areas is access to river, but not to obtaining protein. Some residents who use river water for washing purposes.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p>HCV assessment conducted in 2008. PT. Agro Muko prepared HCV management plan: "Program Kegiatan Bunga Tanjung Estate 2020"</p> <ul style="list-style-type: none"> <li>• Patrol/controlling conservation area – every month;</li> <li>• Camera trap install – every month;</li> <li>• Propagating tree seedling (for restoration) – on February, May, August, November 2020;</li> <li>• Nurture tree seedling (for restoration) – every month, by ranger;</li> <li>• Planting tree seedling (for restoration) – on February, May, August, November 2020, by ranger;</li> <li>• Maintain and listing/inventory the tree in restoration – every end of month, by ranger;</li> <li>• Inventory the signboard of conservation area – every month, by ranger, report into monitoring form;</li> <li>• Controlling Mucuna and invasive species – every other month, by ranger, report into monitoring form;</li> <li>• Monitoring RTE flora and fauna – every month, by ranger, report into monitoring form;</li> <li>• Prepare/replace new signboard – on April &amp; September 2020;</li> <li>• Socialization of conservation area to worker – on February and July 2020, by ranger;</li> <li>• Socialization of conservation area to stakeholder/surrounding community – on March, June and October 2020, by ranger;</li> <li>• Management meeting with ENC team on every month</li> </ul>	Complied

		<p><b>Extension to scope Sungai Teramang Estate:</b>  Based on the results of the HCV assessment in the PT MMAS STGE area, HCV1 that wildlife animals with RTE status discovered as below:  HCV1: Populations of multiple endemic or RTE (rare, threatened or endangered) species. There are still sun bears (<i>Helarctos malayanus</i>), Southern pig-tailed macaque (<i>Macaca nemestrina</i>) and bearded wild boar (<i>Sus barbatus</i>), black- crested Sumatran langur (<i>Presbytis melalophos</i>).</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.  HCV management plan are still exist and applicable.  Laporan Pemantauan Jenis Tumbuhan dan Satwa di Area Konservasi PT. Agro Muko dan PT. Mukomuko Agro Sejahtera 2018. The HCV management plan consist of monitor to HCV area (seek for indication of encroachment, tree felling, burning, vandalism, erosion, animal hunting, sign board condition), Mucuna control, and camera trap installation (monitoring of wildlife).  The report evaluation: the monitoring and management of HCV area is good. The HCV area controlled, employee understanding on RTE species protection is good.  The report conclusion: based on monitoring, RTE species (flora and fauna) is still present. The HCV area still functioning as habitat for wildlife.  Audit team made visit to HCV1 and HCV4, near block 05NN01 – buffer zone Sungai Bantal Kanan. The condition is good, vegetation is good.  RTE species identified:  Aves: Elang Tikus (<i>Elanus caeruleus</i> – IUCN LC, CITES App II), Elang kelelawar (<i>Macheiramphus alcinus</i> - IUCN LC, CITES App II), Elang hitam (<i>Ictinaeus malayensis</i> – IUCN LC, CITES App II), Rangkong Badak (<i>Buceros rhinoceros</i> – IUCN NT, CITES App II), Elang Ular Bido (<i>Spilorna cheela</i> – IUCN LC, CITES App II), Alap-alap capung (<i>Microhelax fringillarius</i> - IUCN LC, CITES App II), Pelatuk Merah (<i>Chrysophlegma minicaeum</i> – IUCN LC), Raja Udang Punggung Merah (<i>Ceyx rufidorsa</i> – IUCN LC);</p>	<p>Not applicable</p>

		<p>Primates: Siamang (<i>Hylobates syndactylus</i> – IUCN EN, CITES App II), Monyet ekor panjang (<i>Macaca fascicularis</i> – CITES App II), Lutung Simpai (<i>Presbytis melalaphos</i> – IUCN EN, CITES App II), Lutung Kelabu (<i>Presbytis cristatus</i> – CITES II).</p> <p>Plant: Waru Gunung (<i>Hibiscus macrophyllus</i> – IUCN VU), Kantong Semar (<i>Nepenthes</i> sp. – CITES II), Anggrek Tanah (<i>Curculigo vilosa</i> – Protected in Indonesia), Manggeris (<i>Koompassia excelsa</i> – IUCN LR), Resak (<i>Vatica</i> spp – IUCN LC), Rengas (<i>Glutha renghas</i> – Protected in Indonesia).</p> <p>Bunga Tanjung Estate:          “Laporan Mingguan Ranger Bunga Tanjung Estate”. RTE Species captured from camera trap in Bunga Tanjung Estate period January – July 2021: Sempidan biru (<i>Lophura ignita</i> – IUCN Near Threatened), Kucing kuwuk (<i>Prionailurus bengalensis</i> – CITES App II, protected, PP RI), Pig-tailed Macaque (<i>Macaca nemestrina</i> – IUCN Vu, CITES App II).</p> <p>RTE Species captured from camera trap in Bunga Tanjung Estate period August 2019: Pig-tailed Macaque (<i>Macaca nemestrina</i> – IUCN Vu, CITES App II).</p> <p><b>Extension to scope Sungai Teramang Estate:</b>          PT Mukomuko Agro Sejahtera took over the palm oil plantation company named PT Asri Rimba Wirabhakti since 2018 and changed the estate name become Sungai Teramang Estate. Based on the land title/HGU certificate, PT Asri Rimba Wirabhakti has had the 1,770 Ha concession, but the planted existing only around 375 Ha. The rest of area occupied by the local communities/smallholder. Since the previous management hand over the area to the PT Mukomuko Agro Sejahtera – SIPEF Group, the company committed to not obtained the occupied area from the communities.</p> <p>NPP verification for Sungai Teramang Estate was conducted in 2021 and there is no comments from any stakeholders. Since SIPEF Group acquired the land, there is no new plantings/new development or extension new land of Sungai Teramang Estate since 15 November 2018. They only conduct replanting for agronomy reason to replace unproductive palm.</p> <p>Monitoring RTE species is frequently conducted in monthly basis and reported annually in “Laporan Pemantauan Jenis Tumbuhan dan Satwa di Area Konservasi PT. Agro Muko</p>	
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		<p>dan PT. Mukomuko Agro Sejahtera 2021”, which monitoring area are focused only in Sungai Teramang Estate.</p>																	
<p>7.12.8</p>	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>Bunga Tanjung Estate:          The oil palm in Bunga Tanjung Estate planted between 1998 and 2006.</p> <table border="1" data-bbox="965 523 1339 922"> <thead> <tr> <th>Planting Year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>1998</td> <td>646.81</td> </tr> <tr> <td>1999</td> <td>223.43</td> </tr> <tr> <td>2000</td> <td>357.21</td> </tr> <tr> <td>2001</td> <td>193.68</td> </tr> <tr> <td>2005</td> <td>117.97</td> </tr> <tr> <td>2006</td> <td>569.41</td> </tr> <tr> <td>Total</td> <td>2,312.19</td> </tr> </tbody> </table> <p>During onsite visit, auditor did not found new planting.</p> <p><b>Extension to scope Sungai Teramang Estate:</b>          Sungai Teramang Estate area is the land acquired by PT Asririmba Wirabhakti since 2018 according to the Notary Deed Number 08 dated 13 August 2018, concerning Conditional Land Purchase and Sale Agreements.          Land title of Sungai Teramang Estate is under previous company PT Asririmba Wira Bhakti. HGU Certificate No. 43, dated 18 June 1997 (valid until 31 December 2024). Total land title area is 1,770 Ha as refer to SK BPN RI Nomor: 68/HGU/BPN/1994, dated 21 September 1994.          So that there is no land compensation made for its area since managed by PT MMAS. However, total managed area since PT Asririmba Wira Bhakti established up to acquired by PT Muko Muko Agro Sejahtera is only 375.16 Ha, the remain 1,394.84 Ha is occupied by local communities and planted with oil palm as well.</p>	Planting Year	Hectarage	1998	646.81	1999	223.43	2000	357.21	2001	193.68	2005	117.97	2006	569.41	Total	2,312.19	<p>Complied</p>
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		<p>Currently, Sungai Teramang Estate is managed by PT Muko Muko Agro Sejahtera which previously under PT Asirimba Wirabhakti (non-member RSPO). Acquisition from PT Asirimba Wirabhakti to PT Muko Muko Agro Sejahtera (SIPEF) on 13 August 2018 (Deed Act No. 08).</p> <p>When it was managed by PT Asirimba Wirabhakti, it was already an oil palm plant without an HCV assessment. The historical process of RaCP is as follows:</p> <ol style="list-style-type: none"> <li>1. Date of Acquisition: 13/08/2018</li> <li>2. Previous company name: PT Asirimba Wirabhakti (non-member RSPO)</li> <li>3. Current managed company: PT Mukomuko Agro Sejahtera/SIPEF (RSPO member)</li> <li>4. HCV assessment: 10 April - 13 September 2018</li> <li>5. HCV report issue: 31 March 2020</li> <li>6. Social Impact assessment: 4 – 14 September 2018</li> <li>7. HCS Assessment: July – September 2020</li> <li>8. LUC Analysis: 22 April – 14 September 2018</li> <li>9. LUCA submission: 30 September 2021</li> <li>10. LUCA review report status Pass: 28 February 2022</li> <li>11. Annex 7 RP concept note submission to RSPO: 17 March 2022</li> <li>12. Annex 8 Remediation Plan submitted to RSPO on 1<sup>st</sup> April 2022</li> <li>13. Annex 8 Remediation Plan approved by RSPO on 13 June 2022</li> </ol> <p><b>Recap of the plan:</b>  The Remediation plan is for PT MMAS/Sei Teramang Estate (374.7 ha) with 76.3 ha remediation area of riparian buffer and 0 ha of FCL.</p> <p><b>The summary and feedback from the Compensation Panel</b>  Environmental remediation</p> <ul style="list-style-type: none"> <li>• The objective and expected outcome for the on-site remediation actions is well described.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• There is a general agreement that the proposed remediation activities are based on available BMPs.</li> </ul> <p><b>Conclusion:</b> The Remediation Plan is <b>Endorsed</b>.</p> <p>During audit process, Sungai Teramang Estate has provide Environmental Remediation Plan as below:</p> <p>“Rencana Mitigasi dan Restorasi Zona Riparian PT MMAS – Sungai Teramang Estate”.</p> <p>The recommendation plan consisting:</p> <ol style="list-style-type: none"> <li>a. Publicize to local communities against HCV boundary and its function within the managed area. – 23 Feb 2022 to villagers that have land surrounding the managed area (Block 19A03), attended by 4 villagers;</li> <li>b. Collaborative partnership with stakeholders related program of protection and preservation riparian zone.</li> <li>c. Publicize and assistance of HCV borders to third party contractor during land preparation of replanting program. 7 Dec 2021 to Land Clearing contractor CV. Wijaya Wikrama Wardana (attended by 7 persons).</li> <li>d. Signboard installation related disallowing of pesticide application surrounding riparian area. – 14 Jan 2022 spraying workers at Block 20B03 (8 spraying workers)</li> <li>e. Implementation of Best Management Practice to preserved riparian water quality.</li> <li>f. Implementation of soil and water conservation, in regard to soil erosion control, like: terracing, planting of legume cover crops, water drainage.</li> <li>g. Enrichment planting with woody plants in riparian zone. – 25 March 2022, location Block 20B02, species of woody plants are: Durian, Kayu Pahit, Mahoni, Resak totally 120 stems.</li> <li>h. Preserve and conserve HCV area through maintaining HCV boundary and security patrol. – security patrol: 7 Mar 2022 patrol riparian area of Teramang Kecil river at Block 20B02.</li> </ol> <p>Environmental Remediation Plan has verified at Sungai Teramang Estate and accordance with indicator 7.8.2.</p>	
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**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2020 for Bunga Tanjung POM and supply base was calculated using the PalmGHG Calculator version 4.0. 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 Bunga Tanjung POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.89
PKO	0.89

Extraction	%
OER	22.18
KER	4.91

Production	t/yr
FFB Process	138,238.37
CPO Produced	30,659
PKO Produced	6,790.58

Land Use	Ha
OP Planted Area	6,825.73
OP Planted on peat	0.00
Conservation (forested)	804.56
Conservation (non-forested)	0.00
<b>Total</b>	<b>7,630.29</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	62726.33	11.01	7331.57	0.47	5787.88	0.00	75845.78	
CO <sub>2</sub> Emission from fertilizer	4617.12	0.81	585.46	0.04	383.87	0.00	5586.45	
NO <sub>2</sub> Emission	3729.34	0.65	414.59	0.3	365.73	0.00	4409.56	
Fuel Consumption	1674.57	0.29	242.88	0.02	0.00	0.00	1917.45	
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-53317.23	-9.36	-5914.36	-0.38	-4669.07	0.00	-63900.66	
Conservation Sequestration	-6153.71	-1.08	-1224.10	-0.08	0.00	0.00	-7377.82	
<b>Total</b>	13276.42	2.33	1435.96	2.27	1768.39	0.00	16480.77	

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	16817.87	0.12
Fuel Consumption	175.38	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>16993.24</b>	<b>0.12</b>

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

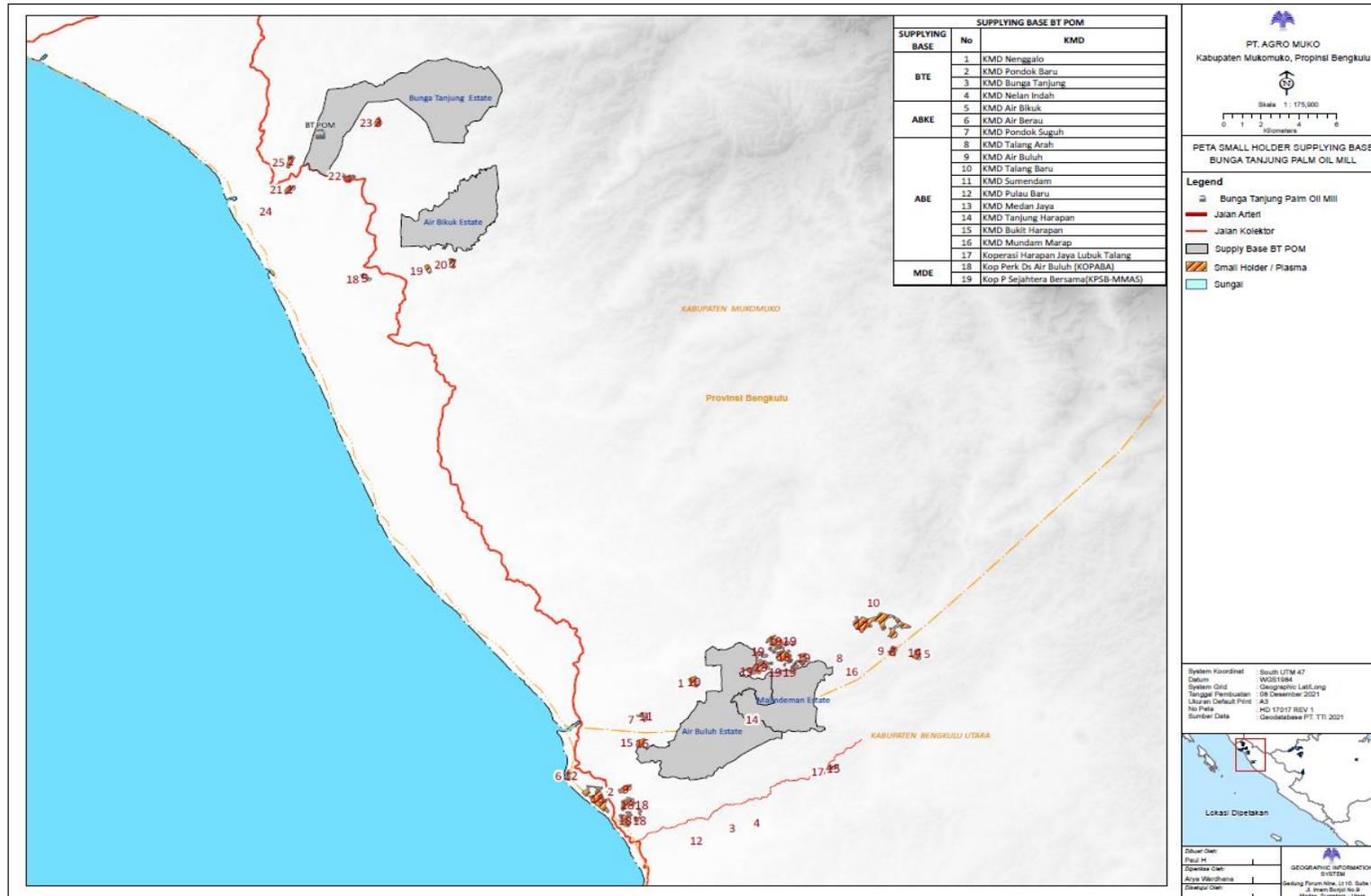
Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

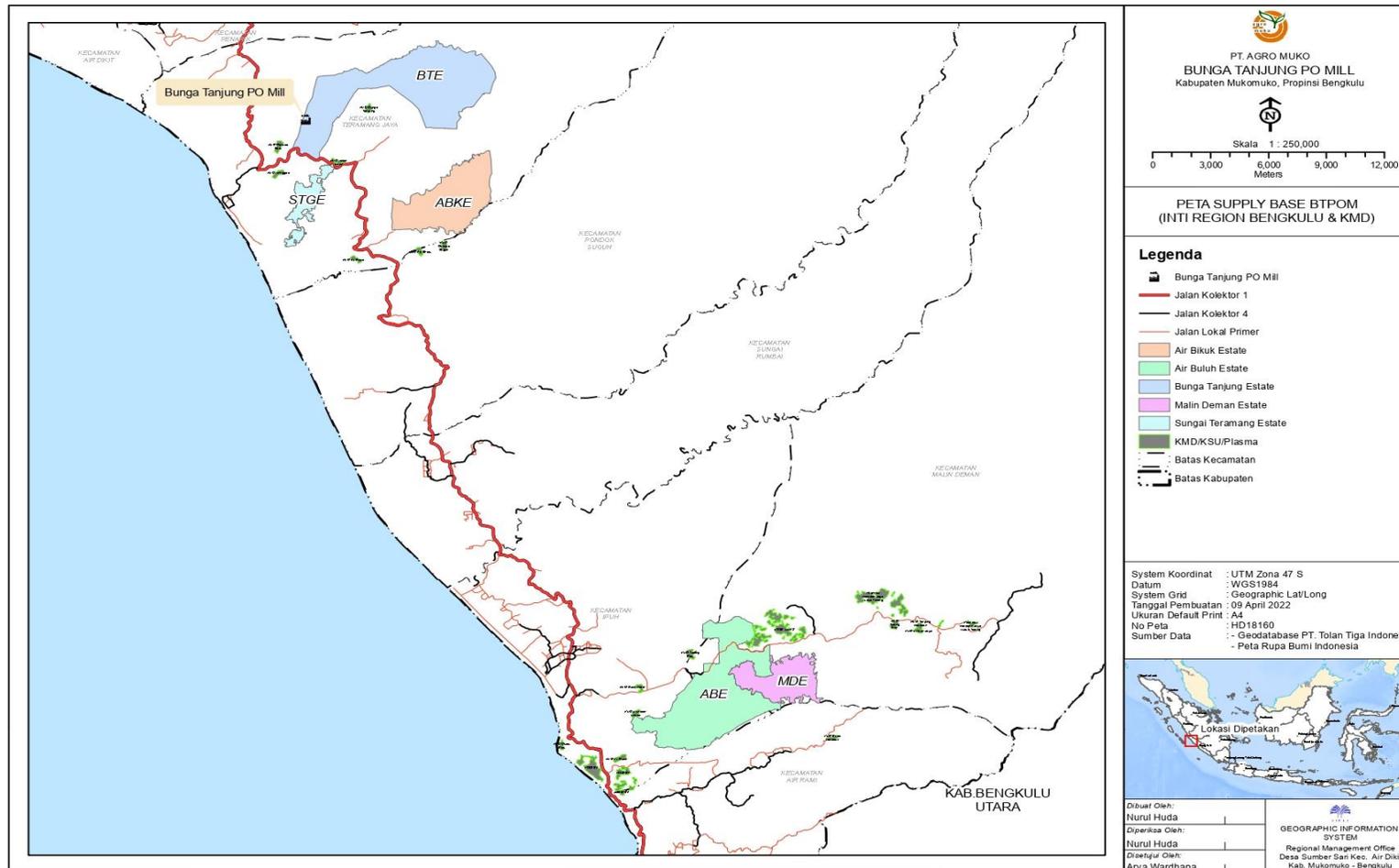
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

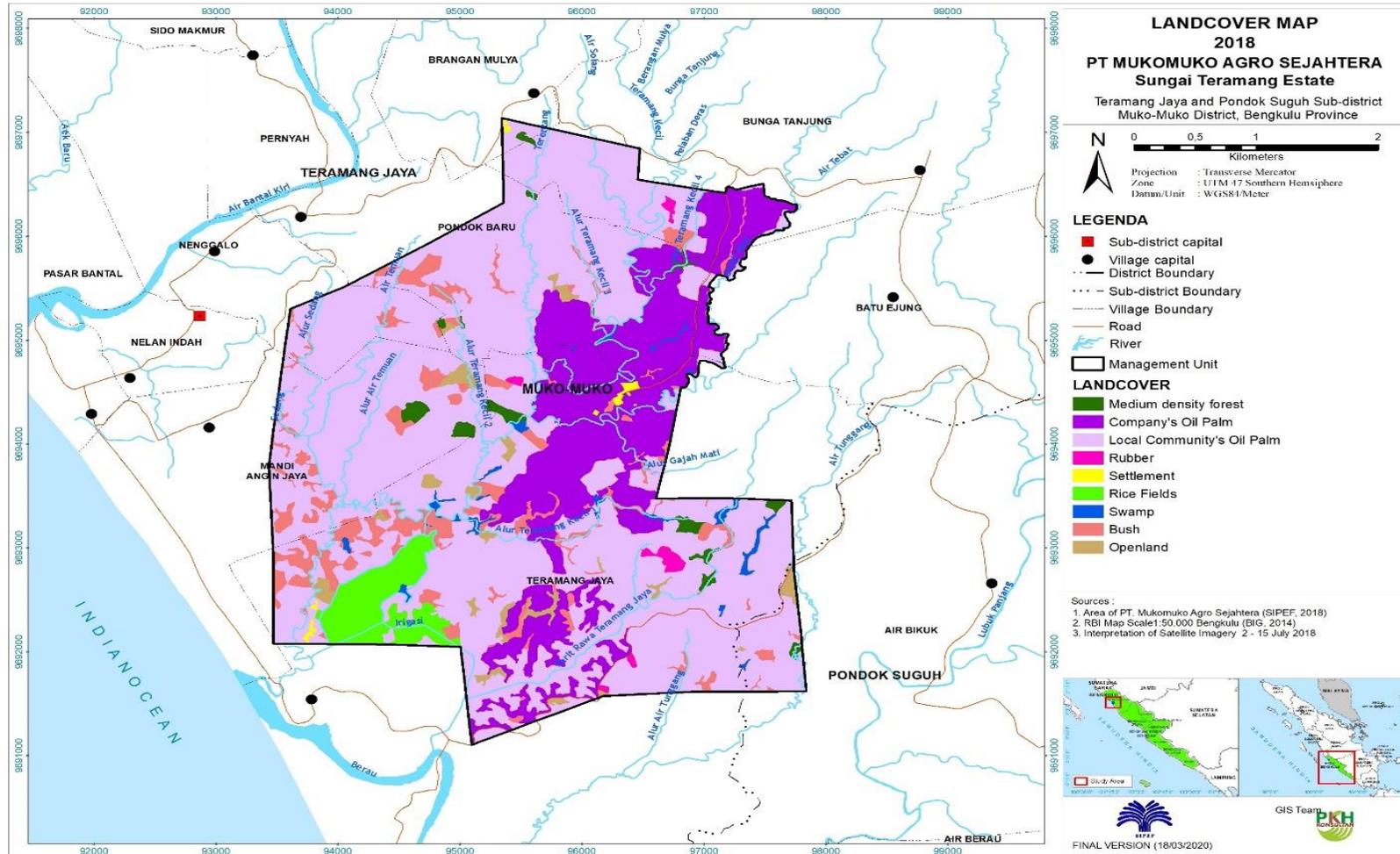
**Appendix C: Location Map of Certification Unit and Supply bases**



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**Appendix D: Estate Field Map Sungai Teramang Estate**



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

- KMD Tanjung Harapan, KMD Bukit Harapan and KMD Mundam Marap (Air Buluh estate and Malind Deman Estate)
- Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)
- Koperasi Perkebunan Air Buluh Agromuko (KOPABA)
- Koperasi Harapan Jaya Lubuk Talang (KHJLT)
- KMD Air Bikuk, KMD Air Berau, KMD Pondok Suguh (Air Bikuk Estate)
- KMD Pasar Bantal, KMD Nelan Indah (Bunga Tanjung Estate)

## 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