

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: PT Sampoerna Agro Tbk
Client Company / Parent Company Address: Jl. Basuki Rahmat, No. 788, Palembang, South Sumatera Province, Indonesia
Certification Unit: PT Usaha Agro Indonesia Usaha Agro Indonesia Palm Oil Mill Location of Certification Unit: Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province, 78864, Indonesia
Date of Final Report: 01/12/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Sampoerna Agro Tbk		
RSPO Membership Number	1-0031-07-000-00	Membership Approval Date	9 January 2007
Address	Jl. Basuki Rachmat No. 788, RT 015/RW 004, Talang Aman Kemuning, Palembang City, South Sumatera Province, 30128		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Usaha Agro Indonesia Usaha Agro Indonesia Palm Oil Mill		
Location / Address	Jambi Village, Manis Mata Sub-District, Ketapang District, West Kalimantan Province 78864, Indonesia		
Website	www.sampoernaagro.com		
Management Representative	Ms. Yusi Rosalina	E-mail	yusi.rosalina@sampoernaagro.com
Telephone	081271238226	Facsimile	0711-811585

2. Certification Information			
Certificate Number	RSPO 790206	Certificate Start Date	21/06/2023
Date of First Certification	21/06/2018	Certificate Expiry Date	20/06/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK).		
Visit Objectives	The objective of the assessment was to conduct a recertification assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the requirements of Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 th April 2020.		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45 ton/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
AML-ISPO-002.1	ISPO	PT Agri Mandiri Lestari	2 August 2027

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
UAI Palm Oil Mill	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Provinsi Kalimantan Barat	2° 41' 00.40" S	110° 58' 32.00" E
Ulin Agro Estate	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Provinsi Kalimantan Barat	2° 40' 36.30" S	111° 01' 45.40" E
Kruing Agro Estate	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Provinsi Kalimantan Barat	2° 41' 05.71" S	110° 58' 53.66" E
Meranti Agro Estate	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Provinsi Kalimantan Barat	2° 37' 01.20" S	110° 56' 27.60" E
Koperasi Perkebunan Jambi Mekar Jaya Sempurna (380 smallholders)	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Provinsi Kalimantan Barat	2° 40' 03.86" S	111° 01' 14.88" E
Koperasi Perkebunan Sempurna Mandiri (44 smallholders)	Desa Suren, Desa Buntar, Kec. Manis Mata, Kab. Ketapang, Provinsi Kalimantan Barat	2° 38' 46.64" S	110° 56' 43.42" E

Notes: Koperasi Perkebunan Jambi Mekar Jaya Sempurna (JMJS) and Koperasi Perkebunan Sempurna Mandiri (SM) is fully managed by PT Usaha Agro Indonesia. The Koperasi are treated as a Division of the Estate. JMJS is under Ulin Agro Estate and SM is under Kruing Agro Estate.

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ulin Agro Estate	2,508.34	40.91	754.08	3,303.33	75.93
Kruing Agro Estate	2,901.35	167.32	612.24	3,680.91	78.82
Meranti Agro Estate	2,493.95	24.57	493.96	3,012.48	82.79
Koperasi Perkebunan Jambi Mekar Jaya Sempurna	1,098.38	-	-	1,098.38	100.00

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Koperasi Perkebunan Sempurna Mandiri	796.83	-	-	796.83	100.00
Total	9,798.85	232.80	1,860.28	11,891.93	

Note: This information is according to the latest area statement of PT Usaha Agro Indonesia, this data is the most accurate data compare to previous CB report.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Ulin Agro Estate	110.61	2,283.25	114.48	-	2,397.73	110.61
Kruing Agro Estate	-	1,868.66	1,032.69	-	2,901.35	-
Meranti Agro Estate	-	877.93	1,616.02	-	2,493.95	-
Koperasi Perkebunan Jambi Mekar Jaya Sempurna	-	1,098.38	-	-	1,098.38	-
Koperasi Perkebunan Sempurna Mandiri	-	796.83	-	-	796.83	-
Total (ha)	110.61	6,925.39	2,763.19	-	9,688.24	110.61

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Estimated last year (21 Jun 2022 – 20 Jun 2023)	Tonnage (MT) / year		Forecast (June 2023 – May 2024)
		Actual (Apr 2022 – Mar 2023)		
		Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
Ulin Agro Estate	115,858	5,160.30	9,874.43	31,710
Kruing Agro Estate		6,896.50	20,147.09	42,102
Meranti Agro Estate		17,405.60	39,029.46	70,247
Koperasi Perkebunan Jambi Mekar Jaya Sempurna		6,535.90	14,316.50	22,468
Koperasi Perkebunan Sempurna Mandiri		3,601.90	8,874.69	14,144
Total	115,858	131,842.37		180,671

Note: Referring to the ASA 4 report produced by Bureau Veritas, the Actual Production Period for ASA 4 was unclear. Hence, BSI has reported RC 1 Actual Production Period based on the date of the ASA 4 audit conducted by BV which is in April 2022.

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8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (21 Jun 2022 – 20 Jun 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (June 2023 – May 2024)
		Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
Nil		Nil	Nil	
Total		Nil		

Note: Referring to the ASA 4 report produced by Bureau Veritas, the Actual Production Period for ASA 4 was unclear. Hence, BSI has reported RC 1 Actual Production Period based on the date of the ASA 4 audit conducted by BV which is in April 2022.

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (21 Jun 2022 – 20 Jun 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (June 2023 – May 2024)
		Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
Kruing Agro Estate (NPP Sanction)	N/A	1,864.54	2,522.42	6,220.00
Ulin Agro Estate (NPP Sanction)	N/A	862.33	3,502.61	9,769.00
PT Anugrah Palm Indonesia (sister company, non-certified)	N/A	1,533.34	3,888.63	10,683.00
KopBun Sempurna Bersatu (Non-Certified)	N/A	2,425.63	5,315.17	8,602.00
Rudi (Independent Smallholder)	N/A	286.42	203.47	-
Total	N/A	22,404.56		35,274

Note: Referring to the ASA 4 report produced by Bureau Veritas, the Actual Production Period for ASA 4 was unclear. Hence, BSI has reported RC 1 Actual Production Period based on the date of the ASA 4 audit conducted by BV which is in April 2022.

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	April 2022	13,857.37	2,352.6	16,209.97
2	May 2022	11,899.77	2,165.44	14,065.21
3	June 2022	13,843.07	2,454.22	16,297.29

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4	July 2022	13,148.26	2,380.78	15,529.04
5	August 2022	14,795.22	2,215.23	17,010.45
6	September 2022	10,990.28	2,108.39	13,098.67
7	October 2022	9,226.41	1,643.55	10,869.96
8	November 2022	9,120.38	1,138.19	10,258.57
9	December 2022	10,532.51	1,861.22	12,393.73
10	January 2023	8,476.55	1,410.15	9,886.7
11	February 2023	6,963.95	1,140.04	8,103.99
12	March 2023	8,988.61	1,534.75	10,523.36
TOTAL		131,842.38	22,404.56	154,246.94

Note:

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

Estimated last year (21 Jun 2022 – 20 Jun 2023)	Actual (Apr 2022 – Mar 2023)		Forecast (June 2023 – May 2024)
	Previous license period (Apr 2022 – Jun 2022)	Current license period (Jul 2022 – Mar 2023)	
FFB	FFB		FFB
115,858 mt	39,600.21 mt	92,242.17 mt	180,671 mt
	TOTAL	131,842.38 mt	
CPO (OER: 24.70 %)	CPO (OER: 23.27 %)		CPO (OER: 24.50 %)
28,617 mt	9,034.68 mt	21,645.63 mt	44,264 mt
	TOTAL	30,680.31 mt	
PK (KER: 4.25 %)	PK (KER: 4.07 %)		PK (KER: 4.00 %)
4,924 mt	1,601.00 mt	3,767.31 mt	7,227 mt
	TOTAL	5,368.31 mt	

Note: Referring to the ASA 4 report produced by Bureau Veritas, the Actual Production Period for ASA 4 was unclear. Hence, BSI has reported RC 1 Actual Production Period based on the date of the ASA 4 audit conducted by BV which is in April 2022.

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

No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	April 2022	3,236.39	582.92
2	May 2022	2,712.67	484.92
3	June 2022	3,085.62	533.16
4	July 2022	3,026.84	505.36
5	August 2022	3,454.21	613

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6	September 2022	2,551.97	466
7	October 2022	2,151.68	392.07
8	November 2022	2,150.31	383.8
9	December 2022	2,518.24	422.78
10	January 2023	1,997.34	338.94
11	February 2023	1,687.51	286.63
12	March 2023	2,107.53	358.73
TOTAL		30,680.31	5,368.31
Note:			

11. Summary of Actual Volume sold					
Current License period (Jul 2022 – Mar 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	9,050.00	0	0	8,549	17,599.00
PK (MT)	2,597.48	0	0	43	2,640.48
Credits	0	0	0	0	0
Previous License period (Apr – Jun 2022)					
CPO (MT)	0	0	0	0	0
PK (MT)	510.00	0	0	0	510.00
Credits	0	0	0	0	0
Note:					
1. Conventional is RSPO certified material but sold as non-RSPO.					
2. Referring to the ASA 4 report produced by Bureau Veritas, the Actual Production Period for ASA 4 was unclear. Hence, BSI has reported RC 1 Actual Production Period based on the date of the ASA 4 audit conducted by BV which is in April 2022.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Andes Agro Investama	RSPO_PO1000006639	0	1,700.00
2	PT Sumber Indah Perkasa	RSPO_PO1000007286	0	700.00
3	PT Smart Tbk	RSPO_PO1000006554	0	707.48
4	PT Wahana Citra Nabati	RSPO_PO1000000250	9,050.00	0
TOTAL			9,050.00	3,107.48
Note:				

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Classified	8,549	-
2	Classified	-	43
TOTAL		8,549	43
Note:			

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

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

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

Note: Not applicable

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not Applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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

Note: Not applicable

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 12 – 16 June 2023. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 5 May 2023.

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

The Critical NC close out on-site assessment was conducted on 12 – 13 September 2023. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
UAI Palm Oil Mill	X	X	X	X	X
Ulin Agro Estate	X	X	X	X	X
Kruing Agro Estate	X	X	X	X	X
Meranti Agro Estate	X	X	X	X	X
Kopbun Jambi Mekar Jaya Sempurna	X	X	X	X	X
Kopbun Sempurna Mandiri	X	X	X	X	X

Tentative Date of Next Visit: April 1, 2024 – April 5, 2024

Total Number of Mandays: 20

2.2 BSI Assessment Team

Name	Role	Competency
Eko Purwanto (EP)	Team Leader	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&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&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&C Lead Auditor Training, Understanding</p>

		<p>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, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: HCV and conservation, environmental impact assessment and waste management, GHG management verification, timebound plan.</p>
Pratama Agung Sedayu (PS)	Team Member	<p>Education: Holds a Bachelor Degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.</p> <p>Work Experience: 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001 and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program.</p> <p>Training attended: Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISPO Lead Auditor endorsed Course and Endorsed RSPO P&C Lead Auditor Course and Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements training, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Legal compliance, human rights compliance, land legality, code of ethical conduct, contractor compliance, complaint handling.</p>
Imam Fakhrurozi (IF)	Team Member	<p>Education: Holds a Bachelor Degree majoring in Agriculture Technology, Gadjah Mada University.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETA Requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Best Management Practices for estate and mill, productivity and long-term economic planning, continuous improvement, Occupation Health Safety requirement, HIRARC.</p>
Yudwi Wisnu Rahmanto (YWR)	Team Member	<p>Education: Holds a Bachelor of Forestry with Silviculture, Faculty of Forestry, University of Gadjah Mada</p> <p>Work Experience: 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme,</p>

		<p>RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Supply Chain, General Custody of Chain, Rules on Market Communications & Claims, Previous land owner, consultation with stakeholders, interview with worker and worker welfare, interview with smallholder.</p>
<p>Dr. Suhaili Bin Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health & Safety 3. ISO 14001:2015 Standard 4. RSPO Standards: RSPO P&C 2018 MY-NI 2019 5. MSPO Standards: MS 2530:2013 part 1, 2, 3 and 4 6. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 7. HACCP MS 1480:2019

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		8. GAP Standard: Global GAP, Euro GAP 9. ASI Peer Reviewer training
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Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	Auditor			
			EP	PS	IF	YWR
Tuesday, 13/06/2023	08.00-09.00	Opening Meeting: - Presentation By Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan	√	√	√	√
	09.00-12.00	Document and record verification - Verification of Supply Chain Data - Data verification of RSPO P&C (Best management practices Mill, OHS, EMS, Social and Labour)	√	√	√	√
	12.00-14.00	Break	√	√	√	√
	14.00-17.00	Field visit to UAI Palm Oil Mill to verify: - Best Management Practice for Mill Processing and RSPO Supply Chain Certification Standard - Element for Palm Oil Mill – site visit to check on FFB receiving, FFB process, CPO and PK dispatch, document, and record keeping. - Visit to POM housing: house condition, water supplies, sanitation, access to affordable food, welfare amenities. - Implementation of OHS (loading ramp, processing stations, workshop, boiler, turbine, diesel bowser, material warehouse, fire-fighting equipment) - Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, hazardous waste storage, Biogas Plant (if any)) - Interview with workers related to human resource management, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Interview with workers related to health and safety condition, training provision, worker right and condition, etc.	√	√	√	
		Stakeholder consultation - Stakeholder consultation to relevant agencies of Ketapang Regency				√

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Date	Time	Subjects	Auditor				
			EP	PS	IF	YWR	
		<ul style="list-style-type: none"> - Village Head, Community leader, Contractor (FFB Transporter, Land Clearing, etc). - Worker union, Gender committee - Local NGO - Previous Landowner 					
Wednesday 14/06/2023	08.00-12.00	<p>Field visit to Meranti Agro Estate</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope. - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities. - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities, HCV area, riparian zone 	√	√	√		
		<p>Stakeholder consultation</p> <ul style="list-style-type: none"> - Stakeholder consultation to relevant agencies of Ketapang Regency - Local NGO 				√	
	12.00-14.00	Break		√	√	√	√
	14.00-16.30	<p>Document and records verification:</p> <p>Meranti Agro Estate</p>		√	√	√	
		<p>Stakeholder consultation</p> <ul style="list-style-type: none"> - Village Head, Community leader, Contractor (FFB Transporter, Land Clearing, etc). - Previous Landowner 					√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√	
Thursday 15/06/2023	08.00-12.00	<p>Field visit to Kruing Agro Estate</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. 	√	-	√	-	

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Date	Time	Subjects	Auditor			
			EP	PS	IF	YWR
		<ul style="list-style-type: none"> - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities, HCV area, riparian zone 				
		<p>Field visit to Koperasi Kebun Sempurna Mandiri</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities, HCV area, riparian zone 	-	√	-	√
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	<p>Document and records verification:</p> <p>Kruing Agro Estate and Koperasi Kebun Sempurna Mandiri</p>	√	√	√	√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√
Friday 16/06/2023	08.00-12.00	<p>Field visit to Ulin Agro Estate</p> <ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities, HCV area, riparian zone 	√	-	√	-
		Field visit to Koperasi Kebun Jambi Mekar Jaya Sempurna	-	√	-	√

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Date	Time	Subjects	Auditor			
			EP	PS	IF	YWR
		<ul style="list-style-type: none"> - Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, oil palm nursery, replanting, area with slope - Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. - Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. - Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities - Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. - Visit to HGU boundary poles, border with surrounding entities, HCV area, riparian zone 				
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	Document and records verification: Ulin Agro Estate and Koperasi Kebun Jambi Mekar Jaya Sempurna	√	√	√	√
	16.30-17.00	Wash up meeting and Reporting	√	√	√	√
Saturday 17/06/2023	08.00-12.00	Document and records verification: Kruing Agro Estate, Koperasi Kebun Sempurna Mandiri, Ulin Agro Estate and Koperasi Kebun Jambi Mekar Jaya Sempurna.	√	√	√	√
	12.00-14.00	Break	√	√	√	√
	14.00-16.00	Reporting and auditor discussion	√	√	√	√
	16.00-17.00	Closing Meeting	√	√	√	√

NCR Close Out Visit

Date	Time	Subjects	Auditor
Monday, 11/09/2023	AM	Flight Jakarta – Semarang – Pangkalan Bun <i>Batik Air ID-6350; ETD 08.45 – ETA 09.50</i> <i>Wings Air IW-1808; ETD 10.55 – ETA 12.20</i>	IF
	13.00-18.00	Travel Pangkalan Bun - Site	IF
Tuesday 12/09/2023	08.00-09.00	Opening Meeting: - Presentation By Lead Auditor - Confirmation audit scope, requirements, document access permission and clarifying audit plan	IF
	09.00-12.00	Document Review and Site observation related to major NC - RSPO P&C 2018 – INA NI 2020 1. Indicator 3.5.2 - Berdasarkan wawancara dan kunjungan ke lapangan, auditor menemukan beberapa pekerja yang belum memiliki Perjanjian Kerja PKWT sebagaimana dipersyaratkan dalam Sampoerna Agro IMS Procedure –	IF

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Date	Time	Subjects	Auditor
		<p>Rekrutmen No. P-SAG-ADM-KTU-04 revisi 2 tertanggal 1 Maret 2018. Eskalasi ke NC Major dari NC minor pada ASA-4</p> <ol style="list-style-type: none"> 2. Indicator 3.8.7 - Perusahaan belum menunjukkan secara lengkap sumber TBS dari area bersertifikat dan non-non sertifikat. 3. Indicator 6.2.4 - Perusahaan telah menyediakan perumahan beserta perlengkapan rumah tangga bagi pekerjanya, namun masih terdapat kekurangan karena ada pekerja yang menumpang di rumah keluarga lain. 4. Indicator 6.6.8 - Ditemukan pekerja perawatan di UAE dengan hubungan kerja sebagai PKWT tidak didasari Perjanjian Kerja Waktu Tertentu yang masih berlaku. 5. Indicator 6.7.3 - Perusahaan telah menyediakan APD bagi pekerjanya, namun terdapat beberapa pekerja yang menggunakan APD bukan dari pemberian perusahaan. 6. Indicator – 7.2.6 - Perusahaan telah memberikan pelatihan bagi petugas aplikasi pestisida, namun terdapat beberapa pekerja yang tidak tersedia rekaman/catatan pelatihannya 	
	12.00 – 14.00	Break	IF
	14.00 – 17.00	Continue morning agenda	IF
Wednesday 13/09/2023	08.00 – 12.00	<p>Document Review and Site observation related to major NC - RSPO P&C 2018 – INA NI 2020 – Continue</p> <ol style="list-style-type: none"> 7. Indicator 1.1.3 - Berdasarkan wawancara dengan sample pekerja dan stakeholder terkait disampaikan beberapa permintaan informasi namun demikian unit sertifikasi tidak dapat menunjukkan rekaman permintaan informasi dan tanggapannya. 8. Indicator 1.1.4 - Sampoerna IMS Procedure - Komunikasi, Partisipasi, dan Konsultasi, no: P-SAG-HO-CA&L-08 belum dipahami oleh stakeholder terkait. 9. Indicator 3.6.1 - Belum semua aktifitas di dalam ruang lingkup PT Usaha Agro Indonesia telah dilakukan analisa risiko. 10. Indicator 6.2.2 - Pekerja di PT. Usaha Agro Indonesia menyatakan belum mengetahui informasi perhitungan dasar pengupahan dan dasar pemotongan yang tertera di slip gaji. 	IF
	12.00 – 14.00	Break	IF
	14.00 – 15.00	Discussion if there any outstanding issues	IF
	15.00 – 15.30	Report preparation	IF
	15.30 – 16.30	<p>Closing Meeting</p> <ul style="list-style-type: none"> • Presentation of Report of NCR • Comments, Responses and Questions 	IF
	16.30 -	Travel back to Pangkalanbun Overnight at Pangkalanbun	IF

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?	PT Sampoerna Agro Tbk revised their 'RSPO Certification Timebound Plan' most recently on 2 June 2021. The timebound plan include name of all subsidiary companies, all estates and all mills under PT Sampoerna Agro Tbk.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are several estates and mills that have not yet received certification for various reasons, including ongoing RaCP and land title verification in progress. PT Sampoerna Agro Tbk obtained RSPO Membership on 9 January 2007. PT Sampoerna Agro Tbk submitted the updated RSPO Timebound Plan to RSPO Secretariat on 9 May 2021. RSPO Secretariat has approved the timebound plan on 2 June 2021.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new land acquisition has been informed. As of 9 May 2021, PT Sampoerna Agro Tbk communicated the modifications and the extension of their Timebound Plan (TBP) to the RSPO Secretariat via email, and the RSPO acknowledged receipt of this communication on the very same date.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of 9 May 2021, PT Sampoerna Agro Tbk communicated the modifications and the extension of their Timebound Plan (TBP) to the RSPO Secretariat via email, and the RSPO acknowledged receipt of this communication on the very same date.	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 revised time bound plan reviewed by auditor team during this recertification assessment.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there is no change in time-bound plan since the last audit.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure. Each management unit has a specified timeline for the audit implementation.	Complied
Un-Certified Units or Holdings		

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<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>Based on the RSPO RaCP Tracker, Audit team noted 9 MUs with potential liability, 9 MUs with LUCA submitted, 6 MUs with LUCAs review completed, 6 MUs with CN required, 0 MUs with CN submitted, 0 MUs with CN approved, 0 MUs with CP submitted, 0 MU with CP endorsed, 7 MUs with RP required, 0 MU with RP submitted, 0 MU with RP approved.</p> <p>Based on Sampoerna Agro – LUCA review status: There are management units with Remediation Plan required, because of planting on peat and/or riparian prior to HCV assessment, which is PT Telaga Hikmah (additional 229 ha); PT Mutiara Bunda Jaya; Plasma PT Mutiara Bunda Jaya; Plasma PT Telaga Hikmah; PT Sawit Selatan; PT Sungai Rangit and PT Lanang Agro Bersatu.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, including for new planting after 1 January 2010, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>Based on the RSPO RaCP Tracker, Audit team noted 9 MUs with potential liability, 9 MUs with LUCA submitted, 6 MUs with LUCAs review completed, 6 MUs with CN required, 0 MUs with CN submitted, 0 MUs with CN approved, 0 MUs with CP submitted, 0 MU with CP endorsed, 7 MUs with RP required, 0 MU with RP submitted, 0 MU with RP approved.</p> <p>Based on Sampoerna Agro – LUCA review status: There are management units with Remediation Plan required, because of planting on peat and/or riparian prior to HCV assessment, which is PT Telaga Hikmah (additional 229 ha); PT Mutiara Bunda Jaya; Plasma PT Mutiara Bunda Jaya; Plasma PT Telaga Hikmah; PT Sawit Selatan; PT Sungai Rangit and PT Lanang Agro Bersatu.</p> <p>Based on search to the RSPO website, there is no NPP approved for the subsidiary of PT Sampoerna Agro, Tbk. Currently, there are NPP assessment conducted, which still under proses of review and revision, that is for PT Kedurang</p>	<p>Complied</p>

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	<p>Prakarsa Nabati at Bengkayang Regency, and for area of PT UAI under IUP 334/DPMPTSP-D/2020 covers 612 Ha.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>There is documented proof of verification carried out by PT Sampoerna Agro Tbk for all certification units to ensure that any land conflicts are being resolved through a mutually agreed process.</p> <p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>Based on the RSPO Case Tracker and web search, Audit team noted there was no active complaint related land disputes.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>There is documented proof of verification carried out by PT Sampoerna Agro Tbk for all certification units to ensure that no labour disputes has been reported/identified within any of the uncertified management units.</p> <p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>Based on the RSPO Case Tracker and web search, Audit team noted there was no active complaint related to labour disputes.</p>	<p>Complied</p>

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<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>PT Sampoerna Agro Tbk has completed self-assessments for all its subsidiary companies, as detailed in the Internal Assessment regarding compliance with Clause 5.5.3 (a) – (d) of the RSPO Certification System.</p> <p>There is documented proof of verification carried out by PT Sampoerna Agro Tbk for all certification units to ensure that no legal non-compliance has been reported/ identified within any of the uncertified management units.</p> <p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>Based on the RSPO Case Tracker and web search, Audit team noted there was no active complaint related legal non-compliance.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>The unit of certification (UoC) has submitted evidence of self-assessments conducted on all of its uncertified management units. The checklists utilized during these self-assessments cover all the indicators and requirements specified in Section 5.5 of the RSPO Certification System document. Additionally, it has been confirmed that the UoC has provided a positive assurance statement, affirming compliance for every uncertified management unit.</p> <p>For example:</p> <ul style="list-style-type: none"> - Self-Assessment Report of PT Usaha Agro Indonesia – Sahara Estate and Smallholder carried out on 17 - 18 February 2022. - Self-Assessment Report of PT Usaha Agro Indonesia – Koperasi Kebun Sempurna Bersatu carried out on 26 - 27 January 2022. - Self-Assessment Report of PT Lanang Agro Bersatu – Bukit Subur Estate, Bukit Makmur estate & Smallholder carried out on 8 – 9 February 2022. - Self-Assessment Report of PT Nusantara Sarana Alam – Gunung Alam Estate & Nusantara Sarana Alam Smallholder carried out on 8 – 9 February 2022. 	<p>Complied</p>

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<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Yes, there are critical (Major) non-compliance raised during internal audits to uncertified management units. PT Sampoerna Agro Tbk has prepared correction and corrective action.</p> <p>For example:</p> <ul style="list-style-type: none"> - Self-Assessment Report of PT Usaha Agro Indonesia – Sahara Estate and Smallholder; Internal audit team issued NC related to 2.1.3, 4.2.2, 4.5.4 & 7.12; management has prepared correction and corrective action including date of completion. - Self-Assessment Report of PT Usaha Agro Indonesia – Koperasi Kebun Sempurna Bersatu; Internal audit team has issued no NC. - Self-Assessment Report of PT Lanang Agro Bersatu – Bukit Subur Estate, Bukit Makmur estate & Smallholder; Internal audit team has issued no NC. - Self-Assessment Report of PT Nusantara Sarana Alam – Gunung Alam Estate & Nusantara Sarana Alam Smallholder; Internal audit team has issued no NC. 	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Audit team checked on Self-Assessment Reports and verified the stakeholder consultation has been carried out, e.g. with the District Head, District Police, Village non-commissioned officer, Village Head, youth and community leader.</p> <p>Prior to this recertification assessment, Audit team sent email to Wetlands, Sawit Watch, Aid Environment, WALHI, WWF, Forest Watch Indonesia, WCS Indonesia, LINKS and Solidaridad, to obtain stakeholder comment, until assessment ends audit team did not received any response.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

<p>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</p>		
<p>Requirement</p>	<p>Remarks</p>	<p>Compliance</p>
<p>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</p>	<p>PT Usaha Agro Indonesia – Usaha Agro Indonesia Palm Oil Mill initially certified on 21 June 2018. All the scheme smallholder, Kopbun Jambi Mekar Jaya Sempurna and Kopbun Sempurna Mandiri have been certified since ASA 2.</p>	<p>Complied</p>

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

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Remarks
				Latitude	Longitude					
PT Aek Tarum	Indonesia	Mill Belida	Desa Sumber Baru, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8404	104.9698	0.00	Certified	2011	2011	-
	Indonesia	Estate Belida	Desa Sumber Baru, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	3.8275	105.0242	3,155.50	Certified	2011	2011	
	Indonesia	Estate Permata Bunda Satu	Desa Sumber Baru, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8275	105.0242	552.24	Certified	2016	2016	
	Indonesia	KUD Panca Sawit Makmur	Desa Nusa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8047	105.1063	945.63	Certified	2016	2016	
	Indonesia	KUD Rahayu Bhakti	Desa Sumber Baru, kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8344	104.9928	748.62	Certified	2017	2017	
	Indonesia	KUD Mulya Jaya	Desa Mulya Jaya, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8520	105.0456	1,044.73	Certified	2017	2017	
	Indonesia	KUD Mekar Sari	Desa Mekar Wangi, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8437	105.0848	1,049.05	Certified	2017	2017	
	Indonesia	KUD Sumber Rejeki	Desa Karya Mukti, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8759	105.0682	497.36	Certified	2017	2017	
	Indonesia	KUD Permata Bunda	Desa Mataram Jaya, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7798	105.0508	1,128.27	Certified	2018	2018	
	Indonesia	KUD Subur Makmur	Desa Cipta Sari, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7508	104.9922	1,219.33	Certified	2018	2018	
	Indonesia	KUD Karya Makmur	Desa Sumbu Sari, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7779	105.0060	1,301.91	Certified	2017	2017	
PT Mutiara Bunda Jaya	Indonesia	Mill Permata Bunda	Desa Margo Bhakti, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9428	105.1131	0.00	Certified	2016	2016	
	Indonesia	Estate Mesuji	Desa Pematang Panggang, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan.	-4.0268	105.0268	2,439.80	Certified	2011	2011	

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				Latitude	Longitude					
	Indonesia	Estate Surya Adi	Desa Surya Adi, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0102	105.0578	588.97	Certified	2016	2016	
	Indonesia	KUD Bina Sawit Utama	Desa Kali Deras, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0703	105.0127	1,017.52	Not Certified	2024	-	
	Indonesia	KUD Citra Sawit Mandiri	Desa Sumber Deras, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0728	105.0395	738.47	Certified	2018	2018	
	Indonesia	KUD Marga Mulya*	Desa Makarti Mulya, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.5572	105.1629	2,008.99	Certified	2018	2018	
	Indonesia	KUD Surya Bhakti	Desa Margo Bhakti, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9541	105.0733	1,551.40	Certified	2018	2018	
	Indonesia	KUD Surya Adi	Desa Surya Adi, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9845	105.0320	2,053.45	Certified	2018	2018	
	Indonesia	KUD Sinar Jaya	Desa Jaya Bhakti, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.9279	105.0263	2,092.28	Certified	2018	2018	
	Indonesia	KUD Tunas Harapan	Desa Suryakarta, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-4.0691	104.9836	766.66	Certified	2018	2018	
PT Gunung Tua Abadi	Indonesia	Mill Sumber Sawit	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8064	105.1719	-	Certified	2016	2016	
	Indonesia	Estate Permata Bunda Dua	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7848	105.1589	1,370.50	Certified	2016	2016	
	Indonesia	Estate Sumber Sawit	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.8126	105.1736	5,032.00	Certified	2016	2016	
	Indonesia	Estate Hikmah Tiga	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7167	105.2081	3,120.00	Certified	2017	2017	
	Indonesia	Estate Hikmah Lima	Desa Pagar Dewa, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7379	105.2394	2,327.00	Certified	2017	2017	
	Indonesia	Estate Hikmah Lima Estate (HGU 2019)	Desa Pagar Dewa, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7379	105.2394	229.28	Not Certified	2023	-	LUCA assessment for RaCP on process reviewed by RSPO

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				Latitude	Longitude					
	Indonesia	Estate Limau Kesturi	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7148	105.6496	6,734.12	Not Certified	2023	-	
	Indonesia	Estate Jaya Permai	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.8369	105.6608	3,802.75	Not Certified	2023	-	Audited on 15-17 Dec 2022 by TUV Rheinland
	Indonesia	Estate Nawa Surya	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6753	105.6570	7,450.91	Not Certified	2023	-	Audited on 15-17 Dec 2022 by TUV Rheinland
	Indonesia	Estate Puncak Terang	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7418	105.7466	3,410.88	Not Certified	2023	-	uncomplete infrastructure development
	Indonesia	KUD Makmur Bersama	Desa Dabuk Makmur, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7722	105.1528	503.27	Not Certified	2023	-	uncomplete land title SHM (sertifikat Hak Milik) process for all smallholders
	Indonesia	KUD Dewa Makmur	Desa Pagar Dewa, Kec. Mesuji, Kab. OKI, Prov. Sumatera Selatan	-3.7791	105.2296	2,000	Certified	2017	2017	
	Indonesia	KUD Jeruju Bhakti Mandiri	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6247	105.6313	170.00	Not Certified	2024	-	
	Indonesia	KUD Supas Maju Bersama	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7669	105.6135	170.00	Not Certified	2024	-	
	Indonesia	KUD Surya Gajah Dewa	Desa Gajah Mati, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.7285	105.7957	1,921.00	Not Certified	2024	-	
PT Telaga Hikmah	Indonesia	Mill Telaga Hikmah	Desa Sumber Hidup, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5985	105.0588	0	Certified	2018	2018	
	Indonesia	Estate Tanjung Sari	Desa Rantau Durian II, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.6055	104.9264	3,873.50	Certified	2021	2022	
	Indonesia	Estate Mega Terang	Desa Sungai Menang, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6990	105.3623	2,790.30	Certified	2021	2022	

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	Indonesia	Estate Sepucuk	Desa Cinta Jaya, Kec. Pedamaran, kab. OKI, Prov. Sumatera Selatan	-3.5341	104.9467	1,216.84	Certified	2021	2022	
	Indonesia	Estate Hikmah Satu	Desa Sumber Hidup, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6031	105.0815	3,752.30	Certified	2018	2018	
	Indonesia	Estate Hikmah Empat	Desa Sido Mulyo, Kec. Sungai Menang, Kab. OKI, Sumatera Selatan	-3.6403	105.2589	3,766.10	Certified	2019	2019	
	Indonesia	Estate Gading Jaya	Desa Kayu Labu, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5794	105.1887	3,243.46	Certified	2021	2022	
	Indonesia	KUD Permata Indah	Desa Sungai Menang, Kec. Sungai Menang, Kab. OKI, Prov. Sumatera Selatan	-3.6353	105.3192	344.14	Not Certified	2024	-	
	Indonesia	KUD Tanjung Mesayu	Desa Tanjung Sari I, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.5914	104.9545	705.30	Not Certified	2023	-	
	Indonesia	KUD Sumber Makmur	Desa Rantau Durian II, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.5566	104.9637	568.00	Not Certified	2023	-	
	Indonesia	KUD Sari Makmur	Desa Tanjung Sari II, Kec. Lempuing Jaya, Kab. OKI, Prov. Sumatera Selatan	-3.6192	104.9055	573.40	Not Certified	2023	-	
	Indonesia	KUD Sanjaya Citra Mandiri	Kab. OKI, Prov. Sumatera Selatan	-3.5147	104.9086	65.00	Not Certified	2025	-	
PT Sampoerna Agro	Indonesia	Mill Selapan Jaya	Desa Kerta Mukti, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7109	105.0975	118.595	Certified	2017	2017	
	Indonesia	Estate Hikmah Dua	Desa Pulau Geronggang, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6557	105.1617	3,120	Certified	2017	2017	
	Indonesia	KUD Jadi Mandiri	Desa Embacang Permai, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7275	105.1186	579.81	Certified	2020	2020	
	Indonesia	KUD Maju Lancar	Desa Sedyo Mulyo, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6524	105.0338	983.88	Certified	2018	2018	
	Indonesia	KUD Madya Karya Bhakti	Desa Suka Sari, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7444	105.0248	1,011.88	Certified	2018	2018	

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	Indonesia	KUD Sedyu Mukti	Desa Gedung Rejo, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6962	105.0522	1,068.90	Certified	2018	2018	
	Indonesia	KUD Jaya Makmur	Desa Bumi Makmur, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6797	105.1006	1,436.07	Certified	2018	2018	
	Indonesia	KUD Bina Sejahtera	Desa Kerta Mukti, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7126	105.0778	1,122.62	Certified	2018	2018	
	Indonesia	KUD Bina Tani Mulya	Desa Maribaya, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6577	105.1302	1,138.46	Certified	2018	2018	
	Indonesia	KUD Intan	Desa Panca Warna, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5250	105.1454	876.57	Certified	2018	2018	
	Indonesia	KUD Marga Mulya**	Desa Tanjung Makmur, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.9015	105.1060	593.16	Certified	2018	2018	
	Indonesia	KUD Sumber Sentosa	Desa Sumber Hidup, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5617	105.0717	1,199.85	Certified	2018	2018	
	Indonesia	KUD Serba Usaha	Desa Gading Raja, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5759	105.1037	1,216.58	Certified	2018	2018	
	Indonesia	KUD Ipoh Raya	Desa Kayu Labu, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.5890	105.2143	1,000.95	Not Certified	2024	-	
	Indonesia	KUD Puger Mulya	Desa Pulau Geronggang, Kec. Pedamaran Timur, Kab. OKI, Prov. Sumatera Selatan	-3.6435	105.2102	446.40	Not Certified	2024	-	
	Indonesia	KUD Harapan Jaya Mandiri	Desa Embacang, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.6993	105.1595	350.50	Not Certified	2024	-	
	Indonesia	KUD Balian Sejahtera Abadi	Desa Balian, Kec. Mesuji Raya, Kab. OKI, Prov. Sumatera Selatan	-3.7442	105.1783	1,364.40	Not Certified	2024	-	
PT Sungai Rangit	Indonesia	Mill Sungai Rangit	Desa Kartamulya Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.6319	111.2554	-	Not Certified	2024	-	
	Indonesia	Estate Baboti	Desa Sukaraja, Kec. Sukamara, Desa Sumber Mukti, Kec. Kota Waringin Lama, Kab. Kotawaringin Barat, Prov. Kalimantan Tengah	-2.5198	111.2788	2,411.81	Not Certified	2024	-	

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	Indonesia	Estate Rauk Naga	Desa Babual Baboti & Desa Tempayung, Kec. Kotawaringin Lama, Kab. Kota Waringin Barat, Prov. Kalimantan Tengah	-2.5323	111.3387	2,349.56	Not Certified	2024	-	
	Indonesia	Estate Waringin	Desa Kartamulya, Desa Babual Baboti & Desa Tempayung, Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.5964	111.2743	3,039.66	Not Certified	2024	-	
	Indonesia	Estate Sukamara	Desa Kartamulya, Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.6384	111.2572	2,983.43	Not Certified	2024	-	
	Indonesia	Estate Telaga Bintang	Desa Pudu Rundun, Desa Natai Sedawa & Desa Kartamulya, Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.7142	111.2265	1,635.52	Not Certified	2024	-	
	Indonesia	Estate Sungai Sagu	Desa Kartamulya Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.5905	111.2316	3,120.90	Not Certified	2024	-	
	Indonesia	Estate Sahara	Desa Kartamulya Kec. Sukamara, Kab. Sukamara, Prov. Kalimantan Tengah	-2.5913	111.3453	3,362.78	Not Certified	2024	-	
	Indonesia	Koperasi Pasir Subur Sampoerna	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5743	111.3104	79.85	Not Certified	2025	-	
	Indonesia	Koperasi Sawit Mukti Jaya	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5269	111.2255	740.97	Not Certified	2025	-	
	Indonesia	Koperasi Mulya Jaya	Kab. Sukamara, Prov. Kalimantan Tengah	-2.6851	111.2917	430.44	Not Certified	2025	-	
	Indonesia	Koperasi Patih Payung Sejahtera	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5773	111.3042	458.60	Not Certified	2027	-	
	Indonesia	Kelompok Tani (PokTan) I s.d XXVIII	Kab. Sukamara, Prov. Kalimantan Tengah	-2.7087	111.2482	1,809.00	Not Certified	2026	-	
	Indonesia	Kelompok Tani Mitra Terpadu I s.d III	Kab. Sukamara, Prov. Kalimantan Tengah	-2.6097	111.3055	884.15	Not Certified	2027	-	

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	Indonesia	Koperasi Usaha Tani Sejahtera	Kab. Sukamara, Prov. Kalimantan Tengah	-2.5476	111.2149	55.56	Not Certified	2025	-	
PT Usaha Agro Indonesia	Indonesia	Mill Usaha Agro Indonesia	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Prov. Kalimantan Barat	-2.6824	110.9748	0	Certified	2021	2018	
	Indonesia	Estate Ulin Agro	Desa Jambi, Kec. Manis Mata, Kab. Ketapang, Prov. Kalimantan Barat.	-2.6320	111.0595	2,527.98	Certified	2021	2018	
	Indonesia	Estate Kruing Agro	Desa Jambi & Desa Danau Buntar, Kec. Manis Mata & Kendawangan, Kab. Ketapang, Prov. Kalimantan Barat.	-2,6500	110.9441	2,955.37	Certified	2021	2018	
	Indonesia	Estate Meranti Agro	Desa Danau Buntar, Kec. Kendawangan, Kab. Ketapang, Prov. Kalimantan Barat.	-2.6171	110.9412	4,187.10	Certified	2021	2018	
	Indonesia	Third location permit 2.283 ha	Kab. Ketapang, Prov. Kalimantan Barat.	-2.6522	111.0441	2,283	Not Certified	2025	-	
	Indonesia	Estate Gaharu Palm	Desa Suka Ramai, Kec. Manis Mata, Kab. Ketapang, Prov. Kalimantan Barat	-2.5777	111.0974	5,418	Not Certified	2025	-	
	Indonesia	Kopbun JMJS	Kab. Ketapang, Prov. Kalimantan Barat	-2.6522	111.0441	1,320.02	Certified	2021	2021	
	Indonesia	Kopbun SM	Kab. Ketapang, Prov. Kalimantan Barat	-2.5598	110.9455	901.95	Certified	2021	2021	
	Indonesia	Kopbun SB	Kab. Ketapang, Prov. Kalimantan Barat	-2.5610	110.9439	273.1100	Not Certified	2025	-	
	Indonesia	Gaharu Smallholder	Kab. Ketapang, Prov. Kalimantan Barat	-2.5887	111.0806	1,507.00	Not Certified	2027	-	
PT Lanang Agro Bersatu	Indonesia	Mill Lanang Agro Bersatu	Desa Istana, Kec. Sandai, Kab. Ketapang, Prov. Kalimantan Barat	-1.2113	110.5223		Not Certified	2024	-	
	Indonesia	Estate Bukit Subur	Desa Sandai Kiri, Penjawaan, Jago Bersatu, Kec. Sandai, Kab. Ketapang, Prov. Kalimantan Barat	-1.2493	110.4634	5,411.42	Not Certified	2024	-	
	Indonesia	Estate Bukit Makmur	Desa Petai Patah, Demit, Kec. Sandai, Kab. Ketapang, Prov. Kalimantan Barat	-1.2339	110.6075	4,262.16	Not Certified	2024	-	

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	Indonesia	Kopbun Bina Bersama	Kab. Ketapang, Prov. Kalimantan Barat	-1.2232	110.4541	618.76	Not Certified	2025	-	
	Indonesia	Kopbun Mitra Peruye Bersatu	Kab. Ketapang, Prov. Kalimantan Barat	-1.2070	110.5968	718.17	Not Certified	2025	-	
	Indonesia	Kopbun Dara Kaba	Kab. Ketapang, Prov. Kalimantan Barat	-1.1872	110.6733	199.06	Not Certified	2025	-	
Landak Area I	Indonesia	Estate Gunung Tenerah	1. Desa Songga, Desa Angkaras, Desa Berinang Mayun, Desa Sidan, dan Desa Lintah Betung (Kec. Menyuke) 2. Desa Semade, Desa Kampet, Desa Padang Pio, Desa Ringo Lojo dan Desa Untang (Kec. Banyuke Hulu) 3. Desa Tunang dan Desa Tiang Tanjung (Kec. Mempawah Hulu) 4. Desa Tahu (Kec. Meranti), Kab. Landak, Prov. Kalbar	0.6199	109.5812	3,127.58	Not Certified	2024	-	
	Indonesia	Estate Gunung Alam	1. Desa Songga, Desa Timbang Bale, Desa Lintah Betung, Desa Sidan, dan Desa Berinang Mayun (Kec. Menyuke) 2. Desa Padang Pio (Banyuke Hulu) 3. Desa Kayu Ara, Desa Kelampai Stolo, Desa Muara Betung (Kec. Meranti), Kab. Landak, Prov. Kalbar	0.6677	109.5935	3,245.35	Certified	2024	-	
	Indonesia	Estate Kedurang Prakarsa Nabati	Kec. Menyuke, Banyuke Hulu, Meranti & Mempawah, Kab. Bengkayang, Prov. Kalimantan Barat	0.7680	109.6079	3,319.00	Not Certified	2024	-	
	Indonesia	Kopbun Usaha Ane Laki	Kab. Landak, Prov. Kalimantan Barat	0.6014	109.5673	276.15	Not Certified	2026	-	
	Indonesia	Kopbun Usaha Tandan Hidup	Kab. Landak, Prov. Kalimantan Barat	0.7257	109.6123	523.49	Not Certified	2026	-	

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Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Remarks
				Latitude	Longitude					
	Indonesia	Kopbun Biki Diri Maju	Kab. Landak, Prov. Kalimantan Barat	0.6788	109.5792	607.62	Not Certified	2026	-	
	Indonesia	Kopbun Panamukng Sagauh Raya	Kab. Landak, Prov. Kalimantan Barat	0.6158	109.7035	296.06	Not Certified	2026	-	
	Indonesia	PT. Kedurang Prakarsa Nabati Smallholders	Kab. Bengkayang, Prov. Kalimantan Barat	0.7748	109.6068	450.00	Not Certified	2026	-	
Landak Area II	Indonesia	Estate Gunung Sejahtera	Desa Kuala Behe, Paku Raya, Sumedang, Nyanyum, Kec. Kuala behe, Kab. Landak, Prov. Kalimantan Barat	0.5768	110.0506	1,655.00	Not Certified	2025	-	
	Indonesia	Estate Gunung Mentari	1. Desa Serimbu, Jambu Tembawang, Sepangah, Engkadi Pede dan Temoyok, Kec. Air Besar 2. Desa Semedang & Permit, Kec. Kuala Behe Kab. Landak, Prov. Kalimantan Barat	0.7322	110.0936	951.26	Not Certified	2025	-	
	Indonesia	Estate Gunung Utama	1. Desa Serimbu, Jambu tembawang, Sepangah, Engkadi pede dan Temoyok, Kec. Air Besar 2. Desa Semedang & Permit, Kec. Kuala behe Kab. Landak, Prov. Kalimantan Barat	0.6903	110.1053	896.49	Not Certified	2025	-	
	Indonesia	Kopbun Sawit Ene Mampui Sejahtera	Kab. Landak, Prov. Kalimantan Barat	0.5833	110.0423	521.64	Not Certified	2027	-	
	Indonesia	Kopbun Binua Aek' Ayak	Kab. Landak, Prov. Kalimantan Barat	0.7250	110.0667	253.65	Not Certified	2027	-	
	Indonesia	Kopbun Saripan Ayung Apu	Kab. Landak, Prov. Kalimantan Barat	0.6472	110.0770	223.35	Not Certified	2027	-	

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 ten (10) Critical; five (5) Minor nonconformities and nil Opportunity For Improvement raised. The PT Usaha Agro Indonesia Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2355770-202306-M1	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	1.1.3 (Critical)		
Statement of Nonconformity:	Based on interviews with workers' samples and related stakeholders, several requests for information were delivered, however the certification unit could not show a record of information requests and responses.		
Requirement Reference:	Records of requests for information and responses are maintained.		
Objective Evidence:	<p>Certification Unit has a form for recording communications and responses in the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Based on interviews with a sample of workers and related stakeholders, several requests for information were submitted, however, the certification unit was unable to show records of requests for information and their responses.</p> <p>Example:</p> <ul style="list-style-type: none"> Harvester and fruit collector employees at Ulin Agro Estate submitted a request for information regarding details of salary deductions, but there was no record of it in the Stakeholder Communication Logbook. The management of the Koperasi Jambi Mekar Jaya Sempurna (JMJS) submitted a request for information related to the Monthly and Annual Work Plans, as well as Monthly Activity Results Reports at Plasma which are not routinely submitted, but there are no records in the Stakeholder Communication Logbook. 		
Corrections:	<p>Record and provide responses to every recorded request for information received from both employees and external parties into the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Data verified during NCR Close Out Visit:</p> <ul style="list-style-type: none"> Review of the Communication & Stakeholder Response Logbook document at KAE. Related: Leaking house roof (reported by Mr Feri Huan for inspection and repair dated July 15, 2023). Status: has been followed up and closed. Review of the Communications & Stakeholder Response Logbook document in the UAE. Related: Leaking floor condition (reported by Nasya (block A1), to be checked and repaired on 12 August 2023). Status: has been followed up and closed. 		

	<ul style="list-style-type: none"> Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001).and Wages, dated 24 August 2023. Location in Meranti Agro Estate, that was attended by 68 workers. Based on the results of interviews with sample employees (dated 12 September 2023), information was obtained that they understood the process of submitting information requests.
Root Cause Analysis:	The certification unit (UAE, KAE, MAE) does not yet understand the mechanism for recording and responding to information requests submitted to the company in the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).
Corrective Actions:	<p>Carrying out dissemination regarding recording mechanisms and responding to requests for information in accordance with the P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation, and conducted dissemination to workers related "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Data verified during NCR Close Out Visit:</p> <p>Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001) and Wages Issues to workers, dated 24 August 2023. Location at Meranti Agro Estate, that was attended by 68 workers</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-M2	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	1.1.4 (Critical)		
Statement of Nonconformity:	Sampoerna IMS Procedure - Communication, Participation and Consultation, no: P-SAG-HO-CA&L-08 has not been understood by relevant stakeholders.		
Requirement Reference:	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		
Objective Evidence:	<p>The Certification Unit has the Sampoerna IMS Procedure document - Communication, Participation and Consultation, no: P-SAG-HO-CA&L-08, 2nd revision dated 1 February 2016. This procedure is approved by the CEO and is available in Indonesian.</p> <ul style="list-style-type: none"> Based on interviews with a sample of harvesting and harvesting workers, they submitted complaints regarding work bases, premiums, fines, and salary cuts, but they stated that they did not know where to submit these complaints. There were several complaints and requests for information submitted by workers and stakeholders, but they were not recorded in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001). 		

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Corrections:	<p>Record and respond to complaints and requests for information submitted by workers and stakeholders in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001)</p> <p>Data verified during NCR Close Out Visit:</p> <ul style="list-style-type: none"> Review of the Communication & Stakeholder Response Logbook document at KAE. Related: Leaking house roof (reported by Mr Feri Huan for inspection and repair dated July 15, 2023). Status: has been followed up and closed. Review of the Communications & Stakeholder Response Logbook document in the UAE. Related: Leaking floor condition (reported by Nasya (block A1), to be checked and repaired on 12 August 2023). Status: has been followed up and closed. Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001).and Wages, dated 24 August 2023. Location in Meranti Agro Estate, that was attended by 68 workers. Based on the results of interviews with sample employees (dated 12 September 2023), information was obtained that they understood the process of submitting information requests.
Root Cause Analysis:	<p>The certification unit (UAE, KAE, MAE) does not yet understand the procedures of P-SAG-HO-CA&L-08, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation. There are several complaints and requests for information submitted by workers and stakeholders that have not been properly documented in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001).</p>
Corrective Actions:	<p>Carrying out socialization regarding recording mechanisms and responding to requests for information in accordance with the P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation, and conducted dissemination to workers related "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Data verified during NCR Close Out Visit:</p> <p>Dissemination document related to Stakeholder Logbook (LB-SAG-HO-CA&L-080001) and Wages Issues to workers, dated 24 August 2023. Location at Meranti Agro Estate, that was attended by 68 workers</p>
Assessment Conclusion:	<p>PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.</p>

Non-conformity			
NCR Ref #	2355770-202306-M3	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.5.2 (Critical) Escalation of minor NC on ASA-4		
Statement of Nonconformity:	Based on interviews and site visits, the auditor found several workers who did not have a PKWT Work Agreement as required in the Sampoerna Agro IMS Procedure –Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018.		

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Requirement Reference:	Employment procedures are implemented and records are maintained.
Objective Evidence:	<p>The Certification Unit has the Sampoerna Agro IMS Procedure –Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018.</p> <p>In the procedural attachment the stages of PKWT recruitment are explained, and in number 7.9 it is stated that the Work Unit Leader makes a work agreement between the Company and Employees (WI-SAG-ADM-KTU-0401), after which the workforce signs a form of understanding and approval for employee induction (FM-SAG-ADM-KTU-040002)</p> <p>Based on interviews and site visits, the auditor found several workers who did not have PKWT Work Agreement documents.</p> <p>Example:</p> <ul style="list-style-type: none"> • On behalf of Mr. S***** (Harvester), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 3 months. • On behalf of Mr. T***** (Harvester), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 1.5 months. • On behalf of A**** (Harvest Assistance Workers), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 17 days
Corrections:	<p>Inform and provide copies of work agreement documents to harvest, maintenance and other workers in accordance with company procedures.</p> <p>Data verified during NCR Close Out Visit:</p> <p>The auditor has verified that all employees have contract documents, both for permanent employees (PB and KHT) and contract employees (PKWT). This proof is available in Minutes document of handover (Berita Acara Serah Terima Dokumen), as follows:</p> <ul style="list-style-type: none"> • Minutes document of handover of Employee Work Agreement Letter, dated 16 August 2023 at Ulin Agro Estate, for example Mr Ahmad Zarkasi (Division 1, harvester worker, accompanied by signature), Mrs Brigita Permatasari (Division 1, fertilizer application worker, accompanied by signature), and Mr Hasan Basi (Division 2, chemist application worker, accompanied by signature) • Minutes document of handover of Employee Work Agreement Letter, dated 16 August 2023 at Kruing Agro Estate, for example Mr Hendi Mardane (Division 2, workers of loading the FFB, accompanied by signature), Mr Yacob Tapah (Division 2, fertilizer application worker, accompanied by signature) • Based on the results of interviews with employees during the NCR closure visit process (dated 12 September 2023), confirmation was obtained that all employees had signed employment contracts and had copies of these documents.
Root Cause Analysis:	Delay by unit officers in providing copies of work agreement documents to harvest, maintenance and other workers in accordance with company procedures.
Corrective Actions:	<p>Coordinate with the HRD Department to:</p> <ul style="list-style-type: none"> • Conduct socialization regarding work agreement documents in accordance with company procedures. • Carry out periodic monitoring of the handover and provide copies of work agreement documents to workers in accordance with company procedures.

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	Data verified during NCR Close Out Visit: Dissemination document related to Agreement Process and Its Compliance with relevant regulation, dated 14 August 2023. Location in General Manager Office in PT UAI, that were attended by 19 staff and representative of employee.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-M4	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Not all activities within the scope of PT Usaha Agro Indonesia have been risk analyzed.		
Requirement Reference:	All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>The certification unit has updated its risk analysis in January 2023, but this document does not yet cover all activities within the scope of the company, for example:</p> <ul style="list-style-type: none"> • Monitoring HGU boundaries • HCV Management and Monitoring • Activities of contractors working in factories and plantations • Fire monitoring activities in the fire tower. 		
Corrections:	<p>Review risk analysis documents based on all activities within the scope of the company, for example:</p> <ul style="list-style-type: none"> • Monitoring HGU boundaries • HCV Management and Monitoring • Activities of contractors working in factories and plantations • Fire monitoring activities in the fire tower. <p>Data verified during NCR Close Out Visit: All the activities in operation unit have been identified at the risk assessment document, including monitoring of HGU boundaries, HCV inspection, contractor activities and monitor of fire.</p> <ul style="list-style-type: none"> • Review of the document risk assessment as per "Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan Keselamatan Kesehatan Kerja", form number: FM-SAG-HO-SUS-070006, Unit Operation: Kruing Agro Estate, last review on 22nd July 2023. All the operation activities in estate have been identified. • Review of the document risk assessment as per "Analisa Risiko Operasional (ORM), Aspek Mutu, Lingkungan dan Keselamatan Kesehatan Kerja", form 		

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	number: FM-SAG-HO-SUS-070006, Unit Operation: Ulin Agro Estate, last review on 24 th July 2023. All the operation activities in estate have been identified.
Root Cause Analysis:	<p>Activities such as:</p> <ul style="list-style-type: none"> • Monitoring HGU boundaries • HCV Management and Monitoring • Activities of contractors working on factories and gardens • Fire monitoring activities in Fire tower. <p>It has not been identified in the risk analysis document that has been updated by the company because procedures related to this activity were not evaluated when creating the risk analysis document.</p>
Corrective Actions:	<p>Identify every activity and new activities within the scope of the company and carry out risk analysis based on the activities and new activities that have been identified in accordance with company procedures.</p> <p>Data verified during NCR Close Out Visit:</p> <p>All the activities in operation unit have been identified at the risk assessment document of UAI Palm Oil Mill, Meranti Agro Estate, Ulin Agro Estate and Kruing Agro Estate.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-M5	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.8.7 (Critical)		
Statement of Nonconformity:	The company has not fully indicated its FFB sources from certified and non-certified areas.		
Requirement Reference:	Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.		
Objective Evidence:	Detailed data on certified and non-certified FFB supply source blocks is not yet available, considering that there are Core plantation areas that are subject to sanctions for planting without NPP and amalgamation of the Koperasi Jambi Mekar Jaya Sempurna block.		

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Corrections:	<p>Providing detailed data on certified and non-certified FFB supply source blocks in the Core plantation area which received sanctions for planting without NPP and amalgamation of the Koperasi Jambi Mekar Jaya Sempurna block.</p> <p>Data verified during NCR Close Out Visit: All the unit operation (UAE, KAE, MAE) has demonstrated the document of Identify RSPO Sustainable and Non-Sustainable Blocks, sample seen:</p> <ul style="list-style-type: none"> • In Kruing AGro Estate, based on "Identifikasi Blok Sustainable & Non-Sustainable RSPO", updated in August 2023. Sample of Non-Sustainable block in Division 2, block IK0016 (11.76 Ha), block IM0012 (11.07 Ha), block IM00014 (5.35 Ha) and block IL0014 (24.23). All FFBs generated from this block are not claimed to be certified FFBs. • In Meranti Agro Estate, based on "Identifikasi Blok Sustainable & Non-Sustainable RSPO", updated in August 2023. Sample of Non-Sustainable block in Division 2, block PD0005 (2.76 Ha), PD0008 (13.09 Ha), PE0012 (16.45). All FFBs generated from this block are not claimed to be certified FFBs. • In Ulin Agro Estate, based on "Identifikasi Blok Sustainable & Non-Sustainable RSPO", updated in August 2023. Sample of Non-Sustainable block in Division 2, block IM006 (9.29 Ha), block IN0041 (17.05 Ha), and block IM0051 (13.93 Ha). All FFBs generated from this block are not claimed to be certified FFBs. <p>Based on the field visit (dated 12 September 2023), it was found that the non-sustainable blocks had been clearly identified, apart from that the PIC was also able to explain the condition of the blocks.</p>
Root Cause Analysis:	Detailed data on certified and non-certified FFB supply source blocks has not been adjusted to data on amalgamated core plantation and plasma areas.
Corrective Actions:	<p>Updating detailed data on certified and non-certified FFB supply source blocks in amalgamated core and plasma plantation areas.</p> <p>Data verified during NCR Close Out Visit: All the unit operation unit (UAE, MAE and KAE) has demonstrated the document of Identified RSPO Sustainable and Non-Sustainable Blocks. The document updated in August 2023.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

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Non-conformity			
NCR Ref #	2355770-202306-M6	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.2.2 (Critical)		
Statement of Nonconformity:	Employees at PT. Usaha Agro Indonesia stated that they did not know the information on the basic calculation of wages and basic deductions stated on the pay slip.		
Requirement Reference:	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.		
Objective Evidence:	Based on interviews with harvest and harvest workers at KAE, MAE, UAE, they stated that they did not know the information on the wholesale basis, the basis for deductions and the nominal value of the deductions stated on the pay slip, and they stated that they did not know where to ask for clarity regarding this matter.		
Corrections:	<p>The company is conducting socialization again regarding information on wage components including basic salary, premiums, deductions/compensation to all workers.</p> <p>Data verified during NCR Close Out Visit:</p> <p>Auditor team has interview with sample of smallholder, example: Mrs Wiwik Kardasih (in Ulin Estate, as manual weeding worker), Mrs Mahmudah (in Kruing Estate, pesticides applicator), Mrs Sariya (in Kruing Estate, as pesticides applicator) and they can explain and understand the information on the basic calculation of wages and basic deductions stated on the pay slip.</p> <p>Moreover, based on review of Contractual Agreement also has been stated the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice. For example:</p> <ul style="list-style-type: none"> • Employee Work Agreement Letter, dated 16 August 2023 at Ulin Agro Estate, for example Mr Ahmad Zarkasi (Division 1, harvester worker, accompanied by signature), Mrs Brigita Permatasari (Division 1, fertilizer application worker, accompanied by signature), and Mr Hasan Basi (Division 2, chemist application worker, accompanied by signature) • Employee Work Agreement Letter, dated 16 August 2023 at Kruing Agro Estate, for example Mr Hendi Mardane (Division 2, workers of loading the FFB, accompanied by signature), Mr Yacob Tapah (Division 2, fertilizer application worker, accompanied by signature). 		
Root Cause Analysis:	The company has provided information and explanations on the wholesale basis, the basis for deductions and the nominal value of deductions stated on the pay slip, but the documentary evidence is not complete, and some employees do not understand this.		

Corrective Actions:	<p>The company continues to provide information and explanations on the wholesale basis, the basis for deductions and the nominal value of the deductions stated on the pay slip to all employees.</p> <p>Data verified during NCR Close Out Visit: All workers are employed based on the Surat Perjanjian Kerja (Employment Agreement) which outlines items such as wages, overtime pay, holiday, working hours and days, insurance, medical, occupational safety, and health following the company regulation year 2022-2024, which approved by 'Dinas Tenaga Kerja & Transmigrasi'.</p>
Assessment Conclusion:	<p>PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.</p>

Non-conformity			
NCR Ref #	2355770-202306-M7	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.2.4 (Critical)		
Statement of Nonconformity:	The company has provided housing and household equipment for its workers, but there are still shortages because some workers live in other families' homes.		
Requirement Reference:	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.		
Objective Evidence:	Based on interviews with workers (loose fruit collector) of UAE, they stated that there was 1 worker who lived with another worker's family in 1 house; while other workers stated that their house accommodated 1 other worker from a different family in the house.		
Corrections:	<ul style="list-style-type: none"> Collect data again between the number of workers' housing needs and the number of employees, both married and single. The company provides rental houses in the area around the company for employees who do not yet have housing facilities. <p>Data verified during NCR Close Out Visit: The company has prepared the document of listed housing provided under document "Daftar Penghuni Rumah PT Usaha Agro Indonesia" – updated in August 2023, in detail: At Ulin Agro Estate, such as:</p> <ul style="list-style-type: none"> Type G2 housing has a total of 46 units, the number of employees occupying 97 workers. Type G6 housing with 36 units, the number of employees occupying 108 workers. 		

	<ul style="list-style-type: none"> Type G10 housing with a total of 40 units, the number of employees occupying 121 workers. <p>All employees have their own homes with their respective families. There are no two or more families living in one house. This house facility is sufficient for all employees at Ulin Agro Estate.</p> <p>Based on field visits to housing (emplacement) at Ulin Agro Estate and Kruing Agro Estate (dated 12 September 2023), the auditor team found that housing facilities were adequate and continued to progress to ensure they were available for all employees.</p>
Root Cause Analysis:	The company has added employee housing facilities, but currently construction is still in progress. The company has prepared rental houses in the area around the company for employees who do not yet have housing facilities. However, the worker choose to live in the same house as another family in employee housing.
Corrective Actions:	<p>Providing and handing over housing facilities to employees who still live in the same house but with different families after the housing construction progress is complete.</p> <p>Data verified during NCR Close Out Visit: The company has shown a monitoring list of housing facilities for employees who have occupied homes. Based on the monitoring report for August 2023, there are no employees who do not have housing facilities.</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-M8	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.6.2 (Critical)		
Statement of Nonconformity:	It was found that care workers in the UAE with work relationships as PKWT were not based on a valid Fixed Time Work Agreement.		
Requirement Reference:	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.		
Objective Evidence:	Based on the document review, there is a "Specified Time Work Agreement No.PKWT/UAE/2022, namely Mrs Kristina (Manual Weeding)" dated March 14 2022. Article 2 states that the PKWT period for Care Employees is not appropriate, namely for 6 months for the period 03/14/2022 – 14 /03/2022 with wages IDR 115,520 per day. At the time of the interview, the worker concerned still had PKWT status.		
Corrections:	Revised the editorial writing of the PKWT document No.PKWT/UAE/2022 dated March 14 2022, on behalf Mrs Kristina (manual weeding)		

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	<p>Data verified during NCR Close Out Visit:</p> <p>PT Usaha Agro Indonesia has demonstrated the revised the document of Specific Time Work Agreement, namely Mr Kristina, as per document "Perjanjian Kerja Waktu Tertentu", namely Mrs Kristina (address Sungai Danau Village, Tanah Bumbu Regency) and on behalf company is Estate Manager in Ulin Agro Estate. In Article 1 mentioned that Mrs Kristina as Contract Workers, valid until 4th March 2024.</p> <p>Based on result of interview with sample employee during NCR visit (dated 12 September 2023), example: Mrs Wiwik Kardasih (in Ulin Estate, as manual weeding worker), Mrs Mahmudah (in Kruing Estate, pesticides applicator), Mrs Sariya (in Kruing Estate, as pesticides applicator) they have confirmed that all employees have a Specific Time Work Agreement document.</p>
Root Cause Analysis:	There was an editorial error in writing the PKWT document No.PKWT/UAE/2022 dated March 14 2022, namely Mrs Kristina (manual weeding), which period should be 03/14/2022 – 09/13/2022.
Corrective Actions:	<p>Coordination with the HRD Department to:</p> <ul style="list-style-type: none"> • Conduct outreach to KTU regarding the mechanism for making PKWT documents to all workers. • Conduct regular monitoring in analyzing employee work documents, whether they have PB, KHT, PKWT or contract status, therefore no more errors in writing or typing. <p>Data verified during NCR Close Out Visit:</p> <p>The site HRD has demonstrated the list of documents of Specific Time Work Agreement, updated in August 2023 as regular monitoring in analyzing employee work documents</p>
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-M9	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	The company has provided PPE for its workers, but there are some workers who use PPE not provided by the company.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		

<p>Objective Evidence:</p>	<p>Based on a review of the PPE Handover Minutes document, the company has provided PPE for its workers, however during site visits and interviews, there were several workers who used PPE not provided by the company, for example:</p> <ul style="list-style-type: none"> • 2 (fruit collected workers) at KAE use AP shoes not given by the company. • 1 driver transporting FFB at KAE use safety shoes not provided by the company. • 1 EFB Applicator at KAE, 3 wholesalers at JMJS, 4 harvesters at JMJS and 1 grading worker at the loading ramp wearing AP shoes not given by the company.
<p>Corrections:</p>	<ul style="list-style-type: none"> • Record the amount of PPE needed for each type of work based on the number of employees. • Provide PPE as needed for each type of work based on the number of employees. <p>Data verified during NCR Close Out Visit: The company has provided the PPE to all employees, the record provided such as:</p> <ul style="list-style-type: none"> • In Ulin Agro Estate -> Data Monitoring Stock of PPE update on 23rd August 2023, i.e., safety helmet (32 pcs for blue type, 48 pcs for yellow type), face shield (61 pcs), AP boot (124 pcs), • In Meranti Agro Estate -> Data Monitoring Stock of PPE update on 23rd August 2023, i.e., safety helmet (18 pcs for blue type), face shield (51 pcs), AP boot (91 pcs), N95 Dust Mask (30 pcs) • In Kuring Agro Estate -> Data Monitoring Stock of PPE update on 23rd August 2023, i.e., safety helmet (11 pcs for blue type, 156 pcs for yellow type), face shield (129 pcs), AP boot (1110 pcs), apron (110 pcs), Carbon Mask (80 pcs), and N95 Dust Mask (75 pcs) <p>Based on field visit during NCR (dated 12 September 2023), in Kuring Agro Estate Division 02, the auditor team has interview with sample worker namely Mr Misawti (pesticides applicator), Mrs Siti Husnul (pesticides applicator) and Mrs Maria Aernesia (pesticides applicator), they have stated that the pesticide applicator employees have used PPE as required in the OHS risk assessment results document.</p> <p>Apart from this, the HSE team (sustainability on site) has provided a report on the use of PPE for all employees at the work site. examples are provided in APA inspection reports for July and August 2023, where it was reported that all employees were wearing PPE as required</p>
<p>Root Cause Analysis:</p>	<p>The availability of PPE stock for workers is still less than the need. This is because worker turnover at PT UAI is quite high.</p>
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Coordination with unit leaders and HRD to provide guidance and understanding in ensuring the availability of employees in each estate. • Providing PPE stock in the warehouse as needed for each type of work based on the number of employees in each unit. <p>Data verified during NCR Close Out Visit:</p>

	The company has demonstrated the List of Data Monitoring Stock of PPE (updated in August 2023). The documents shown that the availability of PPE is sufficient for employees.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-M10	Issued Date	18 June 2023
Due Date	17 September 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	7.2.6 (Critical)		
Statement of Nonconformity:	The company has provided training for pesticide application officers, but there are several workers whose training records are not available.		
Requirement Reference:	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.		
Objective Evidence:	Visits and interviews were conducted with spraying workers at Ulin Agro Estate and Meranti Agro Estate, however based on a review of documents there were several workers who did not have records that they had taken training in pesticide use, for example: Kristina (UAE), Belandina and Wiwin (MAE).		
Corrections:	<ul style="list-style-type: none"> Identify spray workers who have not received training on pesticide use from the company. Conduct pesticide use training for several spray workers based on company identification results. <p>Data verified during NCR Close Out Visit: The company has provided the training program and delivered to all pesticide’s applicators (Tim Unit Sempit – TUS), sample see:</p> <ul style="list-style-type: none"> In Kruing Agro Estate has carried the training on 18th August 2023 (time: 02.00 PM), the subject training is refreshment of the SOP on pesticides handling and application (SOP-SAG-KBN-PML-12 and P-SAG-KBN-PML-22). The training has attended by 15 workers, 5 Staff, 2 supervisor and 1 sustainability staff. In Meranti Agro Estate has carried the training on 18th August 2023 (time: 09.00 AM), the subject training is refreshment of the SOP on pesticides handling and application (SOP-SAG-KBN-PML-12 and P-SAG-KBN-PML-22). The training has attended by 14 workers, 6 Staff, 2 supervisor and 1 sustainability staff. In Ulin Agro Estate has carried the training on 19th August 2023 (time: 09.00 AM), the subject training is refreshment of the SOP on pesticides handling and application (SOP-SAG-KBN-PML-12 and P-SAG-KBN-PML-22). The training has attended by 20 workers, 4 Staff, 2 supervisor and 2 sustainability staff. 		

	Based on field visit during NCR (dated 12 September 2023), in Kuring Agro Estate Division 02, the auditor team has interview with sample worker namely Mr Misawti (pesticides applicator), Mrs Siti Husnul (pesticides applicator) and Mrs Maria Aernesia (pesticides applicator), they have stated that provided the training program and delivered to all pesticide’s applicators (Tim Unit Sempit – TUS)
Root Cause Analysis:	The employees on behalf of Kristina (UAE), Belandina and Wiwin (MAE) are new employees, they did not take part in the pesticide use training, which was carried out on November 25, 2022, by the FQA team located at Kruing Agro Estate.
Corrective Actions:	The unit makes a regular training schedule for pesticide use every year for all spray workers. Data verified during NCR Close Out Visit: The company has prepared the annual training program, example in 2023 the training on handling and application pesticides have planned in August and December 2023.
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. CH can demonstrate consistent correction and corrective action planned. The Major NC closed satisfactorily.

Non-conformity			
NCR Ref #	2355770-202306-N1	Issued Date	18 June 2023
Due Date	ASA1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	2.1.2 (Minor)		
Statement of Nonconformity:	Regulatory Identification and Evaluation Document at PT. Indonesian Agro Business has not been updated.		
Requirement Reference:	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.		
Objective Evidence:	PT. Usaha Agro Indonesia has not yet updated the "Form for Identification of K3, Environmental, Plantation Regulations and Other Related Requirements" for the 2023 period. The last update is in 2022, which is not in accordance with the SOP "Sampoerna Agro Integrated Management System Procedure for Identification and Evaluation of Legislative Regulations and Requirements Others No.P-SAG-HO-SUS-06 r3" dated 1 September 2017 – Section 7.4 states that legal reviews are carried out once a year. Furthermore, the identification of regulations does not yet include the 2023 Ketapang Regency Minimum Wage regulations.		
Corrections:	Carrying out identification to update K3, Environmental, Plantation and other related requirements in 2023.		
Root Cause Analysis:	Implementation of SOP No.P-SAG-HO-SUS-06" dated 1 September 2017 concerning Identification and Evaluation of Legislative Regulations and Other		

	Requirements has not been consistently implemented because the responsible officer has just joined. Therefore, in the identification of regulations there are still several regulations that have not been updated, such as the 2023 Ketapang Regency Minimum Wage regulations
Corrective Actions:	Coordination with the Systems and Certification Team in terms of: <ul style="list-style-type: none"> Update regulatory identification documents related to K3, environmental, plantation and other related requirements every year. Request documents from the Compliance Assistant as the person in charge periodically
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.

Non-conformity			
NCR Ref #	2355770-202306-N2	Issued Date	18 June 2023
Due Date	ASA1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	5.2.2 (Minor)		
Statement of Nonconformity:	PT Usaha Agro Indonesia has not demonstrated a capacity building program for plasma/smallholders		
Requirement Reference:	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).		
Objective Evidence:	Information obtained during consultation with the management of the Koeprasi Jambi Mekar Jaya Sempurna, stated that there were no programs and training provided to Plasma for institutional improvement, Agronomy, K3, FPIC, RSPO and other aspects. Based on a review of documents, the company was also unable to demonstrate a training program for Plasma.		
Corrections:	The company began conducting training programs for plasma for institutional improvement, agronomy aspects, K3, FPIC, RSPO and others.		
Root Cause Analysis:	The partnership team and cooperative management have not yet prepared programs and training for Plasma to improve institutions, aspects of Agronomy, K3, FPIC, RSPO and others.		
Corrective Actions:	The company creates training programs for plasma for institutional improvement, agronomy aspects, K3, FPIC, RSPO and others every year.		
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.		

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Non-conformity			
NCR Ref #	2355770-202306-N3	Issued Date	18 June 2023
Due Date	ASA 1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	6.7.4 (Minor)		
Statement of Nonconformity:	PT Usaha Agro Indonesia has included its workers in the BPJS Health and Employment program, however there are several workers who do not yet have BPJS Health and Employment cards.		
Requirement Reference:	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.		
Objective Evidence:	<p>Based on a review of the Company Regulation documents, in Section 21 concerning BPJS, it states that employers include workers in the BPJS Employment program and include workers in the BPJS Health program.</p> <p>Based on field visits and interviews, there are several workers who do not yet have BPJS Health and BPJS Employment Cards, including 3 buyers at JMJS, 6 harvesters at JMJS, 2 buyers at KAE, and 1 worker with an empty contract application at KAE.</p>		
Corrections:	<ul style="list-style-type: none"> • Several workers are still in the process of registering for BPJS Employment and Health due to problems with membership registration and administrative completeness. • The company has not carried out socialization regarding the use of the JMO and JKN mobile applications. Currently BPJS Health and Employment does not issue cards in physical form, proof of BPJS Health and BPJS Employment membership can be accessed via JMO and JKN (mobile application). 		
Root Cause Analysis:	<p>Based on a review of the Company Regulation documents, in Section 21 concerning BPJS, it states that employers include workers in the BPJS Employment program and include workers in the BPJS Health program.</p> <p>Based on field visits and interviews, there were several workers who did not have BPJS Health and BPJS Employment Cards, including 3 wholesalers at JMJS, 6 harvesters at JMJS, 2 wholesalers at KAE, and 1 worker who applied empty baskets at KAE.</p>		
Corrective Actions:	The company carries out outreach regarding the use of JMO and JKN (mobile applications).		
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.		

Non-conformity			
NCR Ref #	2355770-202306-N4	Issued Date	18 June 2023
Due Date	ASA 1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Waste management has not been implemented properly		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>The results of the field visit to the Final Waste Disposal Site (TPSA) found:</p> <ul style="list-style-type: none"> Block N15 Division 2 Kruing Agro Estate and Block E28 Division 2 Meranti Agro Estate found that organic and inorganic waste was not separated. Block N15 Division 2 Kruing Agro Estate found used motor oil packaging (B3 waste) which was dumped in the TPSA hole. <p>This is not in accordance with the socialization of Waste Management and the Prohibition of Burning Policy dated 10th January 2023.</p>		
Corrections:	<ul style="list-style-type: none"> Separate organic and inorganic waste in the final waste disposal site (TPSA) Block N15 Division 2 Kruing Agro Estate and Block E28 Division 2 Meranti Agro Estate. Retrieve and hand over the used motor oil packaging that was thrown into the Final Waste Disposal Site (TPSA) hole in Block N15 Division 2 Kruing Agro Estate to the Temporary B3 Waste Storage Site. 		
Root Cause Analysis:	The lack of awareness of employees living in the Kruing Agro Estate and Meranti Agro Estate housing complex has not been consistent in carrying out the P-SAG-KBN-LMB-01 procedures regarding Waste Control in Gardens.		
Corrective Actions:	<p>Providing an awareness of waste by:</p> <ul style="list-style-type: none"> Socialization regarding Waste Control procedures in Plantations (P-SAG-KBN-LMB-01) to employees and their families who live in employee housing units in all units (PKS, KAE, UAE and MAE) Provide education regarding waste management, the dangers or risks posed by waste and the positive impacts if waste is managed properly and correctly 		
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.		

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Non-conformity			
NCR Ref #	2355770-202306-N5	Issued Date	18 June 2023
Due Date	ASA 1-1	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.3 (Minor)		
Statement of Nonconformity:	Waste management is still found by burning it.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	<p>Based on the results of field visits at the Kruing Agro Estate and Ulin Agro Estate housing complexes, it was still found that there was the practice of burning domestic waste around the housing complex.</p> <p>This is not in accordance with the socialization of Waste Management and the Prohibition of Burning on January 10, 2023.</p>		
Corrections:	<ul style="list-style-type: none"> Conduct outreach to workers living in the Kruing Agro Estate and Ulin Agro Estate employee housing locations regarding the prohibition on burning domestic waste in accordance with the P-SAG-KBN-LMB-01 procedure concerning Waste Control in Gardens. Post a notice prohibiting burning of rubbish at workers' housing locations. 		
Root Cause Analysis:	Lack of awareness of workers living in Kruing Agro Estate and Ulin Agro Estate housing regarding domestic waste management in accordance with P-SAG-KBN-LMB-01 procedures concerning Waste Control in K		
Corrective Actions:	<p>Provide understanding not to burn waste around housing by:</p> <ul style="list-style-type: none"> Prepared a schedule and conduct outreach to workers and their families who live in employee housing for all units (PKS, KAE, UAE and MAE) about domestic waste management in accordance with the P-SAG-KBN-LMB-01 procedure concerning Waste Control in Gardens. Providing education regarding waste management, the prohibition of burning waste, the dangers or risks posed by burning waste and the positive impacts if waste is managed properly and correctly 		
Assessment Conclusion:	PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	m20	Issued Date	14 April 2022
Due Date	13 June 2023	Closure Date	13 September 2023
Indicator & Category (Critical / Minor)	3.5.2 (minor)		
Statement of Nonconformity:	During onsite audit, CH cannot demonstrate that the recruitment procedure has been implemented and the records are maintained.		
Requirement Reference:	Employment procedures are implemented and records are maintained.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Worker List of PT UAI, February 2022, found that there are harvesting worker which recruited (join date) in August 2021 to February 2022. 2. Field checked at Ulin, Kruing and Meranti Estates confirmed that there are new harvesting workers recruited in this last 12 months in field (SM, AS, NS). 		
Corrections:	<ul style="list-style-type: none"> • The process of recruiting harvesters through a selection process by the operations team and HR and making a PKWT work agreement which is prepared by the Estate that using the labour. • Periodically conducted refreshment of the SOP for recruitment to the person in charge at the unit. 		
Root Cause Analysis:	Employee recruitment documents are not archived by the Estate according to the SOP because it is centralized at KBS (Head Office) and personnel in the unit do not fully understand the existing SOP due to very dynamic personnel replacement.		
Corrective Actions:	<ul style="list-style-type: none"> • During recruitment process, all documents are archived properly in accordance with existing SOPs. • Conduct regular evaluation and monitoring of data archiving/recruitment processes. 		
Assessment Conclusion:	<p>The Certification Unit has the Sampoerna Agro IMS Procedure –Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018.</p> <p>In the procedural attachment the stages of PKWT recruitment are explained, and in number 7.9 it is stated that the Work Unit Leader makes a work agreement between the Company and Employees (WI-SAG-ADM-KTU-0401), after which the workforce signs a form of understanding and approval for employee induction (FM-SAG-ADM-KTU-040002)</p> <p>Based on interviews and site visits, the auditor found several workers who did not have PKWT Work Agreement documents.</p> <p>Example:</p>		

	<ul style="list-style-type: none"> • On behalf of Mr. S***** (Harvester), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 3 months. • On behalf of Mr. T***** (Harvester), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 1.5 months. • On behalf of A***** (Harvest Assistance Workers), the work location at JMJS Division 3 and Ulin Agro Estate has been working for 17 days
Effectiveness Closure (for previous audit closed Critical NC):	Based on interviews and site visits, the auditor found several workers who did not have a PKWT Work Agreement as required in the Sampoerna Agro IMS Procedure – Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018. The corrective action is not effectively addressing the non-conformity. This minor non-conformity escalated to Critical NC.

Non-conformity			
NCR Ref #	m21	Issued Date	14 April 2022
Due Date	13 June 2023	Closure Date	13 June 2023
Indicator & Category (Critical / Minor)	7.8.1 (minor)		
Statement of Nonconformity:	Water management plan to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment are not adequately implemented.		
Requirement Reference:	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: a. The unit of certification does not limit access to clean water or does not pollute the water used by the community; b. Workers have adequate access to clean water.		
Objective Evidence:	<ul style="list-style-type: none"> • Clean water monitoring result for all unit (KAE, MAE, UAE, POM, Staff) which conducted on 18 April 2021 by PERKIMLH Office Ketapang Laboratory only measure the parameters of turbidity, pH, Pb, Cd, Fe, Mn, Zn, NO₂, F; several mandatory parameters refer to Ministry of Health Regulation No. 32/2017 such as e. coli and coliform were not measured. • Surface water utilization permit was not available and still in progress, based on Letter No. 010/SP-AIL/IV/2022 dated 12 April 2022 from PT AIL (environmental consultant) described the permit in stage of field data analysis and hydrological study to complete the technical recommendation submission to Balai Wilayah Sungai (BWS) Kalimantan II Palangkaraya 		
Corrections:	<ul style="list-style-type: none"> • Carrying out re-testing of several parameters that were missed, so that they can fulfil Minister of Health Regulation No. 32/2017. • Carrying out intensive coordination with the River Basin Center (BWS) until the surface water utilization permit is issued. 		
Root Cause Analysis:	<ul style="list-style-type: none"> • Parameter tests have not been carried out according to Minister of Health Regulation No. 32/2017, such as <i>E. coli</i> and coliform. • Surface water utilization permits are not available and are still in the process of field data analysis and hydrological studies. 		

Corrective Actions:	<ul style="list-style-type: none"> The Sustainability Team will ensure clean water monitoring testing for <i>e.coli</i> and coliform parameters in accordance with Minister of Health Regulation No. 31/2017. The Plantation Support Team will follow up with the Kalimantan II Palangkaraya River Basin Center (BWS) to ensure the issuance of surface water utilization permits.
Assessment Conclusion:	<p>The Sustainability Team has committed to taking corrective actions by conduct testing for <i>E. coli</i> and coliform parameters in alignment with Minister of Health Regulation No. 31/2017, ensuring compliance with the regulations. Additionally, they will actively collaborate with the Kalimantan II Palangkaraya River Basin Center (BWS) to expedite the issuance of surface water utilization permits.</p> <p>These corrective actions demonstrate a commitment to rectifying the issues at hand and ensuring compliance with regulatory standards, thereby enhancing the overall effectiveness and sustainability of the operation. Continuous monitoring and coordination will be essential in maintaining regulatory compliance and achieving the desired outcomes.</p> <p>PT Usaha Agro Indonesia has identified the root cause; prepare correction plan and corrective action plan. All the evidence has been followed up at this recertification assessment. Minor NC is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>The names and positions of stakeholders need to be updated, the Chairman of the Kopbun JMJS, which is still written by Mr. Ujang, refer to the PT Usaha Agro Indonesia Stakeholder List 2022 document (No. FM-SAG-HO-CA&L-080003 - Rev. 2). Based on the consultations with the Kopbun JMJS on 12 April 2022, the chairman of the Kopbun JMJS was changed to Mr. Tono.</p> <p>Verification / Follow-up actions:</p> <p>The Plantation Support Team and Operational Unit maintain intensive communication with all stakeholders, ensuring that during changes in leadership and within various government agencies, they can promptly receive document updates.</p>
OFI 2	<p>OFI Statement:</p> <p>CH showed Maps consisting of information regarding boundary markers. List of boundary markers position and information regarding its conditions as part of Monitoring Report. Field visit to existing boundary at Ulin, Meranti and Kruing (random checked with 2 samples each estate) found that boundary markers are in a good condition. CH also showed boundary marker maintenance program which showed the maintenance progress. Reviewing this program document found that there is no measurable target mentioned. According to this finding, CH encouraged to improve their boundary markers maintenance program by adding measurable target per year.</p> <p>Verification / Follow-up actions:</p>

	<p>The certification unit is actively coordinating with several support departments to conduct a more comprehensive inventory and data collection, ensuring that the presence and locations of all boundary markers can be precisely identified and known.</p>
<p>OFI 3</p>	<p>OFI Statement:</p> <p>Company has established employee recruitment procedure No.P-SAG-ADM-KTU-04, 1 March 2018 and Sustainable policy of PT. Sampoerna Agro Tbk, dated October 1, 2019 point 4 regarding non-discrimination, prohibition of all forms of forced labour, or slavery. Report on the handover of the contract on 10 February 2022 for MAE workers was observed. Based on the interview with MAE workers on 13 April 2022, obtained information there was no recruitment fee and retention of worker documents. Based on interview from of the others workers in estates, they did not keep the copy of the employment contract, it's encourage to company share the copy of workers employment contract.</p> <p>Verification / Follow-up actions:</p> <p>The certification unit has conducted a thorough and reaffirming socialization to the workforce about the importance of having copies of employment contracts well-documented. This effort enables both employees and employers to transparently implement labor regulations. However, this follow up is not effective, therefore audit team raised a critical NC on indicator 6.6.2 (refer to 2355770-202306-M6).</p>
<p>OFI 4</p>	<p>OFI Statement:</p> <p>Company has established sustainable policy in point 8 "Preventing work accidents and occupational diseases, which are caused by unsafe conditions and action". Procedure of "Kesiapsiagaan & Tanggap Darurat di Kebun, Doc. No. P-SAG-KBN-DDR-01" was established and implemented. Minutes of socialization to workers related to Occupational Health and safety was observed. Based on interviews with workers, they were understanding related to occupational safety and health procedures. Work accident record was documented properly. Report of first aid kit handover on 28 July 2021 was observed. Based on site observation at KAE Block IK008 and MAE Block ID0026 the foreman harvester was equipped with first aid kits, but at UAE Block IM0052 the foreman forget to bring first aid kits.</p> <p>Verification / Follow-up actions:</p> <p>All supervisors are emphasized to carry a first aid kit bag (P3K) when heading to work, during work, and when going to the division office for reporting. This ensures that no one is left without a first aid kit bag during harvesting activities.</p>
<p>OFI 5</p>	<p>OFI Statement:</p> <p>Company has established, documented and implemented:</p> <ul style="list-style-type: none"> • Peta Gambut PT UAI – updated in April 2022 (all estates) • RSPO Peat Inventory Template – reporting period of 2021 • Procedure No. P-SAG-KBN-PML-28 01-Jul-20 - Water Management System in Peatland and Lowland Area <p>Based on site observation on peatland area (piezometer, peat subsidence and water gate) in Block IM0043 (UAE), Block IO0022, IP0016 & IN0020 (KAE) and Block ID0017 & IC0024 (MAE), water management was implemented properly.</p> <p>Water and land cover implementation documentation was observed for UAE and KAE estates, i.e.:</p> <ul style="list-style-type: none"> • Peta Realisasi Pemasangan Peat Subsidence dan Piezometer period of 2020-2021 • Pencatatan Data Curah Hujan – period of 2021-2022 • Rekap Pengamatan Subsiden Gambut – period of 2021-2022 • Monitoring Tinggi Muka Air Tanah – period of 2022 • Monitoring Rambu Tinggi Muka Air – period of 2022 <p>Verification / Follow-up actions:</p> <p>All estates consistently and thoroughly report the installation of peat subsidence equipment, monitor groundwater levels, and peat subsidence, ensuring well-documented records. The company carry out</p>

	monitoring and cross-check documentation in accordance with the reporting schedule for peat subsidence equipment installation and ongoing groundwater level and peat subsidence monitoring.
OFI 6	<p>OFI Statement:</p> <p>Company has monitor the mill effluent quality for period of January 2021-March 2022 conducted by Sucofindo Laboratory. Company also has monitor the groundwater quality in estates and emplacement to prevent contamination from mill effluent application, measured by Sucofindo Laboratory on 15 June 2021 and 25 October 2021. Parameter measurement result was complied with Ministry of Environment Decree No. 28/2003 and land application permit owned. Company already has land application permit based on Decree Letter of Ketapang Regency No. 400/PERKIMLH-C/2017 on 25 July 2017 valid for 5 (five) years. Mill effluent application implementation report period of 2021 was observed and reported quarterly to Ministry of Environment, which last reported on 24 March 2022. Land application permit will be expired on July 2022 and permit extension was submitted to PERKIMLH Office Ketapang Regency on 4 April 2022.</p> <p>Verification / Follow-up actions:</p> <p>The Plantation Support Team is conducting coordination with Ketapang Regency Environmental Office regarding the extension of land application permit, ensuring that the progress is closely monitored. The Plantation Support Team has ensured that permit extension has been approved by Ketapang Regency Environmental Office.</p>
OFI 7	<p>OFI Statement:</p> <p>Company already has zero burning policy in “Kebijakan Keberlanjutan PT Sampoerna Agro Tbk.” established on 1 October 2019. Procedures have been established and implemented properly. Fire emergency system and equipment was available and inspected periodically. Emergency preparedness team was established for each unit and fire simulation was conducted, i.e.:</p> <ul style="list-style-type: none"> • POM – 29 March 2022 • UAE – 8 March 2022 • KAE – 15 March 2022 • MAE – 12 March 2022 <p>Fire prevention and control implementation report period of 2021 was observed and reported on 2 February 2022 to external stakeholder i.e. PERKIMLH Office Ketapang Regency, Environment Agency of West Kalimantan Province and Ministry of Environment and Forestry. During this audit, this report not yet reported to Plantation Agency Ketapang Regency refer to public consultation result.</p> <p>Verification / Follow-up actions:</p> <p>The Operational Unit has prepared report on fire prevention and control measures, and coordinate with the Plantation Support Team for further action with the relevant authorities. The Plantation Support Team diligently record and report the implementation of fire prevention and control measures to the Ketapang Regency Plantation Office.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2355770-202306-M1	Critical	1.1.3	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M2	Critical	1.1.4	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M3	Critical	3.5.2	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M4	Critical	3.6.1	18 Jun 2023	Closed, 13 Sep 2023

2355770-202306-M5	Critical	3.8.7	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M6	Critical	6.2.2	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M7	Critical	6.2.4	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M8	Critical	6.6.2	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M9	Critical	6.7.3	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-M10	Critical	7.2.6	18 Jun 2023	Closed, 13 Sep 2023
2355770-202306-N1	Minor	2.1.2	18 Jun 2023	Open
2355770-202306-N2	Minor	5.2.2	18 Jun 2023	Open
2355770-202306-N3	Minor	6.7.4	18 Jun 2023	Open
2355770-202306-N4	Minor	7.3.2	18 Jun 2023	Open
2355770-202306-N5	Minor	7.3.3	18 Jun 2023	Open

3.4 Stakeholders and previous landowner / 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 Usaha Agro Indonesia Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal – Gender Committee	Head of Gender Committee (Ms. Lia Agustina)	Face to face interview
Union – LKS BIPARTIT	Representative (Nipsi and Catur Kridaningtias)	Face to face interview
Local Community Head	Jambi Village Head (Mr Buhari Muslim)	Face to face interview
Governmental Department	<ul style="list-style-type: none"> Manpower Agency in Katapang Regency (Mr. Hari Panjaitan) Plantation Agency in Kapatang Regency (Mr. Suhanadiaja) 	Face to face interview

	<ul style="list-style-type: none"> Environmental Agency in Kapatang Regency (Mrs. Win) 	
NGO	Yayasan Orangutan Indonesia (YAYORIN) (Mr Iman S)	Contacted by phone
Previous Landowner	Presented below	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Gender Committee</p> <ul style="list-style-type: none"> Gender committee was established to represent the voice of women in PT Usaha Agro Indonesia Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment. Female workers have the right to get menstruation leave (H1) and maternity leave (H2). PT Usaha Agro Indonesia has assets the new mother need. PT Usaha Agro Indonesia has promoted the time to breastfeeding during working time. In 2022 – 2023, there was no issue related sexual harassment, violation of reproduction rights, or gender related discrimination in recruitment or promotion. <p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>
2	<p>Feedbacks: Union – LKS BIPARTIT</p> <ul style="list-style-type: none"> The last meeting between PT Usaha Agro Indonesia and LKS BIPARTIT in January discussed minimum wage of 2023. PT Usaha Agro Indonesia has paid the workers with minimum wage 2023. PT Usaha Agro Indonesia has provided the PPE based on risk assessment. In 2022 – 2023, there is no issue related PPE provision. The workers can get the change of PPE if broken during work. For core work is done by permanent workers. There is no negative issue related employment or OHS in PT Usaha Agro Indonesia <p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>
3	<p>Feedbacks: Yayasan Orangutan Indonesia (YAYORIN)</p> <ul style="list-style-type: none"> YAYORIN is an NGO that focuses on research, education and conservation of orangutans and tropical forests as the natural habitat for wild orangutans and other animals around them in the wet tropical forests of Kalimantan. Throughout 2022-2023, there were no reports of conflicts between PT UAI and wild orangutans and other animals around the company. PT UAI has provided support to the surrounding community in the fields of education and other CSR. <p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>
4	<p>Feedbacks: Jambi Village Head (Mr Buhari Muslim)</p> <ul style="list-style-type: none"> During 2022-2023 there will be no disputes between the community and the company.

	<ul style="list-style-type: none"> As residents of the village surrounding the company, that the company often provided community assistance. For example, watering roads during the dry season, providing clean water if there is a community celebration, Open job opportunities by providing information to the village office if there are job vacancies
	<p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>
5	<p>Feedbacks: Manpower Agency of Katapang Regency (Mr Hari Panjaitan)</p> <ul style="list-style-type: none"> Until this audit, there are no negative issues related to industrial relationships in Estate/Mill. PT Usaha Agro Indonesia has paid their employees in accordance with the current minimum wage regulation of 2023. Pension and work termination are also pay according to the current regulation. PT Usaha Agro Indonesia has registered the Company Regulation
	<p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>
6	<p>Feedbacks: Environmental Agency in Kapatang Agency (Mrs Win)</p> <ul style="list-style-type: none"> There are no complaints/complaints related to environmental pollution. Environmental management and monitoring report run in an orderly and timely manner. No issue related environmental and waste management.
	<p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>
7	<p>Feedbacks: Plantation Agency in Kapatang Regency (Mr Suhanadiaja)</p> <ul style="list-style-type: none"> PT Usaha Agro Indonesia is a plantation company that has fulfilled its obligations regarding legal, financial, administrative and communication issues with Plantation Service in Kapatang Regency. To date, there have been no significant conflicts between the company and the community or other parties and there have been no complaints Plantation Service in Kapatang Regency. Plantation Service in Kapatang Regency has carried out an assessment of the plantation business at PT Usaha Agro Indonesia Plantation Service in Kapatang Regency encourages an increase in the number of farmers, land area and forms of cooperation.
	<p>Audit Team verification and response: Positive comments. No negative issue to be followed up.</p>

List of landowner / 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
Cabe	-	4.48	Yes – GRTT dated 13 March 2008	Yes	Berita Acara GRTT was provided
Kansul	-	7.37	Yes – GRTT dated 13 March 2008	Yes	Berita Acara GRTT was provided
Silang	-	4.20	Yes – GRTT dated 10 May 2008	Yes	Berita Acara GRTT was provided

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Saleh	-	15.14	Yes – GRTT dated 10 May 2008	Yes	Berita Acara GRTT was provided
Maren	-	13.02	Yes – GRTT dated 10 June 2008	Yes	Berita Acara GRTT was provided
Seniap (2)	-	8.35	Yes – GRTT dated 10 th June 2008	Yes	Berita Acara GRTT was provided
Kawan	-	12.73	Yes – GRTT dated 10 June 2008	Yes	Berita Acara GRTT was provided
Sipi	-	20.78	Yes – GRTT dated 11 August 2008	Yes	Berita Acara GRTT was provided
Anang Batu	-	17.90	Yes – GRTT in February 2009	Yes	Berita Acara GRTT was provided
Majikul	-	5.03	Yes – GRTT in February 2009	Yes	Berita Acara GRTT No: 030/BAP-GRTT/UAI/II/2009
Bukhari	-	5.56	Yes – GRTT in February 2009	Yes	Berita Acara GRTT was provided
Mukian/Aspen	-	6.52	Yes – GRTT in February 2009	Yes	Berita Acara GRTT was provided
Kasirin	-	4.51	Yes – GRTT in March 2009	Yes	Berita Acara GRTT was provided
Jambat	-	0.31	Yes – GRTT in March 2009	Yes	Berita Acara GRTT was provided
Soilkhin	-	1.50	Yes – GRTT in March 2009	Yes	Berita Acara GRTT was provided
Tuing / Mukian	-	1,30	Yes – GRTT dated 10 May 2010	Yes	Berita Acara GRTT was provided
Ahar	-	2.04	Yes – GRTT dated 15 July 2010	Yes	Berita Acara GRTT was provided
Abun/Sudirman	-	0.56	Yes – GRTT dated 4 September 2010	Yes	Berita Acara GRTT was provided
Seniap	-	4.78	Yes – GRTT in October 2010	Yes	Berita Acara GRTT was provided
Rudi/Init	-	1.55	Yes – GRTT in October 2010	Yes	Berita Acara GRTT was provided
Bacing	-	1.51	Yes – GRTT dated 16 November 2010	Yes	Berita Acara GRTT was provided
Inyok	-	7.40	Yes – GRTT dated 16 November 2010	Yes	Berita Acara GRTT was provided
Ahil	-	13.59	Yes – GRTT dated 23 December 2010	Yes	Record document of GRTT – Ganti Rugi Tanah dan Tanaman Tumbuh

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					No: 134/SP-GRTT/UAI/XII/2010
Pelua	-	15.50	Yes – GRTT dated 25 August 2011	Yes	Berita Acara GRTT was provided
Agon	-	3.36	Yes – GRTT dated 25 August 2011	Yes	Berita Acara Pembayaran GRTT No: 005/BAP-GRTT/UAI/VIII/2011
Repi	-	3.79	Yes - GRTT dated 15 November 2011	Yes	Berita Acara GRTT was provided
Dasimah	-	2.70	Yes – GRTT in May 2012	Yes	Berita Acara GRTT was provided
Jitun	-	3.00	Yes – GRTT in May 2012	Yes	Berita Acara GRTT was provided
Ali Aryanto	-	4.58	Yes – GRTT in August 2012	Yes	Berita Acara Serah Terima GRTT No: 043/BAST-GRTT/UAI.VII/2012
Lunak	-	16.69	Yes – GRTT in August 2012	Yes	Berita Acara GRTT was provided
Madkasi	-	6.50	Yes – GRTT in August 2012	Yes	Berita Acara GRTT was provided
Revi/Duang	-	5.51	Yes – GRTT in October 2012	Yes	Berita Acara GRTT was provided
Martinus	-	11.81	Yes – GRTT in October 2012	Yes	Berita Acara GRTT was provided
Jumaidi	-	4.00	Yes – GRTT in November 2012	Yes	Berita Acara GRTT was provided
Jahar/Abun	-	2.01	Yes – GRTT in January 2013	Yes	Berita Acara GRTT was provided
Mujimin/Khuan	-	12.37	Yes – GRTT in January 2013	Yes	Berita Acara GRTT was provided
Uwin	-	1.56	Yes – GRTT in January 2013	Yes	Berita Acara GRTT was provided
Dayal	-	10.15	Yes – GRTT in May 2013	Yes	Berita Acara GRTT was provided
Bicah	-	12.87	Yes – GRTT in May 2013	Yes	Berita Acara GRTT was provided
Uwim	-	4.73	Yes – GRTT in November 2013	Yes	Berita Acara GRTT was provided
Icui	-	16.18	Yes – GRTT in December 2013	Yes	Berita Acara GRTT was provided
Mukri	-	25.81	Yes – GRTT in December 2013	Yes	Berita Acara GRTT was provided

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Juang Sukma/Ijas	-	1.74	Yes – GRTT in January 2014	Yes	Berita Acara GRTT was provided
Abdul Bar	-	38.73	Yes – GRTT dated 27 February 2014	Yes	Berita Acara Pembayaran GRTT No: 17/BAP-GRTT/UAI/II/2014
Ambang	-	51.02	Yes – GRTT dated 17 March 2014	Yes	Berita Acara Pembayaran GRTT No: 32/BAP-GRTT/UAI/III/2014
Ibar	-	8.06	Yes – GRTT in July 2014	Yes	Berita Acara GRTT was provided
Ujang Ebit	-	5.07	Yes – GRTT in July 2014	Yes	Berita Acara GRTT was provided
Mahui	-	35.19	Yes – GRTT in July 2014	Yes	Berita Acara GRTT was provided
Bandi	-	85.68	Yes – GRTT in November 2015	Yes	Berita Acara GRTT was provided
Kamaludin	-	55.94	Yes – GRTT in November 2015	Yes	Berita Acara GRTT was provided
Sudaremo	-	19.57	Yes – GRTT in November 2015	Yes	Berita Acara GRTT was provided
Ayul/Isang	-	5.43	Yes – GRTT in December 2015	Yes	Berita Acara GRTT was provided
Damai	-	11.35	Yes – GRTT in December 2015	Yes	Berita Acara GRTT was provided
Aseng	-	30.20	Yes – GRTT in December 2015	Yes	Berita Acara GRTT was provided
Depiansyah	-	17.46	Yes – GRTT in December 2015	Yes	Berita Acara GRTT was provided
Hendi/Arpandi	-	14.60	Yes – GRTT in February 2016	Yes	Berita Acara GRTT was provided
Yosep Idun	-	8.12	Yes – GRTT in February 2016	Yes	Berita Acara GRTT was provided
Sipitui/Debon	-	5.57	Yes – GRTT in February 2016	Yes	Berita Acara GRTT was provided
Ahmad Yani	-	5.21	Yes – GRTT in October 2016	Yes	Berita Acara GRTT was provided
Abun Maayam	-	8.49	Yes – GRTT in April 2017	Yes	Berita Acara Pembayaran GRTT No: 2/BAP-GRTT/UAI/IV/2017
Hadian	-	0.77	Yes – GRTT in April 2017	Yes	Berita Acara GRTT was provided

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Jipit	-	23.27	Yes - GRTT in May 2018	Yes	Berita Acara GRTT was provided
Tasmin	-	27.66	Yes - GRTT in May 2018	Yes	Berita Acara GRTT was provided
Oot Ariadi	-	2.04	Yes - GRTT in May 2018	Yes	Berita Acara GRTT was provided
Bagong	-	18.55	Yes - GRTT in May 2018	Yes	Berita Acara GRTT was provided
Rumanus Sukarno	-	5.95	Yes - GRTT in May 2018	Yes	Berita Acara GRTT was provided
Note: Total previous landowner was 1,065 names. Sample during RAV-2023 is = $\sqrt{1,065 \times 2} = 66$ samples.					

Previous land owner / user comment	
1	<p>Feedbacks:</p> <ul style="list-style-type: none"> - Abun Maayam (8.49 Ha), - Ambang (51.02 Ha), - Abdul Bar (38.73), - Ali Aryanto (4.58 Ha) <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • Sample of previous landowner has confirmed the above process and that they have been consulted, negotiated, and compensated fairly and agreed upon for every land area that has been acquired by the company. Sample seen: Berita Acara Pembayaran GRTT No: 2/BAP-GRTT/UAI/IV/2017, Berita Acara Pembayaran GRTT No: 32/BAP-GRTT/UAI/III/2014 and Berita Acara Pembayaran GRTT No: 17/BAP-GRTT/UAI/II/2014, Berita Acara Serah Terima GRTT No: 043/BAST-GRTT/UAI.VII/2012. • PT Usaha Agro Indonesia currently owns a total of 11,953.3225Ha land banks, which have been divided into 3 phase of development. The area covered in this certification is Phase 1 is under Hak Guna Usaha (HGU) Nomor: 6/HGU/KEM-ATR/BPN/2015 covering total land title of 8,287.20 Ha. Phase 2 and Phase 3 is covered under HGU Nomor: 40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225 Ha) and Izin Lokasi 915/UAI/XI/16/HQ/GC (covering 2,283Ha).

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Yusi Rosalina
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: PT Usaha Agro Indonesia
Title: Lead Assessor	Title: System & Certification Manager
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: 10 October 2023	Date: 11 October 2023

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -</p>	<p>During RAV – in June 2023, PT Usaha Agro Indonesia has shown the documents that are specified in RSPO P&C. The management documents available in form FM-SAG-HO-CA&L-080004-Revision 3 - "Daftar Informasi Yang Dapat Diakses oleh Pemangku Kepentingan" The document consisted of: A. Legal Aspect: Legality and Compliance to Requirement</p> <ul style="list-style-type: none"> • "Izin Lokasi Perusahaan" • "Izin Pelepasan Kawasan" • "Bukti GRTT" • "Sertifikat HGU" • "Peta HGU dan Patok HGU" • "Bukti Monitoring Patok HGU" • "Izin Mendirikan Bangunan (IMB)" • "Dokumen ANDAL" • "Dokumen RKL/RPL" • "SK Kelayakan/Izin Lingkungan" • "Izin Usaha Perkebunan (IUP)" • "Penilaian Usaha Perkebunan" 	<p>Complied</p>

		<ul style="list-style-type: none"> • "Dokumen Badan Hukum" • "Dokumen Kajian/Studi dan Izin Pemanfaatan Land Aplikasi" • "Izin Pemanfaatan Air Permukaan/Sungai" • "Bukti Retribusi Pajak Air Permukaan" • "Izin Pengeboran dan Pengambilan Air Tanah" • "Peta Jenis Tanah, Topografi, RTRW, Peta Lokasi dan Peta Areal Statement" • "Areal Statement" • "Perjanjian Kerjasama Antara Perusahaan dengan Plasma/Kemitraan" • "SK Gubernur tentang Penetapan Harga TBS Plasma/Kemitraan" • "Bukti Bayar Penjualan TBS dari Plasma/Kemitraan dan atau Pihak Ketiga" • "Informasi Harga TBS" • "Realisasi Pembangunan Plasma/Kemitraan dan Bukti Laporan Perkembangan Kebun Kemitraan ke Pemerintah" • Izin Tempat Penyimpanan Sementara Limbah B3" • "Rekomendasi masa simpan Limbah B3" • "Izin Pemasangan esin-mesin (Boiler, Turbin, Genset, Sterilizer, Kompresor, Vacuum Dryer, Hoisting Crane" <p>B. Environmental & compliance to environmental regulations.</p> <ul style="list-style-type: none"> • Monthly report of effluent quality test report as seen on record "Sertifikat Hasil Uji Kualitas Limbah Cair" • Evaluatiuon of effluent quality test as seen on record "Evaluasi Hasil Pengukuran Kualitas Limbah Cair (6 bulan sekali)" • Receipt of "Bukti Pelaporan Kualitas Limbah Cair kepada 	
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		<p>Pemerintah 3 (tiga) bulan sekali”</p> <ul style="list-style-type: none"> • “Sertifikat Hasil Uji Kualitas Sumur Pantau, Sumur Kontrol, dan Sumur Warga Land Aplikasi (6 bulan sekali)” • “Sertifikat Hasil Uji Kualitas Lingkungan Kerja (6 bulan sekali)” • “Evaluasi Hasil Pengukuran Uji Kualitas Lingkungan Kerja (6 bukan sekali)” • “Sertifikat Hasil Uji Kualitas Tanah Land Aplikasi (1 tahun sekali) • “Hasil Uji Emisi Sumber Bergerak (kendaraan)” • “Sertifikat Hasil Uji Kualitas Air Permukaan/Sungai (6 bulan sekali)” • “Evaluasi Hasil Pengukuran Kualitas Air Permukaan/Sungai (6 bulan sekali)” • “Sertifikat Hasil Uji Kualitas Air Bersih (1 tahun sekali)” • “Bukti Penggunaan Air di PKS” • “Neraca Limbah B3” • “Dokumen Pelaporan Pengelolaan Limbah B3 (3 bulan sekali)” • “Dokumen Pengiriman LB3 kepada Pihak Ketiga yang memiliki izin” • Copy of “Kelengkapan Izin Pengangkutan/Pengelolaan/ Pemusnahan yang dimiliki oleh Pihak Ketiga” • “Surat Pernyataan dari Pihak Ketiga Transportir LB3 tidak dalam masalah lingkungan” • “Laporan Pelaksanaan RKL-RPL (6 bulan sekali) dan bukti Laporrannya kepada instansi terkait”. • “Bukti Tera Ulang Jembatan Timbang” • “Bukti Kalibrasi tangka CPO dan Tangki Solar” • “Bukti Verifikasi Alat Ukur” 	
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		<ul style="list-style-type: none"> • "Struktur Tanggap Darurat" • "Bukti Simulasi dan Evaluasi Tanggap Darurat" • "Nomor Teleon Darurat Internal dan Eksternal" • "Daftar Inventarisasi Alat Pemadam Kebakaran" • "Laporan Posisi APAR, Hydrantm dan P3K" • "Laporan Pengendalian Kebakaran" • "Laporan CSA/HCS & GHG" • "Identifikasi Sumber emisi GHG, Perhitungan GHG Tahunan dan Mitigasi GHG" • "Form Identifikasi Peraturan Perundangan Update" and Evaluation. <p>C. Management policy</p> <ul style="list-style-type: none"> • "Kebijakan Keberlanjutan" • "Kebijakan Whistle Blowing" • "Rencana Bisnis Jangka Pendek (5 tahunan)" • "Rencana Tahunan Kegiatan Kebun dan Pabrik (Budget tahunan)" • "Rekaman Rapat Tinjauan Manajemen (Undangan, Daftar Hadir, Notulen, Foto)" • Public Summary of "Laporan Sertifikasi RSPO, ISOPO, ISCC, IMS dan Laporan Sertifikasi lainnya" • "Rencana dan Realisasi Perbaikan Berkelanjutan" • "Rencana Pengurangan dan Pencegahan Polusi" • "Laporan Tahunan Perseroan" • "Buletin Perseroan Triwulanan" • "Majalah Derap" 	
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		<ul style="list-style-type: none"> • "Corporate Presentation Booklet" • "Analyst Briefing Material" • "Laporan Keuangan Perseroan" • "Daftar Informasi" <p>D. Social</p> <ul style="list-style-type: none"> • "SOP P-SAG-HO-CA&L-08 tentang Komunikasi, Partisipasi dan Konsultasi" • "Proses dan Hasil Free, Prior, and Informed Consent (FPIC/Persetujuan Atas Dasar Informasi di Awal Tanpa Paksaan (PADIATAPA))" • "Rekaman Keluhan dan Pengaduan Pekerja dan Stakeholder (Selain Pekerja)" • "Logbook Komunikasi Stakeholder (Permintaan/Pemberian Informasi, Permintaan/Pemberian Bantuan)" • "Legalitas Koperasi Karyawan" • "Rencana dan Realisasi CSR" • "Dokumen Penilaian SIA" • "Rekaman Sosialisasi SIA Kepada Stakeholder" • "Rencana dan Laporan Pelaksanaan Rencana Kelola SIA" • "Laporan Review SIA" <p>The document listed above are made publicly through stakeholder consultation (meeting), available prior request, upload on website of Sampoerna Agro (www.sampoerna-agro.com), or by requested by relevant stakeholders.</p>	
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1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>During RAV in June 2023, PT UAI has defined the procedure on mechanisms and responding to requests for information in accordance with the P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation, PT Usaha Agro Indonesia has shown the information has been received in the appropriate form and language for relevant stakeholders (provided in Bahasa Indonesia).</p> <p>Based on interview with sample of interested parties (e.g.: Head of Jambi Village, Labor Union, and local governance in Ketapang Regency), they have well awareness of the type of information and how to get access to the information as gained during stakeholder consultation and onsite interview with workers.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has shown the procedure on communication with relevant stakeholders as per "IMS Procedure Komunikasi, Partisipasi, dan Konsultasi, document no. P-SAG-HO-CA&L-08 procedure, 2nd revision dated 1 February 2016 concerning Communication, Participation and Consultation. The procedure has approved by CEO and written in Bahasa Indonesia.</p> <p>The procedure has explained that:</p> <ul style="list-style-type: none"> • Timeframe for response to request for information has stated in the procedure as sighted on article no. 7.1 (external communication) point 3.f.: "the head of unit/department provided a response to stakeholder at least 14 days after information/request received". • The persons in charge (PIC) for receiving and responding the request from stakeholder have been defined in the procedure no. P-SAG-HO-CA&L-08, revision 2, dated February 01, 2016. The PIC as sighted on the procedure as follow: <ul style="list-style-type: none"> - Head of each unit (estate, POM, & laboratory) have responsible to received and recorded of suggestion and/or input from 	Non-compliance (2355770-202306-M1)

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		<p>internal and external parties who come directly (via verbally) or in writing and submit them to the head of the department.</p> <ul style="list-style-type: none"> - CA&L department delivers relevant significant legal and social information to internal and external parties in accordance with regulation and company policy. - Human Resources & Services: deliver relevant and significant employment information to internal and external parties in accordance with regulations and company policy. - The unit of sustainability has responsibility to deliver information of quality, H&S, environmental and food safety to relevant internal and external parties. <p>During RAV in June 2023, PT Usaha Agro Indonesia has demonstrated the evidence of records of information requested, and responses are maintained as sighted on the document "Logbook Komunikasi Stakeholder", document no. LB-SAG-HO-CA&L-080001.</p> <p>Record and provide responses to every recorded request for information received from both employees and external parties into the "Stakeholder Communication Logbook" (LB-SAG-HO-CA&L-080001).</p> <p>Critical Non-conformity: Based on interviews with workers' samples and related stakeholders, several requests for information were delivered, however the certification unit could not show a record of information requests and responses.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>PT Usaha Agro Indonesia has shown the procedure on communication with relevant stakeholders as per "IMS Procedure Komunikasi, Partisipasi, dan Konsultasi, document no. P-SAG-HO-CA&L-08, revision</p>	<p>Non-compliance</p>

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	- Critical (Major) compliance -	2, dated February 01, 2016. The procedure has approved by CEO and written in Bahasa Indonesia. Record and respond to complaints and requests for information submitted by workers and stakeholders in the Stakeholder Communication Logbook (LB-SAG-HO-CA&L-080001). Critical Non-conformity: Sampoerna IMS Procedure - Communication, Participation and Consultation, no: P-SAG-HO-CA&L-08 has not been understood by relevant stakeholders.	(2355770-202306-M2)
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	During RAV Audit, PT UAI has shown the document list of contact and detail of stakeholders and their nominated representatives as per "Daftar Stakeholder PT Usaha Agro Indonesia updated in June 2023". The information in the list includes institution's name, address, contact person & position, phone numbers person. There is evidence that the institutions and persons that listed in the document are exist as the result of random checks.	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Code of ethical conduct included in "Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk." Signed by CEO 1 April 2023. The policy stipulated commitment for integrity and ethical conduct in all transaction and business operation in line with Sampoerna Way. Comply to appropriate business practice, prohibit all form of corruption and other abuse of resources, as well as information transparency in compliance with relevant legal regulation. The code of conduct policy is included in the contractual agreement with contractors. Verified: - Contractor Melda and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.010/SPK-LKL/UAI-KAE/II/2023" signed by both	Complied

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		<p>parties on 1 February 2023 for the work of manual circle cleaning. Chapter 12 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment.</p> <ul style="list-style-type: none"> - Contractor Antony and PT. Usaha Agro Indonesia (Ulin Agro Estate) has "Surat Perjanjian Kerja (SPK) No.063/UAI-UAE/SPK-LKL/III/2023" signed by both parties on 1 March 2023 for the work of scheme smallholder FFB transport. Chapter 11 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. - FFB supplier Rudi and PT. Usaha Agro Indonesia has "Perjanjian Pemasokan Tandan Buah Segar Kelapa Sawit PT. Usaha Agro Indonesia dengan Rudi No.001/UAI/TBS/IV/2023" dated 1 April 2023 Chapter 3 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. 	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Company has communicated the policy of ethical conduct "Kebijakan Berkelanjutan":</p> <ul style="list-style-type: none"> - In Kantor Besar communication of "Kebijakan Berkelanjutan" carried out 13 May 2023 attended by 22 personnel. - In Kruing Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 2 June 2023 for 4 staffs, 7 mandores, 152 workers; attended by Estate Manager. - In Meranti Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 5 June 2023 for 3 staffs, 20 mandores, 223 workers; acknowledged by Estate Manager Meranti Agro. - In Ulin Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 3 June 2023 for 4 staffs, 8 mandores, 173 workers; 	<p>Complied</p>

		<p>Based on interview with sampled worker in Usaha Agro POM, they understand the implementation of ethical conduct in their daily activity: no cheating with weighbridge scale; no mark up in maintenance work, no abuse in use of resources and fund.</p> <p>Code of ethical conduct implementation reviewed during internal audit process in February 2023.</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -</p>	<p>Company refers to "Form Identifikasi Peraturan K3, Lingkungan, Perkebunan dan Persyaratan Lainnya yang Terkait Tahun 2022", issued 16 July 2022. Each management unit then review their operations against the act, regulation, rules listed in the identification form, indicating all relevant clause, verse, chapter in there.</p> <ul style="list-style-type: none"> - Location Permit issued in 2010: As per "Keputusan Bupati Ketapang No.414 Tahun 2010 tentang Revisi Perpanjangan Izin Lokasi Pembangunan Perkebunan Kelapa Sawit dan Pabrik Pengolahan Atas Nama PT. Usaha Agro Indonesia" dated 27 July 2010. Area allocated for PT. Usaha Agro Indonesia has been revised and extended for 11,300 Ha in Manis Mata and Kendawangan Regency. - Land title "Sertifikat HGU No.108 PT. Usaha Agro Indonesia" dated 24 June 2015 for 2,465.74 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00108. Completed with map scale 1:50000. - Plantation business permit as per "Keputusan Bupati Ketapang No.334/DPMPTPSP-D/200 tentang Perubahan Keputusan Bupati Ketapang No.913/DISBUN-D/2016 Tentang Izin Usaha Perkebunan PT. Usaha Agro Indonesia" dated 29 September 2020. Commodity oil palm; total area 12,840 Ha; processing capacity 90 MT FFB/hour. 	<p>Complied</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>- Minor compliance -</p>	<p>Company refers to "Sampoerna Agro Integrated Management System procedure Identifikasi dan Evaluasi Peraturan Perundangan dan Persyaratan lainnya No.P-SAG-HO-SUS-06 r3" dated 1 September 2017; and updated "Form Identifikasi Peraturan K3, Lingkungan, Perkebunan dan Persyaratan Lainnya yang Terkait Tahun 2022", issued 16 July 2022.</p> <p>Each management unit then review their operations against the act, regulation, rules listed in the identification form, indicating all relevant clause, verse, chapter in there.</p> <ul style="list-style-type: none"> - Kruing Agro Estate, date of review 12 February 2022. Reviewing "Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan" – act on manpower; "Peraturan Pemerintah No.35 Tahun 2021 tentang Perjanjian Kerja Waktu Tertentu dan Waktu Istirahat, Dan Pemutusan Hubungan Kerja" – temporary work agreement – status done - Ulin Agro Estate, date of review 21 February 2022. Reviewing "Peraturan Menteri Pertanian No.38 Tahun 2020 tentang Penyelenggaraan Sertifikasi perkebunan Kelapa Sawit Berkelanjutan Indonesia/ISPO" – done certified since 2017. - Koperasi Perkebunan Sempurna Bersatu, dated of review 18 February 2022. Reviewing "Peraturan Pemerintah No.36 Tahun 2021 tentang Pengupahan" – government regulation on worker payment. <p>Minor Non-conformity: PT Usaha Agro Indonesia has not yet updated the "Form for Identification of K3, Environmental, Plantation Regulations and Other Related Requirements" for the 2023 period. The last update is in 2022, which is not in accordance with the SOP "Sampoerna Agro Integrated Management System Procedure for Identification and Evaluation of Legislative Regulations and Requirements Others No.P-SAG-HO-SUS-06</p>	<p>Non-compliance (2355770-202306-N1)</p>
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		<p>r3" dated 1 September 2017 – Section 7.4 states that legal reviews are carried out once a year.</p> <p>Furthermore, the identification of regulations does not yet include the 2023 Ketapang Regency Minimum Wage regulations.</p>																						
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>Boundary poles in PT. Usaha Agro Indonesia sampled from Kruing Agro Estate, Meranti Agro Estate, Ulin Agro Estate, Scheme Smallholder Estate:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>Longitude</th> <th>Latitude</th> </tr> </thead> <tbody> <tr> <td>UAI017 boundary with PT. KPAM; Kruing Estate nearest block Q39</td> <td>2° 42' 53.77" S</td> <td>111° 02' 40.96" E</td> </tr> <tr> <td>UAI041 boundary with PT. MSL; Kruing Estate block M26</td> <td>2° 40' 55.17" S</td> <td>110° 59' 30.93" E</td> </tr> <tr> <td>UAI150 boundary with PT. ISK; Meranti Estate block C15</td> <td>2° 34' 47.57" S</td> <td>110° 55' 21.43" E</td> </tr> <tr> <td>UAI001 boundary with PT. ISK; Meranti Estate block C13</td> <td>2° 34' 27.63" S</td> <td>110° 55' 31.02" E</td> </tr> <tr> <td>UAI010 boundary with PT. MSL; Meranti Estate block E16</td> <td>2° 34' 59.96" S</td> <td>110° 57' 03.29" E</td> </tr> <tr> <td>UAI012 boundary with PT. MSL; Meranti Estate block E20</td> <td>2° 35' 39.92" S</td> <td>110° 57' 03.93" E</td> </tr> </tbody> </table>	Description	Longitude	Latitude	UAI017 boundary with PT. KPAM; Kruing Estate nearest block Q39	2° 42' 53.77" S	111° 02' 40.96" E	UAI041 boundary with PT. MSL; Kruing Estate block M26	2° 40' 55.17" S	110° 59' 30.93" E	UAI150 boundary with PT. ISK; Meranti Estate block C15	2° 34' 47.57" S	110° 55' 21.43" E	UAI001 boundary with PT. ISK; Meranti Estate block C13	2° 34' 27.63" S	110° 55' 31.02" E	UAI010 boundary with PT. MSL; Meranti Estate block E16	2° 34' 59.96" S	110° 57' 03.29" E	UAI012 boundary with PT. MSL; Meranti Estate block E20	2° 35' 39.92" S	110° 57' 03.93" E	Complied
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<p>Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																								
2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>Each estate records the contracted parties.</p> <p>Kruing Agro Estate</p> <table border="1"> <thead> <tr> <th>Work scope</th> <th>Name</th> <th>Contract/SPK</th> </tr> </thead> <tbody> </tbody> </table>	Work scope	Name	Contract/SPK	Complied																		
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<p>Pruning</p> <p>Transport Soil</p> <p>School children transport</p> <p>Path weeding (manual)</p> <p>FFB transport</p>	Melda	023/SPK-LKL/UAI-KAE/II/2023																		
	Gow Kwe Fi	028/SPK-LKL/UAI-KAE/II/2023																		
	Rahmat Nurmutakim	027/SPK-LKL/UAI-KAE/II/2023																		
	Khanipudin	019/SPK-LKL/UAI-KAE/II/2023																		
	Ekang Asep Pauzi	028/SPK-LKL/UAI-KAE/II/2023																		
<p>Estate also keeps record of contractor's worker name and age.</p> <p>Meranti Agro Estate</p> <table border="1"> <thead> <tr> <th>Work scope</th> <th>Name</th> <th>Contract/SPK</th> </tr> </thead> <tbody> <tr> <td>FFB transport</td> <td>Hadi Sucipto</td> <td>079/SPK/MAE/VII/2022</td> </tr> <tr> <td>FFB transport</td> <td>Markom Rochim</td> <td>080/SPK/MAE/VII/2022</td> </tr> <tr> <td>FFB transport</td> <td>Tukijan</td> <td>012/UAI-MAE/SPK-LKL/II/2023</td> </tr> <tr> <td>Pruning</td> <td>Khanipuddin</td> <td>029/UAI-MAE/SPK-LKL/II/2023</td> </tr> </tbody> </table> <p>Estate also keeps record of contractor's worker name and age.</p> <p>Ulin Agro Estate</p> <table border="1"> <thead> <tr> <th>Work scope</th> <th>Name</th> <th>Contract/SPK</th> </tr> </thead> <tbody> </tbody> </table>			Work scope	Name	Contract/SPK	FFB transport	Hadi Sucipto	079/SPK/MAE/VII/2022	FFB transport	Markom Rochim	080/SPK/MAE/VII/2022	FFB transport	Tukijan	012/UAI-MAE/SPK-LKL/II/2023	Pruning	Khanipuddin	029/UAI-MAE/SPK-LKL/II/2023	Work scope	Name	Contract/SPK
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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>- Minor compliance -</p>	<p>In the contract, company and contractor agreed to put clause on meeting legal requirement and prohibit use of child worker, prohibit use of forced labour and trafficked worker.</p> <p>Kruing Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Melda and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.010/SPK-LKL/UAI-KAE/II/2023" signed by both parties on 1 February 2023 for the work of manual circle cleaning. Chapter 12 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. - Contractor Khanipudin and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.019/SPK-LKL/UAI-KAE/II/2023" signed by both parties on 1 February 2023 for the work of manual path weeding. Chapter 12 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. 	Complied																		

		<p>Meranti Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Hadi Sucipto and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.079/SPK/MAE/II/2022" signed by both parties on 1 July 2022 for the work of FFB transport. Chapter 13 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. - Contractor Tukijan and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.012/UAI-MAE/SPK-LKL/I/2023" signed by both parties on 2 January 2023 for the work of FFB transport. Chapter 10 stipulated shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. <p>Ulin Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Antony and PT. Usaha Agro Indonesia (Ulin Agro Estate) has "Surat Perjanjian Kerja (SPK) No.063/UAI-UAE/SPK-LKL/III/2023" signed by both parties on 1 March 2023 for the work of scheme smallholder FFB transport. Chapter 11 stipulated contractor shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. <p>FFB Supplier Rudi:</p> <ul style="list-style-type: none"> - FFB supplier Rudi and PT. Usaha Agro Indonesia has "Perjanjian Pemasokan Tandan Buah Segar Kelapa Sawit PT. Usaha Agro Indonesia dengan Rudi No.001/UAI/TBS/IV/2023" dated 1 April 2023 Chapter 3 stipulated contractor shall abide to relevant regulation by 	
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		Indonesia government on manpower, health and safety and environment.	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>In the contract, company and contractor agreed to put clause on meeting legal requirement and prohibit use of child worker, prohibit use of forced labour and trafficked worker.</p> <p>Kruing Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Melda and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.010/SPK-LKL/UAI-KAE/II/2023" signed by both parties on 1 February 2023 for the work of manual circle cleaning. Chapter 12 verse 2 stipulated contractor prohibit to employ underage worker, worker from human trafficking or implement force labour practice and shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. - Contractor Khanipudin and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.019/SPK-LKL/UAI-KAE/II/2023" signed by both parties on 1 February 2023 for the work of manual path weeding. Chapter 12 verse 2 stipulated contractor prohibit to employ underage worker, worker from human trafficking or implement force labour practice and shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. <p>Meranti Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Hadi Sucipto and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.079/SPK/MAE/II/2022" signed by both parties on 1 July 2022 for the work of FFB transport. Chapter 13 verse 2, verse 3 and verse 6 stipulated contractor prohibit to employ underage worker, worker from human trafficking or implement force labour practice and shall abide to relevant regulation 	Complied

		<p>by Indonesia government on manpower, health and safety and environment.</p> <ul style="list-style-type: none"> - Contractor Tukijan and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.012/UAI-MAE/SPK-LKL/I/2023" signed by both parties on 2 January 2023 for the work of FFB transport. Chapter 10 verse 2, verse 3 and verse 6 stipulated contractor prohibit to employ underage worker, worker from human trafficking or implement force labour practice and shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. <p>Ulin Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Antony and PT. Usaha Agro Indonesia (Ulin Agro Estate) has "Surat Perjanjian Kerja (SPK) No.063/UAI-UAE/SPK-LKL/III/2023" signed by both parties on 1 March 2023 for the work of scheme smallholder FFB transport. Chapter 11 verse 2, verse 3 and verse 6 stipulated contractor prohibit to employ underage worker, worker from human trafficking or implement force labour practice and shall abide to relevant regulation by Indonesia government on manpower, health and safety and environment. <p>FFB Supplier Rudi:</p> <ul style="list-style-type: none"> - FFB supplier Rudi and PT. Usaha Agro Indonesia has "Perjanjian Pemasokan Tandan Buah Segar Kelapa Sawit PT. Usaha Agro Indonesia dengan Rudi No.001/UAI/TBS/IV/2023" dated 1 April 2023 Chapter 3 point 5 stipulates contractor prohibit to employ underage worker, worker from human trafficking or implement force labour practice and shall abide to relevant regulation by Indonesia government on manpower. 	
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Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>Usaha Agro Indonesia POM receives FFB's from directly sources from Nucleus Estate and others out grower:</p> <p>Certified FFB are sourced from:</p> <ul style="list-style-type: none"> - Ulin Agro Estate - Kruing Agro Estate - Meranti Agro Estate - Koperasi Kebun Jambi Mekar Jaya Sempurna (scheme smallholders) - Koperasi Kebun Sempurna Mandiri Estate (scheme smallholders) <p>Whilst non-certified FFB are coming from:</p> <ul style="list-style-type: none"> - PT Anugrah Palembang Indonesia (APIN) - Koperasi Kebun Sempurna Bersatu (scheme smallholders) - Rudi (outsider FFB suppliers) - Ulin Agro Estate (new planting sanctions non-NPP) - Kruing Agro Estate (new planting sanctions non-NPP) - Meranti Agro Estate (new planting sanctions non-NPP) - PT Karya Prima Agro Mandiri (KPAM) - Koperasi Perkebunan Sempurna Bersatu <p>Information regarding geolocation and land status of FFB sources for out grower are available in place.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>No indirectly sourced FFB from the collection centres, agents or other intermediaries entering the UAI POM.</p>	Complied

Principle 3: Optimise productivity, efficiency, positive impact and resilience
 Implement plans, procedures and systems for continuous improvement.

Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.																																																		
<p>3.1.1</p> <p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia prepared Business Plan 2023-2027, updated in 2023, explaining the Legal Aspects, Business Location, Company capital assets, Management, Estate and Mill Profile, Production of FFB, CPO and PK, Transportation, CSR Program, Environmental and social impact, Marketing, SWOT analysis, and Finance History.</p> <p>Estimated Production of FFB, CPO and PK 2023-2027:</p> <table border="1" data-bbox="1133 671 1957 903"> <thead> <tr> <th>Description</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>FFB Production (Ton)</td> <td>173,642</td> <td>187,663</td> <td>204,252</td> <td>221,864</td> <td>237,873</td> </tr> <tr> <td>Yield (Ton/Ha)</td> <td>20.5</td> <td>20.8</td> <td>21.2</td> <td>21.9</td> <td>22.3</td> </tr> <tr> <td>FFB processed (Ton)</td> <td>184,436</td> <td>202,252</td> <td>221,086</td> <td>240,950</td> <td>264,701</td> </tr> <tr> <td>CPO (MT)</td> <td>45,187</td> <td>49,552</td> <td>54,166</td> <td>59,033</td> <td>64,852</td> </tr> <tr> <td>PK (MT)</td> <td>7,839</td> <td>8,596</td> <td>9,396</td> <td>10,240</td> <td>11,250</td> </tr> <tr> <td>OER (%)</td> <td>24.5</td> <td>24.5</td> <td>24.5</td> <td>24.5</td> <td>24.5</td> </tr> <tr> <td>KER (%)</td> <td>4.25</td> <td>4.25</td> <td>4.25</td> <td>4.25</td> <td>4.25</td> </tr> </tbody> </table> <p>Unit of certification demonstrated independent financial audit report for the year that ended on 31 December 2022. Based on the report, the financial statements presents that the company booked profit 29.63% compare to previous year.</p> <p>The long-term management plan includes scheme smallholder area which is fully operated by the company. The business plan has been approved by Top Management in 2023.</p>	Description	2023	2024	2025	2026	2027	FFB Production (Ton)	173,642	187,663	204,252	221,864	237,873	Yield (Ton/Ha)	20.5	20.8	21.2	21.9	22.3	FFB processed (Ton)	184,436	202,252	221,086	240,950	264,701	CPO (MT)	45,187	49,552	54,166	59,033	64,852	PK (MT)	7,839	8,596	9,396	10,240	11,250	OER (%)	24.5	24.5	24.5	24.5	24.5	KER (%)	4.25	4.25	4.25	4.25	4.25	<p>Complied</p>
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<p>3.1.2</p> <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Annual replanting programme for 5 years is made available in the company's Rencana Bisnis 2023-2027 document. Based on the document, no replanting activity will take place in the next 5 years (up to 2027). Based on year of planting, the oldest oil palms are planted in 2006, therefore the shortest replanting will be conducted in 2031. Latest yearly review made on available in business plan document. The</p>	<p>Complied</p>																																																

		document has included production history since 2018 to 2022 as consideration for replanting activity.	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -	Management review (Rapat Tinjauan Manajemen) as per specified by the company's Memorandum 081/SUS/X/2022, is to be conducted once a year. The latest management review has been conducted on 6 December 2022, via online, which was attended by all top management of the company (Chief Operating Officer) and all related personnel with total 72 participants. Management review lead by Head of Sustainability, Mr. Bona Ranto Pasaribu. Based on the management review meeting record, internal and external audit result for all certification standards are discussed (RSPO, ISPO and IMS). Latest Internal audit has been conducted in February 2023. Corrective and preventive action which result from audits, including follow-up actions from management review are discussed. Other issues discussed and presented are follow up action regarding the management review result of 2022, progress of certification and sustainability area Kalimantan & Sumatera, procurement, Human Resources, marketing, CSR, human resources, tenurial and improvement recommendation. Some, follow up action are verified as closed whilst others are still in progress or continually implemented.	Complied
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification. - Critical (Major) compliance -	Continual Improvement Plan has been determined in Business Plan 2023 – 2027, covered consideration of the main social and environmental impact and opportunities of the unit of certification. Continuous improvement plan includes: <ul style="list-style-type: none"> • Increase quality and services of communities' education. • Increase access and service of health. • Increase local communities' income. 	Complied

		<ul style="list-style-type: none"> • Increase quality of environment. • Strengthen capacity of communities' institution. • Preservation of communities' socio-cultural. <p>In the Sustainable Improvement Program, Year 2023, implemented across all estates during recertification audit, a comprehensive plan has been devised. This plan encompasses various crucial aspects, including economic, social, environmental, and new technology considerations. Each aspect of the plan has designated individuals responsible for its implementation and ongoing monitoring, with clear statuses indicated within the plan.</p> <p>Examples of successfully executed plans include:</p> <ol style="list-style-type: none"> 1. Economy: A detailed evaluation of capital expenditure, comparing planned versus realized expenditures. 2. Social and Manpower: Initiatives aimed at improving housing maintenance and enhancing personal protective equipment (PPE) standards. 3. Environment: Measures taken to enhance evacuation routes, establish waste banks, and introduce a "clean Friday" initiative. 4. Best Management Practice: Enhancements in Integrated Pest Management techniques and the safe application of chemical sprays. <p>These initiatives reflect company's commitment to continuous improvement across various facets of operations, contributing to overall sustainability goals for the year 2023.</p>	
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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>The company has provided RSPO metrics template, and all the necessary data has been meticulously completed within it. This includes:</p> <ul style="list-style-type: none"> a) Comprehensive member details b) Annual information regarding the mill c) Annual information encompassing the estate and scheme for smallholders, which covers various aspects such as production, manpower, health, and safety. <p>Furthermore, a thorough verification process has been conducted, affirming that the presented data is accurate and also traceable to its original source of information.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has List of applicable SOPs related to mill and plantation operation, listed in "Daftar Dokumen Kebun" for plantation operation and "Daftar Dokumen PKS" (FM-SAG-HO-SUS-01004), updated June 2023. The SOPs found adequately cover all estate and mill processes and activities, e.g.:</p> <ul style="list-style-type: none"> • Estate: Land Preparation, Blocking, Land Clearing, Planting LCC, Water and Soil Conservation, Maintenance of Terrace and Ditch, Road and Bridge Development, Nursery, Planting Oil Palm, Weeding, Integrated Pest Management, Fertilizing, Harvesting, FFB Transport, Water Management, Emergency Response, HCV Identification, Management and Monitoring. • Mill: Weighing, Loading Ramp, Sterilizer, Thresher, Presser, Clarification, Kernel Recovery, Boiler, Machine Room, Water Treatment, Final Effluent Treatment, Buch Ash, Composting, Traceability & Mass 	Complied

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		<p>Balance, Maintenance & Repair, Process Analysis, Emergency Response, Hazardous Material & Waste Handling, Biogas Plant.</p> <p>Based on interview with workers, obtain information that all workers at relevant workstation have been briefed with the SOP prior to start working on regular basis. The SOP is made available for reference at the estate and mill's office. The procedures are established in Bahasa Indonesia.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Mechanism to check consistent implementation of procedures observed based on several record such as:</p> <ul style="list-style-type: none"> - "Laporan Hasil Assessment Mutu ancah dan mutu buah", report described assessment result of FFB and location quality. - "Hasil Verifikasi PMA dan PMB Asisten Divisi", report described verification result of palms checked, palms harvested, unharvested bunch, unpicked bunch, unpicked loose fruit and total loose fruit. - Mill assessment based on "Assessment Mill Usaha Agro Indonesia", report described assessment result of Loading Ramp, Sterilizer, Thresher, Press Station, Clarification Station, Storage Tank, Kernel Station, Storage Tank, Kernel Bulking Silo, Final Effluent, Boiler, Engine Room, Water Treatment, Laboratories and Workshop. - Operational internal audit, e.g. report No.069/IA-RTN/2022 dated 3 Oct 2022; visit date 30 Aug – 3 Sep 2022. Report described aspect: Land Clearing & nursery, upkeep and fertilizing, harvesting and FFB transport, finance, supplies and procurement, fixed asset, salary and human resources. 	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>A robust system for maintaining operational records and taking necessary actions is in place. This includes documents like the Operational Internal Audit Report (No. 087/IA-RTN/2023 dated 3 March 2023) to ensure accountability and transparency.</p>	Complied

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		<p>The master list for all Standard Operating Procedures (SOPs) is readily available, as outlined in section 4.1.1. Any changes or revisions made to these SOPs are meticulously recorded in the Document Register (FM-SAG-HO-SUS-010004). It's noteworthy that the SOPs are established in the local language (Indonesian), making them accessible to all.</p> <p>The estates maintain an ongoing monitoring system to oversee procedure implementation. Daily work activities are meticulously planned on both monthly and daily bases, with records maintained in the Daily Planning Book (<i>Rencana Kerja Harian</i>). Supervisors or Mandors for each workstation diligently update the supervisor's logbook - "<i>Buku Kerja Mandor</i>" on a daily basis.</p> <p>Information recorded in the supervisor's logbook is extracted to compile the Manager Monitoring Report, which is prepared by the Chief Admin on a monthly basis. This report undergoes review by the Estates Manager and General Manager before being submitted to the Operation Management Support at the head office. Routine monitoring and supervision of SOP implementation by workers are carried out daily by Field Assistants, with monthly verification by the Agronomic Continuous Improvement unit.</p> <p>All SOP implementations are rigorously verified by the Agronomic Continuous Improvement (ACI) unit, as evident in the Field Administration Checklist - "<i>Checklist Administrasi Kebun</i>". Examples of evidence from monitoring records observed during the audit include:</p> <ul style="list-style-type: none"> - Planning and realization for continuous improvement for the years 2021, 2022, and 2023. - Daily Planning (<i>Rencana Kerja Harian - RKH</i>). - Realization, Supervisor's Logbook (<i>Buku Kerja Mandor - BKM</i>). <p>Furthermore, the Head of Assistant (ASKEP) and Field Staff have received comprehensive training on the implemented SOPs at the PT Usaha Agro Indonesia Training Centre in Sumatera Selatan. Evidence of</p>	
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		<p>the training attended by the assistants is documented in the PT Usaha Agro Indonesia STAR Program.</p> <p>Lastly, regular inspections of the SOP implementation are carried out by the Sustainability Department, encompassing the management system and implementation, as evident in the internal audit report conducted in March 2023. These comprehensive measures ensure the continued adherence to and improvement of SOPs within PT Usaha Agro Indonesia.</p>	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>The Social & Environmental Impact Assessment (SEIA) [i.e.: Analisis Dampak Lingkungan Hidup (LU-ANDAL) 2008 document (ref: no. 29] dated 16 January 2009 has been established and undertaken through a participatory methodology which includes the affected stakeholders. The scope of SEIA was covering all aspects for the establishment and operation of the plantation as well as the mil.</p> <p>The SEIA conducted for an area totalling to 11,300 ha and addressing all impacts that may arise following to the operation of the plantation and the mill which is summarized as follows:</p> <ul style="list-style-type: none"> ○ Major planned activities, including planting, mill operations, roads, buildings, and infrastructure. ○ Flora and fauna. ○ Natural ecosystems of planned developments, including whether development or expansion will increase pressure on nearby natural ecosystems. ○ Watercourses and wetlands. ○ Hydrology and land subsidence. 	<p>Complied</p>

		<ul style="list-style-type: none"> ○ Soil composition and topographic, including the identification of steep slopes, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and flooding. ○ Type of land to be used (forest, degraded forest, cleared land); ○ Land ownership and user rights. ○ Land use patterns. <p>Social aspects for the surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus long-term residents.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Unit of certification has developed social and environmental management plan which refer to SIA document. The documented report "Laporan Rencana Kelola dan Pemantauan Dampak Sosial PT Usaha Agro Indonesia", dated March 2022. Several aspects described in the report are Social and Culture, Tenurial, Economic, Environmental, Education, Manpower and Internal Company.</p> <p>There are two types of issues were explained in the management plan, an internal issue, and external issues.</p> <p>An internal issue comprises of PPE use by workers, employee's status, Clinic, Worker Union, Creche.</p> <p>An external issue comprises of Decreasing of water quality, Employee recruitment, Socialisation of Land compensation and CSR program.</p> <p>The management plan developed by involvement of participation of affected stakeholders, particularly local resident or villagers surrounding the plantation, there are Sukaramai village, Jambi village, Danau Buntar village and Sungai Buluh village.</p> <p>Stakeholder consultation for developing social management plan conducted every two (2) years. The latest consultation is on 21-23 February 2022 for input management plan year 2022 and 2023.</p>	Complied

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		Methodology used during stakeholder consultation by Focus Group Discussion (FGD). Total participants involved for inputs is 16 respondents of 4 villages with 60 closed questions.	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The social and environmental management and monitoring plan is consistently put into action, with regular reviews and updates carried out through a participatory approach. This inclusive process ensures that our efforts to address social and environmental concerns remain dynamic and responsive to the needs of all stakeholders involved.</p> <p>Laboratory measurement data for surface water analysis are accessible, providing valuable insights into water quality and related parameters. The Implementation Report for the Environmental Management and Monitoring Plan (RKL-RPL) offers a comprehensive overview of company's commitment to responsible environmental practices.</p> <p>Furthermore, the Social Impact Management and Monitoring Plan Report for PT Usaha Agro Indonesia, dated March 2022, provides a detailed account of efforts in addressing and monitoring social impacts within company's operations.</p> <p>These endeavours are carried out in a participatory manner, involving stakeholders through a biennial questionnaire data collection process. This collaborative approach ensures that the perspectives and concerns of various stakeholders are considered, fostering transparency and sustainability in our practices.</p>	Complied
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has shown Employment procedures for recruitment, selection, hiring, promotion, retirement, and termination, such as:</p> <ul style="list-style-type: none"> • Procedure Recruitment of Daily Worker (P-SAG-ADM-KTU-04, dated 1 March 2018), Penilaian Prestasi Kerja (P-SAG-HO-HR-03, dated 1 Aug 2019) and Penyediaan Staff (P-SAG-HO-HR-01, dated 1 Sep 	Complied

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		<p>2017)</p> <ul style="list-style-type: none"> • Procedure for retirement and termination and other matters related to employment, 'Peraturan Perusahaan PT Usaha Agro Indonesia' - that was obtained from Manpower Agency as per document Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023 tentang Pengesahan Peraturan Perusahaan PT Usaha Agro Indonesia Periode Januari 2023 – January 2025. • Record of the employee recruitment process as follows: <ul style="list-style-type: none"> - Employee request form (FM-SR-HO-HRS-010001) - Evidence of follow-up from employee recruitment activities in the form of recorded communication via email - Evidence of the next follow-up from the employee recruitment process, namely a Work Call Letter. <p>Types of employments are permanent (PB and KHT) and contract (PKWT).</p> <p>The audit team has been informed that all procedures are made available upon request. Series of socialisation and training session are set to ensure awareness and knowledge on the relevant matters.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has employment procedures listed in 3.5.1 above. The implementation is in accordance and made references to a letter by Kepala Dinas Tenaga Kerja dan Transmigrasi No: 034 Tahun 2021 dated 4 Jan 2021.</p> <p>Sample on Recruitment process:</p> <ul style="list-style-type: none"> • Employee request form (FM-SR-HO-HRS-010001) Form Ulin Estate Manager, dated 15th November 2022, namely Mr W***k K***d, position as Pesticides Applicator • Interview process was carried by KTU Staff in Ulin Agro Estate, dated 	<p>Non-compliance (2355770-202306-M3)</p>

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		<p>16th November 2022</p> <ul style="list-style-type: none"> • Document of Work Agreement as and contact employees (PKWT), was signed on 20th November 2022 (valid until 2 years). The detail information such as: <ul style="list-style-type: none"> - Position: Weeding (Perawatan) - Work Unit: Ulin Agro Estate - Status: PKWT - Salary: Rp Rp. 124,555 per day - Rice: 0.5 Kg/Day <p>Critical Non-conformity: Based on interviews and site visits, the auditor found several workers who did not have a PKWT Work Agreement as required in the Sampoerna Agro IMS Procedure –Recruitment No. P-SAG-ADM-KTU-04 revision 2 dated March 1, 2018.</p> <p>Recurrent Non-conformity, Escalated to Critical.</p>	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>During the Recertification Audit, the unit of certification demonstrated a robust risk assessment procedure in line with the "SOP Identifikasi K3" (No. P-SAG-HO-SUS-12), dated 1 September 2017. Additionally, the document titled "<i>Form Identifikasi Aspek Mutu, Lingkungan dan K3 Serta Dampak Penting Lingkungan dan Bahaya dan Risiko K3</i>" (Doc. No.: FM-SAG-HO-SUS-070006) serves as a reference for the estates and UAI-POM.</p> <p>Moreover, the audit team identified a noteworthy policy promoting palm oil sustainability titled "Kebijakan Keberlanjutan," which was signed by the Chief Executive Officer on 1 October 2019. This policy reflects the company's commitment to various objectives, including:</p>	<p>Non-compliance (2355770-202306-M4)</p>

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		<ol style="list-style-type: none"> 1. Ensuring Workplace Safety: Emphasizing the prevention of accidents and occupational diseases resulting from unsafe conditions and actions, underlining company's dedication to employee well-being. 2. Continual Health and Safety Improvement: Demonstrating commitment to the ongoing enhancement of health and safety measures, reflecting dedication to maintaining a secure working environment. <p>These commitments underscore commitment to responsible and sustainable palm oil production, placing a strong emphasis on the welfare of workforce and environmental stewardship.</p> <p>All estates and mill have established risk assessment identification for 2023, updated on 12 Jan 2023. The risk assessment complete information such as potential hazard, risk assessment (probability, consequence, and risk level), risk control (risk mitigation), OHS program to mitigate the risk, advance risk assessment (probability, consequence, and risk level), effectiveness, and follow-up action. Type of activity assessed on risk assessment, such as Nursery, IPM, weeding, pest control, planting beneficial plants, introduce and monitoring <i>Tyto alba</i>, castration and sanitation, fertilizing, road and bridge maintenance, harvesting, water management, administrations, human resource, clinic management, waste management, workshop, boreholes, oil palm maintenance, road maintenance, manual and chemical weeding, fertilizer application, oil palm tree inventory, IPM, chemical handling, EFB mulching, harvesting, distribution and transportation of work equipment's, FFB collecting, FFB transportation, HCV monitoring activity, unit transportation maintenance, heavy equipment maintenance, genset operational, workshop activity, electrical maintenance, emplacement maintenance, grass cutting machine maintenance, and others.</p>	
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		<p>The document has found tabulated the risk assessment for all activities at estates and mill, and covers the following:</p> <ul style="list-style-type: none"> - Working Unit - Aspect Code - Area/Activity/Product/Service - Detail Activity/Product/Service - Type (O/S/H/E) - Aspect/Hazard - Impact/Risk/Opportunity - Regulation - Operation condition (Routine/Normal) - Existing Mitigation - Probability - Severity - Risk Level - Significant grading - Management (Elimination, Substitution, Teknik, Administration & PPE) <p>The certification unit has updated its risk analysis in January 2023, but this document does not yet cover all activities within the scope of the company, for example:</p> <ul style="list-style-type: none"> • Monitoring HGU boundaries • HCV Management and Monitoring • Activities of contractors working in factories and plantations • Fire monitoring activities in the fire tower. <p>Critical Non-conformity: Not all activities within the scope of PT Usaha Agro Indonesia have been risk analyzed.</p>	
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<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>Upon conducting document verification, it has been confirmed that the Health and Safety (H&S) plan, also known as the Occupational Health and Safety (OHS) work plan, has been duly in place for the years 2022 and 2023. Additionally, the records pertaining to the evaluation of the H&S plan's performance for the year 2022 are available, complete with detailed information on program types, activity objectives, scheduling, the number of personnel involved, follow-up actions, and explanations of achievements for each type of activity. These evaluation findings have been instrumental in providing feedback for the enhancement of the H&S plan in 2023.</p> <p>The H&S plan for 2023 includes essential information such as program types, target objectives, timetables, and the designated responsible personnel.</p> <p>The effectiveness of the H&S plan in mitigating health and safety risks to individuals is vigilantly monitored through regular inspections of Occupational Safety and Health (OSH) and environmental compliance within various locations, which include:</p> <ul style="list-style-type: none"> - Office - Engine room and Genset - Clinic - Housing area - Final waste disposal site - Sanitation facilities - Estate <p>The selection of Personal Protective Equipment (PPE) for workers is contingent upon the specific type of tasks they are engaged in. Reference is made to the established Standard PPE Requirement (APD) which is determined based on the duration of a worker's employment.</p> <p>Furthermore, during the morning briefings conducted with the harvester workers at the designated block, the foreman routinely imparts critical</p>	<p>Complied</p>
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		information including work targets, block locations, and OHS objectives such as the mandatory use of complete PPE, the goal of zero accidents, and other pertinent safety measures.	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>The Unit of Certification has the annual training program of 2022 and 2023 that has covered all aspects of the RSPO principles and criteria, OHS awareness, environment, as well as good agricultural and manufacturing practices. These trainings included mandatory training set by regulation and inhouse training.</p> <p>From the matrix of program has structured training name, timetable, and worker will be trained, including whole staff, workers from employee status monthly, daily employees, smallholders and contract employees, and smallholders.</p> <p>Available annual training program as documented in "Rencana Pelatihan 2023" with training detail:</p> <ol style="list-style-type: none"> 1. Limited pesticide, planned in July 2023 2. Fire prevention, planned in August 2023 3. Genset operator, planned in June 2023 4. Hiperkes, planned in July 2023 5. Security basic training, planned in August 2023 6. Lift and transport, planned in September 2023 7. Boiler, planned in October 2023 	Complied
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The unit of certification has meticulously documented a comprehensive array of training activities, encompassing both mandatory regulatory requirements and internal knowledge enrichment initiatives.</p> <p>For mandatory training, records reveal that 13 individuals have been trained in accordance with regulations governing their respective roles. These roles include electricity technicians, boiler technicians, generator</p>	Complied

		<p>set technicians, first aid kit team members, heavy vehicle operators, and personnel engaged in high-altitude work.</p> <p>In addition to mandatory training, the organization has consistently invested in the professional development of its workforce through a series of internal training programs. Some notable examples of these initiatives are as follows:</p> <ul style="list-style-type: none"> - On 12 July 2022, conducted training session on best practices for pesticide spraying. - On 11 January 2022, a training session on payment procedures was held to enhance operational efficiency. - Training of Boiler operator conducted on 18 – 22 January 2022, and training of hazardous waste management conducted on 24 – 25 March 2022. - A comprehensive dissemination of code of conduct policies took place on 4 November 2022, 6 December 2022, 16 December 2022, and 7 April 2023. These sessions were attended by both internal staff members and workers, as well as contractors on 2 March 2023. - On 13 February 2023, organized a training program focused on first aid kit usage, with an attendance of 36 participants. - The organization prioritized safety by conducting a training and simulation session on firefighting techniques on 2 January 2023, with 34 participants actively engaging in the exercise. - An emergency response training, featuring a scenario involving Fuel and Oil Spill, was executed on 27 April 2023, at the UAI Palm Oil Mill. This exercise further fortified preparedness and response capabilities. <p>These initiatives underscore the commitment to upholding the highest standards of competence and safety across the organization, fostering a culture of continuous learning and preparedness among the workforce.</p>	
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>Unit of certification has determined Organisation Structure on Supply Chain Certification dated 31 December 2022. Personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) are:</p> <ol style="list-style-type: none"> 1. Mill Manager 2. Laboratory & QC Assistant – Mass Balance controlling 3. Head of Laboratory & QC – Delivery and Sounding Palm Product 4. Production Administration – Mass Balance Reporting 5. Administration Head – Controlling and Monitoring Report 6. Head of Security – FFB Entering/Receiving 7. Weighbridge Operator – Weighing input. <p>Appropriate training has been provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS), such as receiving station, weighing station, administration (record keeper). Training is specific and relevant to the task(s) performed. The latest training of RSPO Supply Chain Certification conducted on 6 December 2022 and training evaluation conducted on 15 February 2023. Attendance list, training material and photograph are available.</p>	Complied
<p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing</p>	<p>PT Usaha Agro Indonesia Palm Oil Mill (UAI POM) is implementing RSPO Supply Chain Module Mass Balance.</p> <p>This indicator is not Applicable.</p>	Not Applicable

	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.		
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>UAI Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance. Certified FFB are sources from:</p> <ul style="list-style-type: none"> - Ulin Agro Estate - Kruing Agro Estate - Meranti Agro Estate - Koperasi Kebun Jambi Mekar Jaya Sempurna (scheme smallholders) - Koperasi Kebun Sempurna Mandiri Estate (scheme smallholders) <p>Whilst non-certified FFB are coming from:</p> <ul style="list-style-type: none"> - PT Anugrah Palembang Indonesia (APIN) - Koperasi Kebun Sempurna Bersatu (scheme smallholders) - Rudi (outsider FFB suppliers) - Ulin Agro Estate (new planting sanctions non-NPP) - Kruing Agro Estate (new planting sanctions non-NPP) - Meranti Agro Estate (new planting sanctions non-NPP) - PT Karya Prima Agro Mandiri (KPAM) <p>There is no change in the supply chain module since last assessment.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>UAI Palm Oil Mill is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Ulin Agro Estate, Kruing Agro Estate, Meranti Agro Estate, Koperasi Kebun Jambi Mekar Jaya Sempurna Estate, Koperasi Kebun Sempurna Mandiri Estate and Non-certified FFB from third party supplier, Extraction rates, Processing report.</p>	Complied

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		<p>capacity, CPO & PK production. The actual tonnage produced are recorded in each annual surveillance report.</p> <p>The actual tonnage produced as per license period Jun 2022 – May 2023 are:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>FFB (MT)</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">Sustainable sources</td> </tr> <tr> <td>1</td> <td>Ulin Agro Estate</td> <td>10,040.90</td> </tr> <tr> <td>2</td> <td>Kruing Agro Estate</td> <td>22,674.14</td> </tr> <tr> <td>3</td> <td>Meranti Agro Estate</td> <td>47,758.48</td> </tr> <tr> <td>4</td> <td>Koperasi Perkebunan Jambi Mekar Jaya Sempurna (JMJS)</td> <td>19,022.69</td> </tr> <tr> <td>5</td> <td>Koperasi Perkebunan Sempurna Mandiri (SM)</td> <td>12,229.82</td> </tr> <tr> <td colspan="2">TOTAL sustainable</td> <td>111,726.03</td> </tr> <tr> <td colspan="3" style="text-align: center;">Non-sustainable sources</td> </tr> <tr> <td>1</td> <td>Ulin Agro Estate (NPP sanction)</td> <td>8,604.07</td> </tr> <tr> <td>2</td> <td>Kruing Agro Estate (NPP sanction)</td> <td>7,189.44</td> </tr> <tr> <td>3</td> <td>Meranti Agro Estate (NPP sanction)</td> <td>5,549.74</td> </tr> <tr> <td>4</td> <td>Koperasi Perkebunan Jambi Mekar Jaya Sempurna (JMJS) – NPP sanction</td> <td>211.56</td> </tr> <tr> <td>5</td> <td>Koperasi Perkebunan Sempurna Mandiri (SM) – NPP sanction</td> <td>13.24</td> </tr> <tr> <td>6</td> <td>Koperasi Perkebunan Sempurna Bersatu (SB)</td> <td>7,181.87</td> </tr> <tr> <td>7</td> <td>Outgrowers</td> <td>7,004.13</td> </tr> <tr> <td colspan="2">TOTAL non-sustainable</td> <td>35,754.05</td> </tr> </tbody> </table> <p>Actual UAI Palm Oil Mill production period Jun 2022 – May 2023: - FFB Received: 124,982.16 MT (sustainable); 35,754 MT (non-sustainable).</p>	No	Estate	FFB (MT)	Sustainable sources			1	Ulin Agro Estate	10,040.90	2	Kruing Agro Estate	22,674.14	3	Meranti Agro Estate	47,758.48	4	Koperasi Perkebunan Jambi Mekar Jaya Sempurna (JMJS)	19,022.69	5	Koperasi Perkebunan Sempurna Mandiri (SM)	12,229.82	TOTAL sustainable		111,726.03	Non-sustainable sources			1	Ulin Agro Estate (NPP sanction)	8,604.07	2	Kruing Agro Estate (NPP sanction)	7,189.44	3	Meranti Agro Estate (NPP sanction)	5,549.74	4	Koperasi Perkebunan Jambi Mekar Jaya Sempurna (JMJS) – NPP sanction	211.56	5	Koperasi Perkebunan Sempurna Mandiri (SM) – NPP sanction	13.24	6	Koperasi Perkebunan Sempurna Bersatu (SB)	7,181.87	7	Outgrowers	7,004.13	TOTAL non-sustainable		35,754.05	
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		<ul style="list-style-type: none"> - FFB Processed: 120,216.27 MT (sustainable); 27,353.51 MT (non-sustainable). - CPO Production: 28,024.14 MT (sustainable); 6,363.17 MT (non-sustainable). - OER: 23.39 % - PK Production: 5,073.63 MT (sustainable); 902.06 MT (non-sustainable) - KER: 4.06%. 	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	UAI POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000006365 registered as PT Usaha Agro Indonesia Palm Oil Mill.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. 	<p>The unit of certification has written procedure and work instruction to ensure the implementation of all elements specified in these requirements, e.g:</p> <ul style="list-style-type: none"> a) Procedure of Traceability and Mass Balance (P-SAG-PKS-PRS-14) dated 1 Jul 2020, Rev. 3 is covering the implementation of all the elements of the supply chain model requirements. Available as well, Standard Operational Procedure of Palm Oil Process which is included: Grading, Loading Ramp, Weighing Bridge, Sterilization Station, Threshing Station, Pressing Station, Clarification Station, Recycling CPO, Nut and Kernel, Engine Room, Boiler, Water Treatment, Final Effluent, and Laboratories. The procedure was available at the site office, complete and up to date covering the implementation of all the elements of the supply chain model requirements. b) The unit of certification is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply 	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>chain's general requirement and modular requirement, including training records. Sample seen: The latest training of RSPO Supply Chain Certification conducted on 6 December 2022 and training evaluation conducted on 15 February 2023. Attendance list, training material and photograph are available.</p> <p>c) Personal in charge for applying Supply Chain at UAI POM as refer to designation letter, as below:</p> <ul style="list-style-type: none"> - Letter No: 003/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: Desi Irnawati (WB operator). FFB weighing process and operating WB input system. - Letter No: 002/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: Nispi (WB operator). FFB weighing process and operating WB input system. - Letter No: 001/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: M. Saujan (Security Head). Monitoring of FFB receiving at Mill. - Letter No: 004/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: Yasinta Sarosa (Production Admin). Creating mass balance and traceability report. - Letter No: 005/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: Asep Iman H (Laboratory Assistant and QC). Monitoring and controlling traceability mass balance report. - Letter No: 006/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: Tomi Lapis (CPO/PK Delivery and Sounding Officer). Responsible for CPO/PK sounding and delivery. - Letter No: 007/PKS-KRY/SP/I/2022, dated 3 January 2022. Name: Yogi Hermanto (Administration Head). Monitoring and controlling traceability mass balance report. <p>d) The procedure of Traceability and Mass Balance (P-SAG-PKS-PRS-14) dated 1 Jul 2020, Rev. 3 has included mechanism of receiving</p>	
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		of certified and non-certified FFB. The mill uses supply chain Model Mass Balance, contamination is followed.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>The mill's referring to the most recent internal audit procedure, denoted as Procedure Audit Internal (P-SAG-HO-SUS-03), Revision 5, effective as of 1 August 2020. Notably, commitment to upholding the RSPO Supply Chain requirements was subject to the latest internal audit, conducted on 1 February 2023.</p> <p>Moreover, it is imperative to highlight that the Audit Internal procedure explicitly incorporates references to the RSPO Supply Chain requirements and the RSPO Rules governing Market Communication and Claims.</p> <p>Any discrepancies identified during internal audits has promptly addressed through corrective measures. The unit of certification conduct an annual management review of the audit results and the steps taken to rectify these discrepancies. Additionally, comprehensive records and reports of internal audits are maintained.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>iv) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>v) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>vi) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The Palm Oil Mill (POM) maintains comprehensive records of all incoming certified and non-certified Fresh Fruit Bunches (FFBs). The exact quantities are documented in both the Mass Balance Table and Production Report. The POM distinguish between certified and uncertified FFBs by cross-referencing the incoming weighbridge tickets. The protocol for handling incoming FFBs is detailed in Section 7.1, titled "Identification of Sustainable FFB Inputs," within the RSPO Supply Chain System Traceability document (P-SAG-PKS-PRS-14).</p> <p>In the event of anticipated overproduction, the POM proactively initiates communication with the BVC, as outlined in Section 7.5.9 of the RSPO Supply Chain System & Traceability guidelines.</p> <p>The Certification Unit has introduced an updated procedure for Supply Chain System Traceability (P-SAG-PKS-PRS-14) on 4 July 2020. Section</p>	Non-compliance (2355770-202306-M5)

		<p>7.6 of this procedure outlines the necessary steps to be taken by the Palm Oil Mill in the event of encountering non-conforming products.</p> <p>Critical Non-conformity: Detailed data on certified and non-certified FFB supply source blocks is not yet available, considering that there are Core plantation areas that are subject to sanctions for planting without NPP and amalgamation of the Koperasi Jambi Mekar Jaya Sempurna block.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>UAI POM (Palm Oil Mill) has implemented a comprehensive system, including the "<i>Form Hasil Penimbangan CPO/PK</i>" (FM-SAG-PKS-PRS-010202), also known as the Internal Fresh Fruit Bunch (FFB) Weighing, which contains all the necessary information.</p> <p>The Weighing Note for External Transactions includes details such as the truck number, driver's name, "<i>Surat Pengiriman Buah</i>" (SPB) number, and the weight of the received FFB (in tonnage).</p> <p>The Weighing Note for Internal Transactions comprises information like the truck number, driver's name, SPB number, estate name, division, block, sub-block, FFB received (in tonnage), and the weight of loose fruit (in kilograms). This note also includes information about the identification of sustainable and non-sustainable FFB, which can be determined from the block's identity.</p> <p>Furthermore, PT Usaha Agro Indonesia has provided evidence of delivery orders for certified Crude Palm Oil (CPO) and Palm Kernel (PK). Upon reviewing these documents, it is clear that the certification unit has ensured the availability of the minimum information required for RSPO (Roundtable on Sustainable Palm Oil) certified products across a wide range of documents.</p>	<p>Complied</p>

<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>UAI Palm Oil Mill (POM) has engaged third-party transportation services for the transportation of Crude Palm Oil (CPO) and Palm Kernel (PK). The POM has established a documented control system with explicit procedures for outsourced processes, and these procedures have been effectively communicated to the contracted transportation service providers.</p> <p>The appointed transportation contractors have formal contract agreements in place:</p> <p>Contractor A:</p> <ul style="list-style-type: none"> • Agreement Name: Crude Palm Oil Transportation Service Agreement • Agreement No.: 051/X/COM/EX/2014 (Addendum) • Date: 31 December 2019 • Contractor's Name: CV Karya Mandiri Sejati • Address: Jl. Gajah Mada Komp Palm Vista Residence D No. 20, RT/RW 030/005, Kali Nilam, Delta Pawan, Ketapang, Kalbar. • Period: The agreement specifies that its validity is automatically renewed for the following 12 months if there is no termination notice issued at least 30 days prior to the termination date. <p>Contractor B:</p> <ul style="list-style-type: none"> • Agreement Name: Palm Kernel Transportation Service Agreement • Agreement No.: 009/I/COM/EX/2022 • Date: 14 January 2022 • Contractor's Name: CV Adila Perdana Nusantara • Address: Jalan Bendahara RT.004, Kumai Hulu, Kumai, Kab. Kotawaringin Barat, Kalimantan Tengah. • Period: Similar to Contractor A's agreement, there is a specific section in this agreement stating that its validity is automatically 	<p>Complied</p>
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		<p>renewed for the following 12 months if there is no termination notice issued at least 30 days prior to the termination date.</p> <p>The agreement include term and conditions that PT Usaha Agro Indonesia has the legal ownership of the CPO or PK during transport, and Contractors shall abide RSPO Supply Chain requirement including provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is deemed necessary and announced in advance.</p> <p>These formal agreements and their renewal clauses ensure that the transportation services for CPO and PK are well-documented and that the contractual relationships are maintained in accordance with the specified terms and conditions.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	As of the audit date, UAI POM has outsourced the transportation of Crude Palm Oil (CPO) and Palm Kernel (PK) to third-party service providers. Detailed information about these contractors, including their names and contact details, is readily accessible and can be found in indicator 3.8.9.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The unit of certification aware to inform the audit team in case there is changes in the list of CPO and PK transporter through the RSPO P&C Pre-Audit Information checklist.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>The UAI palm oil mill has maintained accurate, complete, up-to-date, and easily accessible records and reports, encompassing all facets of RSPO Supply Chain Certification Standard requirements. Some examples of the available records and reports include:</p> <ul style="list-style-type: none"> • Daily Mill Report • Closing Book Stock CPO RSPO Mass Balance • Weighbridge Ticket <p>In adherence to relevant legal and regulatory requirements, the mill has established a retention period of a minimum of two (2) years for all</p>	Complied

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	<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>records and reports related to RSPO SCCS. This practice ensures the ability to verify the certified status of raw materials or products held in stock. The specific list of record and document retention periods can be found in the "<i>Daftar Catatan</i>" (FM-SAG-HO-SUS-020001).</p> <p>Usaha Agro Indonesia's palm oil mill operates under the Mass Balance Module, which entails the following practices:</p> <p>a. The mill keeps records and balances all receipts of RSPO certified Fresh Fruit Bunches (FFB) and deliveries of RSPO certified Crude Palm Oil (CPO) and Palm Kernel (PK) on a three-monthly basis, as exemplified in the Closing Book Stock CPO RSPO Mass Balance. A transaction verified during the audit period is as follows:</p> <ul style="list-style-type: none"> • Period: April 2022 to March 2023 • Incoming RSPO Certified FFB: 131,677.33 MT • Opening Stock RSPO/MB Certified CPO: 3,451.82 MT • RSPO/MB Certified CPO Produced: 29,161.54 MT • RSPO/MB Certified CPO Dispatched: 9,050.00 MT • Closing Stock RSPO/MB Certified CPO: 3,137.42 metric tons <p>b. The mill ensures that all volumes of certified CPO and PK delivered have been accurately deducted from the material accounting system in accordance with the conversion ratios specified by RSPO. Importantly, the mill exclusively delivers Mass Balance sales from a positive stock, adhering to RSPO standards and principles.</p>	
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>The oil extraction rate (OER) and kernel extraction rate (KER) utilized by the Palm Oil Mill (POM) provide a dependable estimate of the quantity of certified Crude Palm Oil (CPO) and Palm Kernel (PK) derived from the processed Fresh Fruit Bunches (FFB). These extraction rates are determined using data from the Daily Mill Report and are considered reliable indicators of the mill's performance.</p>	Complied

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		The OER typically falls within the range of 23.12% to 24.43%, while the KER ranges from 3.34% to 4.45%. These figures demonstrate the efficiency and effectiveness of the mill's extraction processes in converting FFB into CPO and PK while ensuring compliance with relevant standards and requirements.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Based on the Daily Mill Report, the actual OER and KER are updated on daily basis and summarized in the monthly report.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not applicable. The POM is implementing Mass Balance module.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. 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.	PT Usaha Agro Indonesia – UAI Palm Oil Mill is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000006365. This has been checked through the POM's Palmtrace account during the audit. As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, UAI POM has made Shipping Announcement for certified CPO and PK sold. During this assessment period, UAI POM sold several volumes of certified CPO as conventional, therefore UAI POM performed "Remove" in the RSPO IT Platform, for examples: Transaction ID: ST-TR-ae74cb19-aae7; dated 16-06-2023; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 43 MT; Reason: Sold as conventional.	Complied
3.8.17	Claims	The procedure for claims is stated in Procedure of Supply Chain System Traceability (P-SAG-PKS-PRS-14) dated 4 July 2020. The mill only makes	Complied

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	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.	claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified Mass Balance is only stated in sales documents of RSPO certified product.	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT Usaha Agro Indonesia Palm Oil Mill did not make corporate communication. Corporate communications are conducted by the parent company, PT. Sampoerna Agro Tbk as RSPO member with membership No. 1-0031-07-000-00, member since 9 January 2007 on website: https://sampoernaagro.com .	Complied
4.2	In corporate communications a member is allowed to: <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	In corporate communication, PT. Sampoerna Agro Tbk has display its RSPO membership status, display a link to the RSPO web address, stated that PT. Sampoerna Agro Tbk support the work of the RSPO and stated PT. Sampoerna Agro Tbk's history with regard to the RSPO. PT. Sampoerna Agro Tbk did not uses RSPO trademark in the website.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	On the website, PT. Sampoerna Agro Tbk not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	On the website, PT. Sampoerna Agro Tbk ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Complied

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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.	On the website, PT. Sampoerna Agro Tbk does not uses the RSPO corporate logo.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Usaha Agro Indonesia Palm Oil Mill made Business to Business communication by stated in sales documents, e.g. Sales Contract and Delivery Note that the product sold is RSPO Certified CPO or PK model MB.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Supply chain model and RSPO certificate number were stated on the delivery document, e.g. Delivery Note and weighbridge ticket.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, 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. b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	PT Usaha Agro Indonesia Palm Oil Mill is not a distributor or wholesaler.	Not Applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not	PT Usaha Agro Indonesia Palm Oil Mill is not producing or selling end-product to consumer. No labelling on product whatsoever. Not applicable.	Complied

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

	<ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>There is no product partial claims. Not applicable</p>	<p>Not Applicable</p>
Principle 4: Respect community and human rights and deliver benefit			

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Code of ethical conduct included in "Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk." Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, 4.a No discrimination based on race, tribe, nation origin, religion, physical disability, gender, sexual orientation, worker union affiliation, age;</p> <p>4.b Prohibit force labour, slavery and use human trafficking labour;</p> <p>4.c Not employ worker under 18 years old;</p> <p>4.d Protect the rights of all workers for collective bargaining;</p> <p>4.e Prevent sexual harassment and protect reproductive rights;</p> <p>4.f. Protect human rights defender;</p> <p>4.g Provide fair working opportunity and business opportunity for local communities.</p> <p>Company has communicated the policy of ethical conduct "Kebijakan Berkelanjutan":</p> <ul style="list-style-type: none"> - In Kruing Agro Estate Div. III & IV, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 13 February 2023 for 28 upkeep workers; 21 harvesters. - In Kruing Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 2 June 2023 for 4 staffs, 7 mandores, 152 workers; attended by Estate Manager. 	Complied

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		<ul style="list-style-type: none"> - In Meranti Agro Estate, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 8 February 2023 for 36 harvesters, 8 fertilizer applicators, 39 upkeep workers and 1 harvest mandor. - In Meranti Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 5 June 2023 for 3 staffs, 20 mandores, 223 workers; acknowledged by Estate Manager Meranti Agro. - In Ulin Agro Estate, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 9 February 2023 for 43 harvesters, 10 fertilizer applicators, 25 upkeep workers and 1 harvest mandor. - In Ulin Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 3 June 2023 for 4 staffs, 8 mandores, 173 workers; <p>Based on interview with sampled worker in Usaha Agro POM, they understand the implementation of ethical conduct in their daily activity: no cheating with weighbridge scale; no mark up in maintenance work, no abuse in use of resources and fund.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Based on interview with surrounding communities, worker and previous landowner, company never use mercenaries and paramilitaries to instigate violence or harassment in their operation.</p>	Complied
<p>Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>PT Usaha Agro Indonesia has prepared the "IMS Procedure Komunikasi, Partisipasi dan Konsultasi", document no. P-SAG-HO-CA&L-08, revision 4, date August 01, 2019. The complaint and grievance can come from internal and external. The system allows for the complainant to agree</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>on the process of the grievance mechanism as stated point 7.4 "Resolution of Complaint/Grievance", such asL</p> <ul style="list-style-type: none"> • For internal: Resolution refers to "Peraturan Perusahaan PT Usaha Agro Indonesia' - that was obtained from Manpower Agency as per document Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023 tentang Pengesahan Peraturan Perusahaan PT Usaha Agro Indonesia Periode Januari 2023 – January 2025.": settlement with the direct supervisor no later than 3 (three) days; If it is not completed, it will be continued to a higher superior, for a maximum of 3 days. If it cannot be resolved, then it is forwarded to the head of the Human Resources department and the union management to be resolved by consensus (bipartite). • For external Resolution by unit head: external parties submit verbal/written complaints to unit leaders; the unit leader resolves the complaint within an agreed period or within at least 14 days the company must provide an answer or response to the complaint. • Resolution by mediation forum: if the problem cannot be resolved by unit leader, and both parties agree to create a mediation forum. A mediation forum is formed from the disputing parties and a neutral third party or does not side with one of the disputing parties. In the mediation forum the company is represented by the dept head/manager involved; Third parties as mediators can come from local government agencies, religious leaders. customary/traditional institutions, NGOs, or other people if it is accepted and agreed upon by both parties. <p>There is a system for protection of the anonymity of the complainant as sighted on document "Kebijakan Pelaporan Pelanggaran PT Sampoerna Agro Tbk." at point 5.1 and 5.2. There is no complaint or grievance as informed by management of UAI POM.</p>	
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		<p>There is a non-retaliation or non-reprisal policy to protect complainants or whistle-blowers as sighted on document "Kebijakan Pelaporan Pelanggaran PT Sampoerna Agro Tbk." at point 6.</p> <p>The complaint and grievance resolution mechanism has been communicated to surrounding communities, such as: dated 2 February 2023, location in Jambi Village that was attended by 12 participants.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has prepared the procedure to ensure that the system to deal with complaints and grievances is understood by affected parties, i.e.: document i.e.: "IMS Procedure Komunikasi, Partisipasi dan Konsultasi (document no. P-SAG-HO-CA&L-08, revision 4, date August 01, 2019) as stated at Point 7.1. (External communication) and 7.2 (internal communication).</p> <p>The procedure has communicated to surrounding communities, such as: dated 2 February 2023, location in Jambi Village that was attended by 12 participants.</p> <p>In Ulin Agro Estate, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 9 February 2023 for 43 harvesters, 10 fertilizer applicators, 25 upkeep workers and 1 harvest mandor. The field assistant read out the policy and procedures to some worker who cannot read.</p> <p>Based on interview with sampled workers, labour union, communities from Jambi village during RAV year 2023; audit team has obtained information that the stakeholders have known the grievance procedure through regular dissemination.</p>	Complied
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>PT Usaha Agro Indonesia has demonstrated the record of complaints or grievance resolution as seen on documents "IMS Procedure Komunikasi, Partisipasi dan Konsultasi", document no. P-SAG-HO-CA&L-08, revision 4, date August 01, 2019. The procedure at point 7.4 said: "the</p>	Complied

	- Minor compliance -	<p>management unit did recognize rights for the complainants to access independent legal and technical advice".</p> <p>The company has established a record book to compile all complaints received from the stakeholder i.e.: document of "Logbook Komunikasi Stakeholder". And on the other hand, a specific form has been established and used for handling complaints and grievances i.e.: Register of Information Request/Complaint Form (Form FM-SAG-RO-CA&L-080002). Since the last audit, there is no reported of any conflict been recorded or received by the unit of certification.</p> <p>Based on interview with Plantation Agency in Ketapang Regency during RAV-2023, there have been no significant conflicts between the company and the community or other parties and there have been no complaints Plantation Service in Ketapang Regency.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As stated in the procedure of Handling of Complaints and Grievances of the Communication, Participation and Consultation Procedure (Ref. Doc.: P-SAG-HO-CA&L-08) – dated August 01, 2019; the management unit did recognize rights for the complainants to access independent legal and technical advice. Since the last audit, there is no report of any conflict been recorded or received by the unit of certification.</p> <p>Based on interview with Plantation Agency in Ketapang Regency during RAV-2023, there have been no significant conflicts between the company and the community or other parties and there have been no complaints Plantation Service in Ketapang Regency.</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has identified local development need with consultation with local communities as sighted on document "Kertas Rencana Kerja Kegiatan PT Usaha Agro Indonesia Tahun 2022-2023 /CSR Program year 2023-2023".</p>	Complied

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		<p>The programs are based on the results of consultation with local community and local governance.</p> <ul style="list-style-type: none"> • The stakeholder meeting at the Regency level was held involving 9 related agencies in Ketapang Regency and the company's Internal Team on 15 March 2022, by holding a virtual meeting (Zoom Application). • The stakeholder meeting activity in Manis Mata sub-district was held on 16 February 2022, with the sub-district head and Dayak Traditional Council (DAD) of Manis Mata sub-district, the police chief in Manis Mata sub-district and the Koramil in Manis Mata sub-district. <p>Sample of CSR Program year 2022-2023, such as:</p> <ul style="list-style-type: none"> • Socialization and counseling on the dangers of drugs for the younger generation in the Manis Mata sub-district. • Economic programs: Provide ambulance and information on recruitment of workers can be conveyed to the village. • Overcoming forest and land fires, namely by strengthening KTPA including counseling the community not to land-clearing by fire; The latrine program and KB Kes TNI in local villages. • Reforestation program by planting trees (local fruit trees, etc.); Carry out restoration of sacred places in Jambi village. • Improvement of road infrastructure. <p>PT Usaha Agro Indonesia has demonstrated the record of report of the contributions made to the local community development year 2022.</p> <p>Based on interview with local community (Head of Jambi Village) during RAV year 2023, there was informed that the company has contributed such as on improvement of road infrastructure</p>	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior</p>	Location permit 2007:	Complied

	<p>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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Location permit issued in 2007 "Surat Bupati Ketapang No.403 tahun 2007 tentang Pemberian Izin Lokasi Pembangunan Perkebunan Kelapa Sawit atas nama PT. Usaha Agro Indonesia terletak di Kecamatan Manis Mata dan Kendawangan, Kabupaten Ketapang seluas 11,300 Ha" dated 8 November 2007.</p> <p>Location permit 2008: Location permit issued in 2008 "Surat Bupati Ketapang No.250 tahun 2008 tentang Perubahan Keputusan Bupati Ketapang No.403 tahun 2007 tentang Izin Lokasi Pembangunan Perkebunan Kelapa Sawit dan Pabrik Pengolahan atas nama PT. Usaha Agro Indonesia di Kecamatan Manis Mata dan Kendawangan, Kabupaten Ketapang seluas 11,300 Ha" dated 11 July 2008.</p> <p>Location permit 2010: Location Permit issued in 2010: As per "Keputusan Bupati Ketapang No.414 Tahun 2010 tentang Revisi Perpanjangan Izin Lokasi Pembangunan Perkebunan Kelapa Sawit dan Pabrik Pengolahan Atas Nama PT. Usaha Agro Indonesia" dated 27 July 2010. Area allocated for PT. Usaha Agro Indonesia has been revised and extended for 11,300 Ha in Manis Mata and Kendawangan Regency.</p> <p>Land survey summary for gazette "Risalah Panitia B":</p> <ul style="list-style-type: none"> - "Risalah Panitia Pemeriksaan Tanah B No.21/HGU-HTPT/BPN/2014" dated 26 August 2014. The application for 8,781.42 Ha; for HGU; duration 35 years. Land survey map No.57-14.07-2014 dated 4 July 2014: - NIB.14.07.00.00.00065 of 2,465.74 Ha - NIB.14.07.00.00.00066 of 3,070.52 Ha 	
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		<ul style="list-style-type: none"> - NIB.14.07.00.00.00067 of 858.30 Ha - NIB.14.07.00.00.00068 of 1,840.56 Ha - NIB.14.07.00.00.00273 of 52.08 Ha - "Risalah Panitia Pemeriksaan Tanah B No.22/HGU-HTPT/BPN/2014" dated 27 August 2014. The application for 642.04 Ha; for HGU; duration 35 years. Land survey map No.57-14.07-2014 dated 4 July 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00277 of 8.11 Ha - NIB.14.07.00.00.00278 of 633.93 Ha - "Risalah Panitia Pemeriksaan Tanah B No.23/HGU-HTPT/BPN/2014" dated 28 August 2014. The application for 765.55 Ha; for HGU; duration 35 years. Land survey map No.57-14.07-2014 dated 4 July 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00274 of 474.96 Ha - NIB.14.07.00.00.00275 of 202.07 Ha - NIB.14.07.00.00.00276 of 88.52 Ha <p>Land title for Nucleus Estate:</p> <ul style="list-style-type: none"> - Land title decree as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.6/HGU/KEM-ATR/BPN/2015 tentang Pemberian Hak Guna Usaha atas nama PT. Usaha Agro Indonesia atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 6 April 2015. With this decree, government granted the land title upon state land for 35 years (until 2050) of 8,287.20 Ha located in Jambi Village, Manis Mata District and Buntar Village, Kendawangan District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.80-14.07-2014" dated 15 September 2014: 	
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		<ul style="list-style-type: none"> - NIB.14.07.00.00.00065 of 2,465.74 Ha - NIB.14.07.00.00.00066 of 3,070.52 Ha - NIB.14.07.00.00.00067 of 858.30 Ha - NIB.14.07.00.00.00068 of 1,840.56 Ha - NIB.14.07.00.00.00273 of 52.08 Ha <p>Subsequently issued with certificates:</p> <ul style="list-style-type: none"> - Land title "Sertifikat HGU No.108 PT. Usaha Agro Indonesia" dated 24 June 2015 for 2,465.74 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00108. Completed with map scale 1:50000. - Land title "Sertifikat HGU No.109 PT. Usaha Agro Indonesia" dated 24 June 2015 for 3,070.52 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00109. Completed with map scale 1:60000. - Land title "Sertifikat HGU No.110 PT. Usaha Agro Indonesia" dated 24 June 2015 for 858.30 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00110. Completed with map scale 1:40000 - Land title "Sertifikat HGU No.111 PT. Usaha Agro Indonesia" dated 24 June 2015 for 1,840.56 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00111. Completed with map scale 1:50000 - Land title "Sertifikat HGU No.112 PT. Usaha Agro Indonesia" dated 24 June 2015 for 52.08 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00112. Completed with map scale 1:50000 - Land title decree as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.40/HGU/KEM-ATR/BPN/2018 tentang Pemberian Hak Guna Usaha atas nama PT. 	
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		<p>Usaha Agro Indonesia atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat” dated 30 May 2018. With this decree, government granted the land title upon state land for 35 years (until 2053) of 1,383.1225 Ha located in Jambi Village, Manis Mata District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey “Peta Bidang Tanah No.80-14.07-2014” dated 15 September 2014:</p> <ul style="list-style-type: none"> - NIB.10-14.07.00.00.00571 of 110.3902 Ha (issued 6 March 2017) - NIB.30-14.07-2017 of 1,272.7233 Ha (issued 31 March 2017) - NIB.14.07.00.00.00551 of 829.6624 Ha - NIB.14.07.00.00.00552 of 330.8042 Ha - NIB.14.07.00.00.00553 of 112.2657 Ha <p>Subsequently issued with certificates:</p> <ul style="list-style-type: none"> - Land title “Sertifikat HGU No.222 PT. Usaha Agro Indonesia” dated 5 July 2018 for 829.6624 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00222. Completed with map scale 1:50000. - Land title “Sertifikat HGU No.223 PT. Usaha Agro Indonesia” dated 5 July 2018 for 330.8042 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00223. Completed with map scale 1:50000. - Land title “Sertifikat HGU No.224 PT. Usaha Agro Indonesia” dated 5 July 2018 for 112.2657 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00224. Completed with map scale 1:25000. - Land title “Sertifikat HGU No.225 PT. Usaha Agro Indonesia” dated 5 July 2018 for 110.3902 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00225. Completed with map scale 1:50000. 	
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		<p>Land Title for Scheme Smallholders Koperasi Perkebunan Sempurna Mandiri:</p> <ul style="list-style-type: none"> - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.7/HGU/KEM-ATR/BPN/2015 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan "Sempurna Mandiri" atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 6 April 2015. With this decree, government granted the land title upon state land for 35 years (until 2050) of 642.04 Ha located in Danau Buntar Village, Kendawangan District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.53-14.07-2014" dated 4 July 2014: <ul style="list-style-type: none"> - NIB.14.07.00.00.00277 of 8.11 Ha - NIB.14.07.00.00.00278 of 633.93 Ha - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.41/HGU/KEM-ATR/BPN/2018 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan Sempurna Mandiri atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 30 May 2018. With this decree, government granted the land title upon state land for 35 years (until 2053) of 259.5522 Ha located in Danau Buntar Village, Kendawangan District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.030-14.07-2017" dated 31 March 2017: <ul style="list-style-type: none"> - NIB.14.07.00.00.00554 of 116.1114 Ha - NIB.14.07.00.00.00555 of 143.4408 Ha <p>Subsequently issued with certificates:</p>	
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		<ul style="list-style-type: none"> - Land title "Sertifikat HGU No.105 Koperasi Perkebunan Sempurna Mandiri" dated 24 June 2015 for 8.11 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00103. - Land title "Sertifikat HGU No.104 Koperasi Perkebunan Sempurna Mandiri" dated 24 June 2015 for 633.93 Ha in Danau Buntar, Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00104. - Land title "Sertifikat HGU No.217 Koperasi Perkebunan Sempurna Mandiri" dated 5 July 2018 for 116.1114 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00217. - Land title "Sertifikat HGU No.218 Koperasi Perkebunan Sempurna Mandiri" dated 5 July 2018 for 143.4408 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00218. <p>Land Title for Scheme Smallholders Koperasi Perkebunan Jambi Mekar Jaya Sempurna:</p> <ul style="list-style-type: none"> - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.5/HGU/KEM-ATR/BPN/2015 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan "Jambi Mekar Jaya Sempurna" atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 6 April 2015. With this decree, government granted the land title upon state land for 35 years (until 2050) of 765.55 Ha located in Jambi Village, Manis Mata District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.54-14.07-2014" dated 4 July 2014: - NIB.14.07.00.00.00274 of 474.96 Ha - NIB.14.07.00.00.00275 of 202.07 Ha - NIB.14.07.00.00.00276 of 88.52 Ha 	
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		<ul style="list-style-type: none"> - Land title decree for smallholder cooperative as per "Surat Keputusan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No.42/HGU/KEM-ATR/BPN/2018 tentang Pemberian Hak Guna Usaha atas nama Koperasi Perkebunan Jambi Mekar Jaya Sempurna atas Tanah di Kabupaten Ketapang, Provinsi Kalimantan Barat" dated 30 May 2018. With this decree, government granted the land title upon state land for 35 years (until 2053) of 554.4697 Ha located in Jambi Village, Manis Mata District, Ketapang Regency, Kalimantan Barat Province. The land granted as per land survey "Peta Bidang Tanah No.030-14.07-2017" dated 31 March 2017: <ul style="list-style-type: none"> - NIB.14.07.00.00.00556 of 454.1873 Ha - NIB.14.07.00.00.00575 of 51.0485 Ha - NIB.14.07.00.00.00576 of 49.2339 Ha <p>Subsequently issued with certificates:</p> <ul style="list-style-type: none"> - Land title "Sertifikat HGU No.105 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 24 June 2015 for 474.96 Ha in Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00105. - Land title "Sertifikat HGU No.106 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 24 June 2015 for 202.07 Ha in Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00106. - Land title "Sertifikat HGU No.107 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 24 June 2015 for 88.52 Ha in Ketapang Regency; valid until 19 June 2050; Register No.14.07.00.00.2.00107. - Land title "Sertifikat HGU No.219 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 5 July 2018 for 454.1873 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00219. - Land title "Sertifikat HGU No.220 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 5 July 2018 for 51.0485 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00220. 	
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		<ul style="list-style-type: none"> - Land title "Sertifikat HGU No.221 Koperasi Perkebunan Jambi Mekar Jaya Sempurna" dated 5 July 2018 for 49.2339 Ha in Ketapang Regency; valid until 5 July 2053; Register No.14.07.00.00.2.00221. <p>HGB Decree:</p> <p>Based on "Keputusan Kepala Kantor Wilayah Badan Pertanahan Nasional Provinsi Kalimantan Barat No.23/HGB/BPN.61/2014 tentang Pemberian Hak Guna Bangunan Atas Nama PT. Usaha Agro Indonesia seluas 149,200 m2 di Desa Jambi Kecamatan Manis Mata Kabupaten Ketapang Provinsi Kalimantan Barat" dated 3 December 2014.</p> <p>The land was originated from (sampled):</p> <ul style="list-style-type: none"> - State land under control Cawang of 1.61 Ha in Jambi village, Manis Mata District, Ketapang Regency – controlled since 1988 without administrative letter; equipped with village statement "Surat Pernyataan Penguasaan/Pemilikan Tanah" dated 12 March 2008. The said land compensated by PT. Usaha Agro Indonesia on 13 March 2008 as recorded under "Surat Perjanjian Kesepakatan Ganti Rugi Tanah dan Tanam Tumbuh No.013/SPK-GRTT/UAI/III/08. Out of 16,100 m2 applied for HGB of 2,900 m2. - State land under control Tibin of 2.80 Ha in Jambi village, Manis Mata District, Ketapang Regency – controlled since 1985 without administrative letter; equipped with village statement "Surat Pernyataan Penguasaan/Pemilikan Tanah" dated 12 March 2008. The said land compensated by PT. Usaha Agro Indonesia on 13 March 2008 as recorded under "Surat Perjanjian Kesepakatan Ganti Rugi Tanah dan Tanam Tumbuh No.008/SPK-GRTT/UAI/III/08. Out of 28,000 m2 applied for HGB of 11,200 m2. - State land under control Cabe of 5.48 Ha in Jambi village, Manis Mata District, Ketapang Regency – controlled since 1986 without administrative letter; equipped with village statement "Surat 	
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		<p>Pernyataan Penguasaan/Pemilikan Tanah” dated 12 March 2008. The said land compensated by PT. Usaha Agro Indonesia on 13 March 2008 as recorded under “Surat Perjanjian Kesepakatan Ganti Rugi Tanah dan Tanam Tumbuh No.004/SPK-GRTT/UAI/III/08. Out of 54,800 m2 applied for HGB of 32,500 m2.</p> <p>Izin Usaha Perkebunan/Plantation Permit 2016 Based on “Keputusan Bupati Ketapang No.913/Disbun-D/2016 tentang Perubahan Luas Lahan PT. Usaha Agro Indonesia” dated 30 December 2016. The permit stated the area changed from initially 9.728 Ha into 12,228 Ha with milling capacity 60 MT FFB/hour, located in Jambi village, Manis Mata District, Ketapang Regency.</p> <p>Izin Usaha Perkebunan/Plantation Permit 2020 Based on “Izin Usaha Perkebunan PT. Usaha Agro Indonesia No.8120106833913” dated 12 October 2018.</p> <p>Izin Lingkungan/Environmental Permit 2009 Environmental permit as per “Dokumen Analisis Dampak Lingkungan” approved as in “Keputusan Gubernur Kalimantan Barat No.29 Tahun 2009 tentang Kelayakan Lingkungan Kegiatan Perkebunan” dated 16 January 2009.</p> <p>Izin Lingkungan/Environmental Permit 2016 Environmental permit as per “Surat Kantor Lingkungan Hidup Kabupaten Ketapang No.710/KLH-B/2016 tentang Izin Lingkungan Kegiatan Pembangunan Perkebunan Kelapa Sawit beserta Fasilitas Pendukung oleh PT. Usaha Agro Indonesia di Kecamatan Manis Mata” dated 29 November 2016.</p>	
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<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on interview with previous landowners, audit team got information:</p> <ul style="list-style-type: none"> - Company made initial socialization on plantation development plan to the surrounding communities. - The agreed rate for land compensation follows the Regency Regulation (Peraturan Daerah Kabupaten Ketapang No.6 Tahun 2006 mengenai Pengaturan Harga Dasar Ganti Rugi Tanam Tumbuh di Kabupaten Ketapang). The regulation reference is regulating the bottom price for land compensation, tree compensation, building compensation. - The community stated they provided with choice to get their land compensation and benefit of becoming scheme smallholder with cooperative. <p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiate individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make</p>	<p>Complied</p>
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		<p>community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Based on interview with previous landowner, company gives choices for the landowner to sell their land and get benefit of becoming scheme smallholder with cooperative.</p> <p>Some of the previous landowner does not sell their land until now and company respect the decision.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>Based on interview with previous landowners, audit team got information that company made initial socialization on plantation development plan to the surrounding communities. During the initial socialization phase, company explain the positive and negative aspect of plantation development. Positive aspect such as: improve economy condition, opportunity to work as company employee, opportunity for business partner (as vendor/contractor). Negative aspect: loss of natural biodiversity, increase in traffic load in the nearby village.</p> <p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each</p>	

		<p>land owner negotiate individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community member respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia and community made participatory mapping and measurement before land compensation process. Based on interview with previous landowner sampled and cross check with map of land compensation:</p> <ul style="list-style-type: none"> - Giran stated mapping and measurement done before negotiation and land compensation; map of Giran's land can be identified. - Tata stated mapping and measurement done before negotiation and land compensation; sketch and location of Tata's land can be identified. - Madi stated mapping and measurement done before negotiation and land compensation; sketch and location of Madi's land can be identified. 	<p>Complied</p>

		<p>- Timpul stated mapping and measurement done before negotiation and land compensation; sketch and location of Timpul’s land can be identified.</p>	
<p>4.4.4</p>	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on interview with previous landowner, audit team got information: fair information provided during initial socialization phase (positive and negative), land measurement and mapping process, negotiation, land compensation price determination, land compensation/payment and recording process, scheme smallholder cooperative initiation, all in Bahasa Indonesia and they understand.</p> <p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team “Satuan Pelaksana – Satlak” for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the “Satlak” team will be ready forconsultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p>	<p>Complied</p>

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		Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.	
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	Based on interview with previous landowners, audit team got information that they were free to choose their representative, however majority of previous landowners choose to negotiate the land compensation individually/directly with company. The previous landowners choose to appoint a representative, had chosen the village head and cultural leader (ketua adat) as their representation.	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	Since land compensation process started, company consulting/reporting to several government/organization annually such as to Plantation Office Ketapang Regency.	Complied
<p>Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	PT. Usaha Agro Indonesia can demonstrate documented identification of landowners in the concession area – Izin Usaha Perkebunan. This data then overlay on map "Peta Identifikasi Lahan PT. Usaha Agro Indonesia", scale 1:73,268.	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>Based on interview with previous landowners, company has implemented principle of FPIC:</p> <ul style="list-style-type: none"> - PT. Usaha Agro Indonesia has started with socialization of plantation development to Jambi village since 2008. - PT. Usaha Agro Indonesia has explained the positive and negative aspect of plantation development. 	Complied

	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Landowners stated they were free to choose their representative, however majority of previous landowners choose to negotiate the land compensation individually/directly with company. - Landowners stated they have government officials from Ketapang Regency accompanying/consulting them during socialization process. - Landowners stated they can sell or keep their land. - Company offers option to build scheme smallholder plantation for community of Jambi village and Danau Rantau village. <p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the "Satlak" team will be ready forconsultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management. Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p>	
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		Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.	
4.5.3	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. - Minor compliance -	Landowners stated they can sell or keep their land. PT. Usaha Agro Indonesia can demonstrate map of land whereby the owner does not want to sell their land and status is enclave.	Complied
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process. - Minor compliance -	In commitment to ensuring local food and water security, the company actively engage FPIC process, promote SEIA participation, and facilitate participatory land-use planning with local communities. Throughout this collaborative effort, the company ensure and consider a wide range of options for food and water provisioning. Furthermore, dedication to transparency is reflected in the openness of land allocation processes, fostering trust and accountability within interactions with local stakeholders. Collective efforts have significantly contributed to local community development, including purchasing from the local community (as evidenced in the "Monitoring Pembelian Lokal" document for January to May 2023 and corporate social responsibility initiatives (as seen in the "Rekap Monitoring Realisasi CSR" documents for 2022 and 2023). Local community members have confirmed the positive impact of these contributions, which include funding for road maintenance, support for ritual activities, and more. These actions reflect ongoing commitment to the betterment of the communities surrounding the company.	Complied

<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the "Satlak" team will be ready for consultation.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	<p>Complied</p>
<p>4.5.6</p>	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Audit team verified the documentation of initial communication process from PT. Usaha Agro Indonesia to community of Jambi village, dated 6 February 2008.</p> <p>The communication/socialization process attended by Plantation Office Ketapang Regency. The team "Satuan Pelaksana – Satlak" for land compensation also established: land inventory in Location Permit (Izin Lokasi) PT. Usaha Agro Indonesia will be carried out by village head, district had, Plantation Office from Ketapang Regency will monitor. Each landowner negotiates individually but the "Satlak" team will be ready for consultation.</p> <p>Discussion: The benefit of plantation such as open road access, investment, scheme smallholder plantation, economic development explained. The government official covers area related to possible partnership and investment opportunity, but warning that government will monitor community development, environmental management.</p>	<p>Complied</p>

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		<p>Community members respond that the land measurement process/inventory is accepted but company cannot forcefully make community surrender their land. Company stated the compensation and payment done once agreement based on negotiation for land parcel under PT. Usaha Agro Indonesia permit.</p> <p>Verified: Minutes of meeting "Notulen Rapat Sosialisasi Pembangunan Perkebunan Kelapa Sawit PT. UAI" dated 6 February 2008; attendance list "Daftar Hadir Pertemuan Rapat Sosialisasi Tahap Awal Pembukaan Lahan PT. Usaha Agro Indonesia, dated 6 February 2008 – attended by 124 community members.</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>Based on stakeholder consultation with village people and previous landowners, there was no national expropriation on national interest or agrarian reform in the area of their village. Company compensated land directly from village communities.</p> <p>Furthermore, upon review with location permit, Ketapang Regency stated in the permit that the concession of PT. Usaha Agro Indonesia was gazette as "Area Penggunaan Lain" – area for other use, as per "Rencana Tata Ruang Wilayah" – spatial planning Ketapang Regency.</p> <p>Not applicable.</p>	Not Applicable
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on stakeholder consultation and interview with previous landowner, there was no community in Kendawangan, Ketapang Regency lives in voluntary isolation. The community was already open for incoming/migrating people from another region in Indonesia.</p> <p>Not applicable.</p>	Not Applicable
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			

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<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p> <p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.</p>	<p>Complied</p>
<p>4.6.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p>	<p>Complied</p>

		<p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>The evidence that men and women have equal opportunities as observed during interview with stakeholders. There are no gender discrimination issues indication found on the documents, records, and interview result.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia showed evidence demonstrating FPIC process during land acquisition as below:</p> <ul style="list-style-type: none"> - Document of "Surat Pernyataan Pelepasan Hak Atas Tanah" - Document of "Surat Pernyataan dan Persetujuan Suami/Istri" - Document of "Daftar rekapitulasi ganti rugi lahan" (list of land compensation summary), updated in June 2023. <p>Based on interview with sample previous landowner has confirmed the above process and that they have been consulted, negotiated, and</p>	Complied

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		<p>compensated fairly and agreed upon for every land area that has been acquired by the company. Sample seen: Berita Acara Pembayaran GRTT No: 2/BAP-GRTT/UAI/IV/2017, Berita Acara Pembayaran GRTT No: 32/BAP-GRTT/UAI/III/2014 and Berita Acara Pembayaran GRTT No: 17/BAP-GRTT/UAI/II/2014, Berita Acara Serah Terima GRTT No: 043/BAST-GRTT/UAI.VII/2012.</p> <p>PT Usaha Agro Indonesia currently owns a total of 11,953.3225Ha land banks, which have been divided into 3 phase of development. The area covered in this certification is Phase 1 is under Hak Guna Usaha (HGU) Nomor: 6/HGU/KEM-ATR/BPN/2015 covering total land title of 8,287.20Ha. Phase 2 and Phase 3 is covered under HGU Nomor: 40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225Ha) and Izin Lokasi 915/UAI/XI/16/HQ/GC (covering 2,283Ha).</p>	
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
<p>4.7.1</p>	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p> <p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area</p>	<p>Complied</p>

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		<p>condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant vs local community, legal ownership and communal ownership from customary people.</p>	
<p>4.7.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia referring to the corporate procedure for land and/or planting compensation "Sampoerna Agro Integrated Management System Procedure Pelaksanaan Ganti Rugi Lahan dan/atau Tanam Tumbuh No.P-SAG-HO-CA&L-03 r4" dated 1 November 2019. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights.</p> <p>Section 5.1 stating initial plotting or working area as per location permit "Izin Lokasi" and its map; socialization for plantation development to community, Muspida, district head, village head, hamlet leader, customary leader and other community member in the vicinity. Conduct general land survey continued with detailed land survey. Verification of land survey process. Identification and negotiation carried out directly with the landowner.</p> <p>The area for land compensation shall not overlapping with other purpose/permit, within company concession/plantation permit, area condition is complying with field condition, compensation price agreed by all parties.</p> <p>Section 7 stating database checking, document showing legal ownership of the land legality and validity, land hectarage, vegetation condition, legal boundary of the land. 7.2.4 stated company ensure provide equal opportunity in land selection taking into consideration gender, migrant</p>	<p>Complied</p>

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		vs local community, legal ownership and communal ownership from customary people.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner, company open for new business opportunity. The company demonstrating commitment in nurture the scheme smallholder for Jambil village and Danau Buntar village. The income from scheme smallholder plantation production can help people's economy.	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area. PT. Usaha Agro Indonesia referring to the corporate procedure for claim and land conflict handling "Sampoerna Agro Integrated Management System Procedure Penanganan Klaim dan Sengketa Lahan No.P-SAG-HO-CA&L-09 r1" dated 1 September 2017. The SOP on point 3.14 referencing FPIC approach in identifying legal/customary/use rights. Section 7.1 explaining land claim and land dispute handling process through persuasive method -> mediation -> litigation.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area.	Complied

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4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on interview with government officials in Ketapang Regency, village communities and previous landowner there was no report of land conflict in PT. Usaha Agro Indonesia area. PT. Usaha Agro Indonesia has mapping the enclave area, for landowner that does not want to sell their land.	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	UAI POM receives FFB from own estate, sisters company estates, smallholders from other estate and out grower/independent smallholder. Available Minutes of Meeting on Determination of K Index and FFB Prices for Palm Oil Production by West Kalimantan Smallholders for the second period of May 2023. The unit of certification has taken proactive steps to disseminate information of FFB price to smallholders. The procedures governing the dissemination of this information have been defined and regulated within the Communication, Participation, and Consultation Procedure (No. P-SAG-HO-A & L-08). This procedure outlines the approach to communication, involving smallholders and stakeholders in the decision-making process, thereby promoting transparency and collaboration within the palm oil production ecosystem.	Complied

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5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>UAI POM ensures that the prices for Fresh Fruit Bunches (FFB) determined are communicated to outgrowers and smallholders, in accordance with the terms stipulated in the contracts. To facilitate this communication, FFB prices are conveyed to the related parties on a daily basis through phone calls and text messages. This frequent and direct communication ensures that all stakeholders are well-informed about the pricing agreements and helps maintain transparency and trust in the relationship between the mill and the smallholders.</p>	Complied
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The determination of FFB prices is aligned with the pricing mechanism established by the plantation agency "Dinas Perkebunan Provinsi Kalimantan Barat", which updates prices every two weeks. The updates in FFB pricing have been thoroughly discussed and mutually agreed during special meetings held between the Palm Oil Mill (POM) and its external suppliers. This collaborative approach ensures that both parties are informed and in agreement with any changes in pricing, promoting transparency and fairness in the pricing structure for FFB. Available Minutes of Meeting on Determination of K Index and FFB Prices for Palm Oil Production by West Kalimantan Smallholders for the second period of May 2023.</p>	Complied
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>During the audit, it was verified that contracts for the supply of Fresh Fruit Bunches (FFB) between the company and FFB suppliers have been duly signed by both parties. There was no involvement of any other entity in the decision-making process or providing input on the terms and provisions of these agreements.</p> <p>Additionally, the audit team observed that the company has entered into long-term collaboration agreements with local Independent Smallholders for the management of their smallholder estates and the supply of FFB. Evidence of these agreements was verified during the audit and includes:</p>	Complied

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		<ol style="list-style-type: none"> 1. "Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Jambi Mekar Jaya Sempurna" – agreement dated 25 August 2010. 2. "Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Sempurna Mandiri" – agreement dated 20 December 2011. 3. "Perjanjian Kerjasama Pengembangan Perkebunan Kelapa Sawit Pola Kemitraan antara PT. UAI dengan Koperasi Perkebunan Sempurna Bersatu", based on "Keputusan bersama Nomor: 001/Kemitraan/Usaha Agro Indonesia/I/2012, Nomor: 001/Kopbun-Sempurna Bersatu/I/2012". Agreement dated 17 January 2012. <p>It was observed that these agreements have been signed by both parties and have been witnessed by the respective local authorities, adding an additional layer of legitimacy and accountability to the collaborations.</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Based on review to the contract, it was noted that Contracts are fair, legal and transparent and have an agreed timeframe.</p> <ol style="list-style-type: none"> 1. FFB Supply Agreement between PT. UAI with PT. Kalimantan Prima Agro Mandiri No: 212/XII/COM/EX/2021 dated 29 October 2021 2. Cooperation Agreement for the Development/Construction of Palm Oil Plantation Partnership Pattern between PT. UAI and Koperasi Jambi Mekar Jaya Sempurna, dated 25 August 2010. 3. Partnership Agreement for the Development/Construction of an Oil Palm Plantation between PT. UAI and Koperasi Perkebunan Sempurna Mandiri, dated 20 December 2011. 4. Partnership Agreement for the Development of Oil Palm Plantation between PT. UAI and Koperasi Perkebunan Sempurna Bersatu, based on joint Decree Number: 001/Kemitraan/Usaha Agro 	Complied

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		Indonesia/I/2012, Number: 001/Kopbun-Sempurna Bersatu/I/2012, dated 17 January 2012. 5. FFB Supplier Agreement between PT UAI and Rudi, No.001/UAI/TBS/IV/2023, dated 1 April 2023.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given. - Critical (Major) compliance -	Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given to the suppliers (scheme smallholders and independent smallholders). Available evidence of payment: <ul style="list-style-type: none"> • Paid to Koperasi Perkebunan Jambi Mekar Jaya Sempurna • Address: Jambi Village, Manismata District, Ketapang Regency • Total: Rp. 434,975,995.00 • No. Current Account/Cheque: UAIMDR3 250523B • Open date: 25/05/2023 • Liquidated date: 25/05/2023 • Description: FFB Purchase. 	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis. - Minor compliance -	Weighbridge at UAI POM is annually calibrated by an independent third party. Latest calibration is on 8 June 2023; Weighing Type ZM510 and E1205; Serial Number 182950645 and 141050362; Capacity 40.000 Kg. Calibrated by PT MUGI.	Complied
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. - Minor compliance -	The units of certification are actively supporting Independent Smallholders (ISH) with their certification efforts. There are three smallholder schemes listed under the company's management that supply Fresh Fruit Bunches (FFB) to the company. Based on the verification during the audit, it was observed that the company has entered into long-term agreements with these smallholders, with agreements spanning a 30-year validity. The agreements are as follows:	Complied

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		<ol style="list-style-type: none"> 1. "Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Jambi Mekar Jaya Sempurna" – agreement dated 25 August 2010. 2. "Perjanjian Kerjasama Pengembangan/Pembangunan Perkebunan Kelapa Sawit Pola Kemitraan Antara PT Usaha Agro Indonesia Dengan Koperasi Perkebunan Sempurna Mandiri" – agreement dated 20 December 2011. 3. "Perjanjian Kerjasama Pengembangan Perkebunan Kelapa Sawit Pola Kemitraan antara PT. UAI dengan Koperasi Perkebunan Sempurna Bersatu", based on "Keputusan bersama Nomor: 001/Kemitraan/Usaha Agro Indonesia/I/2012, Nomor: 001/Kopbun-Sempurna Bersatu/I/2012". Agreement dated 17 January 2012. <p>According to these agreements, the management of the smallholders' land is carried out by the company, covering upkeep work such as spraying, slashing, and manuring, all the way through to harvesting. In return, the FFB is supplied directly to the UAI Palm Oil Mill (POM). The revenue generated from the sale of FFB to the POM is shared with a specified ratio, typically 80:20 (with 20% going to the smallholders), contingent on the periodic FFB prices. Furthermore, the land automatically becomes part of the certification scope and is subject to compliance with RSPO requirements, as agreed upon in these agreements. Koperasi Perkebunan Jambi Mekar Jaya Sempurna and Koperasi Perkebunan Sempurna Mandiri have been RSPO certified since 2021, whilst Koperasi Perkebunan Sempurna Bersatu is still in progress. Interviews with the smallholders have confirmed that they are fully aware of the provisions of these agreements and have expressed their satisfaction with this arrangement.</p>	
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	The unit of certification has established a grievance mechanism as outlined in Section 7 of the Handling of Complaints and Grievances in	Complied

	<p>- Critical (Major) compliance -</p>	<p>the Communication, Participation, and Consultation Procedure (P-SAG-HO-CA&L-08), dated 1 August 2019. Additionally, the procedure for handling complaints and grievance mechanism is detailed in Chapter 12 of the agreement: Legal Options and Dispute Resolution.</p> <p>The company has taken proactive steps to brief all relevant stakeholders on the complaint and grievance mechanism. Various consultation activities have been conducted with stakeholders, including socialization sessions held for FFB supplying farmers and FFB transporting contractors in Jambi Village on 1 February 2023. During this event, independent smallholders also attended, ensuring that they were informed about the grievance mechanisms in place.</p> <p>Moreover, the company maintains a stakeholder communication logbook, which helps keep a record of interactions and communications with stakeholders. This logbook is a valuable for tracking and managing stakeholder engagement, ensuring transparency and accountability in addressing concerns and grievances.</p>	
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>The unit of certification manages three scheme smallholders that supply Fresh Fruit Bunches (FFB) to the company. These scheme smallholders are as follows:</p> <ol style="list-style-type: none"> 1. Koperasi Perkebunan Jambi Mekar Jaya Sempurna (KPJMJS), certified in 2021. 2. Koperasi Perkebunan Sempurna Mandiri (KPSM), certified in 2021. 3. Koperasi Perkebunan Sempurna Bersatu (KPSB), in progress for certification. <p>The management of the smallholders' land is carried out by the company, covering upkeep work such as spraying, slashing, manuring, and even harvesting. In return, the smallholders receive revenue from the sale of FFB to the Palm Oil Mill (POM) following an 80:20 ratio, with</p>	<p>Complied</p>

		<p>20% of the proceeds going to the smallholders. The exact distribution depends on the periodic FFB prices. Importantly, the land managed by smallholders is automatically included in the certification scope and is subject to compliance with RSPO requirements.</p> <p>In addition to these practices, the company has implemented Corporate Social Responsibility (CSR) programs, with annual budget allocations. Details of the CSR programs, including those completed in 2022, were made available to the audit team during the audit. These CSR initiatives reflect the company's commitment to social and community development, further demonstrating its dedication to sustainability and responsible business practices.</p>	
<p>5.2.2</p>	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>The unit of certification manages three scheme smallholders that supply Fresh Fruit Bunches (FFB) to the company. These scheme smallholders are as follows:</p> <ol style="list-style-type: none"> 1. Koperasi Perkebunan Jambi Mekar Jaya Sempurna (KPJMJS), certified in 2021. 2. Koperasi Perkebunan Sempurna Mandiri (KPSM), certified in 2021. 3. Koperasi Perkebunan Sempurna Bersatu (KPSB), in progress for certification. <p>The management of the smallholders' land is carried out by the company, covering upkeep work such as spraying, slashing, manuring, and even harvesting. In return, the smallholders receive revenue from the sale of FFB to the Palm Oil Mill (POM) following an 80:20 ratio, with 20% of the proceeds going to the smallholders. The exact distribution depends on the periodic FFB prices. Importantly, the land managed by smallholders is automatically included in the certification scope and is subject to compliance with RSPO requirements.</p> <p>Minor Non-conformity:</p>	<p>Non-compliance (2355770-202306-N2)</p>

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		<p>Information obtained during consultation with the management of the Koperasi Jambi Mekar Jaya Sempurna, stated that there were no programs and training provided to Plasma for institutional improvement, Agronomy, K3, FPIC, RSPO and other aspects.</p> <p>Based on a review of documents, the company was also unable to demonstrate a training program for Scheme Smallholder.</p>	
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Support to the smallholder is shown by the development of Scheme Smallholder. There are 3 Scheme Smallholder existed around the plantation area of PT UAI, which is:</p> <ol style="list-style-type: none"> 1. Koperasi Perkebunan Jambi Mekar Jaya Sempurna (KPJMJS), 2. Koperasi Perkebunan Sempurna Mandiri (KPSM), 3. Koperasi Perkebunan Sempurna Bersatu (KPSB), <p>The operations in scheme smallholders such as upkeep, weeding, pesticide spraying harvesting and FFB transport are fully managed by PT UAI. KPJMJS and KPSM have been certified in 2021, whilst KPSB is in progress for certification waiting the land legality.</p>	Complied
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>The operations in scheme smallholders are fully managed by PT UAI including work with pesticide. All pesticide applicators which is worker of the company are already trained by the unit of certification.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The scheme smallholders under the company's management have a 30-year binding agreement. This agreement outlines the company's responsibilities, including land management encompassing maintenance, weeding, pesticide spraying, harvesting, and FFB transportation.</p> <p>In return, smallholders receive revenue from the sale of their Fresh Fruit Bunches (FFB) to the Palm Oil Mill (POM), with their income dependent on periodic FFB prices. Additionally, their land automatically falls within the certification scope and is subject to compliance with the RSPO</p>	Complied

		<p>Principles and Criteria (P&C) requirements, as stipulated in the aforementioned agreement.</p> <p>Interviews with the smallholders confirm their awareness of the agreement's provisions, and they express satisfaction with this arrangement.</p> <p>The company dutifully reports on the progress of its smallholder support program in the Annual Communication on Progress (ACOP), demonstrating commitment to transparency and responsible management practices.</p>	
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
<p>6.1.1</p>	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia as subsidiary of PT Sampoerna Agro Tbk has shown the commitment of non-discrimination and equal opportunity policy as explained at Kebijakan Keberlanjutan PT Sampoerna Tbk that was signed by Chief Executive Officer dated 1 April 2023.</p> <p>In point 4.a was mentioned that commitment to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation, or age.</p> <p>The policy has communicated to relevant stakeholders, example:</p> <ul style="list-style-type: none"> • Dated 13 May 2023, location in Kantor Besar UAI was attended by 8 staff, 13 workers in office and 2 sustainability staff. • Dated 5 June 2023, location in Meranti Estate Division 1, 2 and 3 were attended by 3 staff, 20 supervisor staff, 223 workers and 1 sustainability staff. • Dated 3 June 2023, location in Ulin Agro Estate Division 1, 2, 3 and 4 were attended by 4 staff, 8 supervisor, 13 workers and 2 	<p>Complied</p>

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		<p>sustainability staff.</p> <ul style="list-style-type: none"> Dated 2 July 2023, location in Kruing Estate Division 1, 2, 3 and 4 were attended by 4 staff, 7 supervisor, 152 workers and 1 sustainability staff. <p>PT Usaha Agro Indonesia has defined the HR procedure to implementation the equal opportunity, example:</p> <ul style="list-style-type: none"> Procedure Recruitment of Daily Worker (P-SAG-ADM-KTU-04, dated 1 March 2018), Penilaian Prestasi Kerja (P-SAG-HO-HR-03, dated 1 Aug 2019) and Penyediaan Staff (P-SAG-HO-HR-01, dated 1 Sep 2017) Procedure for retirement and termination and other matters related to employment, 'Peraturan Perusahaan PT Usaha Agro Indonesia' - that was approved by Manpower Agency as per document "<i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023</i>" regarding Ratification of PT Usaha Agro Indonesia Company Regulations for the Period January 2023 – January 2025. Record of the employee recruitment process as follows: <ul style="list-style-type: none"> Employee request form (FM-SR-HO-HRS-010001) Evidence of follow-up from employee recruitment activities in the form of recorded communication via email Evidence of the next follow-up from the employee recruitment process, namely a Work Call Letter. 	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has shown evidence that non-discrimination and equal opportunity policy is implemented.</p> <p>Based on employee list updated in June 2023, there was cloud concluded that the unit of certification does not practice any form of discrimination, employees are given the opportunity to work regardless</p>	Complied

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		<p>of ethnicity, religion, origin, and gender. The workers came from various religion, ethnic, and area.</p> <p>Based on interview with Labour Union, Gender Committee, Village Heads, Plantation Agency, and Manpower Agency, they mentioned that there is no indication of discrimination conducted by Unit of certification. The job vacancies were published, the recruitments were based on competencies and suitability with the role needed. Local communities and women are not discriminated (there is no migrant worker).</p>	
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>PT Usaha Agro Indonesia has demonstrate the document Company Regulation – Peraturan Perusahaan (PP) that was approved by Manpower Agency as per document "<i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023</i>" regarding Ratification of PT Usaha Agro Indonesia Company Regulations for the Period January 2023 – January 2025.</p> <p>PT Usaha Agro Indonesia has defined the HR procedure to implementation the equal opportunity, example:</p> <ul style="list-style-type: none"> • Procedure Recruitment of Daily Worker (P-SAG-ADM-KTU-04, dated 1 March 2018, Job Performance Assessment (P-SAG-HO-HR-03, dated 1 Aug 2019) and Staff Provision (P-SAG-HO-HR-01, dated 1 Sep 2017) • Procedure for retirement and termination and other matters related to employment stated on Company Regulation of PT Usaha Agro Indonesia' - that was approved by Manpower Agency as per document "<i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Nomor: P/6/DISNAKERTRANS-B.500.15.12.1/I/2023</i>" regarding Ratification of PT Usaha Agro Indonesia Company Regulations for the Period January 2023 – January 2025. • Record of the employee recruitment process as follows: 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Employee request form (FM-SR-HO-HRS-010001) - Evidence of follow-up from employee recruitment activities in the form of recorded communication via email - Evidence of the next follow-up from the employee recruitment process, namely a Work Call Letter. <p>Sample on Recruitment process:</p> <ul style="list-style-type: none"> • Employee request form (FM-SR-HO-HRS-010001) Form Ulin Estate Manager, dated 15 November 2022, namely Mr W***k K***d, position as Pesticides Applicator • Interview process was carried by KTU Staff in Ulin Agro Estate, dated 16 November 2022 • Document of Work Agreement as and contact employees (PKWT), was signed on 20 November 2022 (valid until 2 years). The detail information such as: <ul style="list-style-type: none"> - Position: Weeding (Perawatan) - Work Unit: Ulin Agro Estate - Status: PKWT - Salary: Rp. 124,555 per day - Rice allowance: 0.5 Kg/Day 	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>In Indonesia Regulation, there is no specific regulation to oblige pregnancy testing for female workers. The common activities are the female workers shall monitor their menstrual cycles individually and report to health practitioners (doctor, nurses) if menstrual cycles have changes.</p> <p>During RAV year 2023, there is no instance of the female worker being conducted the pregnancy test as part of the pre-employment medical check-up.</p>	Complied

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		<p>As required to fill in the declaration on their marriage status as well as their pregnancy status and upon declaring that they are pregnant, the female workers will be employed to the less hazardous working areas such as office work. Alternative work is for work that is not related to handling chemicals, for example manual weeding or compound/housekeeping.</p>	
<p>6.1.5</p>	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has shown the document of Letter of Appointment of Gender Committee Management, no: UAI-KBS/I/2022 dated 10 January 2022. The chairman: Mts Lia Agustina, Secretary: Mrs Elisupianti (substantiality admin).</p> <p>Based on interview with representative of Gender Committee during RAV-year 2023, obtain information that:</p> <ul style="list-style-type: none"> • Gender Committee structure and the purpose of Gender Committee have been disseminated regularly. This thing is aligned with the results of interviews with the women workers in estates that were able to describe the women workers rights such as reproduction rights, zero harassment and opportunities and equality in carriers. • Gender Committee provides information related to the sexual harassment on women especially women workers in working areas and how to report any harassment or violence to the authorities. Other than that, the gender committee is a vehicle to disseminate women's rights such as reproduction rights, avoid the sexual harassment/bullying and help them to improve their sanitation in their respective housing complexes and many more positive activities for women. <p>The last meeting with gender committee was provided on 15th March 2023, that was attended by the gender committee board from each unit and representatives (KTU Staff in PT Usaha Agro Indonesia).</p>	<p>Complied</p>

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<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>PT Usaha Agro Indonesia has shown the document of evidence of payment as per Memorandum No.: 002/SAKR/HR/01/23 dated 2 January 2023.</p> <ul style="list-style-type: none"> • The memorandum was issued by HR Director to GM PT. UAI, RH PS, Estate/PKS Mgr, PS Mgr, KTU. • CC: COO, Head of Engineering, RH ABT, Head HR Opr, ICT Mgr, • Subject: Determination of PB/KHT/PKWT Wages in 2023. <p>The memorandum was explained that:</p> <ul style="list-style-type: none"> • As per 1st January 2023 the number of wages for KHT and PKWT is adjusted to the decision of the Governor of West Kalimantan concerning the District Minimum Wage (UMK) in 2022 in Ketapang Regency um wage in year 2023 (UMK/Monthly Wage is Rp 3,085,615.23, and Daily Wage is 123,424.61. The wage divider per HK is 25. • As per 1st January 2023 the amount of monthly employee wages (PB) adjusts the 2023 UMK and the results of the work performance assessment during 2022. • There is an Overtime Order Form which contains the following information: • Date and time; Division; No. SPL, Name, Position, Overtime Hours, percentage of overtime and information. • The Ketapang Regency minimum wage as referred to is the lowest monthly wage received by workers who work 40 hours a week or 7 hours a day for those who work 6 days a week or 8 hours a day for workers who work 5 days a week. • The minimum wage only applies to workers/laborers with less than 1 year of service at the company concerned. 	<p>Complied</p>
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		<p>Sample seen for pays lip month April 2023:</p> <p>Namely Mr. M. I***** (registered number: 20144886510), position as PB (permanent employee)</p> <ul style="list-style-type: none"> - Basic salary: IDR 2,939,008 - Overtime: IDR 3,939,354 - Total gross income: IDR 6,877,154 - JHT Employees IDR 58,100 - PPH21: IDR 67,984 - BPJS medical: IDR 29,280 - Take home pay IDR 6,721,031 <p>Namely Mr. N***** (registered number: 2021063438), position as PB (permanent employee) - Harvester</p> <ul style="list-style-type: none"> - Base salary: IDR 2,962,191 - Overtime: IDR 986,941 - Total gross income: IDR 3,949,132 - JHT Employees IDR 61,712 - BPJS medical: IDR 30,856 - Take home pay IDR 3,856,563 	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Documentation of pay and working conditions in PT. Usaha Agro Indonesia was referring to Company Regulation "Peraturan Perusahaan PT. Usaha Agro Indonesia No.P/6/DISNAKERTRANS-B.500.15.12.1/I/2023" Periodic 2023-2025; acknowledge by Ketapang Regency Manpower Office 28 January 2023.</p> <p>- Chapter 7 explained Salary payment.</p>	Complied

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		<ul style="list-style-type: none"> - Chapter 9 and 10 explained Overtime rate and Overtime calculation. - Chapter 12 stipulated Working days and working hours. - Chapter 13 explained Working day dismissal due to rain. - Chapter 14 explained Holiday and religious festivities. - Chapter 15 explained Annual leave. - Chapter 16 explained Period leave, maternal leave, miscarriage leave. - Chapter 18 explained Cost of Medical/Medical treatment. - Chapter 21 explained Social insurance (BPJS Ketenagakerjaan and BPJS Kesehatan). - Chapter 27 explained Housing facility. - Chapter 28 explained Work-related Accident. - Chapter 34 explained Worker Obligation. - Chapter 36 explained Worker Rights. - Chapter 37 explained Company Obligation. - Chapter 38 explained Company Rights. - Chapter 40 explained Absentee. - Chapter 41 explained Work discipline. - Chapter 43 and 44 explained Warning and "Skors". - Chapter 45 and 46 explained Worker complaint resolution including bi-partite organization. - Chapter 47 explained Work dismissal. <p>The company regulation is available in Bahasa Indonesia.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for</p>	<p>PT. Usaha Agro Indonesia has Company Regulation "Peraturan Perusahaan PT. Usaha Agro Indonesia No.P/6/DISNAKERTRANS-</p>	<p>Non-compliance</p>

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	<p>dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>B.500.15.12.1/I/2023” Periodic 2023-2025; acknowledge by Ketapang Regency Manpower Office 28 January 2023.</p> <ul style="list-style-type: none"> - Chapter 7 explained Salary payment - Chapter 9 and 10 explained Overtime rate and Overtime calculation - Chapter 12 stipulated Working days and working hours - Chapter 13 explained Working day dismissal due to rain - Chapter 14 explained Holiday and religious festivities - Chapter 15 explained Annual leave - Chapter 16 explained Period leave, maternal leave, miscarriage leave - Chapter 18 explained Cost of Medical/Medical treatment - Chapter 21 explained Social insurance (BPJS Ketenagakerjaan and BPJS Kesehatan) - Chapter 27 explained Housing facility - Chapter 28 explained Work-related Accident - Chapter 34 explained Worker Obligation - Chapter 36 explained Worker Rights - Chapter 37 explained Company Obligation - Chapter 38 explained Company Rights - Chapter 40 explained Absentee - Chapter 41 explained Work discipline - Chapter 43 and 44 explained Warning and “Skors” - Chapter 45 and 46 explained Worker complaint resolution including bi-partite organization - Chapter 47 explained Work dismissal <p>In addition, for pay rates related to harvesting activity; company referring to “Surat Keputusan No.001/SK/HRSP/SGRO/05/19 tentang Ketentuan Panen Kelapa Sawit” signed 15 May 2019 by CEO, COO, Head of Agronomy, Human Resource Director. The management decree informing:</p> <ul style="list-style-type: none"> - Wage/pay structure for permanent harvester: basic target productivity (ton/manday) for normal crop, low crop, topography, 	<p>(2355770-202306-M6)</p>
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		<p>etc.; harvest premium for performance over basic target; in-kind benefit as rice 15 kg per worker/month; medical treatment; leave.</p> <ul style="list-style-type: none"> - Wage/pay structure for contract harvester: basic target productivity (ton/manday) for normal crop, low crop, topography, etc.; harvest premium for performance over basic target; in-kind benefit as rice 0.5 kg/manday; medical treatment status; no leave; contract (PKWT) harvester usually hired for probation period (maximum 1 year) or during peak crop. Newly recruited harvesters will undergo a probationary period of 1 year maximum. If the employee demonstrates good performance during this period, they will be promoted to a permanent employee. - Wage/pay structure for FFB loader: basic target productivity (ton/manday) for normal crop, low crop, topography, etc.; harvest premium for performance over basic target; in-kind benefit as rice 0.5 kg/manday; medical treatment status; no leave. <p>Critical Non-conformity: Employees at PT. Usaha Agro Indonesia stated that they did not know the information on the basic calculation of wages and basic deductions stated on the pay slip.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Normative working condition and regulation stipulated under company regulation "Peraturan Perusahaan".</p> <p>Overtime: In Company Regulation "Peraturan Perusahaan" Chapter 10 stated Overtime rate per hour 1/173 x monthly wage. This is complied with government regulation.</p> <p>Maternity leave: In Company Regulation "Peraturan Perusahaan" Chapter 16 stated Company regulating the Period Leave, Maternal Leave, Miscarriage</p>	Complied

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		<p>Leave. Sampled worker in Ulin Agro Estate, formerly sprayer now loose fruit collector; Mrs. Rukia stated she shifted from chemical related work (sprayer) to loose fruit collector when screened pregnant. Maternity leave granted 1.5 months prior labour and 1.5 months after labour (October-December 2022).</p> <p>Holiday entitlement:</p> <p>Sampled worker UAI POM interviewed stated they entitled for holiday during religious festivities Eid Al Fitr and was able to return to their hometown.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with workers (loose fruit collector) of UAE, they stated that there was 1 worker who lived with another worker's family in 1 house; while other workers stated that their house accommodated 1 other worker from a different family in the house.</p> <p>Critical Non-conformity:</p> <p>The company has provided housing and household equipment for its workers, but there are still shortages because some workers live in other families' homes.</p>	<p>Non-compliance (2355770-202306-M7)</p>
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Company provided in-kind benefit in form of rice for each worker; for permanent worker 15 kg for worker; 9 kg for spouse; children 7.5 kg per children. For contract worker 0.5 kg per mandays worked.</p> <p>Company encourages employee's cooperative for provision of basic need such as cooking oil, sugar, soap, etc.</p> <p>In addition, company allows employee to plant fruit and vegetables at the back of the house 30m²: pakchoi, onion, capsicum, lettuce, pumpkin, corn, etc.</p>	<p>Complied</p>
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation</p>	<p>PT Usaha Agro Indonesia paid to all workers referring to the Governor of West Kalimantan concerning the District Minimum Wage (UMK) in</p>	<p>Complied</p>

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	<p>of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>2022 in Ketapang Regency, wage for year 2023 (UMK/Monthly Wage) is Rp 3,085,615.23, and Daily Wage is 123,424.61. The wage divider per day is 25 days.</p> <p>Based on interview with sample of workers and verify their payslip, it was noted that the company paid the workers following the District Minimum Wage (UMK). PT Usaha Agro Indonesia has determined details of in-kind benefit received by employees for year 2023 with 13 parameters which refer to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> • Rice supply (incl. workers, wife and children); • Housing; • Education; • Health; • Electricity; • Water supply; • Transportation; • School bus. <table style="width: 100%; border: none;"> <tr> <td style="width: 80%;">Monetary equivalent of in-kind benefits</td> <td style="text-align: right;">= IDR 1,746,521;</td> </tr> <tr> <td>Minimum wage of Ketapang</td> <td style="text-align: right;">= IDR 3,085,615;</td> </tr> <tr> <td>DLW for 1 family (1 worker, 1 wife, 3 children)</td> <td style="text-align: right;">= IDR 4,832,136;</td> </tr> <tr> <td>Social security (+ 4%)</td> <td style="text-align: right;">= IDR 5,025,422;</td> </tr> <tr> <td>DLW RSPO</td> <td style="text-align: right;">= IDR 2,951,213;</td> </tr> </table> <p>Gap at IDR 2,074,209 (positive).</p> <p>Sample for in-kind benefit calculation representing five level employee status: Single, married no children, married one child, married two children and married three children.</p>	Monetary equivalent of in-kind benefits	= IDR 1,746,521;	Minimum wage of Ketapang	= IDR 3,085,615;	DLW for 1 family (1 worker, 1 wife, 3 children)	= IDR 4,832,136;	Social security (+ 4%)	= IDR 5,025,422;	DLW RSPO	= IDR 2,951,213;	
Monetary equivalent of in-kind benefits	= IDR 1,746,521;												
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DLW for 1 family (1 worker, 1 wife, 3 children)	= IDR 4,832,136;												
Social security (+ 4%)	= IDR 5,025,422;												
DLW RSPO	= IDR 2,951,213;												

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		The calculation DLW will review annually and updated along with changes of minimum wage and cost expenses per family.	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>The interviewed harvesting workers are permanent employees. Some of the harvesting workers who still have the status of temporary contract (Specified Time Work Agreement/PKWT) with a duration of 1 year (for the review process).</p> <p>Sample of contract worker to permanent worker: "Surat PT. Usaha Agro Indonesia No.004/MAE SK-KHT/VIII/2022 for Hastuti binti Asape" dated 1 August 2022 from contract worker status to permanent worker status. Position/work stays the same as sprayer.</p>	Complied
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia has established the policy recognizing freedom of association and right to collective bargaining in national languages as per "Sustainability Policy of PT Sampoerna Agro Tbk", the policy was signed by Chief Executive Officer dated 1 April 2023.</p> <p>At point 4.d. has mentioned "Protect the rights of all workers to organize and bargain collectively".</p>	Complied

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		<p>The policy has communicated to relevant stakeholders, example:</p> <ul style="list-style-type: none"> • Dated 13 May 2023, located at Head Office UAI were attended by 8 staff, 13 workers in office and 2 sustainability staff. • Dated 5 June 2023, location in Meranti Estate Division 1, 2 and 3 were attended by 3 staff, 20 supervisor staff, 223 workers and 1 sustainability staff. • Dated 3 June 2023, located at Ulin Agro Estate Division 1, 2, 3 and 4 were attended by 4 staff, 8 supervisor, 13 workers and 2 sustainability staff. • Dated 2 July 2023, located at Kruing Estate Division 1, 2, 3 and 4 attended by 4 staff, 7 supervisor, 152 workers and 1 sustainability staff. <p>PT Usaha Agro Indonesia has established and conducted specific platform for the workers and the company's top management to meet and discuss a specific issue with respect to the employment and its conditions, namely is the Lembaga Kerjasama Bipartit (LKS Bipartit - Joint Consultative Committee).</p> <p>LKS Bipartite Organizational Structure year 2023, i.e.:</p> <ul style="list-style-type: none"> • Company Representative: Sunarwirawan, Abdul Munif Lubis. Agung Mukhori, Yogi Hermanto, Taat Susanto, Fardomuan Aritonang, Ardiansyah, Haris Yudo PU, Dodi Fauzi, Hari Bersatu, Redye, Oktovianus Baik, Didi Istiadi, Asep Iman, Yusuf Arosyid, NUcahyo Adhi S • Workers Representative: Teguh, Agus Supriyanto, Eko Prasetyo, Catur Kridahingtias, NIsipi, SYafriandi, Anita, Fajar Bekti, Tiur Marlina, Pipentius Roni, Lia Agustina, Paryono, Marlen DIlak, Siti Umi Wahyuni, Hamdia, Rutini, Yunita Pratiwi. 	
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		Based on interview with representative of LKS Bipartit on 13 June 2023 obtained information that the company has recognizing freedom of association and right to collective bargaining.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request. - Minor compliance -	As mentioned in Act No. 13 of 2003 Article 106 (1) related Manpower which specifies that for the company employing more than 50 workers, the company shall establish the Lembaga Kerjasama Bipartit (LKS Bipartit - Joint Consultative Committee). PT Usaha Agro Indonesia has established and conducted the specific platform for the workers and the company's top management to meet and discuss a specific issue with respect to the employment and its conditions. LKS Bipartite (Joint Consultative Committee Meeting) is a coalition between the top management of the company and the workers representative. Sample of the record meeting dated 20 October 2022 was attended by 32 participants both representative of company and workers. Agenda: discuss related drainage in emplacement and management of domestic waste.	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. - Minor compliance -	As mentioned in Act No. 13 of 2003 Article 106 (1) related to Manpower which specifies that for the company employing more than 50 workers, the company shall establish the Lembaga Kerjasama Bipartit (Joint Consultative Committee Meeting). The workers and the company's top management to meet and discuss a specific issue with respect to employment and its conditions. PT Usaha Agro Indonesia has established and conducted the specific platform for the workers and the company's top management to meet and discuss a specific issue with respect to the employment and its conditions. LKS Bipartite Organizational Structure year 2023, i.e.: <ul style="list-style-type: none"> • Company Representative: Sunarwirawan, Abdul Munif Lubis. Agung 	Complied

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		<p>Mukhori, Yogi Hermanto, Taat Susanto, Fardomuan Aritonang, Ardiansyah, Haris Yudo PU, Dodi Fauzi, Hari Bersatu, Redye, Oktovianus Baok, Didi Istiadi, Asep Iman, Yusuf Arosyid, Nurcahyo Adhi S</p> <ul style="list-style-type: none"> Workers Representative: Teguh, Agus Supriyanto, Eko Prasetyo, Catur Kridahingtias, NIsipi, SYafriandi, Anita, Fajar Bekti, Tiur Marlina, Pipentius Roni, Lia Agustina, Paryono, Marlen DIlak, Siti Umi Wahyuni, Hamdia, Rutini, Yunita Pratiwi. <p>Based on interview with representative of LKS Bipartit (date 13th June 2023) obtained information that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers.</p>	
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Code of ethical conduct included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including section 4.c Not employ worker under 18 years old.</p> <p>In the contract, company and contractor agreed to put clause on meeting legal requirement and prohibit use of child worker.</p> <p>Kruing Agro Estate:</p> <ul style="list-style-type: none"> Contractor Melda and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.010/SPK-LKL/UAI-KAE/II/2023" signed by both parties on 1 February 2023 for the work of manual circle cleaning. <p>Chapter 12 verse 2 stipulated not employing underage worker, worker from human trafficking activity, force labour process.</p> <p>Meranti Agro Estate:</p> <ul style="list-style-type: none"> Contractor Hadi Sucipto and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.079/SPK/MAE/II/2022" 	Complied

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		<p>signed by both parties on 1 July 2022 for the work of FFB transport. Chapter 13 verse 2 stipulated not employing underage worker, worker from human trafficking activity, force labour process.</p> <p>Ulin Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Antony and PT. Usaha Agro Indonesia (Ulin Agro Estate) has "Surat Perjanjian Kerja (SPK) No.063/UAI-UAE/SPK-LKL/III/2023" signed by both parties on 1 March 2023 for the work of scheme smallholder FFB transport. Chapter 11 verse 2 stipulated not employing underage worker, worker from human trafficking activity, force labour process. 	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia has Company Regulation "Peraturan Perusahaan PT. Usaha Agro Indonesia No.P/6/DISNAKERTRANS-B.500.15.12.1/I/2023" Periodic 2023-2025; acknowledge by Ketapang Regency Manpower Office 28 January 2023. Chapter I, Verse 4, "Persyaratan Penerimaan Pekerja" – employment requirement stated in point 2: minimum age 18 years old.</p> <p>Verified with sampled worker interviewed, they admitted upon submitting job application form, company ask them to attach copy of personal ID to check the minimum 18 years old age.</p>	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field visit, interview and document review (employee register May 2023), there was no worker under 18 years old employed by the company.</p> <p>In Kruing Agro Estate, youngest worker is 21 years old, Mr. Aldi.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Code of ethical conduct included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including 4.c Not employ worker under 18 years old.</p>	Complied

		<p>Company has communicated the policy of ethical conduct "Kebijakan Berkelanjutan":</p> <ul style="list-style-type: none"> - In Kruing Agro Estate Div. III & IV, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 13 February 2023 for 28 upkeep workers; 21 harvesters. - In Kruing Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 2 June 2023 for 4 staffs, 7 mandores, 152 workers; attended by Estate Manager. - In Meranti Agro Estate, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 8 February 2023 for 36 harvesters, 8 fertilizer applicators, 39 upkeep workers and 1 harvest mandor. - In Meranti Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 5 June 2023 for 3 staffs, 20 mandores, 223 workers; acknowledged by Estate Manager Meranti Agro. - In Ulin Agro Estate, communication of "Kebijakan Berkelanjutan"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 9 February 2023 for 43 harvesters, 10 fertilizer applicators, 25 upkeep workers and 1 harvest mandor. - In Ulin Agro Estate, communication of "Kebijakan Berkelanjutan" carried out 3 June 2023 for 4 staffs, 8 mandores, 173 workers; <p>In the contract, company and contractor agreed to put clause on meeting legal requirement and prohibit use of child worker.</p> <p>Kruing Agro Estate:</p>	
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		<ul style="list-style-type: none"> - Contractor Melda and PT. Usaha Agro Indonesia "Surat Perjanjian Kerja (SPK) No.010/SPK-LKL/UAI-KAE/II/2023" signed by both parties on 1 February 2023 for the work of manual circle cleaning. Chapter 12 verse 2 stipulated not employing underage worker, worker from human trafficking activity, force labour process. <p>Meranti Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Hadi Sucipto and PT. Usaha Agro Indonesia (Meranti Agro Estate) has "Surat Perjanjian Kerja (SPK) No.079/SPK/MAE/II/2022" signed by both parties on 1 July 2022 for the work of FFB transport. Chapter 13 verse 2 stipulated not employing underage worker, worker from human trafficking activity, force labour process. <p>Ulin Agro Estate:</p> <ul style="list-style-type: none"> - Contractor Antony and PT. Usaha Agro Indonesia (Ulin Agro Estate) has "Surat Perjanjian Kerja (SPK) No.063/UAI-UAE/SPK-LKL/III/2023" signed by both parties on 1 March 2023 for the work of scheme smallholder FFB transport. Chapter 11 verse 2 stipulated not employing underage worker, worker from human trafficking activity, force labour process. 	
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to prevent sexual and all other form of harassment and violence is included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including: 4.e. Prevent sexual harassment and sexual abuse/violence for all worker, and to protect reproductive rights, in particular female worker.</p> <p>Company has communicated the policy of ethical conduct "<i>Kebijakan Berkelanjutan</i>":</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - In Kruing Agro Estate Div. III & IV, communication of “Kebijakan Berkelanjutan”; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 13 February 2023 for 28 upkeep workers; 21 harvesters. - In Kruing Agro Estate, communication of “Kebijakan Berkelanjutan” carried out 2 June 2023 for 4 staffs, 7 mandores, 152 workers; attended by Estate Manager. - In Meranti Agro Estate, communication of “Kebijakan Berkelanjutan”; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 8 February 2023 for 36 harvesters, 8 fertilizer applicators, 39 upkeep workers and 1 harvest mandor. - In Meranti Agro Estate, communication of “Kebijakan Berkelanjutan” carried out 5 June 2023 for 3 staffs, 20 mandores, 223 workers; acknowledged by Estate Manager Meranti Agro. - In Ulin Agro Estate, communication of “Kebijakan Berkelanjutan”; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 9 February 2023 for 43 harvesters, 10 fertilizer applicators, 25 upkeep workers and 1 harvest mandor. - In Ulin Agro Estate, communication of “Kebijakan Berkelanjutan” carried out 3 June 2023 for 4 staffs, 8 mandores, 173 workers; <p>Based on interview with sampled female worker in Kruing Agro Estate and Ulin Agro Estate, they understand the threat of sexual harassment and understand who to report if such case occurs – to gender committee in each estate (usually clinic’s midwife).</p>	
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<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policy to protect the reproductive rights of all, especially of women, is included in "<i>Kebijakan Berkelanjutan PT. Sampoerna Agro Tbk.</i>" Signed by CEO 1 April 2023. The policy No.4 stipulated commitment to respect human rights as per human rights declaration and human rights defender declaration by the United Nation, including: 4.e. Prevent sexual harassment and sexual abuse/violence for all worker, and to protect reproductive rights, in particular female worker.</p> <p>Company has communicated the policy of ethical conduct "<i>Kebijakan Berkelanjutan</i>" including topic on reproductive right protection:</p> <ul style="list-style-type: none"> - In Kruing Agro Estate Div. III & IV, communication of "<i>Kebijakan Berkelanjutan</i>"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 13 February 2023 for 28 upkeep workers; 21 harvesters. - In Kruing Agro Estate, communication of "<i>Kebijakan Berkelanjutan</i>" carried out 2 June 2023 for 4 staffs, 7 mandores, 152 workers; attended by Estate Manager. - In Meranti Agro Estate, communication of "<i>Kebijakan Berkelanjutan</i>"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 8 February 2023 for 36 harvesters, 8 fertilizer applicators, 39 upkeep workers and 1 harvest mandor. - In Meranti Agro Estate, communication of "<i>Kebijakan Berkelanjutan</i>" carried out 5 June 2023 for 3 staffs, 20 mandores, 223 workers; acknowledged by Estate Manager Meranti Agro. - In Ulin Agro Estate, communication of "<i>Kebijakan Berkelanjutan</i>"; whistleblowing/raising concern procedure (including anonymity and protection from retaliation); communication, participation and consultation process; carried out 9 February 2023 for 43 harvesters, 10 fertilizer applicators, 25 upkeep workers and 1 harvest mandor. 	<p>Complied</p>
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		<p>- In Ulin Agro Estate, communication of “Kebijakan Berkelanjutan” carried out 3 June 2023 for 4 staffs, 8 mandores, 173 workers.</p> <p>Based on interview with sampled female worker in Kruing Agro Estate and Ulin Agro Estate, they understand their reproductive rights need to be protected, and they have rights for maternal leave, period leave (during menstruation).</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>Management assessed the new of new mother. In period December 2022 – June 2023, identified 1 new mother in Ulin Agro Estate, 5 new mothers in Meranti Agro Estate, 3 new mothers in Kruing Agro Estate. The new mother interviewed, and their need recorded in June 2022 - March 2023. The new mothers request for time to breastfeed the baby, food supplement during pregnancy, child daycare.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Company has prepared Whistleblowing Policy PT. Sampoerna Agro Tbk., dated 27 September 2013. Through email address and letter to PT. Sampoerna Agro Tbk., Sampoerna Strategic Square North Tower, 28th Floor Jl. Jend. Soedirman Kav.45 Jakarta 12930, Indonesia. Section 5.2 stated identity of complainant will be kept confidential. Section 6 prohibit hindering action/retaliatory action.</p> <p>Based on interview with sampled female worker in Kruing Agro Estate and Ulin Agro Estate, they understand the threat of sexual harassment and understand who to report if such case occurs – to gender committee in each estate go to clinic’s midwives as the gender committee representative.</p>	Complied
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent 	<p>Based on interview with loose fruit collectors in Kruing Agro Estate and harvesters in Ulin Agro Estate, they came to the company location from another province (Jawa Tengah Province, Nusa Tenggara Timur Province); they admitted the company use agent when they hired in their origin. The hiring practices is explained clearly when the agent</p>	Complied

	<ul style="list-style-type: none"> • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>engage: the work offered for loose fruit collector and upkeep manpower, explained the company will pay refer to minimum wage, explained the worker will be hired as temporary worker at first but can be appointed as permanent worker based on performance, explained the worker will be provided with housing and the infrastructure (electricity, clean water) for free. The worker admitted they did not pay anything for travelling expense or recruitment fee, no levy paid, no wage deduction, no withholding ID card, no penalty upon resignation.</p>	
<p>6.6.2</p>	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>PT. Usaha Agro Indonesia has contract worker recruitment procedure "Sampoerna Agro Integrated Management System Procedure Rekrutmen No.P-SAG-ADM-KTU-04 r2" dated 1 March 2018. Section 7.7 stipulated recruitment process cost paid by company based on request from GM to Head of Financial Accounting. Section 7.9 stipulated the contract between Unit Head and each contract worker.</p> <p>Document review contract worker</p> <p>Based on interview with contract worker in Kruing Agro Estate, they were brought up from other province (Jawa Tengah and Nusa Tenggara Timur Province) and stated they did not pay any recruitment fee and company pays for their transportation fee from the village to company location.</p> <p>Sampled worker contract</p> <ul style="list-style-type: none"> - Specified Time Work Agreement/PKWT for Meriana Bulu dan PT. Usaha Agro Indonesia" dated 20 September 2022. Contract length 1 year; position as upkeep worker; wage Rp.115,520 per manday; rice benefit 0.5 kg/manday worked. - Specified Time Work Agreement/PKWT for Sumiyati dan PT. Usaha Agro Indonesia" dated 30 May 2022. Contract length 1 year; position 	<p>Non-compliance (2355770-202306-M8)</p>

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		<p>as upkeep worker; wage Rp.115,520 per manday; rice benefit 0.5 kg/manday worked.</p> <ul style="list-style-type: none"> - Specified Time Work Agreement/PKWT for Sanjem dan PT. Usaha Agro Indonesia" dated 31 January 2022. Contract length 1 year; position as upkeep worker; wage Rp.115,520 per manday; rice benefit 0.5 kg/manday worked. - Specified Time Work Agreement/PKWT No.190/PKWT/MAE/2021 for Belandina Taneo dated 19 November 2021. Contract length 2 years; wage Rp.115,520 per manday; rice benefit 0.5 kg/manday worked. <p>Critical Non-conformity:</p> <p>It was found that care workers in the UAE with work relationships as PKWT were not based on a valid Fixed Time Work Agreement.</p> <p>Based on the document review, there is a "Specified Time Work Agreement No.PKWT/UAE/2022, namely Mrs Kristina (Manual Weeding)" dated March 14 2022. Article 2 states that the PKWT period for Care Employees is not appropriate, namely for 6 months for the period 14/03/2022 – 14/03/2022 with wages IDR 115,520 per day. At the time of the interview, the worker concerned still had PKWT status.</p>	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Available Safety Officer license - "Kartu Tanda Kewenangan Ahli K3 Umum" No.93616/PK3/AJ/31/2021/P0, dated 29 Jan 2021, named Nurchayo Adhi Saputro, valid until 29 Jan 2024. Assignment of Safety Officer Assignment of Safety Officer based on Decree of Ministry of Manpower, No.5/360/AS.02.04/ I/2021, dated 29 Jan 2021. Training certificate of Supervision Development of Occupational Safety and Health Norms, No. 5/62/ AS.02.04/1/2021, held by PT Centra Artha Prima on 9 – 21 Nov 2020.</p>	Complied

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		<p>There is an Emergency Response Organizational Structure of PT Usaha Agro Indonesia, dated 1 January 2023</p> <ul style="list-style-type: none"> - Chairman : Abdul Munif Lubis - Firefighting team : Harri Benu Saris dan Yuda Andriana Saleh - Rescue team : Aria Reza, Yusuf Subagio - Evacuation team : Alif Falanda Putra, Tomi Lapisa - Medical team : Asep Iman Heriyana, Fajar Bakti - Security team : Yogi Hermanto, M. Saujan <p>During recertification audit, audit team observed that the Safety and Health committee has been established with structure determined, members appointed from the company and workers' representatives, as evident in "Struktur Organisasi Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3)", dated 2 Nov 2022, the structure are as follow:</p> <ul style="list-style-type: none"> • Chairman : Fardomuan Aritonang (GM PT UAI) • Vice Chairman : Abdul Munif Lubis (MM UAI POM) • Secretary : Haris Yudho Prasetyo, Nurcahyo Adhi Saputro • Coordinator of OHS : Taat Susanto • Coordinator of Environment : Sunawirawan • Coordinator of PPE : Dodi Fauzi • Coordinator of First Aid : Agung Mukhori • Coordinator of EHS Training : Yogi Hermanto <p>Regular meeting has been conducted to discuss concerns monthly, e.g. meeting conducted on 9 Dec 2022. Meeting attended by 28 personnel, led by GM of PT UAI. Based on minutes of meeting, it discussed result of Health, Safety and Environment inspections. Concerns of all parties about health, safety and welfare, are discussed at monthly meetings, and any issues raised during this meeting are recorded. in minutes of</p>	
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		<p>meeting, e.g. OHS meeting on 9 Dec 2022 has discussed potential hazard, potential risk/impact, recommendation of improvement, PIC, due date and status. Meeting attended by 28 participants and lead by chairman of OHS committee, Mr. Fardomuan Aritonang.</p> <p>Dissemination of OHS has been conducted annually by the unit of certification. Latest dissemination conducted on 18 May 2023 at Kruing Agro Estate, attended by 4 Staffs, 7 Supervisors, 152 workers and 1 Sustainability personnel; on 3 May 2023 at Head office of PT UAI, attended by 7 Staffs, 13 workers and 2 Sustainability personnel.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>SOPs for emergency response was sighted during recertification audit, it has adequate coverage of emergencies relating to the estate / mill operations including – Fire (Forest / Plantation / Infrastructure), Flood, Earthquake, Landslide, Typhoon Scheduled/ Waste / Hazardous material spillage, Riot.</p> <p>The following memorandum which included the immediate effect procedure has been presented during the audit:</p> <ul style="list-style-type: none"> • Anticipate Work Accidents in the Rainy Season (455/SAHO/HR/11/17, dated 27 Nov 2017) • Procedure of accident handling and reporting (001/SAKR/HR/1/2018, dated 2 Jan 2018) <p>The above documents were established in Indonesian language, therefore workers can understand.</p> <p>A programme for accident and emergency response for 2023 has been sighted as evident in "Program P2K3 Tahun 2023". The program has included the following:</p> <ul style="list-style-type: none"> - Environment and first aid - Monitoring of OHS - OHS Training 	<p>Complied</p>

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		<p>- Fire prevention.</p> <p>Available accident reports of each estate and mill, detailing the events leading to the occurrence and first aid/medical measures provided to victim. These reports have included the identification of remedial measures/actions to mitigate recurrence. Accident report details are submitted monthly to the local authority.</p> <p>Sample of accident report dated 20 May 2023, named Yonas, chronology - the truck fell to the right, Yonas' position on top of the truck jumped to the ground; impact – cuts, bruises and swelling; injured body parts – right knee and hip; Actions taken – cleaned the wound, bandaged and give medicine; lost time – 1 day. The accident was thoroughly reviewed to identify the causes, and the risk matrix has been updated appropriately.</p> <p>Field observation to PT UAI Palm Oil Mill, observed that first aid kit is available at strategic places. Interviews during field observation to harvesting activity at Block C28 Division 2 Meranti Agro Estate, verified that Mandor (foreman) brought first aid kit.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Available notes of PPE handover e.g., on 31 Jan 2023, type of PPE - apron for spraying workers of Kruing Agro Estate, handed over to 19 workers; on 30 Jan 2023, type of PPE – gum boots for harvester and FFB loader of Kruing Agro Estate, handed over to 19 workers; on 3 Jan 2023, type of PPE – gum boots for upkeep workers, harvester and FFB loader of Kruing Agro Estate, handed over to 13 workers.</p> <p>During field observation to mill processing activity at POM and harvesting and spraying activity at Estate, observed that all workers are using appropriate PPE.</p> <p>Based on interview with spraying workers and field observation to washing facility, there is sanitation facilities for those applying pesticides, therefore workers can change out of PPE, wash and put on</p>	<p>Non-compliance (2355770-202306-M9)</p>

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		<p>their personal clothing. Furthermore, milk are given to spraying workers prior to work as extra food to minimize the effect of agrochemical.</p> <p>Critical Non-conformity:</p> <p>The company has provided PPE for its workers, but there are some workers who use PPE not provided by the company.</p> <p>Based on a review of the PPE Handover Minutes document, the company has provided PPE for its workers, however during site visits and interviews, there were several workers who used PPE not provided by the company, for example:</p> <ul style="list-style-type: none"> • 2 (fruit collected workers) at KAE use AP shoes not given by the company. • 1 driver transporting FFB at KAE use safety shoes not provided by the company. • 1 EFB Applicator at KAE, 3 loose fruit collectors at JMJS, 4 harvesters at JMJS and 1 grading worker at the loading ramp wearing AP shoes not given by the company. 	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>Employees receive medical care coverage through the government's BPJS Ketengakerjakan insurance program, with Policy No: 080000009296 registered under MAE PT Usaha Agro Indonesia. Audit team has confirmed the validity of this insurance policy, which contains comprehensive coverage details. The policy outlines compensation for various situations:</p> <ol style="list-style-type: none"> 1. In the event of an employee's unfortunate demise: <ul style="list-style-type: none"> - A one-time payment of Rp16,200,000.00 - Alternatively, 24 monthly installments of Rp200,000.00, totaling Rp4,800,000.00 (paid as a lump sum) - Child education support amounting to Rp3,000,000.00 	<p>Non-compliance (2355770-202306-N3)</p>

		<ul style="list-style-type: none"> - Educational assistance for the children of participants who pass away due to non-work-related issues and have been part of the scheme for at least 5 years. This educational fund stands at Rp12,000,000.00 for each eligible participant. <p>2. For injuries (compensation as a percentage of monthly wages):</p> <ul style="list-style-type: none"> - Very low risk: 0.24% - Low risk: 0.54% - Medium risk: 0.89% - High risk: 1.27% - Very high risk: 1.74% <p>Minor Non-conformity: PT Usaha Agro Indonesia has included its workers in the BPJS Health and Employment program, however there are several workers who do not yet have BPJS Health and Employment cards. Based on a review of the Company Regulation documents, in Section 21 concerning BPJS, it states that employers include workers in the BPJS Employment program and include workers in the BPJS Health program. Based on field visits and interviews, there are several workers who do not yet have BPJS Health and BPJS Employment Cards, including 3 loose fruit collectors at JMJS, 6 harvesters at JMJS, 2 loose fruit collector at KAE, and 1 worker with an empty contract application at KAE.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The company's approach to safety is evident through its accident recording procedures. A document review revealed that the company uses a specific form, known as "Laporan Kecelakaan Kerja" (Ref: FM-SAG-ADM-KTU-050006), to document any accidents that occur within its working premises.	Complied

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		<p>All reported accidents have been recorded using the Lost Time Accident (LTA) metrics, a reliable standard for measuring workplace safety. This record-keeping system is maintained on a monthly basis, demonstrating the company's commitment to transparency and accountability in safety management.</p> <p>Upon reviewing the work accident recapitulation for the period spanning from January to March 2023, it is noteworthy that there were no reported cases of occupational injuries during this period.</p>	
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has a well-documented procedure in place for the monitoring and management of Integrated Pest Management (IPM). During the audit, it was reviewed several elements of procedure, including:</p> <ul style="list-style-type: none"> • Pest Monitoring - Monitoring Hama (P-SAG-KBN-PML-15), revision 03, dated 01/09/2017. • Leaf Defoliator Pest Handling - Pengendalian Hama Daun (P-SAG-KBN-PML-16), revision 02, dated 02/03/2015. • Rat Handling - Pengendalian Hama Tikus (P-SAG-KBN-PML-18), revision 01, dated 16/03/2012. • Tiratabha Handling - Pengendalian Hama Tirataba (P-SAG-KBN-PML-17), revision 01, dated 16/03/2012. • Introduction and Expansion for <i>Tyto alba</i> - Introduksi dan Pengembangan <i>Tyto alba</i> (P-SAG-KBN-PML-19), revision 01, dated 16/03/2012. <p>Additionally, PT UAI estates follows a best practice of establishing a census program for pest control within its estates. This program is documented in the "<i>Rencana dan Realisasi Monitoring Hama 2022 &</i></p>	Complied

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		<p>2023'. According to the established monitoring and census program, the certification unit conducts pest identification on a monthly basis. During the audit, available records of monthly pest identification, particularly for rats at MAE. Should any pest outbreak issues be detected, a census is promptly carried out. The results of these censuses play a crucial role in informing management decisions regarding pest control strategies.</p> <p>To support these efforts, "Buku Pengamatan Hama Tikus" (LBB-SAG-KBN-PML-150401) and "Form Ringkasan Sensus Hama Daun" (F-SAG-KBN-PML-150201), the templates for census monitoring, were established.</p> <p>It is noteworthy that as of the audit date, there has been no significant outbreak of pests within the certification unit. Consequently, there has been no requirement for the use of chemical treatments, and no prophylactic pesticide use was identified.</p> <p>Moreover, training related to IPM census practices has been conducted and well-documented. This reflects the certification unit's commitment to ensuring a highly competent workforce for pest management.</p> <p>Furthermore, the certification unit has undertaken the cultivation of beneficial plants such as <i>Turnera subulatta</i>, <i>Antigonon leptopus</i>, and <i>Casia cobanensis</i> across all three estates. Field observation confirmed that these beneficial plants have been successfully planted throughout the estates and are being well-maintained. This proactive approach aligns with the principles of IPM and contributes to the overall sustainability and ecological balance within the estates.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Based on document review and field observation, the Unit of Certification implement some biological control practices to suppress pest and diseases infestation such as <i>Turnera subulata</i> and <i>Antigonon leptopus</i>, as well as use barn owl (<i>Tyto alba</i>). Verification results on website of cabi.org has known that these species stated as not invasive in Indonesia.</p>	Complied

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7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on review of pest and disease procedure, field observation, interview with management and stakeholders, has known that the Unit of Certification never used fire for pest control.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Justification method of pesticides has been set in procedure of Weed Management - Pengendalian Gulma TBM (P-SAG-KBN-PML-22) and (P-SAG-KBN- PML-12), such as that have specific to the target (narrow spectrum), and has minimum negative impact on non-target species, as well as legally registered in Pesticide Commission, Ministry of Agriculture.</p> <p>Then, the Unit of Certification has a Pesticide Recommendation of 2023 made by R&D Department, that is the summary of recommended pesticides based on consideration of specific target, active ingredient, WHO Class, trademark and priority. These pesticides consist of herbicides, insecticides, rodenticides, and fungicides. Based on the list, these pesticides are only classified as WHO Class II, III, and IV, as well as have been registered in National Pesticides Commission based on verification in website of https://pestisida.id/.</p> <p>Based on field observation on agrochemical storage and activity of spraying of circle and path, noted that there was no usage of WHO Class I pesticides, the workers have demonstrated that spraying only applied to the specific area and weeds by knapsack sprayer. The sprayer nozzle is also calibrated regularly. Workers were using PPE such as face cover, rubber gloves, apron, and rubber boots. Medical surveillances were regularly conducted, and evidence can be shown by the Unit of Certification. There is no worker under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p>	Complied

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<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided. - Critical (Major) compliance -</p>	<p>The unit of certification has implemented a pesticides application program for each estate, clearly demonstrated through the comprehensive Upkeep Program known as "<i>Rencana dan Realisasi Penggunaan Pestisida 2023</i>". This program is thoughtfully organized and structured, with details tabulated according to Field Number, Chemical Type, Month Program, and Date of Realization.</p> <p>The routine application of pesticides primarily targets weed control within circles and pathways, with a frequency of every four months as deemed necessary. To ensure accurate and transparent documentation of pesticide usage, the unit maintains a dedicated set of records known as "Pesticide Toxicity for Estate". These documents contain essential information such as product names, active ingredients, LD50 (lethal dose for 50% of a test population), the percentage of active ingredients, total applications, total active ingredients, hectare-wise application, and active ingredients per hectare applied. These records provide an overview of pesticide usage within the estate, facilitating effective monitoring and evaluation.</p> <p>Furthermore, detailed records of pesticide usage are consolidated and made available in the GHG (Greenhouse Gas) Data report, which was presented to the audit team. This report includes comprehensive information regarding the active ingredients used and the quantities of each active ingredient applied. Notably, the pesticide usage is documented for various blocks within the estates, ensuring that the management has a view of pesticide application across different areas.</p> <p>By maintaining transparent and comprehensive records of pesticide usage, the unit of certification ensures that its actions align with environmentally principles and contribute to the overall sustainability and health of its estates.</p>	<p>Complied</p>
<p>7.2.3</p>	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>IPM plan has been carried out effectively, therefore there was no chemical use for pest control, with exception for routine weed control.</p>	<p>Complied</p>

	- Critical (Major) compliance -	<p>The IPM Procedure stated for early warning system (pest detection), has been set the economic threshold for pests, and chemical treatment only will be used if the pest infestation exceeds the economic threshold. These IPM strategies aimed to minimize pesticide usage.</p> <p>Pesticides were used regularly only for weed control in the circle and harvesting path with interval every 4 months if necessary. The usage of pesticides has been monitored in monthly and annual basis. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method was not a preventive application, but rather selective for weedy locations that considered exceed the economic threshold. Knapsack sprayers also have been calibrated to prevent overuse of pesticides.</p>	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>Based on document review, field observation, interview with management and stakeholder, noted that the Unit of Certification never uses pesticides prophylactically. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method was not a preventive application, but rather selective for locations that have weeds.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p>	<p>Based on document review, the Unit of Certification did not use WHO 1A, 1B pesticides or paraquat since 2019, or pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 year of 2015 about Pesticide Registration, for example aldrin, formaldehyde, and monokrotofos.</p> <p>There was Internal Memo "Penghentian Pemakaian Paraquat dan Bahan Kimia yang Dilarang Penggunaannya Berdasarkan Ketentuan RSPO" (Ref.: 124/DRD/XI/2019, dated 15 November 2019), distributed by R&D Director to all relevant personnel regarding the commitment not to use</p>	Complied

	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	paraquat anymore since November 2019. Based on field visits (spraying activities) and observations at the pesticide warehouse at MAE, KAE and UAE, that there was no use of pesticides with the active ingredient paraquat."	
	7.2.5d Process to limit the negative impacts of the application.		
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has taken proactive measures to ensure the safety and competence of its workforce through the implementation of the "Program <i>Pelatihan Tahun 2023</i>", a training program designed to address safety and awareness in the handling of pesticides. In response to this training initiative, the certification unit has successfully conducted multiple training sessions, and the corresponding training records have been documented in the "<i>Rekap Pelatihan Individu Tahun 2023</i>". This record-keeping serves as a resource for tracking individual training progress.</p> <p>Critical Non-conformity: The company has provided training for pesticide application officers, but there are several workers whose training records are not available.</p> <p>Visits and interviews were conducted with spray workers at Kebun Ulin Agro Estate and Meranti Agro Estate, however based on a review of documents there were several workers who did not have records that they had taken training in pesticide use, for example: Kristina (UAE), Belandina and Wiwin (MAE).</p>	<p>Non-compliance (2355770-202306-M10)</p>
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field visit to agrochemical storage, the unit of certification has stored all pesticides properly. Each pesticide product equipped with MSDS. The storage also provided PPE's, hand/eye wash facilities and first aid kit. Each pesticide/herbicide stored separated with its level of</p>	<p>Complied</p>

		toxicity, material and its use. Agrochemical material stored at specific warehouse.	
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>The company has procedures for handling used pesticides containers in "Identifikasi Limbah dan Pengendaliannya" which has specified the disposal method for solid waste generated. Sighted in the document, the company has outlined that all used pesticide containers shall be collected and kept at the hazardous waste temporary storage prior transporting to the authorized disposal centre.</p> <p>The company adheres to responsible practices when disposing of empty chemical containers. These containers are managed through approved Solid Waste (SW) collectors, which have received the official endorsement of the local government as recognized pesticide storage waste collectors. This commitment to proper disposal procedures is clearly documented in the Company Profile of PT Semesta Langgeng Sentosa, which is designated as a hazardous waste transporter.</p> <p>Besides that, the company has Agreement No. 735/UAI/XII/21/HQ/CA, between the company and PT Balikpapan Environmental Services, a hazardous waste processor, as well as PT Semesta Langgeng Sentosa.</p> <p>Based on observations and verifications conducted during the audit, it was evident that there were no instances of pesticide containers being improperly disposed of or repurposed for other uses. Instead, all pesticide storage waste was transported to authorized disposal centres, in strict accordance with the established procedures.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in whole are of certificate holder.</p>	Complied

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7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Regular annual medical surveillance is carried out for all workers, by a General Medical Check-up that includes parameters such as blood pressure, weight, eye examinations, dietary assessments, and more. This health monitoring initiative is well-documented in the "Laporan Hasil Pemeriksaan Kesehatan Berkala Tenaga Kerja Periode Tahun 2023", covering all estates, namely UAE, KAE, and MAE. The medical assessments were overseen by the company's dedicated physician, Dr. Agus P. Ginting, who ensured the well-being of all workers.</p> <p>Verification of the medical surveillance's regularity was cross-referenced with the workers' roster in the "Daftar Tenaga Kerja - Maret 2023", confirming that these annual check-ups are consistently administered to all workers. Additionally, for employees involved in the handling of chemical substances, such as chemical sprayers, a Cholinesterase test is thoughtfully scheduled on an annual basis to assess chemical levels in their blood. Records pertaining to both the General Medical Check-up and the Cholinesterase test were thoughtfully provided during the audit, demonstrating the company's commitment to thorough health monitoring. The most recent Cholinesterase test, conducted on 2 - 3 October 2022 for 127 spraying operators, yielded positive results, indicating that all spraying operators were in good health and fit for their roles.</p>	Complied
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>The company prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estates performed monthly pregnancy test. The company also kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting pregnancy tests every month.</p> <p>Based on the latest pregnancy test conducted in April and May 2023. All female sprayer are in well condition and not being pregnant nor breast feeding.</p>	Complied

Note For 7.2.11

Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.

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

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>The document "Identifikasi Sumber Limbah & Pengendaliannya" is in place, and it clearly outlines aspects related to waste management. This document specifies the sources of waste, categorizes waste types, identifies the form of waste generated, and defines the appropriate actions to be taken for handling each type of waste. These actions may include recycling, reuse, or disposal to the landfill. Here are some examples of identified waste and their actions:</p> <ul style="list-style-type: none"> • Scheduled waste (from fertilizer storage, chemical storage, POL storage, etc.) – to be disposed of through an appointed scheduled waste collector. • Organic waste (from housing, office, etc.) – to be disposed of in a landfill. • Inorganic waste (from housing, office, workshop, worship place, etc.) – some are to be disposed of in a landfill, while others are suitable for reuse. <p>Additionally, the certification unit has established specific procedures to manage waste effectively:</p> <ul style="list-style-type: none"> - "Pengendalian Limbah di Kebun" (Waste Management in the Plantation) - Procedure No. P-SAG-KBN-LMB-01, dated 30 October 2015. - "Penanganan B3 dan Limbah di PKS" (Handling of Hazardous and Non-Hazardous Waste in the Palm Oil Mill) - Procedure No. P-SAG-PKS-LMB-01, dated 1 September 2017. <p>These procedures provide clear guidance on how waste is managed in both the plantation and the palm oil mill, ensuring compliance with</p>	<p>Complied</p>
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		regulations and promoting responsible waste handling and disposal practices.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Minor Non-conformity: Based on field visit to the landfill (TPSA) found: <ul style="list-style-type: none"> Block N15 Division 2 Kruing Agro Estate and Block E28 Division 2 Meranti Agro Estate found that organic and inorganic waste was not separated. Block N15 Division 2 Kruing Agro Estate found used motor oil packaging (B3 waste) which was dumped in the landfill. This is not in accordance with the socialization of Waste Management and the Prohibition of Burning Policy dated 10 January 2023.	Non-compliance (2355770-202306-N4)
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Minor Non-conformity: Based on the results of field visits at Kruing Agro Estate and Ulin Agro Estate housing complexes, it was still found that there was the practice of domestic waste burning around the housing complex. This is not in accordance with the socialization of Waste Management and the Prohibition of Burning on 10 January 2023.	Non-compliance (2355770-202306-N5)
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented. - Minor compliance -	The Unit of Certification has best practices mechanism in maintain and improve long term soil fertility, set in Fertilizer Recommendation PT Usaha Agro Indonesia 2023 – FQA, Agronomy, and Continuous Improvement Report, which produced on annual basis for all estates. The recommendation is developed based on the following factors: <ul style="list-style-type: none"> Area statement Rainfall data (2014 – 2022) FFB production data (2016 – 2022) 	Complied

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		<ul style="list-style-type: none"> • Leaf sampling (Annual basis) • Planning and realisation of manuring 2022, • Fertilizer Recommendation 2022, and • Field visit <p>Latest Fertilizer Recommendation 2023 for all estates were made available during the audit.</p> <p>This document set a sort of strategy to maintain and improve long term fertility, by combining efficient and measurable in-organic fertilization, take into account the oil palm age and soil nutrient properties by conducting leaf and soil sampling, as well as fertilization best practices on the field.</p> <p>Based on field observation of fertilization activity, the applicators have used calibrated cup as a spreading tool. The fertilizer was spread on the edge of the circle according to the SOP. Based on interview, the chemical fertilizer is not implemented on riparian. Based on site observation and interview, the ground cover condition during the audit was at satisfactorily condition, whereby the soft grasses are well maintained.</p>	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>The most recent soil analysis was carried out on 31 January 2022, in the land application area. This latest assessment represents a significant update since the previous analysis, which was conducted on 1 December 2015. The findings of this recent soil sampling have been documented and analyzed by Seameo Biotrop Laboratory. Elements analyzed are pH H₂O, Total-N, Total Organic Carbon, Texture, C.E.C, Exch. K, Exch. Mg, Exch. Ca, Exch. Na, Available P-Bray-II, P₂O₅ in 25% HCl, FE in DTPA, Al-dd and Boron in Hot Water. Soil analysis conducted by PT Binawit Makmur Integrated Laboratory, a subsidiary of PT Sampoerna Agro, Tbk.</p> <p>The results of the 2022 soil analysis were compiled into a comprehensive Report of Analysis:</p>	Complied

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		<ul style="list-style-type: none"> - No.040/SL/2022, based on Order No.155/ORDER-AK/IV/2022, Memo No.001/EM-KAE/III/2022; unit Kruing Agro Estate; consist of 12 samples; received dated 13 April 2022; analyze date 21 April – 17 May 2022; date of issued 18 May 2022. - No.041/SL/2022, based on Order No.157/ORDER-AK/IV/2022, Memo No.001/EM-UAE/III/2022; unit Ulin Agro Estate; consist of 12 samples; received dated 13 April 2022; analyze date 21 April – 17 May 2022; date of issued 18 May 2022. - No.042/SL/2022, based on Order No.156/ORDER-AK/IV/2022, Memo No.001/EM-MAE/III/2022; unit Meranti Agro Estate; consist of 10 samples; received dated 13 April 2022; analyze date 21 April – 17 May 2022; date of issued 18 May 2022. <p>The latest leaf sampling was conducted on May 2022 for all estates and has been analyzed by Integrated Laboratory SGRO Palembang – Sumsel. Sampling analysis result has shown the average level of element N, P, K, Ca, Mg, and B was at optimum level. The result was tabulated in a table entitled "<i>Data Analisa Daun 2022</i>".</p> <p>In addition, the Fertilizer Recommendation 2023 report, encompassing all estates, was thoughtfully prepared by PT UAI's Field Quality Assurance (FQA). This report reflects the unit's commitment to ensuring optimal soil fertility and productivity.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>As highlighted in the Annual Fertilizer Recommendation Report, the application of EFB (Empty Fruit Bunch) mulching is advised, particularly for mineral soils. To ensure transparency and compliance, records of EFB application for all estates within the certification unit are maintained in the EFB Application Monitoring system, also referred to as "<i>Monitoring Aplikasi Janjang Kosong</i>."</p> <p>Furthermore, the practice of recycling biomass has been actively implemented, with a focus on utilizing the fiber and shell components in the boiler. This approach aligns with sustainable practices for waste</p>	Complied

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		<p>reduction and energy utilization. Additionally, the treatment of Palm Oil Mill Effluent (POME) is carried out through the application of a Methane capture approach, contributing to environmental sustainability.</p> <p>The implementation of EFB application was thoroughly reviewed by the company, and the outcomes were documented. This review process confirmed that all programs were implemented in accordance with the recommendations outlined in the "Rekomendasi Pupuk Organik".</p>	
<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained. - Minor compliance -</p>	<p>The fertilizer application program within the unit of certification is documented in the Manuring Program/Block, ensuring approach to nutrient management. Subsequently, the actual implementation of these programs is recorded in the Foreman Logbook (<i>Buku Kerja Mandor</i>), which is then integrated into the "Monitoring Aplikasi Pemupukan" system. This monitoring document serves as a comprehensive information, including:</p> <ul style="list-style-type: none"> • The specific estate (Kebun) • The corresponding period (Periode) • The type of fertilizer used (Jenis pupuk) • The month of application and the respective dosage • A comparative summary of the recommended dosage versus the actual implementation. <p>During verification process, it was confirmed that the data recorded in both documents, the Manuring Program/Block and the Foreman Logbook, were synchronized and accurate. Occasionally, adjustments to the dates of manuring activities were necessitated by unforeseen weather conditions, which were beyond the control of the estates.</p> <p>To ensure adherence to the established fertilizer application program, the company conducts an annual review of the program's efficacy. The outcomes of this review, which include an assessment of whether the program was effectively implemented and successfully accomplished,</p>	<p>Complied</p>

		<p>are systematically documented in the “<i>Rencana dan Realisasi Pemupukan 2023</i>”. This process reflects the commitment of the unit of certification to ensuring that the fertilizer application program aligns with best practices and is adapted as needed to optimize crop health and yield.</p>	
<p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p>			
<p>7.5.1</p>	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -</p>	<p>Detailed soil maps providing insights into the unit of certification's soil composition can be accessed through the “Detailed Soil Map (<i>Peta Tanah Detil PT Usaha Agro Indonesia</i>)” and the “Details of Survey and Mapping 2016 (<i>Survei dan Pemetaan Tanah Details 2016</i>)”, thoughtfully compiled by the Field Quality Assurance team. A specific focus is placed on identifying fragile soils, particularly of the peat and sandy types.</p> <p>Notable examples of soil series identified within these fragile soil categories include:</p> <ul style="list-style-type: none"> • Typic Haplohemists • Typic Haplosaprists • Typic Haplofibrist <p>For a comprehensive understanding of the terrain, reference is made to Section 2.3: “<i>Elevasi, Kemiringan Lahan, dan Bentang Lahan</i>” in the “<i>Survei dan Pemetaan Tanah Details 2016</i>” for all estates. This section confirms that the estates are predominantly situated on flat to undulating terrain.</p> <p>To further ensure compliance with best management practices, site observations have been conducted across both peat and sandy areas within the unit of certification. In areas prone to potential flooding, such as peat soils, the unit has proactively constructed bunds to mitigate the risk of overflow from higher water level areas. In sandy regions, a proactive approach is adopted, where the certification unit maintains grasses and ferns. This practice serves to uphold soil moisture levels and</p>	<p>Complied</p>

		stabilize soil structure, thereby promoting sustainable land management and ecosystem preservation.	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Referring to indicator 7.5.1, it is noted that the unit of certification is situated on terrain characterized by a predominantly flat to undulating topography. The gradient of this terrain falls within the range of 0% to 8% across all estates.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	Referring to indicator 7.5.1, it is noted that the unit of certification is situated on terrain characterized by a predominantly flat to undulating topography. The gradient of this terrain falls within the range of 0% to 8% across all estates.	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	Maps displaying the soil types within the unit of certification are readily accessible within the Detailed Soil Map (Peta Tanah Detil PT Usaha Agro Indonesia) and the Details of Survey and Mapping 2016 (Survei dan Pemetaan Tanah Details 2016), both issued by the Field Quality Assurance team. These maps have been updated in 2020 by the Geo-Information Planning, GIS, and Survey Sustainability Department. The plantations are situated upon terrain that encompasses both flat and undulating landscapes. Within the certification unit, there have been discernible identifications of fragile soils, primarily consisting of peat and sandy types. A few notable examples of soil series representing these fragile soils within the certification unit include: <ul style="list-style-type: none"> - <i>Typic Haplohemists</i> - <i>Typic Haplosaprists</i> - <i>Typic Haplofibrist</i> 	Complied

		These provide an understanding of the unique soil characteristics present in the certification unit, important for sustainable land management practices.	
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	Based on on-site observations, it has been noted that the planted areas on peatland are being managed in accordance with best practices for peatland cultivation. The drainage system is being maintained, ensuring that water levels are consistently monitored and maintained at appropriate levels, typically within the range of 50-70 centimetres from the surface. Additionally, the ground cover within these areas is observed to be in a satisfactory condition. The procedures governing water management are outlined in the document titled "Tata Kelola Air di Area Rendahan (Water Management System di Area Peatland dan Lowland) P-SAG-KBN-PML-28 dated 01-Jul-2020." This document has been thoroughly reviewed and serves as the guiding framework for effective water management within both peatland and lowland areas. These practices align with responsible and sustainable land management principles, ensuring the preservation of peatland ecosystems while enabling productive agricultural activities.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	For Phase 1 of the certification, which involves the Location Permit for 11,300 hectares, comprehensive soil surveys have been conducted to determine the long-term suitability of the land for oil palm cultivation. These surveys have taken into consideration in the planning and operational aspects of the plantation. Notably, the AMDAL (Environmental Impact Analysis) document, referenced as Ref. No.: 29, 2009, dated 16 January 2009, has outlined the soil types within the plantation area in Section 3.1.5. In the context of the phase 2 of certification, covering an additional 2,500 hectares under Location Permit 2, soil details have been integrated into the addendum of the 'Analisis Dampak Lingkungan Hidup dan Rencana Pengelolaan Lingkungan Hidup – Rencana Pemantauan	Complied

		<p>Lingkungan Hidup' (Environmental Impact Analysis and Environmental Management Plan – Environmental Monitoring Plan), referenced as No.: 208/DPMPTSP-D.B/2018, dated 22 June 2018.</p> <p>Both phases of the certification have involved soil surveys and in-depth analysis, considering crucial parameters such as pH levels, organic compounds, soil texture, and mineral composition. These analytical findings are specified in Table 3.8 of the AMDAL document and the Environmental Impact Analysis and Environmental Management Plan.</p> <p>Furthermore, soil erosion surveys have been a vital component of the AMDAL, as indicated in Section 3.1.5(3) and the Environmental Impact Analysis and Environmental Management Plan. It is noted that the AMDAL has stated that the possibility of erosion within the plantation area is very small. However, it is acknowledged that this situation could change if heavy rain continues to occur in the area.</p>	
<p>Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
<p>7.7.1</p>	<p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -</p>	<p>The certification unit has comprehensive maps that provide valuable information about the soil composition and suitability of the area:</p> <ol style="list-style-type: none"> 1. Detailed Maps: These maps display the locations of mineral, sandy, and peat soils. These details are crucial for land management and planning. 2. HCV Maps: These maps include information on the depth of peat soils. The certification unit has conducted soil study surveys using HCV maps, leading to the creation of a Soils Suitability Map. This map helps in determining which areas are suitable for specific land uses based on soil characteristics. <p>Furthermore, the certification unit has undertaken Environmental Impact Assessments (EIA) as part of its responsible land management practices:</p>	<p>Complied</p>

		<ol style="list-style-type: none"> 1. "Analisis Dampak Lingkungan Hidup (AMDAL)": This assessment, referenced as Ref. No.: 29, 2009, dated 16 January 2009, is a tool for evaluating and mitigating environmental impacts. It ensures that sensitive and fragile soils, such as peat, are considered in land-use planning. 2. "Analisis Dampak Lingkungan Hidup dan Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan" (ANDAL Dan RKL – RPL): This assessment, referenced as No.: 208/DPMPSTP-D.B/2018, dated 22 June 2018, provides insights into the environmental impacts of land management practices and outlines plans for environmental monitoring. The assessment confirms that peatlands and other sensitive areas have been taken into account. <p>Field observation conducted at the operational area during this recertification audit confirmed that no extensive planting has occurred in sensitive areas. New planting on peatlands has not taken place since the previous assessment. This information was verified using both on-site and remote verification methods and cross-referenced with Google Imagery and HCV Maps extracted from the Final HCV Report 2011.</p>	
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p>	<p>The certification unit has taken comprehensive steps to address peat inventory and environmental considerations in its certified area:</p> <ol style="list-style-type: none"> 1. Previous Certified Area (8,287 ha): A peat inventory for Sampoerna Agro Tbk was submitted to RSPO, as documented in email communication sent on 14 November 2019. This inventory provides essential information about peatlands within the certified area, contributing to responsible land management practices. 2. HCV Assessment: The Public Summary of High Conservation Value, Full Assessment Report for PT Usaha Agro Indonesia, dated 20 June 2016, in Section 5.4: Physical Environment Context, reported the presence of peat soils (<i>haplosaprist</i> and <i>haplohemist</i>) in the scope extension area. This recognition of peatlands highlights the 	Complied

		<p>importance of considering ecological significance in land-use planning and management.</p> <p>3. Scope Extension during ASA2: PT UAI continued its commitment to responsible land management by submitting email communication to the GHG Unit of RSPO, dated 27 July 2021. This communication included information such as soil maps and the RSPO Peat Inventory Template – SGRO for the scope extension area. These details are important for assessing and managing peatland resources within the extension area.</p> <p>Overall, PT Usaha Agro Indonesia has demonstrated dedication to environmentally responsible practices by actively addressing peat inventory and environmental considerations in its certified areas, aligning with RSPO guidelines and sustainability principles. Peat area within unit of certification has been managed, inventoried, documented and reported to the RSPO Secretariat The 2nd submission of Peat Inventory has been submitted to the RSPO Secretariat on 27 October 2023.</p>	
<p>PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).</p>			
<p>7.7.3</p>	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>The certification unit has taken proactive steps to monitor and address peat subsidence, soil conditions, and fire risk in its estates:</p> <p>1. Peat Subsidence Monitoring: Peat subsidence monitoring is in place, and peat subsidence poles have been installed for this purpose. Based on the "Peta Realisasi Pemasangan Peat Subsidence KAE in February 2022" and "Peta Realisasi Pemasangan Peat Subsidence UAE in February 2022", a total of 17 poles (8 at KAE and 9 at UAE) have been installed. The monitoring records are maintained and can be found in the "Rekap Monitoring Peat Subsidence UAE & KAE," with the latest data recorded in May 2023.</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 2. Water Level Monitoring: Site observations during the audit confirmed that the water levels were satisfactory. These water level measurements are recorded in the "Rekap Monitoring Piezometer Kebun (UAE and KAE)" for the period from 2021 to 2023. 3. Detailed Soil Surveys: The "Survei dan Pemetaan Tanah Detail" conducted in 2016 for all estates provides information on soil types within the estates. It is confirmed that PT UAI primarily has peat soil, mainly at KAE and UAE. 4. Fire Risk Assessment: The "Peta Lokasi Rawan Kebakaran" is a spatial map that identifies areas with a high risk of fire within the estates. Notably, there is a significant high-risk area for fire located in the northern part of UAE. This map is essential for fire prevention and management efforts. 5. Latest Peat Subsidence Map: The latest "Peta Realisasi Pemasangan Peat Subsidence UAE" (Reference: 026/GIS-SUS/HO/II/2021) further supports peat subsidence monitoring efforts. The estate representative provided explanations about this map, and it was documented in the monthly planning (Rencana Kerja Bulanan – May 2023). <p>These initiatives reflect PT Usaha Agro Indonesia's commitment to responsible land management and environmental stewardship by actively monitoring and addressing peatland conditions, subsidence, water levels, soil types, and fire risk in its estates.</p>	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	<p>PT Usaha Agro Indonesia (UAI) has made progress in water management for peat areas and maintains comprehensive plans for its ongoing water management efforts:</p> <ol style="list-style-type: none"> 1. Construction of Bunds and Weirs: Progress notes up to 2023 indicate that PT UAI has been actively constructing bunds and weirs for flood control and water level management in appropriate areas. These 	Complied

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		<p>structures are essential for maintaining optimal water levels in peat areas.</p> <ol style="list-style-type: none"> 2. Detailed Water Management Program: The "Program Water Management PT UAI 2023" specifically outlines the company's water management plans for Ulin Agro Estate and Kruing Agro Estate. It includes tasks, specifications, programs, timelines (planned and actual), and progress remarks. This comprehensive document covers various aspects of water management, such as drainage cleaning, canal weirs, flap gates, retention basins, and infrastructure monitoring (water level, piezometer & piezometer). 3. Water Level Monitoring: Site observations during recertification audit confirmed that water levels in peat areas were satisfactory. PT UAI actively monitors groundwater and surface water levels in peat areas using piezometers, with records maintained on a weekly basis. These records were made available during the audit, as evidenced in the "Rekap Monitoring Piezometer Kebun (Ulin Agro Estate & Kruing Agro Estate)" for the period 2023. 4. Land Cover Maintenance: PT UAI places importance on maintaining land cover to preserve soil fertility and minimize environmental impacts. The observed maintenance of land cover during the site visit reflects the company's commitment to responsible land management practices. 5. Effective Water Management Implementation: Site observations in various blocks of UAE, KAE, and MAE, confirm that water management has been properly implemented. Implementation documentation for all estates were presented during the audit. <p>Overall, PT Usaha Agro Indonesia's approach to water management and the maintenance of land cover in peat areas demonstrates its commitment to responsible land management practices and environmental management. The company's planning and monitoring</p>	
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		<p>efforts align with sustainability principles and are important for the long-term sustainability of its operations.</p>	
<p>7.7.5</p>	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the information gathered from interviews with the company's representative and site observations, it has been confirmed that no replanting activities have been conducted since the previous assessment, and there are no plans for replanting in the next five years. The oldest oil palms planted in 2006, therefore the earliest replanting will be carried out in 2026.</p> <p>The unit of certification is willing to implement RSPO Drainability Assessment Procedure, November 2019. Based on the document, RSPO requires a Drainability Assessment to be undertaken starting approximately 5 years before replanting the oil palm on peat (refer to Annex 5). However, the company has collect data of subsidence and water level trends, as evidence in as follow:</p> <ol style="list-style-type: none"> 1. Peat Subsidence Monitoring: Peat subsidence monitoring is in place, and peat subsidence poles have been installed for this purpose. Based on the "Peta Realisasi Pemasangan Peat Subsidence KAE in February 2022" and "Peta Realisasi Pemasangan Peat Subsidence UAE in February 2022", a total of 17 poles (8 at KAE and 9 at UAE) have been installed. The monitoring records are maintained and can be found in the "Rekap Monitoring Peat Subsidence UAE & KAE," with the latest data recorded in May 2023. 2. Water Level Monitoring: Site observations during the audit confirmed that the water levels were satisfactory. These water level measurements are recorded in the "Rekap Monitoring Piezometer Kebun (UAE and KAE)" for the period from 2021 to 2023. 	<p>Complied</p>

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

units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.

<p>7.7.6</p>	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019). - Critical (Major) compliance -</p>	<p>Water Management System (P-SAG-KBN-PML-28) dated 1 Jul 2020, the procedure have been referring to RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019). Principles of Water Management:</p> <ul style="list-style-type: none"> a. Does not hold water but flows water. The canal is dug straight, the excavated soil is disposed in one direction. b. Water from outside the estate (inlet) must not enter the area. c. If there is an inlet it is managed directly to the boundary or directed to the outlet. d. The river functions as a place for water disposal. e. The area is divided into 2 catchment area zones, namely macro between estates and micro within estates. f. Each catchment area has its own outlet. g. The block design for water management is based on the location and flow of the river. h. The main drain is parallel to the river flow, while the collection drain is perpendicular to the river flow. i. The water flow in the block is turned off to be channelled into a canal which was created for easy control and high productivity of the heavy equipment. j. Optional fast field drain as required. k. No flooding in the rainy season and drought in the dry season. 	<p>Complied</p>
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		<p>In accordance with the Peat Audit Guidance, the status of water level monitoring implementation is considered satisfactory. The necessary prerequisites have been met, including:</p> <ul style="list-style-type: none"> • The installation of water level monitoring posts at strategically chosen locations. • The deployment of piezometers for accurate measurement. • Regular weekly monitoring of water levels, with meticulous record-keeping. • Integration of water level data into the comprehensive water management plan. <p>Regarding fire prevention and control measures, proactive steps have been taken to ensure the safety and security of the area. These actions encompass:</p> <ul style="list-style-type: none"> • Continuous water level monitoring to detect any potential fire risks. • Prominent signage displaying the warning message "Stop Kebakaran!!" placed strategically throughout relevant areas. • The installation of fire monitoring towers at key locations, such as KAE – Block I/N 12 and MAE – Block C34. <p>It is noted that there have been no instances of fire evidence resulting from waste disposal practices, and the presence of leaning palm trees has been observed as a rare occurrence, signifying a commendable level of environmental preservation.</p> <p>The unit of certification has instituted a procedure titled "Pengendalian Kebakaran Lahan dan Perkebunan" (No. P-SAG-KBN-DRR-02), dated 1 December 2020. This document outlines the protocol, along with associated responsibilities, concerning fire prevention and control. The development and execution of this procedure have been undertaken, among other reasons, to ensure compliance with local legal</p>	
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		<p>requirements, such as Ministry of Agriculture Regulation “Permentan No. 5 Tahun 2018” regarding Land Clearing and/or Cultivation.</p> <p>To oversee and respond to fire incidents on peat soils, unit of certification has established a dedicated team known as “SatGas”. Remarkably, based on site observations, there have been no reported fire incidents in the past year. Upon conducting thorough record reviews, interviews with management personnel, and on-site assessments, it is evident that the estate has implemented well-planned and effective measures to proactively manage and control potential fire events.</p> <p>The on-site observations have further confirmed the implementation of these measures across all estate locations. This includes the installation of pertinent warning signs, strategically positioned fire towers, and the establishment of water level monitoring systems, ensuring a holistic approach to fire prevention and control.</p>	
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the findings, it is evident that the management of areas planted on peat soils has adhered to best practices for peatland cultivation. This conclusion is substantiated through site observations and interviews conducted during the assessment process.</p>	Complied
<p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p>	<p>The unit of certification has developed a comprehensive Water Management Plan (FM-SAG-ADM-KTU-080001), which encompasses several key aspects:</p>	Complied

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	<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>	<ol style="list-style-type: none"> 1. Identification of Water Sources: The plan identifies various water sources, including bore wells, water catchments, rivers, and rainwater. 2. Management of Water Sources: It outlines measures for maintaining buffer zones, routine maintenance of water drainage in peat areas, and the maintenance of water levels. 3. Monitoring of Water Sources: The plan includes provisions for analyzing the quality of drinking water and domestic water, as well as installing signage to prevent chemical application. 4. Water Quality Monitoring: The certification unit has established a Procedure for Water Management Plan at Low-lying Area (P-SAG-KBN-PML-28) to address water management in peat areas. <p>Additionally, the "Program Water Management PT Usaha Agro Indonesia" (Doc. No.: FM-SAG-ADM-KTU-080001; Rev. 0) dated 2 January 2021, specifies the company's water management plan for three specified areas: housing and office areas, palm oil mill areas, and plantation areas. The plan includes details such as water sources, management responsibilities, monitored parameters, monitoring locations, and frequencies. Notably, actions outlined in the plan, such as water quality monitoring for wells, are implemented as scheduled.</p> <p>Clean water monitoring, conducted on 18 April 2021, by Dinas PERKIMLH Laboratory, adheres to Health Ministry Regulation No. 32/2017. Site observations confirm that the 50-meter buffer zones along watercourses are well-maintained. Notably, there is no evidence of chemical application within the riparian areas. Interviews with spraying applicators have verified that no herbicide or manuring activities are permitted in these environmentally sensitive zones.</p> <p>The clean water monitoring conducted by PERKIMLH Office Ketapang Laboratory for all units (KAE, MAE, UAE, POM, Staff) successfully</p>	
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		<p>measured various parameters such as turbidity, pH, Pb, Cd, Fe, Mn, Zn, NO₂, and F, ensuring the quality and safety of the water supply.</p> <p>The company is actively in the process of securing a surface water utilization permit, as evidenced by Letter No. 010/SP-AIL/IV/2022 dated 12 April 2022, from PT AIL, the environmental consultant. This letter indicates that the permit is progressing through field data analysis and hydrological study, with the goal of submitting technical recommendations to Balai Wilayah Sungai (BWS) Kalimantan II Palangkaraya, demonstrating the company's commitment to regulatory compliance and responsible water resource management.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>The water management plan places a strong emphasis on ensuring that local communities, workers, and their families have access to clean and adequate water for various purposes. To contribute to the well-being of these communities, river water quality is monitored every six months, with the latest monitoring conducted in December 2022 by Mutu Agung Laboratory, in compliance with Government Regulation No. 22/2021.</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018). - Critical (Major) compliance -</p>	<p>The certification unit has established a map that pinpoints the locations of identified natural watercourses and wetlands throughout the area. This map is incorporated into the High Conservation Value (HCV) Map dated March 2016.</p> <p>In a dedicated effort to preserve these natural features, the certification unit maintains the riparian and buffer zones in accordance with the guidelines outlined in Section 6.3.1: HCV Management Plan.</p> <p>The audit team conducted site verifications to confirm the implementation of the management plan as recommended by the HCV assessor. The site inspections focused on wetlands located in deep peat areas (HCV1, 3&4) within UAE Blocks IM0042, IM0043, IM0046, as well as river riparian zones. The outcomes of these inspections demonstrate the certification unit's commitment to maintaining riparian and buffer zones that serve to safeguard watercourses. During a site visit near Sei</p>	<p>Complied</p>

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		Berai River, the audit team found the buffer zone to be well-maintained, further demonstrates the certification unit's dedication to preserving these vital ecosystems.	
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>The mill's effluent treatment process is well-documented in the Final Effluent Treatment procedure (P-SAG-PKS-PRS-11). This procedure outlines the flow of the effluent treatment process, ensuring transparency and clarity in its execution. To provide visual guidance and awareness, a map indicating the precise location of the effluent treatment plant is displayed in the meeting room.</p> <p>The quality of the final water discharge, particularly for land application, undergoes sampling and monitoring. This oversight is in place to guarantee that the discharged water complies with the legal requirements specified in the Implementation Permit issued, known as "Izin Land Aplikasi PT UAI Seluas 163.66 Ha". This permit, authorized by the Regent of Ketapang Decree No. 400/PERKIMLH-C/2017. According to this permit, the approved threshold for discharged BOD (Biological Oxygen Demand) is set at <5,000 mg/litre.</p> <p>To ensure compliance, samples of discharged wastewater are collected on a monthly basis. These samples are then analyzed by Sucofindo Laboratory. An example of the analysis results for the months of January to December 2022 and January to May 2023 has been reviewed and confirms compliance with the prescribed limits established by the relevant regulation. Among the results, it is notable that for January to May 2023, the BOD levels were reported within acceptable standards.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The water consumption at the Palm Oil Mill (POM) is tracked and documented in the "Data Pengambilan dan Pemakaian Air Permukaan Tahun 2023" (Surface Water Intake and Usage Data for the Year 2023). This table provides a comprehensive overview of water usage, including the following details for each month:</p> <p>- Month</p>	Complied

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		<ul style="list-style-type: none"> - Fresh Fruit Bunches (FFB) processed - Water usage (m3) – categorized into process, boiler, others, and the total m³ used - Water consumption per tonne FFB (M³/ton) <p>The recorded data is updated on a monthly basis, and these records undergo a thorough verification process, acknowledge by the mill manager. As a result of this monitoring, the average water usage for the period January to May 2023 was consistently maintained at 1.52 m³ per tonne of FFB processed, underscoring the mill's commitment to responsible water management practices.</p>	
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The plan aimed at improving the efficiency of fossil fuel usage, as outlined in Chapter IV of the "Penilaian Cadangan Karbon dan Nilai Emisi GRK dari Alih Guna Lahan, 2017" (Assessment of Carbon Reserves and Greenhouse Gas Emission Values from Land Use Change, 2017), has been effectively implemented by the company. This comprehensive plan includes measures to reduce fossil fuel consumption, such as:</p> <ul style="list-style-type: none"> - Utilization of fibres and shells in the boiler. - Routine maintenance of all estate vehicles. - Optimum usage of electric generators. - A socialization program aimed at raising awareness about greenhouse gas emissions. <p>The company's commitment to reducing fossil fuel usage is evident in its efforts to optimize renewable energy sources. In particular, the utilization of methane capture serves as a commitment to the company's dedication to sustainable practices.</p> <p>Monitoring of renewable energy usage is documented in "Monitoring Aplikasi Limbah Padat 2023" (Monitoring of Solid Waste Application for</p>	Complied

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		<p>2023). Furthermore, detailed records of fuel consumption at the Palm Oil Mill (POM) during the year 2023 can be found in the "Penggunaan Solar PKS UAI Tahun 2023" (Usage of Diesel at PT Usaha Agro Indonesia Palm Oil Mill for the Year 2023).</p> <p>The company also conducted greenhouse gas (GHG) reporting submissions to the Roundtable on Sustainable Palm Oil (RSPO), demonstrating a commitment to transparent reporting and environmental responsibility.</p>	
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>The company has conducted assessment to identify significant pollutants and greenhouse gas (GHG) emissions across its estates, as detailed in the "Penilaian Cadangan Karbon dan Nilai Emisi GRK dan Alih Guna Lahan" (Assessment of Carbon Reserves and Greenhouse Gas Emission Values from Land Use Change) document. This assessment includes the calculation of TonC/Ha (Tons of Carbon per Hectare) and the estimation of GHG reduction potential per year. The RSPO New Development GHG Calculator has been employed for precise GHG emission calculations, ensuring accuracy and consistency.</p> <p>To address GHG emissions, the company has developed a comprehensive "Program Mitigasi Emisi Gas Rumah Kaca" (Greenhouse Gas Emission Mitigation Program). This program outlines the following key components:</p> <ul style="list-style-type: none"> - Program initiatives (e.g., optimizing manuring, conserving HCV areas). - Action plans (e.g., utilizing Empty Fruit Bunches to reduce fertilizer usage, monitoring and maintaining HCV areas). - Designated personnel responsible for implementation. 	<p>Complied</p>

		<p>- Timeframes for achieving specific objectives.</p> <p>The company follows this program and records its actions in the "Laporan Manajemen & Monitoring Emisi Gas Rumah Kaca" (Management and Monitoring Report of Greenhouse Gas Emissions). This report reflects the progress made in implementing the GHG mitigation program. While certain programs/plans are yet to be fully realized, the company has established revised plans with extended timeframes. The company commits to producing yearly reports, such as "Laporan Manajemen & Monitoring Emisi Gas Rumah Kaca 2022," to transparently track its efforts.</p> <p>The certification unit uses the latest version of the RSPO PalmGHG Calculator v.4 to evaluate GHG emissions resulting from its operations. Verification of the data input into PalmGHG during the audit confirmed the accuracy and validity of the recorded information. For the year 2022, the total emissions are reported at 2.18 tCOe2/tCPO and 2.18 tCOe2/TPK, further demonstrating the company's commitment to GHG emission reduction and responsible environmental practices.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>The company has put in place a comprehensive plan to minimize greenhouse gas (GHG) emissions. This plan is detailed in Chapter IV: GHG Emission Mitigation Program and includes several strategies and options to effectively manage and reduce GHG emissions. Some key elements of this plan are as follows:</p> <ol style="list-style-type: none"> 1. Fertilizer Application Optimization: The company is optimizing fertilizer application by using Empty Fruit Bunches (EFB) and efficiently utilizing effluent discharge, which can contribute to reducing GHG emissions. 2. Efficiency of Diesel Usage: To minimize GHG emissions associated with diesel usage, the company is making efforts to maximize the use of kernel and shell, conducting regular maintenance of vehicles, and limiting the operation of electricity generators. 	Complied

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		<p>3. Water Management at Peat Areas: Effective water management in peat areas is a critical aspect of GHG emissions reduction. The company is taking measures such as constructing water gates, installing piezometers to monitor water levels, and avoiding new planting on peat areas to prevent carbon emissions.</p> <p>4. Maintenance of Conservation Areas: Conservation areas play a crucial role in absorbing carbon emissions. The company is actively identifying carbon stocks within High Conservation Value (HCV) areas and calculating carbon stock increments, which contributes to the overall GHG reduction efforts.</p> <p>These strategies and initiatives reflect the company's commitment to responsible environmental management and its dedication to minimizing GHG emissions.</p>	
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored. - Critical (Major) compliance -</p>	<p>The company has documented a comprehensive list of all polluting activities that contribute to greenhouse gas (GHG) emissions in the "Penilaian Cadangan Karbon dan Nilai Emisi GRK dan Alih Guna Lahan" document. Additionally, the document outlines a plan to reduce or minimize these identified pollutions and GHG emissions. This plan is designed to achieve specific objectives, including the evaluation of carbon stock estimations within PT Usaha Agro Indonesia, and it includes a timeframe for implementation.</p> <p>It's note that the certification unit is committed to environmentally responsible practices. They utilize 100% of the effluent generated for land application purposes, specifically to field P0024. This approach demonstrates their dedication to sustainable waste management.</p> <p>Furthermore, the company maintains detailed records of the palm oil mill effluent (POME) generated and its discharge onto the land. These records include water quality data, and it has been confirmed that the biochemical oxygen demand (BOD) levels in the final water discharge are consistently below the regulatory threshold of 5,000mg/L. This</p>	Complied

		demonstrates the company's commitment to minimizing the environmental impact of its operations and ensuring compliance with relevant regulations.	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	<p>The unit of certification unit has demonstrated commitment to the implementation of a zero-burning policy, as clearly outlined in the company's sustainability policy titled "Kebijakan Keberlanjutan PT Sampoerna Agro TBK", dated 1 October 2019. Additionally, the company has taken proactive steps by formulating two key procedures, namely "Penebangan dan Pembersihan" (P-SAG-KBN-PML-03) for land clearing and "Tata Kelola Air Di Area Rendahan" (P-SAG-KBN-PML-28) for water management at lowland to guide planting and replanting practices.</p> <p>Site inspection was carried out across all estates, affirming that the certification unit refrains from any burning practices during development activities. Notably, at the entrance to the certification unit, prominent signage prohibiting the use of fire is displayed. These informative signs are also strategically placed in high-risk areas, such as peatlands and housing zones. Interviews conducted with selected workers have further validated their awareness of and compliance with these fire prevention measures.</p>	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -	<p>Unit of certification established fire prevention and control measures for land such as provides Firefighting team and its equipment, established fire watch tower, conduct monitoring for hotspots and forming fire program by involving surrounding local communities.</p> <p>The site observations have confirmed the company's dedication to fire prevention and control through various proactive measures. Notably, the company has erected warning and awareness signage throughout the premises, emphasizing the prohibition of fire usage and open burning. Additionally, observation towers have been strategically positioned at specific locations, such as Block Q26 KAE and Block ID D18 MAE, with</p>	Complied

		<p>some towers reaching heights exceeding 15 meters. These structures serve as valuable points for monitoring the surroundings.</p> <p>In terms of manpower involvement, security personnel (<i>Satuan Petugas - Satgas</i>) play a pivotal role in the daily monitoring program, contributing to the company's fire prevention efforts. Furthermore, fire control equipment, including fire extinguishers, has been strategically placed at office buildings, housing areas, and the oil mill. Interviews conducted with random mill workers have demonstrated their understanding of the procedures to follow in the event of a fire emergency.</p> <p>The company has also prioritized fire safety training, conducting a session titled "<i>Pelatihan Penanggulangan Kebakaran</i>" for all mill personnel, with the latest session held on 20 June 2022. In January 2023, training sessions were held across all estates, emphasizing the importance of fire prevention.</p> <p>The company's commitment to fire prevention is documented in the procedure "<i>Pengendalian Kebakaran Lahan dan Perkebunan</i>" (No. P-SAG-KBN-DRR-02), which outlines fire management practices, including the evaluation of readiness systems, facilities, and infrastructure. This document aligns with local legal requirements, particularly "Permentan No. 05 Tahun 2018".</p> <p>Furthermore, the "<i>Peta Lokasi Rawan Kebakaran</i>", a map or spatial model, has been developed to depict the field conditions related to the risk of fire events within the estates. This aids in strategic planning and risk assessment.</p> <p>Lastly, water level maintenance has been upheld across all estates. Interviews with estate representatives have highlighted their understanding of the critical role of water levels in fire prevention, particularly in peat areas. These efforts reflect the company's commitment to fire prevention and safety.</p>	
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<p>7.11.3</p>	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>PT UAI's estates are situated adjacent to or within local communities, fostering a close relationship with the neighbouring stakeholders. In an effort to enhance accessibility and cooperation, the company has thoughtfully provided road access to these surrounding communities. Notably, fire prevention signage has been strategically erected at key locations, including entrance points and junctions leading to adjacent villages.</p> <p>During stakeholder meetings with the local communities, the audit team gained valuable insights. It was evident that the community members were not only aware of but also had a clear understanding of the significance of these fire prevention signs. These visual cues effectively convey the company's commitment to fire prevention and its proactive control measures, further fostering a positive relationship and mutual understanding between PT UAI and the surrounding communities.</p> <p>Available document of formation of "Kelompok Tani Peduli Api (KTPA)" - Fire Care Farmer Group, Seguling Village, Manismata District, dated 26 September 2018. Minutes of the KTPA Training Activities and the handover of equipment and infrastructure for community-based fire prevention and control. A list of training attendees is available.</p> <p>Receipt of logistical items by KTPA in the villages of Jambi, Danau Buntar, Sukaramai, and Seguling, such as:</p> <ul style="list-style-type: none"> • Firefighter uniforms • Safety Boots • Walkie-talkies (HT) • Water pumps • Sunny hoses • Spiral hoses • Banners. 	<p>Complied</p>
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Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

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

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

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

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

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit's location has been confirmed to not overlap with primary forests based on topography maps and land use maps presented in the SEIA (Social and Environmental Impact Assessment) Report conducted in 2008.</p> <p>The certification unit is situated adjacent to Production Forest and Production Forest for Conversion, as identified in the decisions of the Ministry of Forestry. In 2014, the forestry department of Indonesia updated these designations, and the land awarded to PT Usaha Agro Indonesia was categorized as "Areal Penggunaan Lain" (APL), which translates to land for other use.</p> <p>Since the initial clearing of the area after November 2005, the company has conducted a Land Use Change Analysis (LUCA) and a New Planting Procedure (NPP) assessment in 2016. The LUCA assessment was submitted to RSPO for verification and received approval with zero</p>	Complied
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		<p>hectares of liability, as agreed by RSPO Secretariat on 8 December 2018. Therefore, no compensation plan is required.</p> <p>The certification unit has also undertaken High Conservation Value (HCV) assessments, covering all three estates within the production unit. These assessments were conducted by independent consultants, and the results identified a total of 227.43 hectares of HCV areas. It has been confirmed that no planting activities have been conducted within these identified HCV areas.</p> <p>Initial HCV assessments were conducted in 2011 and reviewed by the same consultant in 2017. The 2011 assessment results were used as a baseline for the review process in 2017. All identified protected flora and fauna within the certification unit are documented in the HCV Verification Report. Some examples of identified species include certain plant species, mammals, and reptiles, all of which are essential for maintaining biodiversity.</p> <p>For Phase 2 (<i>Izin Lokasi Kedua</i>), a licensed assessor (Mr. Iwan Setiawan - ALS15039IS) conducted HCV assessments in 2016, covering a total area of 2,500 hectares. The report received a satisfactory score by HCVRN (High Conservation Value Resource Network) on 2 September 2016, and it summarized a total of 5.40 hectares of HCV management areas. From the 2,500 Ha permitted in Izin Lokasi, the land office (BPN) has issued HGU No.40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225 Ha). However, there is peat area with a total area of 616.87 Ha in this HGU. The peat area was planted in the period 2016 to 2017. This area known as Kruing Agro Estate - NPP Sanction and Ulin Agro Estate - NPP Sanction.</p> <p>Noted that there is NPP Sanction area of Kruing Agro Estate covers 715.90 Ha, and NPP Sanction area of Ulin Agro Estate covers 372.13 Ha. These areas are certified on 22 March 2021. Therefore, the sanction will be ended on 22 March 2024.</p>	
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		<p>For scheme smallholders areas (Koperasi Perkebunan Sempurna Mandiri – KPSM and Koperasi Perkebunan Jambi Mekar Jaya Sempurna – JMJS), HCV assessments were conducted in 2011 and 2016.</p> <p>There are plans to include an additional area under Izin Lokasi Ketiga, covering 2,283 hectares, in the certification scope. Up to this recertification audit, the area is still not included in certification scope.</p> <p>LUCA progress of PT Usaha Agro Indonesia that sent by email, as follow:</p> <ol style="list-style-type: none"> 1. 6 June 2020: submission of LUCA report of PT Usaha Agro Indonesia additional 2283 ha area, for the review of RaCP. Responded by RSPO on 9 June 2020. 2. 15 June 2020: submission of LUCA report for PT Usaha Agro Indonesia new location 2283 ha according to LUCA guidance 2017. Responded by RSPO on 17 June 2020, asking for finalized HCV report date and submission of the social liability documents. 3. 22 July 2020: submission of social liability documents and HCV assessment and reporting of PT Usaha Agro Indonesia (UAI) additional 2283 ha that was conducted on Jan – April 2018 and the report finalized by assessor on 30 April 2018. The HCVRN Quality Panel review started on 31 Dec 2018 and satisfactory status on 20 April 2020. Responded by RSPO on 28 July 2020, notify that PT UAI's LUCA has been placed in the queue for review. 4. 22 September 2020: re-submit the social liability documents and map covering UAI's additional 2,283 ha area. Responded by RSPO on 2 December 2020: LUCA review report for PT UAI (extension) with the status "Needs clarification". 5. 31 December 2021: submission of feedback for the review result from RSPO. Responded by RSPO on 4 January 2022: acknowledge receipt of the 1st LUCA Clarification data of PT UAI. On 18 April 2022, RSPO sent the 2nd LUCA review result of PT UAI, LUCA report status is "needs clarification". 	
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		<p>6. 27 July 2022: asking to discuss regarding the PT UAI 2283 ha boundary which needs to be clarified based on the results of the 3rd review. Responded by RSPO on 27 July 2022.</p> <p>7. 23 December 2022: resubmission of LUCA report, the area of the LUCA report for PT UAI's RaCP from the previous 2283 ha changed to 612 ha according to the area of IUP. Responded by RSPO on 18 April 2023: LUCA review report with the "Pass" status.</p>	
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>It has been confirmed during the audit that no land clearing activities which replace any primary forest or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. The existing High Conservation Value (HCV) assessments, as explained in section 7.12.1 above, remain valid.</p>	Complied
	<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>It has been confirmed during the audit that no land clearing activities which replace any primary forest or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. The existing High Conservation Value (HCV) assessments, as explained in section 7.12.1 above, remain valid.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>Not Applicable for Indonesia.</p>	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or</p>	<p>It has been confirmed during the audit that no land clearing activities which replace any primary forest or any areas required to maintain High</p>	Complied

	<p>enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Conservation Values (HCVs) after 15 November 2018. Furthermore, the company has established a "Laporan Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi (KBKT) Tahun 2022" as an integrated plan to protect and enhance High Conservation Value (HCV) and High Carbon Stock (HCS) forests, peatlands, and other conservation areas. This plan was developed in accordance with the recommendations of the HCV assessor, Dr. Nyoto Santoso, who is an ALS Provisionally Licensed Assessor (ALS14013MS).</p> <p>The implementation and monitoring of the plan follow the company's "Panduan Program Pengelolaan dan Pemantauan Kawasan Bernilai Konservasi Tinggi (KBKT)/Kawasan Lindung PT Usaha Agro Indonesia 2017," which was established by the Sustainability Department – Research and Development in 2017. It is specified in the report that these documents are to be used as guidance until the year 2022.</p>	
<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>It has been confirmed during the audit that no land clearing activities which replace any primary forest or any areas required to maintain High Conservation Values (HCVs) after 15 November 2018. The rights of local communities have been respected and upheld through a negotiated agreement, facilitated by FPIC, fostering their active participation in the preservation and sustainable management of these vital conservation areas.</p>	<p>Not Applicable</p>
<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The company is actively implementing local regulations for the protection of wildlife within the certification unit. This commitment is clearly outlined in Memorandum (No. 012/Konsv-UAI/V/2017), which explicitly states the company's commitment to comply with Regulation No. 5 (1990) on the Conservation of Biological Resources and Ecosystems.</p> <p>The "Laporan Pengelolaan dan Pemantauan KBKT/Kawasan Lindung PT. Usaha Agro Indonesia" document provides comprehensive records of the monitoring of flora and fauna conducted by the Sustainability</p>	<p>Complied</p>

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		<p>Department – Research & Development team of Sampoerna Agro TBK. This monitoring encompasses protected species as well as High Conservation Value (HCV) areas within the certification unit and is documented in the "Daftar Temuan Satwa Liar," which is updated on a monthly basis.</p> <p>The information gathered through these monitoring activities is then summarized for annual monitoring and management purposes, as evident in the "Laporan Pengelolaan dan Pemantauan KBKT/Kawasan Lindung 2022" (the latest report). The results of this monitoring have been instrumental in improving HCV areas, such as riverbank restoration and the installation of signposts. Additionally, patrol inspections and flora and fauna monitoring are integral components of HCV management and monitoring. This monitoring report was submitted to the Conservation Body of West Kalimantan in March 2023.</p> <p>Furthermore, the company has taken proactive steps to raise awareness and knowledge about HCV and RTE (Responsible, Traceable, and Ethical) practices. Training sessions on these topics were conducted for local communities and workers on February 2023, within the certification unit.</p> <p>During a site visit, it was observed that relevant signage regarding HCV and RTE was erected at appropriate locations within the plantation area, demonstrating the company's commitment to protecting and preserving biodiversity. Interviews with adjacent stakeholders confirmed their awareness of the company's dedication to these conservation efforts.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The monitoring of High Conservation Value (HCV) areas is conducted on a monthly basis, reflecting the company's commitment to ongoing assessment and management of these conservation area. Annually, the certification unit compiles a comprehensive report specifically dedicated to the HCV managed areas. As example is the "Laporan Pengelolaan dan Pemantauan KBKT/Kawasan Lindung 2022" (the latest report).</p>	Complied

		<p>These reports serve as valuable sources of information and data, providing insights into the condition and changes within HCV areas over time. The information and findings from these reports considered in future management and monitoring plans for HCV areas.</p> <p>By systematically integrating the outputs and findings from these reports into subsequent management and monitoring plans, the company can adapt and refine its conservation efforts to ensure the sustained protection and enhancement of High Conservation Value areas within its operations.</p> <p>The latest HCV monitoring result, recommendations and progress status are as follow:</p> <ol style="list-style-type: none"> 1. Land cover monitoring is carried out annually to determine the dynamics of changes in land cover area in areas with high conservation value and high carbon stock. Progress status: Imagery is being downloaded to determine the land cover of High Conservation Value Areas in 2023. 2. Socialization of high conservation value and high carbon stocks areas carried out annually to provide awareness regarding conservation value and management-monitoring that can be carried out as well as things to avoid in areas with high conservation value and high carbon stock. Progress status: Socialization has been carried out to every estate that has an HCV area, e.g. on 3 May 2023 at Office of PT Usaha Agro Indonesia, attended by 7 staffs, 13 employees and 2 sustainability team; on 16 May 2023 at Merati Agro Estate, attended by 3 staffs, 20 supervisors, 223 employees and 1 sustainability team; on 17 May 2023 at Ulin Agro Estate, attended by 4 staffs, 8 supervisors, 173 employees and 2 sustainability team; on 18 May 2023 at Keruing Agro Estate, attended by 4 staffs, 7 supervisors, 152 employees and 1 sustainability team. 	
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		<p>3. Marking of areas with high conservation value and high carbon stock carried out at each boundary annually to make these boundaries clear so that they can be known and distinguished between HCV/HCS and other areas.</p> <p>Progress status: stakes have been installed for HCV areas in KAE and MAE, e.g. on 19 April 2023 has been installed 4 HCV markers at boundary area of Danau Kapar, Keruing Agro Estate; on 27 April 2023 has been installed 4 HCV markers at boundary area of Paya Tarung River, Meranti Agro Estate.</p> <p>4. In carrying out an inventory of natural flora and vegetation, it is necessary to create permanent sample plots with the aim of determining vegetation growth rates, the potential for natural vegetation and changes in the stratification of natural vegetation that make up the HCV.</p> <p>Progress status: Wildlife inventory has been carried out in the HCV area of Meranti Agro Estate and Keruing Agro Estate, e.g. Wildlife inventory table of Meranti Agro Estate, September 2023.</p>	
<p>7.12.8</p>	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>It was confirmed that no land clearing has taken place after November 2005 for the phase 1 certification area. To address any historical land use changes and ensure compliance with RSPO requirements, the company conducted a Land Use Change Analysis (LUCA) and New Planting Procedure (NPP) assessment in 2016. The LUCA assessment was subsequently submitted to RSPO for verification and was approved with zero hectares (0.00Ha) of liability. Consequently, no compensation plan was required, as agreed upon by the RSPO Secretariat on 8 December 2018.</p> <p>For the Phase 2 (ILOK 2,500 ha) area, High Conservation Value (HCV) assessments were conducted by an ALS licensed assessor (Mr. Iwan Setiawan - ALS15039IS) in 2016, covering a total area of 2,500 hectares. The HCV assessment report received a "Satisfactory" score from the</p>	<p>Complied</p>

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		<p>HCVRN on 2 September 2016, summarizing a total of 5.40 hectares designated as HCV management areas. From the 2,500 Ha permitted in Izin Lokasi, the land office (BPN) has issued HGU No.40/HGU/KEM-ATR/BPN/2018 (covering 1,383.1225 Ha). This area has been included in certification scope by BV during ASA 2. However, there is peat area with a total area of 616.87 ha in this HGU, so that this area get sanction from RSPO. The peat area was planted in the period 2016 to 2017, with no NPP submitted. This area known as Kruing Agro Estate - NPP Sanction and Ulin Agro Estate - NPP Sanction.</p> <p>Additionally, for scheme smallholders' area (Koperasi Perkebunan Sempurna Mandiri – KPSM and Koperasi Perkebunan Jambi Mekar Jaya Sempurna – JMJS), HCV assessments were conducted in both 2011 and 2016.</p> <p>For the Phase 3 (ILOK 2,283 hectares) area, there is HCV report, titled "HCV Assessment of Oil Palm Plantation PT Usaha Agro Indonesia, Manismata, Ketapang, West Kalimantan", conducted by Neny Indriyana, identified HCV 1, HCV 3, and HCV 4 covering a total of 11.72 hectares with a status of "satisfactory." This demonstrates the company's commitment to responsible land use practices and conservation efforts. The 4th review of LUC Analysis dated 18 April 2023 was available stating that total area of management unit was reduced 612 ha according to IUP; total area of raw liability was 57.74 ha; and total area of conservation liability was 0 (nil) ha.</p> <p>LUCA progress of PT Usaha Agro Indonesia that sent by email, as follow:</p> <ol style="list-style-type: none"> 1. 6 June 2020: submission of LUCA report of PT Usaha Agro Indonesia additional 2,283 ha area, for the review of RaCP. Responded by RSPO on 9 June 2020. 2. 15 June 2020: submission of LUCA report for PT Usaha Agro Indonesia new location 2,283 ha according to LUCA guidance 2017. 	
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		<p>Responded by RSPO on 17 June 2020, asking for finalized HCV report date and submission of the social liability documents.</p> <ol style="list-style-type: none"> 3. 22 July 2020: submission of social liability documents and HCV assessment and reporting of PT Usaha Agro Indonesia (UAI) additional 2,283 ha that was conducted on Jan – April 2018 and the report finalized by assessor on 30 April 2018. The HCVRN Quality Panel review started on 31 Dec 2018 and satisfactory status on 20 April 2020. Responded by RSPO on 28 July 2020, notify that PT UAI's LUCA has been placed in the queue for review. 4. 22 September 2020: re-submit the social liability documents and map covering UAI's additional 2,283 ha area. Responded by RSPO on 2 December 2020: LUCA review report for PT UAI (extension) with the status "Needs clarification". 5. 31 December 2021: submission of feedback for the review result from RSPO. Responded by RSPO on 4 January 2022: acknowledge receipt of the 1st LUCA Clarification data of PT UAI. On 18 April 2022, RSPO sent the 2nd LUCA review result of PT UAI, LUCA report status is "needs clarification". 6. 27 July 2022: asking to discuss regarding the PT UAI 2,283 ha boundary which needs to be clarified based on the results of the 3rd review. Responded by RSPO on 27 July 2022. 7. 23 December 2022: resubmission of LUCA report, the area of the LUCA report for PT UAI's RaCP from the previous 2,283 ha changed to 612 ha according to the area of IUP. Responded by RSPO on 18 April 2023: LUCA review report with the "Pass" status. 	
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Appendix B: GHG Reporting Executive Summary

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

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

The summary of the Net GHG emitted in **2022** for **Usaha Agro Indonesia Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.18
PKO	2.18

Extraction	%
OER	22.93
KER	4.04

Production	t/yr
FFB Process	161,317.12
CPO Produced	36,991
PKO Produced	6,521

Land Use	Ha
OP Planted Area	8,059.00
OP Planted on peat	1,782.65
Conservation (forested)	232.80
Conservation (non-forested)	0.00
Total	10,074.45

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	68,958.31	0.47	1,091.93	0.14	0.00	0.00	70,050.24	0.61
CO ₂ Emission from fertilizer	4,296.56	0.03	140.16	0.02	0.00	0.00	4,436.72	0.05
NO ₂ Emission	16,718.27	0.11	132.37	0.02	0.00	0.00	16,850.64	0.11
Fuel Consumption	1,758.00	0.01	0.00	0.00	0.00	0.00	1,758.00	0.01
Peat Oxidation	97,225.67	0.66	107.01	0.01	0.00	0.00	97,332.68	0.67
Sink								
Crop Sequestration	-90,698.76	-0.61	-1,436.19	-0.19	0.00	0.00	-92,134.95	-0.80
Conservation Sequestration	-2,134.78	-0.01	0.00	0.00	0.00	0.00	-2,134.78	-0.01
Total	96,123.28	0.65	35.28	0.00	715.56	0.00	96,874.11	0.65

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	499.55	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-2,420.00	-0.02
Sales of EFB	0.00	0.00
Total	-1,920.45	-0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

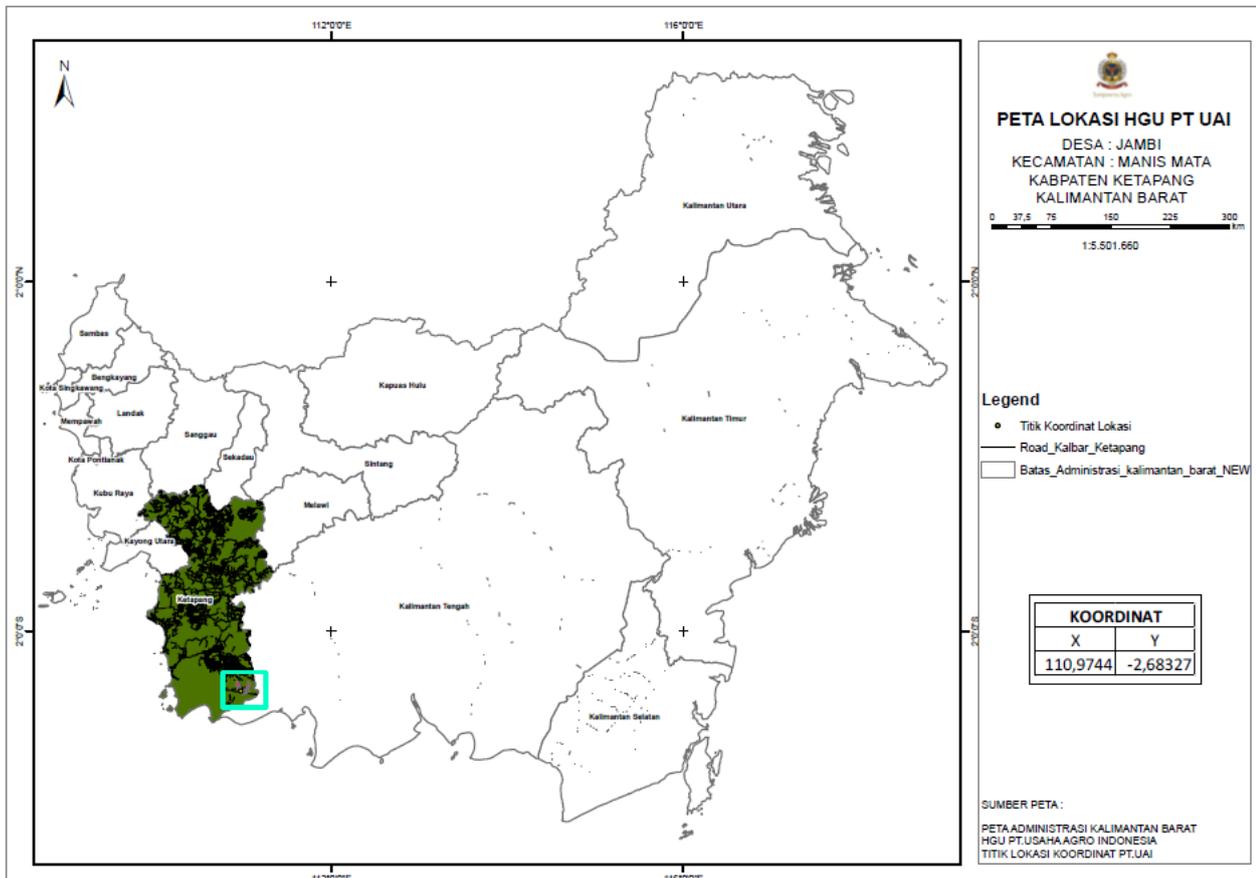
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

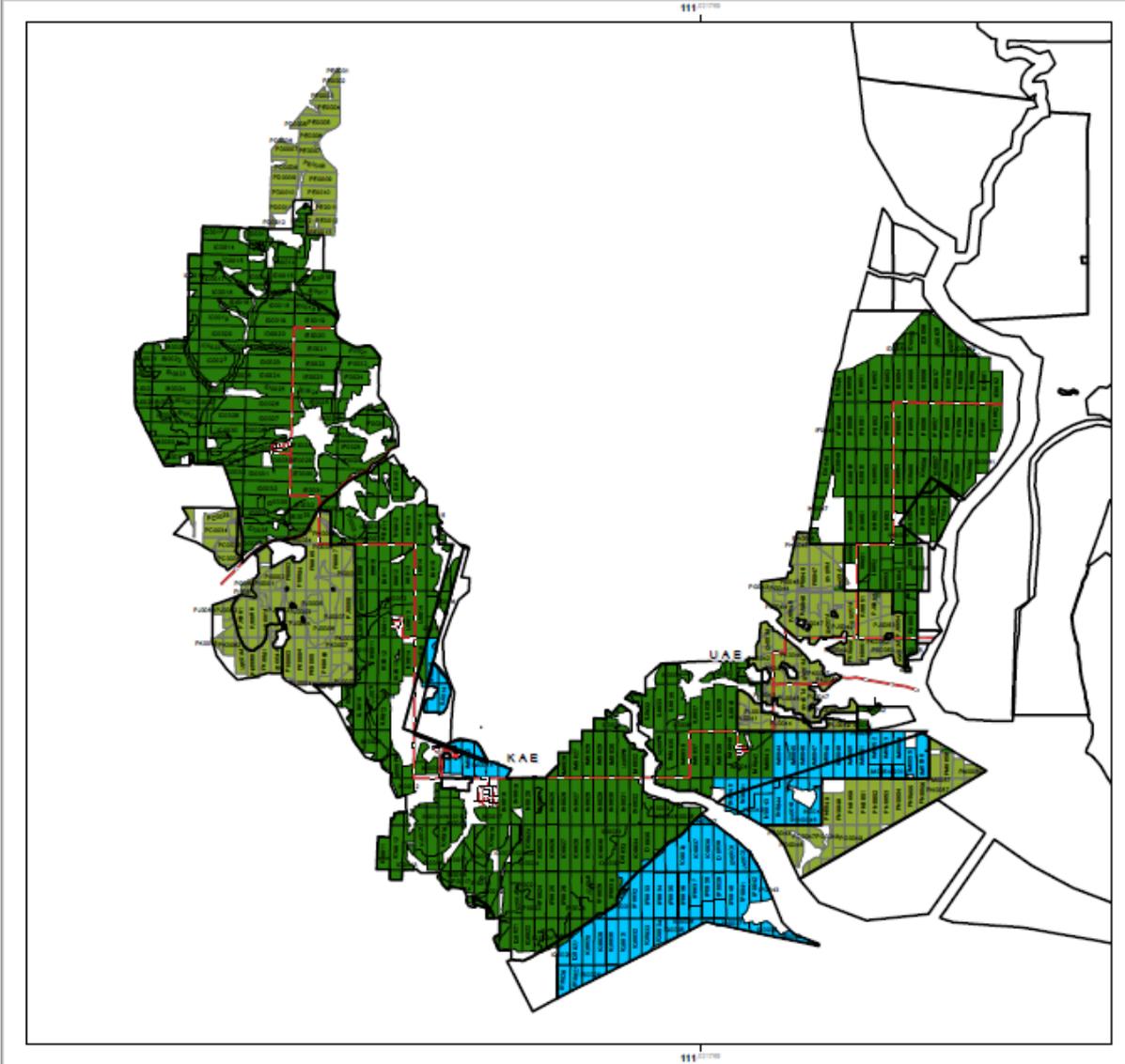
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and/or sampled

Not applicable.

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
KAE	Kruing Agro Estate
LD50	Lethal Dose for 50 sample
MAE	Meranti Agro Estate
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
UAE	Ulin Agro Estate
UAI	Usaha Agro Indonesia