

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment
☐ Recertification Assessment (Choose an item.)
□ Extension of Scope

Client Company Name / Parent Company: SIPEF Group

Client Company / Parent Company Address: Kasteel Calesberg, Calesbergdreef, Schoten, 5B2900, Belgium

Certification Unit:

PT Agromuko – Mukomuko POM

Location of Certification Unit:

Teruntung, Kec. Teras Terunjam, Kab. Mukomuko, Indonesia

Date of Final Report: 30/01/2024



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Section 1: Scope of the Assessment

1. Company Details					
Parent Company	SIPEF Group				
RSPO Membership Number	1-0021-05-000-00	Membership	Approval Date	7/12/2005	
Address	Kasteel Calesberg, Calesbergdreef, Schoten, 5B2900, Belgium Head Office – North Sumatera: Forum Nine Building, 10th Floor, Suite 1-11, Jl.Imam Bonjol No.9, Medan – 20112 Sumatera Utara Province, Indonesia				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Agromuko – Mukomuko Palm Oil Mill				
Location / Address	Teruntung, Kec. Teras Terunj	am, Kab. Muk	omuko, Indonesia		
Website	www.sipef.com				
Management Representative	Mr. Sander Van den Ende E-mail <u>svdende@sipef.com</u>				
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908		

2. Certification Informat	2. Certification Information				
Certificate Number	RSPO 556042 Certificate Start Date 15/02/2022				
Date of First Certification	22/02/2011 Certificate Expiry Date 14/02/2027				
Scope of Certification	Production of Sustainable Cru	ıde Palm Oi	l (CPO) and Palm K	ernel (PK)	
Visit Objectives	Determination of the conwith audit criteria.	formity of t	he client's managen	nent system, or parts of it,	
	 Evaluation of the ability o meets applicable statutor 		•	nsure the client organization equirements	
Assessment Cycle	☐ Pre Assessment (Choose an item.)				
	☐ Initial Assessment				
	☑ Annual Surveillance Assessment (ASA 2_2)				
	☐ Recertification Assessment (Choose an item.)				
	☐ Scope Extension				
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 ☑ Indonesia National Interpretation 2020 of the RSPO P&C 2018				
Supply Chain Module	☑ Identity Preserved; ☐ Mass Balance Mill Capacity 60 MT FFB/hr				
ISH certification Phase	☐ Eligibility ☐ Milestone A ☐ Milestone B ☒ Not Applicable				
Is this a remote audit or on-site audit	☑ On-site audit (Option AI)	□ On-site	audit (Option AII)	☐ Remote audit (Option B)	



3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BSI-ISPO 609454	ISPO	PT. BSI Group Indonesia	06/04/2026
EU-ISCC-Cert-ID230- 20230022	ISCC-EU	PT SBC Asia Sertifikasi	05/07/2024
10374408	ISO 9001:2015	Lloyd's Register Indonesia	02/07/2024

4. Location(s) of Mill & Supp	4. Location(s) of Mill & Supply Bases							
Name	Location	GPS Coo	rdinates					
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude					
Mukomuko POM	Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2º36'05.76" S	101°16'43.50" E					
Mukomuko Estate	Air Dikit Village, Pondok Lunang Village, Air Kasai Village, Dusun Baru Village, Sari Bulan Village, Sumber Village, Teruntung Village, Talang Kuning Village, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 39′ 28.44″ S	101° 12′ 57.48″ E					
Sei Betung Estate	Sidomulyo Village, Penarik Village, Lubuk Sahung Village, Talang Medan Village, Surian Bungkal Village, Sei Jerinjing Village, Talang Bungkal Vilage, Penarik District and Selagan Raya District, Mukomuko Regency, Bengkulu Province, Indonesia	2°36′ 1.59″ S	101° 22′ 12.79″ E					
Tanah Rekah Estate	Tanah Harapan Village, Tanah Rekah Village, Air Dikit Village, Setia Budi/SP-IV Village, Kota Mukomuko District, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36′ 44.61″ S	101° 10′ 48.52″ E					
Talang Petai Estate	Talang Petai Village, Talang Sepakat Village, Talang Sakti Village, Sungai Lintang Village, Sungai Rengas Village, Tunggal Jaya Village, V-Koto District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 28′ 24.42″ S	101° 16′ 33.09″ E					
Sei Kiang Estate	Lubuk Cabau Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24′ 41.18″ S	101° 14′ 19.71″ E					



Air Manjunto Estate	Talang Petai Village and Talang Sepakat Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24′ 41.18″ S	101° 14′ 19.71″ E
Kebun Masyarakat Desa/KMD (33 Estate) (34 smallholders)	Mukomuko Regency, Bengkulu Province, Indonesia	2°36′25.05″S	101° 16′ 40.26″ E
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera (38 smallholders)	Talang Petai Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36′ 25.05″ S	101° 16′ 40.26″ E

Note: Sei Kiang Estate and Air Manjuto Estate is a different estate with the sharing office. Kebun Masyarakat Desa/KMD and Koperasi Produksi Plasma Sungai Tenang Sejahtera a different estate with the sharing office.

5. Description of Supply Base						
New Planting Development	lew Planting Development 🛛 No			□ Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Mukomuko Estate	3,662.30	193.86	108.15	3,964.31	92.38	
Sei Betung Estate	1,205.11	313.68	80.07	1,598.86	75.37	
Tanah Rekah Estate	3,031.22	597.65	97.86	3,726.73	81.34	
Talang Petai Estate	2,058.70	235.93	206.67	2,501.30	82.31	
Sei Kiang Estate	1,764.99	237.95	168.09	2,171.03	81.30	
Air Majunto Estate	980.34	311.95	484.99	1,777.28	55.16	
Kebun Masyarakat Desa/KMD	394.50	0	0	394.50	100	
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	87.20	0	0	87.20	100	
Total	13,184.36	1,891.02	1,145.83	16,221.21	83.48	

Note:

- There are changes in the scope area, especially KMD, where there are 5 KMDs that are no longer included in the scope of certification (KMD No.02, No. 12, No. 34, No. 61, No. 57).
- HCV area based on latest assessment on 2022 (Informed on Criteria 7.12)
- Measurements were carried out in each unit due to changes in actual conditions, such as the construction of electricity lines (Mukomuko Estate), the area of replanting blocks (Talang Petai & Sei Kiang Estate), and also road infrastructure in each unit.



6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Mukomuko Estate	0	3662.30	0	0	3662.30	0
Sei Betung Estate	66.33	813.92	324.86	0	1138.78	66.33
Tanah Rekah Estate	763.76	1244.86	139.48	883.12	2,267.46	763.76
Talang Petai Estate	384.06	1,018.84	655.80	0	1,674.64	384.06
Sei Kiang Estate	547.24	468.25	749.50	0.00	1,217.75	547.24
Air Majunto Estate	0	980.34	0	0	980.34	0
Kebun Masyarakat Desa/KMD	0	154.98	239.52	0	394.50	0
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	0	87.20	0	0	87.20	0
Total (ha)	1,761.39	8,430.69	2,109.2	883.12	11,422.97	1,761.39

Note: Only Mature area is considered as production area

Estate /	Tonnage (MT) / year						
Smallholders	Estimated last year (Feb 2023 – Jan	Actual (Oct 2022 – Sep 2023)		Forecast (Feb 2024 – Jan			
	2024)	Previous license period (Oct 2022 – Jan 2023)	Current license period (Feb 2023 – Sep 2023)	2025)			
Mukomuko Estate	105,000.00	29,486.81	72,359.850	105,999.78			
Sei Betung Estate	30,500.00	7,900.13	18,892.72	28,393.14			
Tanah Rekah Estate	58,000.00	17,507.43	40,273.12	54,444.96			
Talang Petai Estate	38,000.00	9,449.64	22,207.98	37,354.82			
Sei Kiang Estate	28,500.00	7,063.49	15,758.89	28,832.56			
Air Majunto Estate	21,500.00	3,683.36	9,641.57	20,937.02			
Kebun Masyarakat Desa/KMD	6,000.00	1,353.12	3,163.79	5,160.56			
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	1,400.00	432.86	877.12	1,425.89			
Total	288,900.00	260,0	51.88	282,548.73			



Estate /		Tonnage ((MT) / year	
Smallholders	Estimated last year (Feb 2023 – Jan	Act (Oct 2022 -	Forecast (Feb 2024 – Jan	
	2024)	Previous license period (Oct 2022 – Jan 2023)	Current license period (Feb 2023 – Sep 2023)	2025)
		-	-	
Total				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)						
Out growers /		Tonnage ((MT) / year			
smallholders	Estimated last year (Feb 2023 – Jan	Act (Oct 2022 -	Forecast (Feb 2024 – Jan			
	2024)	Previous license period (Oct 2022 – Jan 2023)	Current license period (Feb 2023 – Sep 2023)	2025)		
-	-	-	-	-		
-	-	-	-	-		
Total						
Note:						

No.	Month - Year	Volume of FFB from	Volume of FFB from	Total EED / Month
NO.	Month - Year	certified supply base (mt)	uncertified supply base (mt)	Total FFB/Month (mt)
1	October 2022	21,725.82	0	21,725.82
2	November 2022	20,216.66	0	20,216.66
3	December 2022	16,330.77	0	16,330.77
4	January 2023	18,603.59	0	18,603.59
5	February 2023	13,492.45	0	13,492.45
6	March 2023	15,344.51	0	15,344.51
7	April 2023	15,240.12	0	15,240.12
8	May 2023	26,774.70	0	26,774.70
9	June 2023	27,148.56	0	27,148.56
10	July 2023	31,722.24	0	31,722.24
11	August 2023	27,828.30	0	27,828.30



12	September 2023	25,624.16	0	25,624.16	
	TOTAL	260,051.88	0	260,051.88	
Note	Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)					
Estimated last year (Feb 2023 – Jan 2024)		Ac (Oct 2022	Forecast (Feb 2024 – Jan 2025)		
	Previous licer (Oct 2022 –	•	Current license period (Feb 2023 – Sep 2023)		
FFB		ı	FB	FFB	
200 000 00 mt	76,876.8	34 mt	183,175.04 mt	202 F40 72 mt	
288,900.00 mt	TOTAL		260,051.88 mt	282,548.73 mt	
CPO (OER: 24.00%)		CPO (OEI	R: 23.43%)	CPO (OER: 24.83%)	
CO 22C 00 mt	17,836.0	00 mt	43,090.53 mt	70 152 10 mm	
69,336.00 mt	TOTAL		60,926.53 mt	70,152.19 mt	
PK (KER: 4.00%)		PK (KER: 4.14%)		PK (KER: 5.10%)	
11 556 00	3,181.4	8 mt	7,588.95 mt	14 402 04 mak	
11,556.00 mt	TOTAL		10,770.43 mt	14,403.04 mt	

10A.	10A. Monthly Records of Certified CPO & PK since the last audit				
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)		
1	October 2022	5,144.07	943.10		
2	November 2022	4,694.23	870.39		
3	December 2022	3,786.34	703.89		
4	January 2023	4,211.36	664.10		
5	February 2023	3,188.70	535.09		
6	March 2023	3,607.85	633.66		
7	April 2023	3,536.88	648.96		
8	May 2023	6,422.07	1,090.89		
9	June 2023	6,371.35	1,193.13		
10	July 2023	7,217.69	1,299.13		
11	August 2023	6,549.27	1,157.92		
12	September 2023	6,196.72	1,030.17		
	TOTAL 60,926.53 10,770.43				



Note: As of end September 2022, there was 5,572.21 MT CPO & 297.70 MT PK certified carried over stock from previous production/reporting period.

11. Summary of Actual Volume sold

Current License period (Feb 2023 – Sep 2023)

	RSPO Certified	Other Schen	nes Certified	Conventional	Total
	RSPO Certified	ISCC	Others	Conventional	
CPO (MT)	24,499.65	8,500.03	0	0	32,999.68
PK (MT)	6,418.09	0	0	0	6,418.09
Credits	0	0	0	0	0
Previous Lic	ense period (Oct 2022 -	- Jan 2023)			
CPO (MT)	25,999.21	7,499.85	0	0	33,499.06
PK (MT)	4,650.04	0	0	0	4,650.04
Credits	0	0	0	0	0

Note:

- Conventional is RSPO certified material but sold as non-RSPO.
- As of end September 2022, there was 5,572.21 MT CPO & 297.70 MT PK certified carried over stock from previous production/reporting period.

11A. Re	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. WIM	TR-e35ce0ad-b256	-	147.85		
2	PT. WIM	TR-2ec55263-d041	-	1227.27		
3	PT. WIM	TR-3888ac19-1fef	-	42.28		
4	PT. WIM	TR-d90cb29e-95ff	999.88	-		
5	PT. WIM	TR-04480106-ad80	0.02	-		
6	PT. WIM	TR-eefb1ca5-1160	999.98	-		
7	PT. WIM	TR-b3ee36fd-df54	0.22	-		
8	PT. WIM	TR-cb1cce9f-dfef	999.78	-		
9	PT. WIM	TR-4a992928-eda8	0.03	-		
10	PT. WIM	TR-e9bdf978-77b5	999.97	-		
11	PT. WIM	TR-d45f8c19-f311	500	-		
12	PT. WIM	TR-2636a7eb-4355	500.19	-		
13	PT. WIM	TR-334b6f7b-e987	499.81	-		



11A. Reco	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)		
14	PT. WIM	TR-e0100507-2eda	500.19	-		
15	PT. WIM	TR-393f088a-91b2	499.81	-		
16	PT. WIM	TR-6bab36d3-986d	500	-		
17	PT. WIM	TR-151ec3be-0873	500	-		
18	PT. WIM	TR-dc8fdcc7-3e3a	1000	-		
19	PT. WIM	TR-7f3c4f54-d838	0.12	-		
20	PT. WIM	TR-657a3412-ad0d	-	159.4		
21	PT. WIM	TR-a4086346-b181	-	1057.72		
22	PT. WIM	TR-89e98baa-7395	-	3.59		
23	PT. WIM	TR-00362be1-2343	-	6.74		
24	PT. WIM	TR-8b000a40-38b3	499.86	-		
25	PT. WIM	TR-d06a72a4-b633	500	-		
26	PT. WIM	TR-63903da8-2c21	0.2	-		
27	PT. WIM	TR-8479612b-b12c	999.89	-		
28	PT. WIM	TR-c4a3939a-8b94	500	-		
29	PT. WIM	TR-9a29b092-4dec	500	-		
30	PT. WIM	TR-bbced061-7f43	0.25	-		
31	PT. WIM	TR-4fcc4277-1840	499.75	-		
32	PT. WIM	TR-b8d0ed08-53d8	1000	-		
33	PT. WIM	TR-c45e657b-1490	500.25	-		
34	PT. WIM	TR-d5c271ba-b1d0	-	296.41		
35	PT. WIM	TR-97475d1e-a4be	-	843.26		
36	PT. WIM	TR-3b639709-2bc1	-	29.34		
37	PT. WIM	TR-d3fe06dc-3555	499.8	-		
38	PT. WIM	TR-e4bbecbc-b085	500	-		
39	PT. WIM	TR-2fa11c22-0e6a	500	-		
40	PT. WIM	TR-5c236fd9-8a03	500	-		
41	PT. WIM	TR-e61cec77-5cb9	499.75	-		
42	PT. WIM	TR-65bff3ee-23b8	500	-		
43	PT. WIM	TR-c84d5244-11f8	1000	-		
44	PT. WIM	TR-772eba57-d0a1	0.12	-		



No.	Buyers Name	K Sold under PalmTrace si Palmtrace Trading	Certified CPO Sold	Certified PK Sold
140.	Duyers Name	License Number	(mt)	(mt)
45	PT. WIM	TR-a2609d48-3787	499.88	-
46	PT. WIM	TR-21860d64-2856	500	-
47	PT. WIM	TR-19b418fa-81e6	500	-
48	PT. WIM	TR-37da32f6-5cbe	-	870.66
49	PT. WIM	TR-042149ba-eab2	-	39.17
50	PT. WIM	TR-7bfc4bc2-3a67	499.9	-
51	PT. WIM	TR-0d7b586b-1367	500	-
52	PT. WIM	TR-eab8693e-fa48	500	-
53	PT. WIM	TR-7684f8ce-dac9	1000	-
54	PT. WIM	TR-b83d5342-fc7e	0.18	-
55	PT. WIM	TR-6e192730-db29	999.82	-
56	PT. WIM	TR-0dd9ffa7-db4d	500	-
57	PT. WIM	TR-f5b893d9-c219	0.22	-
58	PT. WIM	TR-612b901e-c2a8	-	360.83
59	PT. WIM	TR-bf05469a-7503	-	263.11
60	PT. WIM	TR-b40f9805-beae	499.78	-
61	PT. WIM	TR-8c412b1f-5ef4	500	-
62	PT. WIM	TR-787276a6-bcd3	500	-
63	PT. WIM	TR-f76b5958-164f	-	186.89
64	PT. WIM	TR-fc0cbac8-180a	-	412.41
65	PT. WIM	TR-5fa84002-2557	-	187.59
66	PT. WIM	TR-d6162f61-a13b	-	283.57
67	PT. WIM	TR-134987a7-0213	-	516.43
68	PT. WIM	TR-fabf5226-7ce9	-	296.19
69	PT. WIM	TR-4254d231-7f24	-	603.81
70	PT. WIM	TR-26df9e2a-a533	-	151.39
71	PT. WNI	TR-9fe4e64b-d2ff	999.96	-
72	PT. WIM	TR-88ad8dda-5da0	499.87	-
73	PT. WIM	TR-56f9c1a6-ebfb	0.1	-
74	PT. WIM	TR-2d84827c-3ce1	-	598.61
75	PT. WIM	TR-7e81fbe4-96f1	-	207.18



No.	Buyers Name	K Sold under PalmTrace si Palmtrace Trading	Certified CPO Sold	Certified PK Sold
No.	buyers Name	License Number	(mt)	(mt)
76	PT. WNI	TR-b3dca46c-47e8	1999.84	-
77	PT. WIM	TR-0a51d460-66c2	499.9	-
78	PT. WIM	TR-a7debebf-6abe	500	-
79	PT. WIM	TR-f91b3dd7-fa3e	0.35	-
80	PT. WIM	TR-1ad69729-46d3	499.65	-
81	PT. WIM	TR-0142d5c5-e96f	500	-
82	PT. WIM	TR-6055136b-af50	1000	-
83	PT. WIM	TR-e891f286-d9de	0.2	-
84	PT. WIM	TR-f25b4953-928f	999.8	-
85	PT. WIM	TR-f65ad8cd-8fac	1000	-
86	PT. WIM	TR-65f88c6c-f56c	0.12	-
87	PT. WIM	TR-635c9395-e2a6	499.88	-
88	PT. WIM	TR-b1a2343b-c287	0.05	-
89	PT. WIM	TR-1b7c540a-cc2a	499.95	-
90	PT. WIM	TR-4866d360-2bf1	500	-
91	PT. WIM	TR-a146695b-0966	500	-
92	PT. WIM	TR-7fd17fe6-1fc3	500	-
93	PT. WIM	TR-cb0611bd-ade5	500	-
94	PT. WIM	TR-cb1d2761-015c	-	792.82
95	PT. WIM	TR-dc222027-d16e	-	140.04
96	PT. WIM	TR-f3cc8848-5d50	499.97	-
97	PT. WIM	TR-6090aad9-bc2d	500	-
98	PT. WIM	TR-32085aae-9197	500	-
99	PT. WIM	TR-a52500df-8d85	500	-
100	PT. WIM	TR-44ced607-8f91	500	-
101	PT. WIM	TR-f9253aac-c69d	2000	-
102	PT. WIM	TR-6869934c-f0f0	500	-
103	PT. WIM	TR-6815709a-6503	0.08	-
104	PT. WIM	TR-bdf74f62-380a	-	1059.96
105	PT. WIM	TR-4a99e5a1-cd0b	-	273.9
106	PT. WIM	TR-5c386b15-eade	-	9.71



11A. Re	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)	
107	PT. WNI	TR-a478c56b-f9dd	999.75	-	
108	PT. WNI	TR-21a4f733-5ed8	1000	-	
109	PT. WIM	TR-7f83a00c-a2a1	249.92	-	
110	PT. WIM	TR-cedbd961-2063	2000	-	
111	PT. WIM	TR-0e853c3c-e6e6	1000	-	
112	PT. WIM	TR-85bca939-76de	749.82	-	
113	PT. WIM	TR-e52b67de-637f	500	-	
114	PT. WIM	TR-6e58e8cb-1d49	1000	-	
115	PT. WIM	TR-6148ec9a-2633	1000	-	
116	PT. WIM	TR-c8bf212b-9d71	1000	-	
		TOTAL	50,498.86	11,068.13	
Note:	Note:				

11B. Re	11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)			
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. WIM	ISCC	15,999.88	-
		TOTAL	15,999.88	
Note:				

11C. Re	11C. Records of CPO & PK Sold as conventional since the last audit (if any)					
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)			
-	-	-	-			
-	-	-	-			
	TOTAL	•	-			
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		
-	-	-	-		
-	-	-	-		



TOTAL	-
Note:	

12. Inde	12. Independent Smallholders Certified Tonnage (MT) / Volume								
	Estimated last year (Feb 2022 – Jan 2023)			Actual (Oct 2022 – Sep 2023)			Forecast (Feb 2024 – Jan 2025)		
Dhace	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

12A.	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)
-	-	-	-	-	-	-
	TOTAL					
Note	Note: 1 mt = 1 credit					

13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current Li	Current License period (Feb 2023 – Sep 2023)						
Credits				-	-	-	-
Physical	-	-	-				
Previous I	Previous License period (Oct 2022 – Jan 2023)						
Credits				-	-	-	-
Physical	-	-	-				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit



No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	CPO Sold	Certified PK Sold (MT/credit)	PKO Sold	Certified PKE Sold (MT/credit)
-	-	-	-	-	-	-	-
		TOTAL	-	-	-	-	-
Note	:						



Section 2: Assessment Process

Certification Body:

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

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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

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 $\mathbf{6} - \mathbf{11}$ **November 2023**. The audit programme is included as Section 2.3.

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

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

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

Meetings were held with stakeholders to seek their views on the performance of the PT Agro Muko – Mukomuko Palm Oil Mill 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.

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 (Re- Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Mukomuko POM	Х	Χ	Х	Х	Х
Mukomuko Estate	X	Χ		X	
Sei Betung Estate	X	X	Х	Х	
Tanah Rekah Estate		X	Х	Х	Х
Talang Petai Estate		Х		Х	Х
Sei Kiang Estate	X		Х		Х
Air Majunto Estate	Х		Х		Х
Kebun Masyarakat Desa/KMD	Х	Х	Х	Х	Х
Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	Х	Х	Х	Х	Х

Tentative Date of Next Visit: November 6, 2023 - November 11, 2023

Total Number of Mandays: 25 Mandays

2.2 BSI Assessment Team

Name		Role	Competency
Briyogi (BS)	Shadiwa	Team Leader	Education: Holds an associate degree in Palm Oil Plantation, Bogor Agricultural University (IPB).
			Work Experience: He has work experience since 2009 - 2016 in several private oil palm plantation companies in Indonesia as Assistant Agronomy and Agronomy Quality Control. Has participated in many audit activities with certification bodies related to the sustainable palm oil certification system since 2017 with worker welfare, OHS, best management practice, supply chain, social, environmental, GHG, and waste management aspect.
			Training attended: Completed Endorsed RSPO Lead Auditor Course by Checkmark, ISPO Auditor Training by LPP, ISO 9001: 2015 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course by Checkmark, ISO 14001: 2015 CQI & IRCA Lead Auditor Course, SMK3 Awareness, OHSAS 18001:2007 Awareness, SA 8000 Requirement Training,



		ISO 45001:2018 Awareness, OHS Expert Training (Ahli K3 Umum), and Endorsed RSPO Refreshment Trainings.
		Language proficiency: Fluent in Bahasa Indonesia and English
		Aspect covered in this audit:
		oxtimes Good Agriculture Practice $oxtimes$ Health and Safety $oxtimes$ Supply chain requirements
		□ Social □ Environmental □ Market Communication and claim requirements
		$\hfill\Box$ ISH context (ICS, internal audit, policy, business planning and trading system)
Yudwi Wisnu Rahmanto (YW)	Team Member	Education: Holds a Bachelor of Forestry with Silviculture, Faculty of Forestry, University of Gadjah Mada
		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, 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
		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 ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.
		Language proficiency: Fluent in Bahasa Indonesia and English
		Aspect covered in this audit:
		$\hfill\Box$ Good Agriculture Practice $\hfill\Box$ Health and Safety $\hfill\Box$ Supply chain requirements
		$oximes$ Social \oorname Environmental \oorname Market Communication and claim requirements
		$\hfill\Box$ ISH context (ICS, internal audit, policy, business planning and trading system)
Eko Purwanto (EP)	Team Member	Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).
		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.
		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



	ı	
		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 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
		Language proficiency: Fluent in Bahasa Indonesia and English
		Aspect covered in this audit:
		\Box Good Agriculture Practice \Box Health and Safety \boxtimes Supply chain requirements
		☐ Social ☐ Environmental ☐ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Eko Prastio Ramadhan (EPR)	Team Member	Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).
		Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.
		Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, Endorsed RSPO Refresher Courses, RSPO Independent Smallholder Training by RSPO Secretariat, and Identification of HCV Areas Training.
		Language proficiency: Fluent in Bahasa Indonesia and English
		Aspect covered in this audit:
		\Box Good Agriculture Practice \boxtimes Health and Safety \Box Supply chain requirements
		\square Social \square Environmental \square Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Naila Karima	Team Member	Education: Holds a bachelor's degree majoring Occupational Safety and Health, Faculty of Public Health, University of Indonesia.
		Work Experience: 10 years working experience as auditor since 2012 covering RSPO and ISPO.
		Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, SA8000 Requirements Training, RSPO Labour Auditing Training, RSPO Independent Smallholder Training by RSPO Secretariat, ISO 9001, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, and Endorsed RSPO Refresher Trainings.
		Language proficiency: Fluent in Bahasa Indonesia and English



	Aspect covered in this audit:
	$\hfill\Box$ Good Agriculture Practice $\hfill\Box$ Health and Safety $\hfill\Box$ Supply chain requirements
	\square Social \boxtimes Environmental \square Market Communication and claim requirements
	$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading
	system)

Accompanying Persons:

Name	Role
Pratama Agung Sedayu	Qualifying Review for Briyogi Shadiwa, Eko Prastio Ramadhan & Naila Karima

2.3 Assessment Plan

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

Date	Time	Subjects	EP	BS	YWR	EPR	NK
Monday,	09.25 - 11.15	Flight Jakarta to Padang	\checkmark		\checkmark	$\sqrt{}$	\checkmark
06/11/2023	11.30 - 14.00	Supply Chain Audit at Muko Tank Terminal	\checkmark	√	\checkmark	\checkmark	\checkmark
		– Port Teluk Bayur					
	14.00 - 20.00	Traveling From Padang to PT Agro Muko	\checkmark	√		√	\checkmark
Tuesday,	08.00 - 09.00	Opening Meeting	\checkmark	√	\checkmark	\checkmark	\checkmark
07/11/2023		- Introduction by Auditee					
		- Presentation by BSI Indonesia					
	09.00 - 12.00	Document review	\checkmark			\checkmark	\checkmark
		Mukomuko POM					
		General information; time bound plan;					
		partial certification verification; RSPO P&C					
		(Management Plan); Palm Oil Mill's Best					
		Management Practices, Social policy and					
		implementation, Continual Improvement.					
		Stakeholder Consultation:		√	\checkmark		
		Interview with Stakeholders from					
		Kabupaten Mukomuko: BPN, BLH, Dinas					
		Tenaga Kerja, Dinas Perkebunan, Previous					
		Land Owner, Local NGO.		,			
	12.00 - 14.00	Break	√	√	√	<u>√</u>	√
	14.00 - 16.30	Field Observation	\checkmark		√	\checkmark	√
		Mukomuko POM:					
		- Supply Chain verification (FFB Receiving,					
		Weighbridge, FFB Sorting, Processing					
		Activity, Dispatch CPO)					
		- ENS, Occupational Health & Safety Aspect					
		(Inspection to Chemical Storage,					
		Hazardous Waste Storage, Fire Control					
		Simulation, POME Pond)		1			
		- Implementation of Employment		1			
		Procedure and Mechanism Aspect.		,			
		Stakeholder Consultation and Document		√			
		review:					

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Date	Time	Subjects	EP	BS	YWR	EPR	NK
		Mukomuko POM					
		Interview with Gender Committee, Labour					
		Union, worker representative, FFB Supplier,					
		Local Contractor (employment, welfare).					
	16.30 - 17.00	Daily Progress Meeting and Reporting	√	√	\checkmark	√	$\sqrt{}$
Wednesday	08.00 - 12.00	Field Observation	√	√		\checkmark	
08/09/2023		Tanah Rekah Estate:					
		- Implementation of Legal Aspect (Land					
		Ownership, Legal Boundaries)					
		- Implementation of Agronomy Aspect					
		(Harvesting & Transportation, Manuring,					
		Pesticides Application, Road Maintenance,					
		Biological Control Monitoring, EFB Application)					
		- Implementation of Environmental,					
		Conservation/HCV and Waste					
		Management Aspect (Inspection to					
		Chemical Storage, Fertilizer Storage,					
		Hazardous Waste Storage, Fire Control					
		Facilities, Waste Management)					
		- Implementation of Occupational Health &					
		Safety Aspect					
		- Implementation of Employment					
		Procedure and Mechanism Aspect					
		- Observation of Workers Facilities					
		(Housing, School, Worship Place).					
		- Interview with related personnel during field observation.					
		Field visit and Interview:					√
		KMD Tanah Rekah					v
		- KMD No. 01 Desa Pasar Mukomuko					
		Stakeholder Consultation:			√		
		- Regency Previous Land Owner					
		- Local Communities representative					
	12.00 - 14.00	Break	√	√	√	√	√
	14.00 - 16.30	Document and Record Verification	√	√	\checkmark	\checkmark	\checkmark
		- Tanah Rekah Estate					
	16.20 17.00	- KMD Tanah Rekah	,	,	,	,	,
Tl	16.30 – 17.00	Daily Progress Meeting and Reporting	√ /	√	√	∕	√
Thursday	08.00 - 12.00	Field Observation Air Majunto Estate :	√			٧	√
09/11/2023		- Implementation of Legal Aspect (Land					
		Ownership, Legal Boundaries)					
		- Implementation of Agronomy Aspect					
		(Harvesting & Transportation, Manuring,					
		Pesticides Application, Road Maintenance,					
		Biological Control Monitoring, EFB					
		Application)					
		- Implementation of Environmental,					
		Conservation/HCV and Waste					
		Management Aspect (Inspection to					



Date	Time	Subjects	EP	BS	YWR	EPR	NK
		Chemical Storage, Fertilizer Storage,					
		Hazardous Waste Storage, Fire Control					
		Facilities, Waste Management)					
		- Implementation of Occupational Health &					
		Safety Aspect					
		- Implementation of Employment					
		Procedure and Mechanism Aspect					
		- Observation of Workers Facilities					
		(Housing, School, Worship Place).					
		- Interview with related personnel during					
	08.00 - 12.00	field Observation.			- /		
	08.00 - 12.00	Field Observation			√		
		Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro					
		Sejahtera					
	08.00 - 12.00	Stakeholder Consultation:		√			
		- Regency Previous Land Owner					
		- Local Communities representative					
	12.00 - 14.00	Break	√	√	√	√	√
	14.00 - 16.30	Document and Record Verification	√	√	√	√	√
		- Air Majunto Estate					
		- Koperasi Produksi Plasma Sungai					
		Tenang Sejahtera Mukomuko Agro					
		Sejahtera					
	16.30 - 17.00	Daily Progress Meeting and Reporting	√	√	$\sqrt{}$	√	√
Friday	08.00 - 12.00	Field Observation	\checkmark	\checkmark			√
10/11/2023		Sei Kiang Estate:					
		- Implementation of Legal Aspect (Land					
		Ownership, Legal Boundaries)					
		- Implementation of Agronomy Aspect					
		(Harvesting & Transportation, Manuring,					
		Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB					
		Application)					
		- Implementation of Environmental,					
		Conservation/HCV and Waste					
		Management Aspect (Inspection to					
		Chemical Storage, Fertilizer Storage,					
		Hazardous Waste Storage, Fire Control					
		Facilities, Waste Management)					
		- Implementation of Occupational Health &					
		Safety Aspect					
		- Implementation of Employment					
		Procedure and Mechanism Aspect					
		- Observation of Workers Facilities					
		(Housing, School, Worship Place).					
		- Interview with related personnel during					
		field observation.			,	,	
	08.00 - 12.00	Field Observation			√	\checkmark	
		KMD Sei Kiang					
	<u> </u>	- KMD No. 09 Desa Lubuk Pinang					



Date	Time	Subjects	EP	BS	YWR	EPR	NK
		- KMD No. 10 Desa Lalang Luas					
	12.00 - 14.00	Break	√	√	√	√	√
	14.00 - 16.30	Document and Record Verification	√	√	√	√	√
		- Sei Kiang Estate					
		- KMD Sei Kiang					
	16.30 - 17.00	Daily Progress Meeting and Reporting	√	√	√	√	√
Saturday	08.00 - 12.00	Field Observation	√	√			√
11/11/2023		Sei Betung Estate:					
		- Implementation of Legal Aspect (Land					
		Ownership, Legal Boundaries)					
		- Implementation of Agronomy Aspect					
		(Harvesting & Transportation, Manuring,					
		Pesticides Application, Road Maintenance,					
		Biological Control Monitoring, EFB					
		Application)					
		- Implementation of Environmental,					
		Conservation/HCV and Waste					
		Management Aspect (Inspection to					
		Chemical Storage, Fertilizer Storage,					
		Hazardous Waste Storage, Fire Control					
		Facilities, Waste Management)					
		- Implementation of Occupational Health &					
		Safety Aspect					
		- Implementation of Employment					
		Procedure and Mechanism Aspect					
		- Observation of Workers Facilities					
		(Housing, School, Worship Place).					
		- Interview with related personnel during					
	00.00 10.00	field observation.			,		
	08.00 - 12.00	Field Observation			\checkmark	\checkmark	
		KMD Sei Betung					
		- KMD No. 47 Desa Lubuk Bangko					
		- KMD No. 48 Desa Setia Budi					
		- KMD No. 49 Desa Sumber Sari					
	12.00 14.00	- KMD No. 50 Desa Pondok Kopi	/	/	/		/
	12.00 - 14.00	Break Designant and Record Verification	- /	_ V	/	V	-/
	14.00 – 16.30	Document and Record Verification	٧	V	٧	٧	V
		- Sei Betung Estate					
	16 20 17 00	- KMD Sei Betung	- /	- /	-/	- /	-/
Friday	16.30 - 17.00	Daily Progress Meeting and Reporting	- √	-/	\ -/		_ V
Friday	09.00 - 10.00	Closing Meeting	V	V	V	٧	V
17/11/2023							



Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. The timebound plan for SIPEF Group including all estate and mill. The data in timebound plan verified against the membership information in RSPO website.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. Some estate waiting for land title issuance. RSPO Secretariat approval for estate and mill not yet certified obtained on 22 December 2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition. The latest acquisition for PT. Agricinal in Bengkulu Province came under PT. Mukomuko Agro Sejahtera have undergone RSPO NPP process.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company. RSPO Secretariat approval for estate and mill not yet certified obtained on 22 December 2022.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes there has been changes in timebound plan. The changes are acceptable as the control of being certified is not on the hands of the Company due to awaiting for land title (Hak Guna Usaha/HGU) on progress and FPIC on process. This changes have been informed to RSPO Secretariat and obtained approval on 22 December 2022.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	All lapses of implanting the original plan are justified base on the awaiting for the land title (Hak Guna Usaha/HGU) and/or awaiting for full estate development.	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	There is no fundamental failure as all delays are justified as stated in TBP.	Complied
Un-Certified Units or Holdings		



No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Previously prior to certification, a subsidiary of SIPEF Group namely PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.	All the new development under the parent company SIPEF Group has undergone NPP and published in the RSPO website: PT. Umbul Mas Wisesa (12 December 2014) • https://rspo.org/public- consultation/sipef-group-pt-umbul- mas-wisesa/ PT. Agro Muara Rupit • https://rspo.org/public- consultation/sipef-group-pt-agro- muara-rupit-iii-and-iv-pt-amr/ • https://rspo.org/public- consultation/sipef-pt-agro-muara- rupit-2/ PT. Agro Kati Lama • https://rspo.org/public- consultation/sipef-pt-agro-kati- lama-phase-ii/ PT. Agro Rawas Ulu • https://rspo.org/public- consultation/sipef-pt-agro-rawas- ulu-new-planting-assessment-call- for-comments-1/ PT. Bandar Sumatra Indonesia (PT BSI) • https://rspo.org/public- consultation/sipef-pt-bandar- sumatra-indonesia-bandar-pinang- estate/ PT. Timbang Deli Indonesia (18 December 2014 and 11 February 2018) • https://rspo.org/public- consultation/sipef-group-pt- timbang-deli-indonesia/ • https://rspo.org/public- consultation/sipef-group-pt- timbang-deli-indonesia/ • https://rspo.org/public- consultation/sipef-group-pt- timbang-deli-indonesia/ • https://rspo.org/public- consultation/sipef-group-pt- timbang-deli-indonesia/ • https://rspo.org/public- consultation/pt-timbang-deli- indonesia-sipef-group/) PT. Mukomuko Agro Sejahtera (Sei Teramang Estate - 26 January 2022 & Batu Kuda Estate - 1 March 2023)	Complied



	https://rspo.org/public- consultation/sipef-pt- mukomuko-agro-sejahtera-pt- mmas/ PT. Mukomuko Agro Sejahtera (Batu Kuda Estate) SIPEF Group - PT Mukomuko Agro Sejahtera Batu Kuda Estate (PT MMAS Batu Kuda) - Roundtable on Sustainable Palm Oil (RSPO)	
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.	The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified. RSPO Case Tracker recorded complaint to PT. Agro Kati Lama, date complaint submitted 22 January 2021. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. On 16 June 2022, The Complaints Panel has reviewed and deliberated on the Mediation Settlement Agreement between the parties and reached a decision to close the Complaint. The Complaint is now formally closed. The complaint tracker available on link https://rspo.my.site.com/Complaint/s/case/5000o000039fl8kAAA/detail Based on RaCP tracker in RSPO website 26 September 2023 as follows: MU's with potential liability: 5 LUCA's review completed (MU's): 5 Concept Note required (MU's): 5 Concept Note submitted (MU's): 4 Compensation Plan submitted (MU's): 3 Remediation Plan required (MU's): 1 Remediation Plan approved (MU's): 1	Complied





Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2

Audit team made review on those SIPEF Management Unit that have not been certified.

RSPO Case Tracker recorded complaint to PT. Agro Kati Lama. The case tracker available on link https://askrspo.force.com/Complaint/s/case/50000000039fl8kAAA/detail

Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. The complainant brought forward the issue of:

- -The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government;
- -The daily casual workers are not protected and no remedy available for work accidents;
- -The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools;
- -The daily casual workers did not receive festive allowance in accordance with the regulation;
- -The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment.

SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.

On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. The latest update is on 25 August 2021 where the first premediation was complete and pending finalization of the mediation process agreement.

On 16 June 2022, Complaint Panel has reviewed and deliberated on the Mediation Settlement Agreement between parties and reach decision to close the Complaint.

Complied



Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Internal audit for PT. Bandar Pinang Indonesia has been conducted on 20-21 September 2022. Report of internal audit completed on 26 September 2022 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. 9 Observations issued by internal audit team.	Complied
	Internal audit for PT. Citra Sawit Mandiri has been conducted on 11-12 October 2022. Report of internal audit completed on 17 October 2022 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. 6 Observations issued by internal audit team. Positive assurance statement already	
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?	justified within the Internal Audit Checklist. Previously prior to certification, PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	No negative comment as at audit in Hargy Oil Palms Limited from stakeholders.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards							
Requirement	Remarks	Compliance					
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	All 100% smallholder under PT Agro Muko is certified.	Complied					
OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a							





major NC if this requirement is not met after three	
years.	



Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	ТВР	Target Year for RSPO
PT. Agro Muko	Muko Muko POM	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
PT. Mukomuko Agro			Air Manjunto Estate, Malin Deman Estate	2014	Certified
Sejahtera			PT Asri Rimba Wirabhakti (acquisition in 2018) – Sei Teramang Estate	2022	Certified June 2022
			PT. Agricinal - Batu Kuda Estate	2025	30-days NPP ended 30 March 2023 without comment
PT. Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	PT Eastern Sumatra Indonesia – Bukit Maradja Estate PT Kerasaan Indonesia – Kerasaan Estate	2010	Certified May 2010
			PT Timbang Deli Indonesia	2018	Certified in 2018 as supply base of Bukit Maradja POM
	Perlabian POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian Estate and Tolan Estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa (UMW) POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate PT Toton Usaha Mandiri Estate	2014	Certified in March 2015
PT. Agro Kati Lama	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia	Agro Kati Lama North Estate, Agro Kati Lama South Estate, Agro Kati Lama East Estate, Koperasi Beringin Jaya	2026	Certification to take place after obtaining HGU (HGU on progress); An NPP submitted in 2019 to cover new areas licensed at the end of 2018.
PT. Agro Rawas Ulu	No mill	Musirawas Regency, South Sumatera, Indonesia	Agro Rawas Ulu East Estate, Agro Rawas Ulu West Estate, Koperasi Rawas Jaya.	2026	Part of Muara Rupit POM supply base;

...making excellence a habit."



Name of company	Name of Mill	Location	Supply Base	ТВР	Target Year for RSPO
					Certification to take place after obtaining HGU (HGU on progress), FPIC process.
PT. Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia	Agro Muara Rupit East Estate, Agro Muara Rupit West Estate, Agro Muara Rupit South Estate, Koperasi Rempan Jaya, Koperasi .	2026	Certification to take place after obtaining HGU (HGU on progress), FPIC process; An NPP submitted in 2019 to cover new areas licensed at the end of 2018.
Hargy Oil Palm Limited (HOPL)	Hargy POM	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo POM	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema POM	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	Certified in April 2014
PT. Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. Certified in 2015.
		Musirawas Utara Regency, South Sumatera Province, Indonesia	Koperasi Tunas Mekar Sempurna, Koperasi Kardipa Batugajah Sejahtera, Koperasi Gaung Mas Bersatu, Koperasi Maju Mandiri Barokah, Koperasi Biru Makmur Mandiri,Koperasi Jaya Makmur Mandiri, Koperasi Bombay Maju Sejahtera, Koperasi Keluarga Serasan Sejahtera, Koperasi Mitra Bersama Serundingan	2025	Smallholder
PT. Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province	Citra Sawit Mandiri Estate	2024	Certification to take place after HGU, following review by RSPO.



Name of company	Name of Mill	Location	Supply Base	ТВР	Target Year for RSPO
PT. Bandar Sumatra Indonesia	No mill	Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai, North Sumatra Indonesia	Bandar Pinang Estate	2025	Rubber plantation conversion. NPP submitted in July 2021



3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. $\,$

During this Assessment there were nil (0) Critical; nil (0) Minor nonconformities and one (1) of OFI Opportunity For Improvement raised.

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 #	N/A	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements			
OFI#	Description		
OFI 1	The company already has land rights for all of its operational areas, however without considering the company can ensure an increase in land rights, especially for the process of issuing HGU certificates with the relevant agencies in the Air Majunto Estate area, it can be but necessary to lead to a future nonconformity if not addressed. (Indicators 4.4.1)		

Positive Findings			
PF#	Description		
PF 1	-		



3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

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

Previous Audit Opportunity for Improvement			
OFI#	Description		
OFI 1	None.		

3.3.2 Summary of the Nonconformities and Status

	Category (Critical / Minor)		Issued Date	Status & Date (Closure)
-	-	-	-	-

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Agro Muko – Mukomuko POM Certification Unit's environmental and social performance, legal and any known dispute issues.

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



Structured worker interviews with male and female workers and staff were held in private at the workplace. 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	Worker Union Agro Mandiri of Mukomuko POM	Face to face interview	
Internal	Gender Committee of Mukomuko POM	Face to face interview	
Contractor	PT Usaha Jaya Express	Phone Interview	
Communities	Village Representative from Sumber Sari Village & KMD Sumber Sari	Face to face interview	
Governmental Department	Agriculture Department of Mukomuko District	Face to face interview	
Governmental Department	One Stop Integrated Service Department of Mukomuko District	Face to face interview	
Governmental Department	National Land Agency of Mukomuko District	Face to face interview	
Governmental Department	mental Department Labor Agency of Mukomuko District		
Communities	Village Representative of Sari Bulan Village	Face to face interview	
Internal	Worker Union Agro Mandiri of Tanah Rekah Estate	Face to face interview	

Stakeholders comment

1 Feedbacks:

Worker Union Agro Mandiri of Mukomuko POM

- Internal union meetings are held at least once every 1 (one) month and with the company once a month or if necessary, can be held at any time.
- Wages paid by the company are in accordance with the applicable minimum wage.
- There were no fatal work accidents during 2022-2023.
- Trade unions are always involved in the process of preparing the CLA.
- No negative issue related to worker welfare aspect on each unit.
- There are no unfinished employee complaints, for example employee complaints such as housing conditions have been followed up by companies.
- The company has included employees in the BPJS program.

Audit Team verification and response:



No negative issue needs to further observation. Based on document verification, all workers has been registered on BPJS program and obtain minimum wage based on local regulation.

2 Feedbacks:

Gender Committee of Mukomuko POM

- There are no complaints regarding issues related to sexual harassment and violence against women.
- The gender committee has socialized policies related to gender, immoral acts and domestic violence.
- Female workers provide menstrual leave at the recommendation of paramedics for a maximum of 2 days. Female workers also have the right to maternity leave.

Audit Team verification and response:

No negative issue needs to further observation. Based on document verification, company provide maternity leave for employees and rest time for breastfeeding mothers

3 Feedbacks:

PT Usaha Jaya Express

- The contractor has been working with the company for a long time in the field of product transportation.
- Work contract based on SPK (work agreement).
- Several requirements that are required and checked by companies include OHS and BPJS.
- So far there have been no complaints regarding the existing collaboration.

Audit Team verification and response:

Based on document verification, the company has shown records of compliance with regulations for contractors and has also carried out internal audits regarding implementation in the field.

4 Feedbacks:

Village Representative (Sumber Sari Head Village and KMD Sumber Sari)

- The company absorbs workers from villages.
- There are no problems or conflicts over land ownership between the company and the surrounding community.
- There have been no issues regarding environmental pollution for the last 1 year.
- The company has socialized about protected animals and conservation areas and put-up signs prohibiting hunting of certain animals around the plantation area.
- There has been socialization regarding the prohibition of burning for land clearing activities.
- The company routinely provides assistance to villages in the form of CSR and direct assistance.
- Communication between the village and the company has no problems and the company always responds to requests from the village.
- There are no conflicts regarding community areas within the company's HGU for which land compensation has not previously been carried out.

Audit Team verification and response:

There's no negative issue need to further observation.

5 Feedbacks:

<u> Agriculture Department – Mukomuko District</u>

- The company has submitted a report on plantation business activities every semester which includes CSR implementation activities.
- The company has a plantation business assessment.



- There is no issue of disruption to the company's plantation business.
- The company has sufficient facilities and infrastructure to prevent and control land fires.
- The company has carried out CSR activities including in the social, infrastructure, economic, etc. fields.
- The company builds village community estate as a form of improving the welfare of village communities in various villages.
- The agency has carried out a plantation class assessment and the company received a grade of II (Good).
- There are no negative issues related to the best cultivation practices carried out in the company's operational areas

Audit Team verification and response:

There's no negative issue need to further observation.

6 Feedbacks:

One Stop Integrated Service Department of Mukomuko District

- The company has a valid environmental permit, liquid waste disposal permit and hazardous waste storage permit.
- Companies routinely submit mandatory reports such as RKL-RPL reports, hazardous waste management reports, and liquid waste management reports to the Environmental Service online.
- Communication between the company and the Agency Service runs smoothly.
- There is no issue of workers under 18 years old.
- The company has routinely submitted employment reports.

Audit Team verification and response:

There are no negative issues that need further verification. The company has shown evidence of mandatory reporting to the relevant agencies.

7 Feedbacks:

National Land Agency of Mukomuko District

- There are no issues of land disputes in the company's operational areas.
- Companies regularly send mandatory reports to agencies.
- Communication with the company went well
- Currently there is still a process for creating HGU, especially for the Air Majunto Estate

Audit Team verification and response:

Regarding the HGU process, this has become an OFI in the CAV assessment.

8 Feedbacks:

Dinas Tenaga Kerja dan Transmigrasi, Kab. Mukomuko

- 1. Labour union of PT Agro Muko is independent union and categorized as Bipartite system, not affiliated with Indonesian Labour Union. So far, there is no workforce issues in PT Agro Muko, this caused that independent worker union or known as "Serikat Pekerja Agro Muko (SPAM)" have well manage the relationship between employees and the company.
- 2. According to Regional Government Regulation or Peraturan Daerah No.01 Tahun 2023, requires that new company shall absorb 80% of total employees are local workers, where existing company at least have 60% employees from locals.

Audit Team verification and response:

1. Please refer to Criteria 6.3



2. Already explain in Indicator 6.1.2, that based on sample unit the percentage of local employees is already met the Regional Government Regulation.

9 Feedbacks:

Village of Sari Bulan Kab. Mukomuko

- 1. Increasing welfare of local communities caused oil palm, because 90% livelihood is oil palm farmers.
- 2. In Sari Bulan village has bachelor graduation, but unfortunately not hired by the company.
- 3. Only 25 villagers of Sari Bulan as employees at PT Agro Muko.

Audit Team verification and response:

Positive comments, no need to follow up. Regarding bachelor graduates, the auditee explained that currently there are no job vacancies for bachelor graduates. If there is, it will immediately be informed to the community around the company, of course with terms and conditions.

10 Feedbacks:

Worker Union Agro Mandiri of Tanah Rekah Estate

- 1. Union Membership is voluntary without any discrimination.
- 2. Family member is totally prohibited to helping workers without work agreement. The company explained this policy continuously.
- 3. Along 2022 there is no issues raised from the workers, good relationship between union and the company. But if there is an issue occurs, union and the company will discuss it to resolve the problem.

Audit Team verification and response:

Positive comments, no need to follow up.

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

2nd Recertification and Third Cycle planting, previous landowner is not applicable.

Previous land owner / user comment			
	Feedbacks: -		
	Audit Team verification and response: -		

3.5 Impartiality and conflict of interest

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



Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Briyogi Shadiwa	Name: Peter David Bayliss
Company Name: PT BSI Group Indonesia	Company Name: PT. Agro Muko — Mukomuko POM
Title: Lead Auditor	Title: President Director
Signature:	Signature: (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.)
Date: 9 December 2023	Date: 20 December 2023



Appendix A: Summary of Findings

Criterio	n / Indicator	Assessment Findings	Compliance		
_	Principle 1: Behave ethically and transparently Orive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.				
	1.1: The unit of certification provides adequate information to relevant stake s and forms to allow for effective participation in decision making.	holders on environmental, social and legal issues relevant to RSPO Criter	ia, in appropriate		
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	Certified units has set the documents that are made publicly available in each unit. Type of document that publicly accessible as follows: Izin Usaha perusahaan/Plantation Permit Analisa Dampak Lingkungan/Environment Impact Assessment Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan/Environment Management and Monitoring Laporan RKL RPL per semester/ RKL RPL Report per semester Laporan Community Development/CSR Report PT Agro Muko Program Panitia Pembina Keselamatan dan Kesehatan Kerja Lingkungan Hidup dan Sosial (P2K3LHS)/ Environmental and Social Work Safety and Health Advisory Committee Rekaman keluh kesah internal dan eksternal/Grievance records Continuous Improvement Plan Rangkuman publik dari Laporan Penilaian Sertifikasi/Public Summary Report of Certification Audit Kebijakan Perusahaan/Company Policies Prosedur permintaan informasi dan jawaban/Procedure for information request and its respond Prosedur Whistle Blowing System/ Whistle Blowing System Procedure	n a a ll		



		Prosedur Keluh Kesah Internal dan Eksternal/Grievance Procedure	
		Each unit has review and updated their list of documents such as Mukomuko POM on 1 March 2023, Sei Kiang Estate on 1 June 2023, Air Manjunto Estate on 4 September 2023 and Sei Betung Estate on 10 August 2023.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Based on consultation with the stakeholders, review of Logbook of incoming mail and response, and review of mandatory report, it is known that the information provided to stakeholders delivered in Indonesian language, except for RSPO Audit Report. There is no migrant worker, and all surrounding communities understood Indonesian language.	Complied
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	Certified units have a procedure about request for information as stated in Procedure for Responding to Requests For Information ENC-01-11/04-03-2019/Rev.1 dated 18 March 2019. This procedure aims as a guideline for all operational units under the management of PT Tolan Tiga Indonesia to provide responses to requests for information/data from relevant stakeholders constructively and quickly as implementation of the principle of transparency.	Complied
		The request for information/data referred to in this procedure is a written request for information submitted via letter, fax, email and orally (conveyed directly by telephone including short messages received from plantation/mill/factory stakeholders. If the answer to the request for information is still under the authority of the Operational Unit Manager and the answer data is available in the operational unit, then requests for information can be answered directly by the Unit Manager.	
		Samples of request for information that has been reviewed :	
		Information/data request letter from the MukoMuko Regency Manpower and Transmigration Service Number: 560/141/D.19/VII/2023 dated 27 July 2023 regarding data requests for the Preparation of Information	

	T		
		Data Collection Reports and Settlement of Industrial Relations Disputes and Data Collection on the Implementation of Social Security for Workers Work and Health Facilities for MukoMuko Regency Workers in 2023, the deadline for submission is 21 August 2023. The letter was received by PT Agro Muko on 28 July 2023.	
		Records of the company's responses are:	
		Letter from Senior Manager Administration No. 40/RMO-All.OU/VII- 23 dated 28 July 2023 addressed to all Operational Unit Managers of PT Agro Muko to collect data requested by the MukoMuko Regency Manpower and Transmigration Service	
		Letter No. 88/RMO-G/VIII/23 dated 21 August 2023 concerning Submission of Data to the MukoMuko Regency Manpower and Transmigration Service	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -	Certified units have a procedure about request for information as stated in Procedure for Responding to Requests For Information ENC-01-11/04-03-2019/Rev.1 dated 18 March 2019. This procedure aims as a guideline for all operational units under the management of PT Tolan Tiga Indonesia to provide responses to requests for information/data from relevant stakeholders constructively and quickly as implementation of the principle of transparency.	Complied
		The request for information/data referred to in this procedure is a written request for information submitted via letter, fax, email and orally (conveyed directly by telephone including short messages received from plantation/mill/factory stakeholders. If the answer to the request for information is still under the authority of the Operational Unit Manager and the answer data is available in the operational unit, then requests for information can be answered directly by the Unit Manager.	
		Documents available to the public and stakeholder can be provided to stakeholders according to their relevance through a written request to the organization.	

		Person in Charge of Consultation and Communication is Estate or Mill Manager. Based on interview with relevant stakeholders, communication and consultation mostly conducted by phone and direct visit. Record of consultation and communication when direct visit is according to level of importance.	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -	Certified units have a list of contact and detailed stakeholder information and available in document "Daftar Pemangku Kepentingan/List of Stakeholder". This document update regularly and the last one was on 1 June 2023 (Sei Kiang Estate), 4 September 2023 (Air Manjunto Estate), 1 August 2023 (Tanah Rekah Estate) and 1 October 2023 (Mukomuko POM).	Complied
		All of records has been reviewed and verified in this audit. Updated stakeholder list explains the name of the institution/organization, address, contact number and name of the serving personnel, such as contractors, labor unions, government institutions, villages around the company, etc. The person to be contacted clearly stated in the stakeholder list. From the results of interviews via telephone with stakeholders referring to the list, it can be connected and the information found is valid.	
Criteria	1.2: The unit of certification commits to ethical conduct in all business operations.	ations 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 -	There are no changes of policy compare to last year audit. A policy for ethical conduct to all companies under SIPEF Group are referred to Code of Conduct policy which have been signed by President Director, dated 28th September 2018. Policy for ethical conduct also publicly available on the website https://www.sipef.com/hq/sustainability/policies/ethics-policy/, where the ethics policy is concerning related:	Complied

		 Compliance: all relevant international and national laws will be upheld. Transparency: shareholders and stakeholders will be provided with all non-confidential information. Zero-tolerance towards bribery and corruption. Facilitation payments are actively avoided, and gifts may only be given with prior approval from senior management. There is zero-tolerance of slavery or forced labor. Management and employees are prohibited from using the Group's facilities or working hours to conduct personal business. Dissemination of information related corporate/company policy concerning ethical are conducted to the employees regularly, the last one was on 30 June – 17 July 2023. Based on interview with workers and contractor, it's known that they 	
		had a good understanding towards code of ethic policy. Based on explanation above, company has policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice conducting through internal audit. Several internal audit conducted by unit of certification, i.e. internal audit Sustainability and internal audit operation.	Complied
		This system is available in Routine Visit and Internal Audit Procedure ENC-01-02/04-03-2019/Rev.2 dated 18 March 2019, that aims to:	
		Providing support and supervision for the implementation of activities to fulfill the principles and criteria and requirements of a sustainable system or supply chain system and traceability.	

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Impleme	le 2: Operate legally and respect rights ent legal requirements as the basic principles of operation in any jurisdiction.		
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•			
•	2.1: There is compliance with all applicable local, national and ratified inter		
2.1.1	(C) The unit of certification complies to relevant regulations.	The company shows evidence related to compliance with regulations	Complied

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- HGU Utilization Report for HGU No. 149 and 150 in the Report Document on the Use and Utilization of Cultivation Rights on January 25, 2022, to the Mukomuko Regency Land Office.
- HGU Utilization Report for HGU No. 32 in the Report Document on the Use and Exploitation of Cultivation Rights on January 25, 2022, to the Mukomuko Regency Land Office.
- Plantation business assessment document for PT Agro Muko based on Decree of the Regent of Mukomuko Number 100-716 of 2022. The company received business class II (Good) assessment results.
- Plantation business assessment document for PT Mukomuko Agro Sejahtera based on Decree of the Regent of Mukomuko Number 100-718 of 2022. The company received business class II (Good) assessment results.
- Land and Building Tax (PBB): Notification of Tax Due dated April 15, 2022, in the name of PT Agro Muko (NPWP 01.790.815.3-123.000). Proof of tax payment can be shown according to the Notice of Tax Due via Bank Mandiri transfer dated September 28, 2022.
- Income Tax (PPH): Periodic Tax Return (SPT) Income Tax Article 21 and/or Article 26 dated January 17 2023 in the name of PT Agro Muko (NPWP 01.790.815.3-123.000). Proof of tax payment can be shown according to the Notification Letter for Tax Due via Bank Mandiri transfer dated January 10 2023.
- Class 1 Steam Vehicle Operator OHS License (No. Reg.P.07.50.OPK3-PUBT-B.I/IV/2021, validity period 5 years from 13 April 2021)

		 First Aid Officer License - Nila Dwi Putri (No. /DKKTRANS-03/VI/2021, valid for 3 years from 13 April 2021) General OHS Expert License - Thres Martin (4980/PK3/AJ/13/2021/P3, valid for 3 years from 31 March 2021). Implementation of minimum wage according to government regulation Number 36 of 2021 concerning Wages. Implementation of overtime pay in accordance with Government Regulation Number 35 of 2021 concerning Work Agreements for Certain Time, Outsourcing, Working Time and Rest Time, and Termination of Employment. 	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor. - Minor compliance -	Regulatory updates are carried out at least once a year (last updated August 2023). The officers responsible for updating the list of regulations according to the SOP are Identification of regulations at the national level by SND RMO department. The document describes the company's compliance with the regulations in force in the Republic of Indonesia, for example the fulfilment of the latest regulations such as the Minister of Health Regulation No. 2 2023 about Environmental Health.	Complied
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries. - Minor compliance -	The company carries out stake monitoring activities in the 2023 HGU Pole Maintenance Record. The company carries out routine monitoring and maintenance by ranger officers every 2 months. As an example: - Air Majunto Estate HGU pole maintenance records dated 18 September 2023 for SL188, SL189 and SL190 stakes are in good and clear condition. - Records of the maintenance of the Sei Kiang Estate HGU Pole in September 2023 which informs that the ANR0161, ANR0165 and ANR0169 pole are in good condition.	Complied

		- Sei Betung Estate HGU pole maintenance records in October 2023 for poles TAP40, TAP41 & TAP42 are in good condition. The report on the inspection and maintenance of the boundary markers has provided complete information regarding the number of markers, condition of markers, location of markers, coordinates of markers and	
		corrective actions as well as the target time for repairs if there are damaged or missing marker. In the monitoring report, it is known that all HGU marker are available.	
		The results of field observations on the boundary pole for example No. 122, 121, and 36 Tanah Rekah Estate & No. 28, 27 and 26 Sei Betung Estate are found and that the condition of the boundary poles is well maintained.	
Criteria	2.2: All contractors providing operational services and supplying labour, and	d Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	_
2.2.1	A list of contracted parties is available. - Minor compliance -	Unit of certification have list of contracted parties and updated when new contractor is engaged.	Complied
		According to sample taken during this audit as below:	
		Tanah Rekah Estate: Book of "Daftar Kontrak" as per October 2023 are listed. Sampled contracted parties engaged with Tanah Rekah Estate. There are:	
		- UD. Nelan Jaya (EFB transporter). Contract No: 02/RMO-BG/TRE/JJK/2023, dated 01 January 2023. Validity contract until 31 Dec 2023.	
		- CV. Putri Bungsu (EFB transporter). Contract No: 05/RMO-BG/TRE/JJK/2023, dated 01 January 2023. Validity contract until 31 Dec 2023.	



		Sei Betung Estate (Eight contracted parties): Book of "Daftar Kontrak" as per October 2023 are listed. Sampled contracted parties engaged with Sei Betung Estate. There are: - CV. Malang Bacinto (FFB transporter). Contract No: 03/RMO-BG/SBE-MB/2023, dated 01 Feb 2023. Validity contract until 31 Jan 2024. - CV. Ari Putri (Heavy equipment for replanting). Contract No: 40/SBE-RMO Bengkulu/2023, dated 10 Aug 2023. Validity contract until Nov 2023.	
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party. - Minor compliance -	Sample of contract sighted and verified are: Tanah Rekah Estate - UD. Nelan Jaya (EFB transporter). Contract No: 02/RMO-BG/TRE/JJK/2023, dated 01 January 2023. Validity contract until 31 Dec 2023. - CV. Putri Bungsu (EFB transporter). Contract No: 05/RMO-BG/TRE/JJK/2023, dated 01 January 2023. Validity contract until 31 Dec 2023.	Complied
		Tanah Rekah Estate using company vehicles for FFB transporter. Specific clause on meeting relevant legal requirements is covered under Article 3: Work Requirements and Rules, in point 3.14. stated that Shall apply applicable national/regional laws and regulations requirements; Not employed worker under 18 years old; paid the workers with applicable minimum wage; not employed forced labour and trafficked labour; providing OHS tools during works, including PPE for workers. Sei Betung Estate (Sampled contracted parties):	

		 CV. Malang Bacinto (FFB transporter). Contract No: 03/RMO-BG/SBE-MB/2023, dated 01 Feb 2023. Validity contract until 31 Jan 2024. CV. Ari Putri (Heavy equipment for replanting). Contract No: 40/SBE-RMO Bengkulu/2023, dated 10 Aug 2023. Validity contract until Nov 2023. Specific clause on meeting relevant legal requirements is covered under Article 3: Work Requirements and Rules, in point 3.19. stated that Shall 	
		apply applicable national/regional laws and regulations requirements; Not employed worker under 18 years old; paid the workers with applicable minimum wage; not employed forced labour and trafficked labour; providing OHS tools during works, including PPE for workers.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	Sample of contract sighted and verified are: Tanah Rekah Estate:	Complied
	- Minor compliance -	 UD. Nelan Jaya (EFB transporter). Contract No: 02/RMO-BG/TRE/JJK/2023, dated 01 January 2023. Validity contract until 31 Dec 2023. 	
		- CV. Putri Bungsu (EFB transporter). Contract No: 05/RMO-BG/TRE/JJK/2023, dated 01 January 2023. Validity contract until 31 Dec 2023.	
		Tanah Rekah Estate using company vehicles for FFB transporter.	
		Specific clause on meeting relevant legal requirements is covered under Article 3: Work Requirements and Rules, in <u>point 3.14</u> . stated that Shall apply applicable national/regional laws and regulations requirements; <u>Not employed worker under 18 years old</u> ; paid the workers with applicable minimum wage; <u>not employed forced labour and trafficked labour</u> ; providing OHS tools during works, including PPE for workers.	
		Sei Betung Estate (Sampled contracted parties):	

Complied



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-	CV. Malang Bacinto (FFB transporter). Contract No: 03/RMO-
	BG/SBE-MB/2023, dated 01 Feb 2023. Validity contract until 31
	Jan 2024.
-	CV. Ari Putri (Heavy equipment for replanting). Contract No:

- CV. Ari Putri (Heavy equipment for replanting). Contract No: 40/SBE-RMO Bengkulu/2023, dated 10 Aug 2023. Validity contract until Nov 2023.

Specific clause on meeting relevant legal requirements is covered under Article 3: Work Requirements and Rules, in point 3.19. stated that Shall apply applicable national/regional laws and regulations requirements; Not employed worker under 18 years old; paid the workers with applicable minimum wage; not employed forced labour and trafficked labour; providing OHS tools during works, including PPE for workers.

Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.

2.3.1 **(C)** For all directly sourced FFB, Palm Oil Mill (POM) requires:

- 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.
- Critical (Major) compliance -

Mukomuko POM receives all FFB's from its own Estates and Associated Smallholders (KMD and Plasma). During this ASA 2_2, there are some KMD which no longer cooperate with PT Agro Muko, because they sold their FFB to other palm oil mill. Changes of supply base to Mukomuko POM were recorded and available. All relevant supply bases are attached in RSPO certificate of Mukomuko POM.

Geolocation of direct FFB suppliers that supplied to MMPOM:

Name	Latitude	Longitude
Mukomuko Estate (MME)	2° 39' 28.44" S	101° 12' 57.48" E
Sei Betung Estate (SBE)	2° 36' 01.59" S	101° 22' 12.79" E
Tanah Rekah Estate (TRE)	2° 36' 44.61" S	101° 10' 48.52" E
Talang Petai Estate (TPE)	2° 28' 24.42" S	101° 16' 33.09" E

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11		T	T 10	
Sei Kian	ng Estate (SKGE)	2° 24' 41.18" S	101° 14' 19.71" E	
Air Man	junto Estate (AME)	2° 24' 41.18" S	101° 14' 19.71" E	
MME	KMD Air Dikit	2° 41' 12.45" S	101° 14' 19.71" E	
	KMD Pondok Lunang	2° 40' 18.57" S	101° 15' 55.75" E	
	KMD Dusun Baru V Koto	2° 39' 41.69" S	101° 16' 36.06" E	
	KMD Sari Bulan	2° 37' 40.50" S	101° 17' 45.32" E	
TRE	KMD Pasar Mukomuko	2° 32' 55.54" S	101° 08' 45.66" E	
	KMD Pondok Batu	2° 35' 17.39" S	101° 09' 09.36" E	
	KMD Tanah Rekah	2° 36' 47.48" S	101° 08' 48.78" E	
SJE	KMD Lubuk Sahung	2° 33' 43.06" S	101° 21' 2.07" E	
	KMD Sungai Jerinjing	2° 34' 24.34" S	101° 20' 46.82" E	
	KMD Teras Terunjam	2° 32' 48.43" S	101° 15' 58.36" E	
	KMD Bumi Mulya	2° 41' 28.92" S	101° 17' 25.29" E	
	KMD Suka Maju	2° 38' 23.34" S	101° 23' 19.01" E	
	KMD Bukit Makmur	2° 38' 15.31" S	101° 24' 45.17" E	
SBE	KMD Sungai Ipuh	2° 30' 23.43" S	101° 20' 20.93" E	
	KMD Ranah Karya	2° 28' 58.49" S	101° 21' 13.08" E	
	LAMB T	2° 29' 35.84" S	101° 19' 54.65" E	
	KMD Teruntung	2° 29' 41.14" S	101° 19' 38.65" E	
	KMD Talang Medan	2° 29' 48.57" S	101° 19' 28.98" E	
	KMD Talang Kuning	2° 29' 53.92" S	101° 14' 28.36" E	
	KMD Sungai Ipuh Satu	2° 28' 48.07" S	101° 20' 49.54" E	
	Air Man	KMD Pondok Lunang KMD Dusun Baru V Koto KMD Sari Bulan TRE KMD Pasar Mukomuko KMD Pondok Batu KMD Tanah Rekah SJE KMD Lubuk Sahung KMD Sungai Jerinjing KMD Teras Terunjam KMD Bumi Mulya KMD Suka Maju KMD Suka Maju KMD Suka Maju KMD Sungai Ipuh KMD Ranah Karya KMD Teruntung KMD Talang Medan KMD Talang Kuning	Air Manjunto Estate (AME) 2° 24' 41.18" S MME KMD Air Dikit 2° 41' 12.45" S KMD Pondok Lunang 2° 40' 18.57" S KMD Dusun Baru V Koto 2° 39' 41.69" S KMD Sari Bulan 2° 37' 40.50" S TRE KMD Pasar Mukomuko 2° 32' 55.54" S KMD Pondok Batu 2° 35' 17.39" S KMD Tanah Rekah 2° 36' 47.48" S SJE KMD Lubuk Sahung 2° 33' 43.06" S KMD Sungai Jerinjing 2° 34' 24.34" S KMD Teras Terunjam 2° 32' 48.43" S KMD Bumi Mulya 2° 41' 28.92" S KMD Bukit Makmur 2° 38' 15.31" S SBE KMD Sungai Ipuh 2° 30' 23.43" S KMD Ranah Karya 2° 28' 58.49" S KMD Teruntung 2° 29' 41.14" S KMD Talang Medan 2° 29' 48.57" S KMD Talang Kuning 2° 29' 53.92" S	Air Manjunto Estate (AME) MME KMD Air Dikit Co 41' 12.45" S 101° 14' 19.71" E KMD Pondok Lunang Co 40' 18.57" S 101° 14' 19.71" E KMD Dusun Baru V Koto Co 39' 41.69" S 101° 16' 36.06" E KMD Sari Bulan Co 37' 40.50" S 101° 17' 45.32" E TRE KMD Pondok Batu Co 32' 35' 17.39" S 101° 08' 45.66" E KMD Pondok Batu Co 35' 17.39" S 101° 09' 09.36" E KMD Tanah Rekah Co 36' 47.48" S 101° 08' 48.78" E SJE KMD Lubuk Sahung Co 33' 43.06" S 101° 21' 2.07" E KMD Sungai Jerinjing Co 34' 24.34" S 101° 20' 46.82" E KMD Bumi Mulya Co 38' 23.34" S 101° 15' 58.36" E KMD Bumi Mulya Co 38' 23.34" S 101° 23' 19.01" E KMD Bukit Makmur Co 38' 23.34" S 101° 24' 45.17" E SBE KMD Sungai Ipuh Co 30' 23.43" S 101° 20' 20.93" E KMD Ranah Karya Co 29' 35.84" S 101° 21' 13.08" E CMD Teruntung KMD Talang Medan Co 29' 48.57" S 101° 19' 38.65" E KMD Talang Medan Co 29' 48.57" S 101° 19' 28.98" E KMD Talang Kuning Co 29' 53.92" S 101° 14' 28.36" E

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KMD Pondok Baru Sei Ipuh 2° 29' 2.33" S 101° 21' 26.37" I KMD Aur Cina 2° 29' 13.10" S 101° 21' 39.22" I KMD Lubuk Bangko 2° 29' 22.53" S 101° 21' 40.50" I KMD Setia Budi 2° 28' 34.13" S 101° 20' 41.45" I				
KMD Aur Cina 2° 29' 13.10" S 101° 21' 39.22" I KMD Lubuk Bangko 2° 29' 22.53" S 101° 21' 40.50" I KMD Setia Budi 2° 28' 34.13" S 101° 20' 41.45" I		KMD Sungai Ipuh Dua	2° 28' 35.68" S	101° 20' 57.08" E
KMD Lubuk Bangko 2° 29' 22.53" S 101° 21' 40.50" I KMD Setia Budi 2° 28' 34.13" S 101° 20' 41.45" I		KMD Pondok Baru Sei Ipuh	2° 29' 2.33" S	101° 21' 26.37" E
KMD Setia Budi 2° 28' 34.13" S 101° 20' 41.45" I		KMD Aur Cina	2° 29' 13.10" S	101° 21' 39.22" E
		KMD Lubuk Bangko	2° 29' 22.53" S	101° 21' 40.50" E
KMD Sumber Sari 2° 28' 35.79" S 101° 20' 49.91" I		KMD Setia Budi	2° 28' 34.13" S	101° 20' 41.45" E
		KMD Sumber Sari	2° 28' 35.79" S	101° 20' 49.91" E
KMD Pondok Kopi 2° 29' 22.88" S 101° 21' 28.97" I		KMD Pondok Kopi	2° 29' 22.88" S	101° 21' 28.97" E
KMD Talang Buai 2° 29' 32.97" S 101° 21' 31.60" l		KMD Talang Buai	2° 29' 32.97" S	101° 21' 31.60" E
TPE KMD Talang Petai 2° 26' 14.52" S 101° 15' 46.53" I	ГРЕ	KMD Talang Petai	2° 26' 14.52" S	101° 15' 46.53" E
KMD Tunggal Jaya-1 2° 30' 25.50" S 101° 16' 43.81" l		KMD Tunggal Jaya-1	2° 30' 25.50" S	101° 16' 43.81" E
KMD Sungai Gading 2° 30' 29.49" S 101° 16' 52.82" I		KMD Sungai Gading	2° 30' 29.49" S	101° 16' 52.82" E
KMD Sungai Lintang 2° 30' 07.24" S 101° 14' 47.32" I		KMD Sungai Lintang	2° 30' 07.24" S	101° 14' 47.32" E
KMD Tunggal Jaya Dua 2° 30' 27.88" S 101° 16' 6.76" E		KMD Tunggal Jaya Dua	2° 30' 27.88" S	101° 16' 6.76" E
SKGE KMD Lubuk Pinang 2° 23' 25.75" S 101° 13' 34.27" I	SKGE	GE KMD Lubuk Pinang	2° 23' 25.75" S	101° 13' 34.27" E
KMD Lalang Luas 2° 23′ 39.42″ S 101° 14′ 18.53″ I		KMD Lalang Luas	2° 23' 39.42" S	101° 14' 18.53" E

During ASA 2_2, conducted field visit to samples of KMD, e.g.:

- KMD Pasar Mukomuko: Lat 2° 32' 55.54" S and Lon 101° 08' 45.66" E;
- KMD Lubuk Bangko: Lat 2° 29' 22.53" S and Long 101° 21' 40.50"
 E;
- KMD Setia Budi: Lat 2° 28' 34.13" S and Long 101° 20' 41.45" E;
- KMD Sumber Sari: Lat 2° 28' 35.79" S and Long 101° 20' 49.91" E;



- KMD Pondok Kopi: Lat 2° 29' 22.88" S and Long 101° 21' 28.97" E;
- KMD KMD Lubuk Pinang: Lat 2° 23' 25.75" S and Long 101° 13' 34.27" E;
- KMD Lalang Luas: Lat 2° 23' 39.42" S and Long 101° 14' 18.53" E; Verified that the geolocations are accurate.

Proof of agreement between PT Agro Muko and the grower/smallholder (KMD) are available, e.g.:

- KMD Pasar Mukomuko (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.01/PKS/GMO/V/2013, dated 1 May 2013, which fully managed by Tanah Rekah Estate. Proof of land ownership: "Berita Acara Penyerahan SKT-Perorangan Kepada Pengurus KMD Kelurahan Pasar Mukomuko" (Handover notes of land ownership) dated 18 July 2005; consist of Alamsyah (2 Ha), Sukiman SH (2 Ha), Aminullah (2 Ha), Nasrun (2 Ha), Maidi Rasyid (2 Ha), Hamdani Barza (2 Ha), Abdul Kadir (2 Ha), H. Muchtar Mara (1 Ha); total 15 Ha.
- Koperasi Produksi Plasma Sungai Tenang Sejahtera (Perjanjian Kerjasama Tentang Pembangunan dan Pengelolaan Kebun Kelapa Sawit Pola Inti Plasma antara Koperasi Produksi Plasma Sungai Tenang Sejahtera dengan PT Mukomuko Agro Sejahtera, No.7, dated 19 August 2016), which full managed by Air Manjunto Estate. Legality of the Cooperative: "Akta Pendirian Koperasi" No.67, dated 18 April 2013 by Notary Nurhasni Arif; endorse by "Kementerian Negara Koperasi No92/BH/IX.5/DPPKU/VI/2013, dated 12 June 2013.
- KMD Sumber Sari (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.06/PKS/GMO/II/2012, dated 28 February 2012, which fully managed by Sei Betung Estate. Proof of land ownership: "Surat Keterangan Tanah" – SKT No.593.3/80/SI

		 D/E.10/2010 (2 Ha); No.593.3/81/SI D/E.10/2010 (0.6 Ha); No.593.3/82/SI D/E.10/2010 (2 Ha); No.593.3/83/SI D/E.10/2010 (0.5 Ha); No.593.3/84/SI D/E.10/2010 (0.6 Ha); No.593.3/85/SI D/E.10/2010 (1.3 Ha); No.593.3/86/SI D/E.10/2010 (0.8 Ha); No.593.3/87/SI D/E.10/2010 (1.7 Ha). KMD Pondok Kopi (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.12/PKS/GMO/II/2012, dated 28 February 2012, which fully managed by Sei Betung Estate. Proof of land ownership: "Surat Keterangan Tanah" – SKT No.593.3/88/SI D/E.10/2010 (1.1 Ha); No.593.3/89/SI D/E.10/2010 (1.0 Ha); No.593.3/90/SI D/E.10/2010 (1.1 Ha); No.593.3/91/SI D/E.10/2010 (2.0 Ha); No.593.3/92/SI D/E.10/2010 (2.0 Ha); No.593.3/92/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (0.3 Ha); No.593.3/94/SI D/E.10/2010 (2.0 Ha). KMD Lalang Luas (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), dated 13 June 2014, which fully managed by Sei Kiang Estate. Proof of land ownership: "Sertipikat Hak Pakai" Lalang Luas Village, V Koto District, Mukomuko Regency – No.00112/2018 (2.0 Ha); No.00113/2018 (2.0 Ha); No.00114/2018 (2.0 Ha); No.00119/2018 (1.527 Ha). KMD Lubuk Pinang (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), dated 13 June 2014, which fully managed by Sei Kiang Estate. Proof of land ownership: "Surat Keterangan" No.01/DLLS/II/2005, dated 20 February 2005. 	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1. - Minor compliance -	Up to this ASA2_2, PT Agro Muko – Mukomuko POM and its supply base does not use collection centres, agents or other intermediaries. Verified that all FFB are sourced from certified supplier only. Mukomuko POM does not receives FFB from others scope, including agents or other intermediaries.	Complied

Complied



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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.

- 3.1.1 **(C)** A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.
 - Critical (Major) compliance -

The company has a long-term plan in the Business Plan Document Estimate year 2023-2028 (5 years period) which was approved by the estate/mill manager. This document contains information related to long-term plans for each unit and various indicators, for example production targets, use of upkeep & harvesting costs, planting area, and cost allocation. The following is an example of a long-term unit plan:

Air Majunto Estate

Indicators	2024	2025	2026	2027	2028
Mature Area (ha)	980.98	980.98	980.98	980.98	980.98
Production (kg)	23,141.25	25,455.37	28,000.91	30,801.00	33,881.10
Cost/Kg FFb	760.928	760.928	760.928	760.928	760.928

Sungai Tenang Plasma

9	9				
Indicators	2024	2025	2026	2027	2028
Mature Area (ha)	87.20	87.20	87.20	87.20	87.20
Production (kg)	1,678.27	1,846.10	2,030.71	2,233.78	2,457.16
Cost/Kg FFb	907.04	907.04	907.04	907.04	907.04

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Sei Kiang Estate

Indicators	2024	2025	2026	2027	2028
Mature Area (ha)	1,343.29	1,327.39	1,278.32	1.314.97	1,417.80
Production (kg)	29,149.00	29,258.00	29,800.00	31,768.00	34,696.00
Cost/Kg FFb	507.75	507.91	509.44	506.87	501.14

Sei Betung Estate

_				
Indicators	2024	2025	2026	2027
Mature Area (ha)	1,066.21	1,033.79	963.83	1,036.86
Production (kg)	28,245.00	26,638.00	24,939.00	26,278.00
Cost/Kg FFb	892.96	920.08	909.26	913.06

Smallholder (KMD & Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera)

Indicators	2024	2025	2026	2027
Replanting (ha)	42.28	30.00	64.62	30.00
Production (yield/ha)	16.94	17.35	17.30	14.34

		Production (ton)	11,097	10,846	9,925	10),557	
		Mukomuko PO	М					
		Indicators	2023	2024	2025	2026	2027	
		CPO (Ton)	73,875	75,523	81,509	80,376	90,825	
		PK (Ton)	14,399	14,721	15,887	15,666	17,703	
		OER (%)	23.60	23.60	23.60	23.60	23.60	
		KER (%)	4.60	4.60	4.60	4.60	4.60	
		CPO Producti Cost (Rp/kg)	on 327.19	337.01	347.12	357.53	368.26	
		PK Producti Cost (Rp/kg)	on 95.58	98.45	101.40	104.45	107.58	
		Some of the pa & PK), main workforce pla production cos	tenance plar ns, as well	ıs (fertiliza as develo _l	ition, sani oment pla	itation an	d others),	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The company Replanting is c density. The fo 5 years:	arried out by o	considering	plant age,	productivit	y and plant	Complied
		Year		Es	tate (ha)			



			Sei Betung	Tanah Rekah	Talang Petai	Sei Kiang	
		2024	-	-	-	-	
		2025	307.89	357.06	173.10	405.94	
		2026	-	664.50	296.55	216.03	
		2027	-	-	-	141.29	
		2028	-	-	-	121.87	
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 -	operational admanagement available at thout management November 202 was attended team. The aginternal audit water and eleof performand out for each to Muko 13 fin Tanal Sei Ki Sei Bei	ctivities based documents setime of the anent review for an	on sustainable uch as minulated as minulated as minulated as minulated as possible of the control of the contro	le business pri tes and atten- mples, Mukomu 3 has been co ffice. This mana er, staff and the eview of correc- tent evaluation f social issues; SPO internal au 9 September ober 2023, identifier 2023, identifier 2023, identifier	t reviews of all nciples. Review dance lists are also POM carried onducted on 4 agement review he Sustainability ctive actions for and evaluation addit was carried 2023, identified tified 1 finding fied 13 findings ided 21 findings 23, identified 5	Complied



		These findings have been followed up and declared closed for management review.		
	Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans the 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 -	Certified units has a continuous improvement program that based on senior management visit and internal audit. Internal audit was using RSPO Principles & Criteria, that covers social and environmental impact and its opportunities. Several findings have been recorded; consist of minor finding, Observation and Opportunity for Improvement. In general, follow up action have been implemented by each management unit and verified by the internal auditor. Continues programs in 2023 such as: • Monitoring and Evaluation of plantation best practices • Monitoring and management of chemical use and chemical waste • Interviews with the community for social aspects • Mitigation and efforts to reduce greenhouse gas emissions • Socialization of conservation areas including socialization of flora and fauna Routine visits or internal audits are carried out at least once a year according to the standards referred to. Records of RSPO Internal audit: • Mukomuko POM, on 28 August – 9 September 2023, identified 13 findings • Tanah Rekah Estate, on 4-5 October 2023, identified 1 finding • Sei Kiang Estate, on 4-6 September 2023, identified 21 findings • Air Manjunto Estate, on 4-6 September 2023, identified 5 findings	Complied	
•		Routine visit such as :		



		Report on the Regional Director's visit on 23 August 2023, where it was found that the harvest administration visit records were incorrect, the work program map, the size of the area in the harvest plot was not yet available, the production map was not equipped with a Legend Map, speeding up the EFB application and so on.	
3.2.2	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. - Minor compliance -	The company has shown the auditor regarding the RSPO metric template Version 2.1 that has been filled in according to the facts and data in the company's record documents, such as the number of workers, the area of production to the record of work accidents. Based on team auditor's review, the information has been matched with others document, such as supply chain record, demographic workers, etc.	Complied
Criteria	3.3: Operating procedures are appropriately documented, consistently imple	emented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place Critical (Major) compliance -	In order to practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures: • Ablation, Castration and Sanitation (OPM-05-01/02-10-2018/Rev.3) dated 4 February 2019, as guide for ablation and	Complied
		 castration on palm oil. Inorganic Fertilizer (OPM-06-01/30-03-2023/Rev.4) and Organic Fertilizer (OPM-06-02/15-02-2023/Rev.4) dated 20 November 2017, as fertilizer guidelines based on recommendations fertilization. 	
		 Leaf sampling and rachis sampling (OPM-06-04/02-10- 2017/Rev.2) on 20 November 2017. 	
		Weed Control (OPM-08-01/02-10-2017/Rev.2) dated 20 November 2017, regarding manual and chemical weed control.	
		Pest Control (OPM-07-02/02-10-2017/Rev.2) dated 20 November 2017, concerning pest control of oil palm plants.	



- Disease Control (OPM-07-03/02-10-2017/Rev.2) dated 20 November 2017, concerning control of oil palm plant diseases.
- Integrated Pest Management (OPM-07-04/17-07-2019/Rev.3) dated 20 November 2017, concerning integrated pest control.
- Weed Control (OPM-08-01/02-10-2017/Rev.2) dated 20 November 2017, regarding manual and chemical weed control.
- Receiving and Inspection Procedures, namely Fruits Grading Procedure (LAB-01-10/08-03-2021/Rev.5) dated March 8 2021, explains the FFB sorting criteria at Palm Oil Mills.
- Harvesting (OPM-05-02/26-10-2021/Rev.6) dated 5 November 2021, as guide for harvesting activities on field.
- POM-01-03; Rev2; dated 03/25/2019; Acceptance of FFB Agro Muko Palm Oil Mill.
- POM-02-03; Rev2; dated 03/25/2019; Sterilizer Station at Agro Muko Palm Oil Mill.
- POM-03-03; Rev1; dated 03/25/2019; Threshing Station at Agro Muko Palm Oil Mill.
- POM-04-03; Rev1; dated 03/25/2019; Pressing Station at Agro Muko Palm Oil Mill.
- POM-05-03; Rev1; dated 03/25/2019; Clarification Station at Agro Muko Palm Oil Mill.
- POM-06-03; Rev3; dated 03/25/2019; Kernel Plant at Agro Muko Palm Oil Mill.
- POM-07-03; Rev1; dated 03/25/2019; Steam Plant at Agro Muko Palm Oil Mill.



- POM-08-03; Rev1; dated 03/25/2019; Power Plant at Agro Muko Palm Oil Mill.
- POM-09-03; Rev1; dated 03/25/2019; Water Treatment at Agro Muko Palm Oil Mill.
- POM-10-03; Rev1; dated 03/25/2019; Effluent Plant at Agro Muko Palm Oil Mill.
- POM-11-03; Rev1; dated 03/25/2019; Storage and Dispatch at Agro Muko Palm Oil Mill.
- POM-12-03; Rev1; dated 03/25/2019; Workshop at Agro Muko Palm Oil Mill.
- POM-13-03; Rev1; dated 03/25/2019; EFB Plant at Agro Muko Palm Oil Mill.
- POM-14-03; Rev1; dated 03/25/2019; Biogas Plant at Agro Muko Palm Oil Mill.
- MKT-03-06; date 04/03/2019; Supply Chain and Traceability of Palm Oil.

Work instructions / SOPs cover all plantation activities starting from land clearing, nursery practice, planting oil palm, planting LCC plants, upkeep of mature and immature and fertilizing, managing pests and diseases, harvesting, and transporting FFB to the mill.

The management explained that until the ASA-2.2 assessment was carried out there had not been any changes to the SOP / Work Instruction.



3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor compliance -	In order to ensure that field implementation is in accordance with established procedures, the company carries out routine internal audit activities for each unit. Here are some recordings:	Complied
		- Routine Visit and Internal Audit Report on 27-28 January 2023 at Sei Betung Estate.	
		 Recording of Routine Visit and Internal Audit Reports on October 5 2023 by the SND Department. From the results of the internal audit at the PT Agro Muko Tank Terminal unit, it was discovered that there were no discrepancies related to supply chain aspects. 	
		In this internal audit activity, there are various indicators that serve as a conformity assessment, for example: hazardous waste management techniques, availability of facilities and infrastructure, use of PPE, harvesting techniques, employment aspects, and environmental management. Mechanisms to ensure compliance with RSPO standards in all operational activities are supervised by operational departments such as foremen, assistants, security personnel, managers and so on.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor compliance -	The company has records in monitoring operational activities for each unit, here are some of them:	Complied
		Mill	
		- In calculating product stock, the company carries out tank sounding activities, for example CPO stock sounding recordings in storage tank No. 1 on November 30 2022 carried out by Hendri Yanto and known to the manager of PT Agro Muko Tank Terminal.	
		- Records of factory processing processes contained in the Mukomuko POM Daily Report. For example, recordings on	

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November 6 2023 which contain year to date processing information include: • Mill throughput : 60 ton/hour CPO Extraction Rate: 23.60% PK Extraction Rate: 4.00% CPO FFA: 3.04% PK FFA: 0.50% Water Consumption: 542,073.15 m3 Total POME: 139,949.23 m3 **Estate** PT Agro Muko production records for Semester II 2022 for each estate: • Sei Betung Estate: 12,038.79 Ton • Sei Kiang Estate: 10,560.37 Ton • Tanah Rekah : 28,918.61 Ton The company already has a record of monitoring and follow-up on the results of internal audit activities for each unit at PT. Agro Muko. For example, on February 2023 in Air Majunto Estate and there were several discrepancies such as there were still losses in harvesting activities. The company management made improvements by tightening harvest inspections, socializing the harvest criteria, and spraying bushy areas. 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. (C) SEIA in new planting or operation including mills, is conducted | The company has several documents related to independent and Complied 3.4.1 independently and participatively by involving the affected stakeholders, participatory social and environmental impact assessments, involving



inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.

- Critical (Major) compliance -

affected stakeholders. SEIA in unit of certification as an existing operation in mills and estates has been conducted by independent organization. During this ASA-2.2 there is no change in SEIA document owned by unit of certification, which is as follow.

PT Agro Muko

The company has AMDAL that have been approved through *Keputusan Gubernur Bengkulu* Number 425 of 2005 dated 14 November 2005. These documents include: *Analisis Dampak Lingkungan (ANDAL)* and *Rencana Pengelolaan dan Pemantauan Lingkungan (RKL-RPL) Perkebunan dan Pabrik Pengolahan Kelapa Sawit dan Karet di Kecamatan Mukomuko Utara, Kecamatan Lubuk Pinang, Kecamatan Teras Terunjam dan Kecamatan Pondok Suguh, Kabupaten Mukomuko, Propinsi Bengkulu, tahun 2005" – covers 20,428 Ha, it was found that the document prepared with public consultation process, involving stakeholders from surrounding community, government bodies, traditional leaders.*

The scope of AMDAL is 2 mills (Mukomuko POM and Bunga Tanjung POM), 1 Crumb Rubber Factory (Agro Muko Crumb Rubber Factory), 7 estates (Talang Petai Estate, Sei Kiang Estate, Tanah Rekah Estate, Mukomuko Estate, Sei Betung Estate, Bunga Tanjung Estate, Air Bikuk Estate), and 1 rubber (Sei Jerinjing Estate), with an area of 20,428 Ha (AMDAL review).

UKL UPL Pembangkit Listrik Tenaga Biogas (PLTGM) PT Agro Muko – MMPOM

In 2016 PT Agro Muko built a Biogas plant unit with a capacity of 2 MW and has Environmental Documents in the form of *UKL-UPL* in accordance with the Approval of the Head of Environmental Office of Mukomuko Regency No.660/1004/F.4/VII/2016 dated 15 July 2016 and



Recommendation of the Head of Environmental Office of Mukomuko Regency No.660/1005/F.4/VII/2016 dated 15 July 2016. The Biogas Plant Unit is currently in the operational after a commissioning period starting in March 2017.

PT Mukomuko Agro Sejahtera

The company has had:

- AMDAL (*Analisis Mengenai Dampak Lingkungan*) of PT Muko Muko Agro Sejahtera (MMAS) No. M.288.XXX Tahun 2011 dated 9 September 2011, are in Village of Malin Deman, Sub-District Ipuh and Lima Koto, Mukomuko Regency, Bengkulu Province.
- Rencana Pengelolaan Lingkungan Hidup (RKL) and Rencana Pemantauan Lingkungan (RPL) No. 660/1138/D.13/X/2019.

The scope of AMDAL is Malin Deman Estate, Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA) and Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS) managed by Malin Deman Estate, Air Majunto Estate, and Sungai Teramang Estate with an area of 6,298 Ha.

Aside from that, the company has prepared the Social Impact Assessment was carried out in 2010 and 2011 in collaboration with Yayasan Kelapa Sawit Berkelanjutan (YASBI) involving the local community. The scope of assessment is carried out on the social impacts of the development of own estates and plans for the development of Kebun Masyarakat Desa (KMD)".

For Kebun Masyarakat Desa, in 2010, the certificated holder has also prepared a social impact assessment, in cooperation with Yayasan Kelapa Sawit Berkelanjutan (YASBI). The scope of social-environment

		impact assessment covers 15 villages around company including Kebun Masyarakat Desa/KMD of 524 Ha from 38 surrounding villages.	
		In 2017, social-environment impact assessment held in cooperation by Kompasia Enviro Institute for scope of 10 KMDs. The social impact assessment was done between 8-16 March 2017 with scope of 15 villages around KMD with focus group discussion (FGD).	
		The SIA document has identified the positive and negative impacts of the company's operational activities. Aspects assessed include demography, livelihoods, employment and land use, income levels, community economic facilities and infrastructure, education, health, religion, ethnicity and customs, kinship system, and social organization. The social impact assessment has involved the affected parties.	
3.4.2	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. - Minor compliance -	Within the AMDAL documents, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document have lined out effort that company should carry out in order to minimize negative impact and promote positive impact from oil palm development. Under the document, the social aspect identified covers source of livelihood, community's revenue, community ability, community perception on company activity, social conflict, social-cultural changes, community health status.	Complied
		The Social-Environment Impact Assessment documents have explained the recommendation that should be done by company to minimize negative impact and promote positive impact from social impact management.	



		As commitment to reduce negative impacts in social aspect, the certificate holder created management and monitoring program of social impact annually. The management and monitoring plans has covered the main issue identified in those documents, that are in the aspects of: • Environmental: air quality, noise disturbance, soil erosion, water quality, flora and fauna, water biota, hazardous waste. • Social: livelihood, community income, community mobility, community perception, social conflict, culture change, community health.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way. - Critical (Major) compliance -	The company has made efforts to implement social and environmental impact management and monitoring as described in indicator 3.4.2. Some of the programs that have been carried out include: Environmental Impact Assessment	Complied
		The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and Environmental Permits owned by the company. The unit of certification prepares the RKL-RPL report based on the attachment to the Environmental Permit, the matrix of which is a compilation of all previously owned RKL-RPL matrices. Environmental management reports are carried out every 6 months and submitted to Environment Agency of Mukomuko Regency and Bengkulu Province, namely:	
		 Report of Implementation RKL-RPL PT Agro Muko semester 1 of 2023 with evidence of receipt dated 23 August 2023. Report of Implementation UKL UPL Pembangkit Listrik Tenaga Biogas (PLTGM) MMPOM semester 1 of 2023 with evidence of 	



receipt dated 23 August 2023 (letter number 234/MMPOM/VIII/2023)

 Report of Implementation RKL-RPL PT Mukomuko Agro Sejahtera semester 1 of 2023 with evidence of receipt dated 11 October 2023 (letter number 16/RMO-BKL/SND/M/X/2023).

Based on the RKL-RPL and UKL-UPL implementation report for semester 1 of 2023, it is known that there are no negative impacts caused by the unit of certification, such as all factory waste quality tests which are carried out periodically and according to regulations quality standards set by the government.

Social Impact Assessment

The social management and monitoring plan are implemented, monitored, and periodically updated in a participatory manner. In general, the company's social management plan is a work program of the company which is grouped into social, stakeholder strengthening, social culture and employment.

The company reviews social impact management at least once every two years, as for evaluating social impact management in line with existing social developments, so that companies can adapt social impact management programs to the current situation. An Internal Social Impact Assessment regarding company operations on stakeholder villages was carried out in June 2023 (for PT Mukomuko Agro Sejahtera) and July to August 2023 (for PT Agro Muko). Social impact assessments are carried out in villages directly adjacent to the management unit. For PT Agro Muko, the number of villages where the assessment was carried out was 41 villages and involved 200 respondents, while for PT

		Mukomuko Agro Sejahtera the number of villages where the assessment was carried out was 9 villages and involved 39 respondents. Based on the results of Internal Social Impact Assessment period 2023, it can be concluded that the existence of the company has had a positive impact on the community around the plantation, including: providing employment opportunities for local village residents according to their abilities, easier accessibility/mobilization and increasing the income of the people who work for the company. Apart from that, the company's relationship with the community is still going well. The suggestions or input provided include, for example, increasing the provision of assistance, especially in the field of education, access to village roads and the construction of places of worship, as well as the company continuing to maintain its contribution to the community which is currently underway.	
3.5.1	 3.5: A system for managing human resources is in place. Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation. Minor compliance - 	Unit of certification have documented procedures for recruitment, selection, hiring, promotion, retirement, and termination in HR Department procedures. During surveillance-2.2 in 2023, there are no revision on employment procedures. Based on document verification with sample taken in each operating unit, confirmed that recruitment, hiring, promotion, retirement and termination have been consistent implemented and comply with organisation procedures.	Complied
3.5.2	Employment procedures are implemented and records are maintained Minor compliance -	Implementation of procedure can demonstrate by unit of certification. Sample of implementation procedure based on verifying its records as below:	Complied



Muko Muko POM have no employees recruited within last 12 month (since the last audit).

Tanah Rekah Estate:

- Application letter name Joko Cahyono dated 13 Jul 2023. Apply for Harvester.
- Estate Office receives the application letter and submit at the same day. The employment requirements are attached as well such as copy of ID, list of job description, police record notes.
- Promotion letter for permanent harvester refer to "Permohonan Pengangkatan PKWTT" through letter No. 91/TRE-RMO/VII/2023, dated 18 Jul 2023. Using promotion form No. HRD-01-04-F-02.
- Reason to promoted refer to harvester needs ratio "Ratio Karyawan Harvester SKU per Juli 2023".
- Training record, start join 1 August 2023.
- Performance evaluation record refer to "Penilaian Karyawan PKWTT/SKU-H" letter no. 0140/TRE-RMO/X/23, dated 12 October 2023. This letter describing evaluation according to on job training result within two (2) months, August and September.
- Promotion Statement Letter No. 44/RMO-TRE/XI/2023, dated 8 Nov 2023. The result stated Joko Cahyono is accepted to work.

Sample promotion employees:

Tanah Rekah Estate:

- Promotion employees or "Promosi Karyawan SKU-H" as per Letter No. 39/RMO-TRE/X/23, dated 6 Oct 2023. Seven (7) harvesters promoted as Daily Permanent Employee.

		 Promotion employees or "Promosi Karyawan PKWT ke SKU-H" as per Letter No. 33/RMO-TRE/VIII/23, dated 14 Aug 2023. Eight (8) employees consist of two (2) helper tractor, four (4) helper dump truck, two (2) field supervisor. All these employees are promoted from Specified Time Work Agreement or "PKWT" to Daily Permanent Employee. 	
		Muko Muko POM: According to letter no. 09/RMO-MM.POM/IX/2023, dated 15 Sep 2023 there are 24 Mill permanent workers are promoted for grade level. While refer to letter no. 08/RMO-MM.POM/IX/2023, dated 15 Sep 2023, there are 9 mill workers promoted from daily permanent to be monthly permanent workers.	
		Sample termination employees:	
		Tanah Rekah Estate:	
		Termination. One (1) employee (driver school bus) is terminated due to Deceased on 26 December 2022. All rights of the deceased have been given to the heirs as per applicable regulation and working period fund.	
Criteria	3.6: An Occupational health and safety (H&S) plan is documented, effective	ly communicated and implemented.	
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	The Certified units has established an Occupational Health and Safety Policy that was signed by President Director dated 27th March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev. Point 1 mentioned, PT Tolan Tiga Indonesia Support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS)	Complied
		There are revision of OHS manual or procedure in 2022 such as :	



- a. Incident reporting procedure OHS-01-08/06-07/2022/Rev.1 dated 15 July 2022. The procedure regulates the mechanism for recording all accidents that occur, illnesses or incidents (including near misses) related to work in the workplace. There are 2 forms, namely OHS-01-08-F01 Incident Reporting Form and OHS-01-08-F02 Investigation Reporting Form
- b. Standards for Installing Safety Signs OHS-01-09/18-02-2022/Rev.1 dated March 8 2022. The procedure aims to provide mechanisms and standards for installing safety signs in company areas.
- c. Personal Protective Equipment OHS-01-10/10-09-2020/Rev.2 dated 29 September 2020. This procedure aims to serve as a guide in determining the PPE required for each work activity in order to protect occupational safety and health.
- d. Land Fire Prevention and Control OHS-01-12/13-04-2022/Rev.2 dated 9 May 2022. The procedure aims to provide guidance in preventing land fires in all plantation areas as well as preventing and avoiding detrimental things that might occur. caused, namely environmental damage, company losses, and human casualties.
- e. Safety Inspection Checklist OHS-01-14/25-01-2021/Rev.0 dated 22 February 2021. This procedure regulates work environment inspection activities, especially those related to occupational safety and health in the workplace. There are 18 Safety Inspection Checklists including:
 - OHS-01-14-F-01 SIC Tooling Tools
 - OHS-01-14-F-02 SIC APAR Hydrant
 - OHS-01-14-F-03 SIC APD
 - OHS-01-14-F-04 SIC Field Work
 - OHS-01-14-F-05 SIC Hygiene and Sanitation
 - OHS-01-14-F-06 SIC Office

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- OHS-01-14-F-07 Vehicle & Heavy Equipment SIC
- OHS-01-14-F-08 SIC Waste Handling
- OHS-01-14-F-09 SIC MSDS & Shower Chemicals
- OHS-01-14-F-10 SIC Gas Cylinder
- OHS-01-14-F-11 SIC Inspection ladder
- OHS-01-14-F-12 SIC Warehouse
- OHS-01-14-F-13 SIC Water Management
- OHS-01-14-F-14 SIC Cover & Access
- OHS-01-14-F-15 SIC K3 coloring & signs
- OHS-01-14-F-16 SIC Slings & Hooks
- OHS-01-14-F-17 SIC Tapping Pruning Stimulant
- OHS-01-14-F-18 SIC Spraying & Pest and Disease

PT Agro Muko – Mukomuko POM and supply bases has established document of risk assessment as per Hazard Identification Risk Assessment and Determining Control, last review was on 28 February 2023 for all estates and was on 1 January 2023 for Mukomuko POM. This document has been disseminated to all workforce regularly, the last one was on 7 November 2023.

The hazard identification has covered all activities in the Estate and Mill, among other land clearing, manuring, harvesting, road maintenance, FFB transport, IPM activities, weighbridge, grading station, sterilizer station, pressing station, engine room, boiler, dispatch of CPO. All working risks have been identified and mitigated, such as by giving regular training, increasing supervision, PPE provision, and regular medical check-up.

Safety Inspection Checklist (SIC) is carried out monthly and verified records are:

		 Personal protective equipment SIC dated 1 August 2023, Fire Extinguisher SIC dated 1 August 2023, Warehouse SIC dated 1 August 2023 Fire Extinguisher SIC dated September 12 2023, Heavy Equipment Vehicle SIC dated September 12 2023, PPE SIC dated September 12 2023 and Warehouse SIC dated September 12 2023 Based on field observation and interview with workers, the HIRAC has been implemented in the field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE. 	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored Critical (Major) compliance -	 OHS program in each operational units cover about: P2K3LHS Meeting and K3 Inspection; frequency every month Monthly meetings and K3 inspections Submission of the P2K3LHS report to the Mukomuko Regency Manpower Office per quarter PPE inspection of all workers Health examination of spraying personnel, warehouse officers and TPS LB3 officers Periodic health checks of workers Health Education Water quality inspection (groundwater and surface water) Socialization of company policies, risk assessment and environmental impact aspects This program updated annually, the last one was on 1 March 2023. 	Complied
		The effectiveness of the OHS Program to address health and safety risks have been monitored in the form of:	



- a. Monthly OHS Committee meeting, to discuss and address current OHS issues. Samples of document that has been reviewed during audit such as :
 - Meeting on October 10, 2023; discussion regarding the results of improvements to the agenda for the P2K3LHS meeting in September 2023, for example improving OHS signboard, faded MSDS and repairing fertilizer warehouses; environmental incidents, and work accidents. There were no environmental incidents or work accidents in the current month.
 - Meeting on September 9, 2023; discussion regarding the results of improvements to the P2K3LHS meeting agenda for August 2023. The consistency of using PPE when working, in bad weather conditions is not required to continue work activities; environmental incidents, and work accidents.
- b. Quarter Report of P2K3 to governance body. Samples of document that has been reviewed during audit such as:
 - Letter No. 279/MMPOM/XI/2023 dated 2 November 2023 regarding reporting of the P2K3 Report for the third quarter of 2023
 - Letter No. 02/P2K3-LHS/SKGE/VII/2023 dated 2 July 2023 regarding reporting of the P2K3 Report for the second quarter of 2023
- c. Documentation of accident record and the calculation of LTA, has been reviewed for period January October 2023.
- d. Annual review of HIRAC, last review was on 28 February 2023 for all estates and was on 1 January 2023 for Mukomuko POM.
- e. Annual Review of OHS Program, the last one was on 1 March 2023

		Based on the results of interviews with workers (harvester, pesticide applicator, and process operator) at Tanah Rekah Estate, Sei Betung Estate, Sei Kiang Estate and Mukomuko POM, it is known that every day when the morning muster is carried out, the supervisor will check the completeness of the PPE of the workers and will deliver a safety briefing. Meanwhile, every month an OHS inspection is held to see how it applies to all units. Based on the explanation above, it can be concluded that the certification unit has monitored the effectiveness of the OHS plan to handle OHS risk in people.	
Criteria	3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract work	ers are appropriately trained.	
3.7.1	(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. - Critical (Major) compliance -	Unit of certification have documented programme and training for employees. In example: Muko Muko POM: annual training program. - Work instruction process planed on end of May until June 2023. Actual training is on 14 Jun 2023. - Hazardous waste management planed in October 2023, the actual training held on 25 May 2023. - HIRADC and workshop training on 14 Jun 2023. Estate: - Training Report "Refresh Spraying Management Training" at Sei Betung Estate on September 9 2023. The training was attended by 14 workers. For KMD (scheme smallholder): Due the workers at KMD are workers from the Main Estate, the workers at KMD have also taken part in training provided by the company.	Complied

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3.7.2	Records of training are maintained, where appropriate on an individual	Muko Muko POM: annual training program.	Complied
	basis Minor compliance -	 Work instruction process planed on end of May until June 2023. Actual training is on 14 Jun 2023. Attended by 24 participants. 	
		 Hazardous waste management planed in October 2023, the actual training held on 25 May 2023. Attended by 3 participants, 	
		 HIRADC and workshop training on 14 Jun 2023. Attended by 4 participants. 	
		Estate:	
		 Training Report "Refresh Spraying Management Training" at Sei Betung Estate on September 9 2023. The training was attended by 14 workers. 	
		Based on interview with all workers in Tanah Rekah Estate, Mukomuko POM, Sei Betung Estate, they declared that all workers attended training by company.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor compliance -	Muko Muko POM: the mill is applying Identity Preserved. Training for persons who implement RSPO supply chain at Mill have been attended on 22 Jun 2023. There was only three (3) persons that have specific and relevant task for implementing supply chain. The specific task is Weighbridge operator, where during interview the operator have understand the Supply Chain requirements.	Complied

Criteria 3.8: Supply chain requirements for mills.

Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)



3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	There is no change in RSPO supply chain module implemented by PT Agro Muko — Mukomuko POM. The RSPO Supply Chain module implemented is Identity Preserved (IP). With the implementation of Identity Preserved Module, Mukomuko POM only received and process FFB from certified sources, which is company-owned estate and certified smallholder (KMD and Plasma). PT Agro Muko operates Agro Muko Tank Terminal (AMTT), which is a bulking storage located at Padang, Sumatera Barat, as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is only receiving CPO from certified palm oil mills under PT Agro Muko, which is Mukomuko POM and Bunga Tanjung POM. Because AMTT handle RSPO Certified CPO model IP from MMPOM and BTPOM, then CPO sold/issued by AMTT become RSPO Certified CPO model Segregated (SG). Mukomuko POM and AMTT implemented the procedure of supply chain and traceability. The procedure is SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019). Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager, whilst in the AMTT is the Storage Tank Manager.	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	The certification unit implemented Identity Preserved, this indicator is not applicable.	Not Applicable

3.8.3	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.	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Mukomuko POM received certified raw material (Fresh Fruit Bunch) from its own estate: Mukomuko Estate; Sei Betung Estate; Tanah Rekah Estate; Talang Petai Estate; Sei Kiang Estate; PT Mukomuko Agro Sejahtera - Air Manjunto Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD and Koperasi Produksi Plasma Sungai Tenang Sejahtera. Kebun Masyarakat Desa/KMD, and Koperasi Produksi Plasma are fully managed by PT Agro Muko and PT Mukomuko Agro Sejahtera, under each adjacent estate. The certification of all Estates and Scheme Smallholders are fall under PT Agro Muko — Mukomuko POM with certificate number RSPO 556042, first certification starts on 22 February 2011, second certification start on 22 February 2016, third certification	Complied
		starts on 22 February 2021. PT Agro Muko – Mukomuko Palm Oil Mill has been registered in RSPO IT Platform (PalmTrace) with registered ID number RSPO_PO1000001278.	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT Agro Muko – Mukomuko Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000001278. The mill has registered its sales of certified product in PalmTrace, e.g.:	Complied
		 Shipping Announcement, with transaction ID TR-d90cb29e-95ff for 999.88 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_P01000001278) as Seller to buyer PT Wira Inno Mas (RSPO_P01000006779); Seller Contract No. 2023/CPO/AM-WIM/62; Status: Confirmed on 11/09/2023. Shipping Announcement, with transaction ID TR-d45f8c19-f311 for 500 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_P01000001278) as Seller to buyer PT Wira Inno Mas 	

- (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AM-WIM/58; Status: Confirmed on 11/09/2023.
- Shipping Announcement, with transaction ID TR-2636a7eb-4355 for 500.19 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AM-WIM/57; Status: Confirmed on 11/09/2023.
- Shipping Announcement, with transaction ID TR-c4a3939a-8b94 for 500 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AM-WIM/51; Status: Confirmed on 21/07/2023.
- Shipping Announcement, with transaction ID TR-c84d5244-11f8 for 1,000 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AM-WIM/37; Status: Confirmed on 28/06/2023.
- Shipping Announcement, with transaction ID TR-e35ce0ad-b256 for 147.85 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_P01000001278) as Seller to buyer PT Wira Inno Mas (RSPO_P01000000119); Seller Contract No. 2023/PK/AM-MM/10; Status: Confirmed on 13/09/2023.
- Shipping Announcement, with transaction ID TR-2ec55263-d041 for 1,227.27 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000000119); Seller Contract No. 2023/PK/AM-MM/09; Status: Confirmed on 13/09/2023.
- Shipping Announcement, with transaction ID TR-a4086346-b181 for 1,057.72 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000000119); Seller Contract No. 2023/PK/AM-MM/08; Status: Confirmed on 04/08/2023.



		 Shipping Announcement, with transaction ID TR-d5c271ba-b1d0 for 296.41 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_P01000001278) as Seller to buyer PT Wira Inno Mas (RSPO_P01000000119); Seller Contract No. 2023/PK/AM-MM/07; Status: Confirmed on 12/07/2023. Shipping Announcement, with transaction ID TR-37da32f6-5cbe for 870.66 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_P01000001278) as Seller to buyer PT Wira Inno Mas (RSPO_P01000000119); Seller Contract No. 2023/PK/AM-MM/05; Status: Confirmed on 14/06/2023. 	
3.8.5	 Documented procedures 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: 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. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	PT Agro Muko has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019). The procedures are complete and up to date covering the implementation of all elements in the supply chain requirements, such as: a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism; b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill; c. Process at Palm Oil Mill covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording. Based on the SOP Supply Chain, the Mill Manager is the person having overall responsibility for and authority over the implementation of RSPO Supply Chain and compliance with all applicable requirements in the palm Oil Mill. The SOP also informs that factories with an IP scheme only accept FFB originating from RSPO certified sources. Identification of	Complied



		these sources starts from the sales process and initial contracts with suppliers. Agro Muko Tank Terminal (AMTT) is deemed as part of the palm oil mill. The control over tank terminal (bulking station) is under PT Agro Muko. Agro Muko Tank Terminal is receiving CSPO from certified palm oil mills under PT. Agro Muko, which is Mukomuko POM and Bunga Tanjung POM. AMTT uses the same procedure with Mukomuko POM. Refreshment training regarding implementation of RSPO Suply Chain in Mukomuko POM has been conducted on 22 June 2023, attended person involved in implementation of RSPO Suply Chain. Training records are available such as attendance list and training module. Refreshment training of RSPO Supply Chain implementation in AMTT has been conducted on 29 September 2023 attended by 6 personnels including Manager, laboratory, weighbridge dan office clerk.	
3.8.6	 Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. 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. 	The unit of certification refer to SOP Routine Visit and Internal Audit (ENC-01-02; Rev.02; dated 4 March 2019 for internal audit. Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to. Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the noncompliance found in a previous internal audit should be made on the next visit.</i>	Complied

		Internal audit of PT Agro Muko – Mukomuko POM has been conducted on 28 – 29 August 2023 against Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil that include supply chain requirements and RSPO Market Communications and Claims. Internal audit records are available, such as Audit Visit Report and audit checklist. There are two Opportunities for Improvement issued related to RSPO Supply Chain. Corrective actions have been determined and verified during Management Review. Management review for year 2023 has been conducted on 4 November 2023, all required agenda have been discussed during management review including internal audit results.	
3.8.7	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.	PT Agro Muko has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT. Agro Muko – Mukomuko POM certificate (RSPO 556042). Based on interview with weighbridge clerk and FFB receiving station, Mukomuko POM only received certified FFB from sustainable source: Mukomuko Estate; Sei Betung Estate; Tanah Rekah Estate; Talang Petai Estate; Sei Kiang Estate; PT Mukomuko Agro Sejahtera - Air Manjunto Estate; and from the Scheme Smallholders: Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU; Koperasi Produksi Plasma Sungai Tenang Sejahtera. Kebun Masyarakat Desa/KMD, Koperasi Serba Usaha/KSU and Koperasi Produksi Plasma are fully managed by PT Agro Muko and PT Mukomuko Agro Sejahtera, under each estate. There is no FFB received from other source. Mukomuko POM does not necessary to check the certificate validity of the FFB source on the RSPO website, because the certification of the FFB suppliers is fall under PT Agro Muko – Mukomuko POM.	Complied



PT Agro Muko – Mukomuko POM has demonstrated SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019). Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print "Receiving Slip" based on FFB Delivery Note, covering information such as estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.

The procedure explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB. Since the previous assessment until this ASA 2_2, Mukomuko POM does not over sold the CPO and PK production.

The SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019) explains control of product non-conformity refer to Marketing Department Manual, SOP Customer Complaint Handling (MKT-03-02; Rev.1; dated 26 April 2018). The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager (Mill Manager) and Senior Manager Marketing.

Since the previous assessment up to this Annual Surveillance Assessment (ASA) 2_2, Mukomuko POM only receive and processed FFB form certified source. There has been no non-conforming FFB and/or documents.

Incoming FFB records available:

 Delivery of FFB from Field "SPB" No. TRE/003654 dated 7 November 2023 from Tanah Rekah Estate, Block 90A04A; planting year 1990; total 280 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB23037053W, FFB from Tanah Rekah

		Estate dated 7 November 2023; Block ID 90A04A; planting year 1990; total bunches 280; nett weight 4,300 kg. Stamp Sustainable Product-IP. 2. Delivery of FFB from Field "SPB" No. SBE/006593 dated 7 November 2023 from Sei Betung Estate, Block 13F02A (102 bunches), 13E01A (100 bunches), 12D02A (204 bunches); total 406 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB23037162W, FFB from Sei Betung Estate dated 7 November 2023; Block ID 13F02A, 13E01A and 12D02A; total bunches 406; nett weight 5,520 kg. Stamp Sustainable Product-IP. 3. Delivery of FFB from Field "SPB" No. AMEE/0015044 dated 7 November 2023 from Air Manjunto Estate, Block 12C01 (320 bunches), and 12D02 (200 bunches); total 520 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB23037138W, FFB from Air Manjunto Estate dated 7 November 2023; Block ID 12C01 and 12D02; total bunches 520; nett weight 7,230 kg. Stamp Sustainable Product-IP. 4. Delivery of FFB from Field "SPB" No. AMEE/0015854 dated 7 November 2023 from Air Manjunto – Plasma Sungai Tenang, Block 18K04; total 189 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB23037145W, FFB from Air Manjunto – Plasma Sungai Tenang, dated 7 November 2023; Block ID 18K04; total bunches 189; nett weight 990 kg. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No. FFB23030794W, from KMD Pasar	
		Receiving slip/weighbridge ticket No. FFB23030794W, from KMD Pasar Mukomuko, dated 18 September 2023; Block ID KMDPMM; planting year 2008; total bunches 200; nett weight 2,700 kg. Stamp Sustainable Product-IP.	
3.8.8	Sales and Goods Out	The SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019) regulated minimum information required by	Complied



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):

- 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.

the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:

- Delivery Order No. 2023/MM-CPO/DO/190 dated 27 July 2023; Seller PT Agro Muko, Gedung Forum Nine lt.10, Jl Imam Bonjol No.9, 20112 – Medan, Indonesia; Buyer: PT Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; Product CPO/RSPO SG; volume: 1,000 MT; module RSPO SG; handover location AMTT Teluk Bayur, Padang. Based on Contract No. 2023/CPO/AM-WIM/62, dated 27 July 2023.
- "Berita Acara Penyerahan CPO" (minutes of CPO transfer handover); No. 025/AMTT-WIM/MM/2023, dated 7 September 2023 based on Contract No. 2023/CPO/AM-WIM/62. Whereby PT Agro Muko assigned Agro Muko Tank Terminal to transfer: product CPO; volume: 1,000,000 kgs; module RSPO SG; seller: PT. Agro Muko Mukomuko POM; Certificate No. RSPO 556042; buyer PT Wira Inno Mas; from ST-1 (PT AMTT) to tank T-5 (PT WIM Factory Padang); volume recorded shore tank 999,878 kgs; signed by both parties.
- Delivery Order No. 2023/MM-CPO/DO/188 dated 13 July 2023; Seller PT Agro Muko, Gedung Forum Nine It.10, JI Imam Bonjol No.9, 20112 – Medan, Indonesia; Buyer: PT Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; Product CPO/RSPO SG; volume: 500 MT; module RSPO SG; handover location AMTT Teluk Bayur, Padang. Based on Contract No. 2023/CPO/AM-WIM/58, dated 13 July 2023.
- "Berita Acara Penyerahan CPO" (minutes of CPO transfer handover); No. 021/AMTT-WIM/MM/2023, dated 11 August 2023 based on Contract No. 2023/CPO/AM-WIM/58. Whereby PT Agro Muko assigned Agro Muko Tank Terminal to transfer: product CPO; volume: 500,000 kgs; module RSPO SG; seller: PT. Agro Muko -Mukomuko POM; Certificate No. RSPO 556042; buyer PT Wira Inno Mas; from ST-1 (PT AMTT) to tank T-5 (PT WIM – Factory Padang); volume recorded shore tank 499,995 kgs; signed by both parties.



- Delivery Order No. 2023/MM-PK/DO/10 dated 30 June 2023; Seller PT Agro Muko, Gedung Forum Nine It.10, Jl Imam Bonjol No.9, 20112 Medan, Indonesia; Buyer: PT Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241; Product Palm Kernel; volume: 150 MT; handover location Mukomuko POM. Based on Contract No. 2023/PK/AM-MM/08 dated 15 June 2023.
- Despatch Slip No. PK23000301W; dated 26 July 2023 based on DO No. 2023/MM-PK/DO/10; Contract No. 2023/PK/AM-MM/08; Seller is PT Agro Muko Mukomuko POM; Buyer is PT Wira Inno Mas (LOC0506); Lorry BA 8802 IU; Transporter PT Chandra Jaya Transport (BSM); Product is Palm Kernel; Quantity 19.50 MT; Stamped Sustainable Product IP, RSPO Certificate No. RSPO 556042.

The information completely available in the documents:

- The name and address of the buyer: PT Wira Inno Mas; Address: Spring Tower 03-34, Jl. KL Yos Sudarso Tanjung Mulia, Medan 20241;
- The name and address of the seller: PT. Agro Muko, Gedung Forum Nine lt.10, Jl Imam Bonjol No.9, 20112 Medan, Indonesia;
- The loading or shipment/delivery date: 7 September 2023 and 11 August 2023 for CSPO from PT AMTT to PT Wira Inno Mas;
- The date on which the documents were issued: 7 September 2023 and 11 August 2023 based on "Berita Acara Penyerahan CPO";
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil – RSPO SG;
- The quantity of the products delivered; 999,878 MT and 499.995 Ha based on "Berita Acara Penyerahan CPO";



		 Any related transport documentation: Contract No. 2023/CPO/AM-WIM/62, dated 27 July 2023 and No. 2023/CPO/AM-WIM/58, dated 13 July 2023; Supply chain certificate number of the seller; RSPO Certificate No. RSPO 556042 on "Berita Acara Penyerahan CPO"; A unique identification number: No. 2023/CPO/AM-WIM/62 and No. 2023/CPO/AM-WIM/58 based on Sales Contract. Information are complete and presented in several document, e.g. Dispatch Slip, Receiving Slip, Delivery Order, Contract and "Berita Acara Penyerahan CPO". 	
3.8.9	 Outsourcing Activities 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. ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 	PT Agro Muko - Mukomuko POM does not outsourced any milling activities, the mill only outsourced transport of CSPO. Whilst Palm Kernel are sold at the mill, therefore transport activities are instructed and managed by the buyer. The transport for RSPO certified sustainable CPO delivery were carried out by several contractors. During transport, legal ownership of CSPO is under PT Agro Muko, this evident by contract between PT Agro Muko and the transporter. These contractors were appointed, contracted and instructed by PT Agro Muko. The transport contractors are: PT Bersama Sejahtera Mandiri; address Komplek Pertokoan Sakura — Jl. Raya By-pass KM.6 Padang; contract No. 06/Angkutan/CPO/AM/09 addendum No. 01/2020 dated 2 January 2020; contact name Mr. H. Sengaja Budi Syukur, SH./Ibu Sri, contact number 08137283*****. PT Mutia Mulia, address Jl. Raya Bypass KM.6 Simpang Arai Pinang — Padang; contract No. 06/Angkutan/CPO/AM/12 addendum No. 01/2020 dated 2 January 2020; contact name Mr. Novi Andres/Mrs. Fitri, contact number 08137433*****.	Complied



	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.	 PT Usaha Jaya Express, address Jalan Olo Ladang No. 3 – Padang; contract No. 06/Angkutan/CPO/AM/12 addendum No. 01/2020 dated 2 January 2020; contact name Mr. Freddy Johan/Ibu Siska, contact number 08535596****. PT Genta Perdana Diandra, address Gang Sehati No.54A RT.003 RW.002 Lubuk Begalung Nan XX – Padang; contract No. 05/Angkutan/CPO/AM/12 addendum No. 01/2020 dated 2 January 2020 contact name Mr. Suhardiman, SE./Ibu Wiwik, contact number 08137427**** 	
		PT Lestari Buana Sakti, address Jl. Bypass Palarik Air Pacah KM.16 RT.03 RW.07 Kel. Air Pacah, Kecamatan Koto Tangah Kota Padang; contract No. 2021/Angkutan/CPO/AM/01 dated 29 January 2021 contact name Mr. Agung Tri Wibowo, contact number 0878*******.	
		PT Berkah Lintas Kencana, address Jl. Sutan Syahrir Painan, Painan IV Jurai, Kab. Pesisir Selatan; contract No.2022/Angkutan/CPO/AM/01 dated 5 July 2022 contact name Mr. Harmon, contact number 0813******.	
		All contractors have signed Statement Letter dated 1 September 2021 (PT Lestari Buana Sakti, PT Usaha Jaya Express, PT Bersama Sejahtera Mandiri, and PT Genta Perdana Diandra), on 16 October 2021 (PT Mutia Mulia), and on 14 August 2022 (PT Berkah Lintas Kencana), that they all committed to comply with RSPO Supply Chain Standard and ready to be audited by CB if it deemed necessary. The Statement letter completed with compliance checklist against RSPO Supply Chain Standard.	
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.	PT Agro Muko – Mukomuko POM has recorded the name and contact details of CPO Transporter as mentioned in indicator 3.8.9 above.	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.	PT Agro Muko – Mukomuko POM through its Sustainability Department will informed Audit Team regarding any addition of CPO transporter. Since last audit there are no changes of CPO transporter.	Complied
3.8.12	 i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: 	There are no changes in procedure of supply chain. The unit of certification implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019). The procedure explains all aspects of supply chain and traceability scope in PT Agro Muko: • FFB harvesting, harvest recording and delivery to Palm Oil Mill; • FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export; • Shipping instruction and preparation; • CPO and PK stock balancing post-shipping.	Complied
	 a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	The procedure of Supply Chain and Traceability stipulates that "Storage and control of recordings related to production process in the mill are kept a shelf life of at least 5 (five) years or determined by Operation Unit. Records can be stored in the hardcopy and/or softcopy". PT Agro Muko – Mukomuko POM can provide record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis, as recorded in Daily Production Figures. Daily Production report dated 31 December 2022; year to date FFB received 255,365.58 tons; FFB processed 255,365.58 tons (budget 287,503.71 tons); CPO production 60,062.24 tons; PK production 10,245.23 tons; processing hour 5,456.97 hours; mill throughput 46.80 ton/hour; OER 23.51% (budget 23.60%); KER 4.01% (budget 4.60%). At the day CPO stock 665.09 tons; CPO dispatched 0 tons;	

		 CPO produced 203.86 tons; stock C/F 868.95 tons; PK stock 358.61 tons; PK dispatched 0 tons; PK produced 67.48 tons; stock C/F 426.09 tons. Daily Production report dated 30 September 2023; year to date FFB received 201,778.63 tons; FFB processed 201,368.88 tons (budget 209,186.93 tons); CPO production 47,299.40 tons; PK production 8,253.04 tons; processing hour 3,390.06 hours; mill throughput 59.40 ton/hour; OER 23.48% (budget 23.60%); KER 4.10% (budget 4.00%). At the day CPO stock 1,130.12 tons; CPO dispatched 212.28 tons; CPO produced 240.57 tons; stock C/F 1,158.41 tons; PK stock 444.99 tons; PK dispatched 88.27 tons; PK produced 55.48 tons; stock C/F 412.20 tons. 	
3.8.13	Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Extraction rates are applied to provide reliable estimation of CPO and PK produced. For year 2022, the budget for conversion from FFB into CPO is 23.60%, whilst from FFB to PK is 4.60%. For year 2023, the budget for conversion from FFB into CPO is 23.60%, whilst from FFB to PK is 4.00%.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) is monitored on daily basis through sounding result and documented in Daily Production Report, then recapitulated in Mill monthly production records. Based on Mill Daily Production Figure dated 31 December 2022, actual OER year to date is 23.51% and KER year to date is 4.01%. Based on Mill Daily Production Figure dated 30 September 2023, actual OER year to date is 23.48% and KER year to date is 4.10%.	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.

PT Agro Muko – Mukomuko POM does not receive any non-certified FFB. Therefore, no non-certified FFB entering the process, no non-certified CPO and PK being produced, and no non-certified product being dispatched. Storage tank for CPO dedicated only for certified palm oil, and Silo for Palm Kernel used to store certified PK.

Complied

The unit of certification has two weighbridge which has been calibrated according to document:

- "Surat Keterangan Hasil Pengujian" No.510/503/TJ/SKHP/B.8/ DISDAG/XI/2022, dated 2 November 2022; a calibration certificate for Avery Weightronix E1215; serial number 152650680; capacity 40,000 kg.
- "Surat Keterangan Hasil Pengujian" No.510/504/TJ/SKHP/B.8/ DISDAG/XI/2022, dated 2 November 2022; a calibration certificate for Avery Weightronix ZM510; serial number 191150158; capacity 40,000 kg.

Available letter from CV Berti Ganda Riau (a calibration body) No.12/BGR-MET/XI/2023, dated 7 November 2023, stated calibration of all weighbridges owned by PT Agro Muko will starts on 10 November 2023, due to tight schedule of metrology officer.

Agro Muko Tank Terminal (AMTT) has three dedicated tanks to received CPO from Mukomuko and Bunga Tanjung POM. Currently Tank uses for RSPO certified CPO are Tank No.3, No.7 and No.8 (capacity 3,000 MT each). To prevent contamination with other CPO, AMTT has a designated piping system to pump the CPO from Agro Muko to the tanks. Receiving station using dedicated pipe number 3, 4 and 5 for CSPO IP, whilst pipe number 1 and 2 are for CPO from other source.



		The unit of certification is able to reach 100% segregated material through ensuring that certified material will always be segregated from non-certified material including during transport and storage.	
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.	As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Agro Muko – Mukomuko POM has made Shipping Announcement for certified CSPO and CSPK sold, for example: - Shipping Announcement, with transaction ID TR-d90cb29e-95ff for 999.88 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AMWIM/62; Status: Confirmed on 11/09/2023. - Shipping Announcement, with transaction ID TR-d45f8c19-f311 for 500 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AMWIM/58; Status: Confirmed on 11/09/2023. - Shipping Announcement, with transaction ID TR-2636a7eb-4355 for 500.19 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AMWIM/57; Status: Confirmed on 11/09/2023. - Shipping Announcement, with transaction ID TR-c4a3939a-8b94 for 500 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000006779); Seller Contract No. 2023/CPO/AMWIM/51; Status: Confirmed on 21/07/2023. - Shipping Announcement, with transaction ID TR-c84d5244-11f8 for 1,000 MT CSPO SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas	Complied



(RSPO_PO1000006779); Seller Contract No. 2023/CPO/AM-WIM/37; Status: Confirmed on 28/06/2023.

- Shipping Announcement, with transaction ID TR-e35ce0ad-b256 for 147.85 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_P01000001278) as Seller to buyer PT Wira Inno Mas (RSPO_P01000000119); Seller Contract No. 2023/PK/AM-MM/10; Status: Confirmed on 13/09/2023.
- Shipping Announcement, with transaction ID TR-2ec55263-d041 for 1,227.27 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000000119); Seller Contract No. 2023/PK/AM-MM/09; Status: Confirmed on 13/09/2023.
- Shipping Announcement, with transaction ID TR-a4086346-b181 for 1,057.72 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000000119); Seller Contract No. 2023/PK/AM-MM/08; Status: Confirmed on 04/08/2023.
- Shipping Announcement, with transaction ID TR-d5c271ba-b1d0 for 296.41 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000000119); Seller Contract No. 2023/PK/AM-MM/07; Status: Confirmed on 12/07/2023.
- Shipping Announcement, with transaction ID TR-37da32f6-5cbe for 870.66 MT CSPK SG; from PT Agro Muko – Mukomuko POM (RSPO_PO1000001278) as Seller to buyer PT Wira Inno Mas (RSPO_PO1000000119); Seller Contract No. 2023/PK/AM-MM/05; Status: Confirmed on 14/06/2023.

PT Agro Muko – Mukomuko POM has done "remove" in PalmTrace for certified product sold as other scheme, conventional, or in case of underproduction, loss or damage, for examples:

		 Stock Transaction ID: ST-TR-1b53c207-08ec; dated 26/05/2023; Product CSPO; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 500.20 MT. Stock Transaction ID: ST-TR-4c1aa5a8-536b; dated 18/04/2023; Product CSPO; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 500.00 MT. Stock Transaction ID: ST-TR-0d4a8b50-fb17; dated 21/03/2023; Product CSPO; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 500.00 MT. Stock Transaction ID: ST-TR-11a6a38c-0b91; dated 15/02/2023; Product CSPO; Supply Chain Model IP; Transaction Type: Remove from certified stock; Transaction Volume: 500.00 MT. Total CSPO removed for current license period is 14,606.49 MT. 	
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products (MKT-03-06; Rev.0; dated 4 March 2019). PT Agro Muko – Mukomuko POM delivered RSPO certified CPO and PK in bulk, the Mill has made no claim regarding the use of or support of RSPO certified oil palm products, e.g. in company letter head, business card or email template. Description of RSPO certified product only made in shipping documentation, e.g. Sales Contract, Delivery Order and Weighbridge Card.	Complied
General	corporate communications		
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	PT Agro Muko is a subsidiary of RSPO registered member, SIPEF Group, with membership No. 1-0021-05-000-00, member since 7 December 2005. The corporate communication of SIPEF Group can be seen in the website: www.sipef.com .	Complied
		On the website, mentioned that SIPEF is devoted to certified sustainable production of tropical agricultural commodities, primarily palm oil. It also produces certified sustainable bananas, rubber and tea. These labor-	



		intensive activities are developed in Indonesia, Papua New Guinea and Ivory Coast. On the website mentioned that SIPEF became an RSPO member in 2005.	
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark license number to promote its RSPO membership	 In Corporate communication, SIPEF Group in its website: Display its RSPO membership status: Yes, it mentioned that SIPEF became an RSPO member in 2005. Display the RSPO web address: Yes, SIPEF display and provide a link to RSPO website. State the member supports the work of the RSPO: Yes, on the website, SIPEF mentioned "SIPEF became an RSPO member in 2005 and compliant as all the criteria for processing RSPO certified oil palm products". State the member's history with regards to the RSPO: Yes, on the website mentioned that SIPEF became an RSPO member in 2005. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication. 	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	SIPEF did not use RSPO corporate logo in its corporate communication.	Complied
4.4	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 palm oil products.	In corporate communication, SIPEF does 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
4.5	Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include: • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)."	In corporate communications, SIPEF make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools, e.g. "SIPEF became an RSPO member in 2005 and compliant as all the criteria for processing RSPO certified oil palm products".	Complied

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	 "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." "We are RSPO certified. Ask us for our RSPO certified products." 		
4.6	RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following: A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication. B. Claim statements are limited to the following examples: i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.	PT Agro Muko – Mukomuko POM is an RSPO certified member.	Complied
	C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".		
Product	t-specific communications		
5.1 Ger	neral		
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack	PT Agro Muko only stated in sales documents, e.g. Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is	Complied

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	such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	RSPO Certified CPO or PK model IP. The communication is mainly of the RSPO certificate number and product description.	
5.1.2	Product-specific communications are voluntary.	PT Agro Muko product specification communications already stated on shipping information such as FFA rate and product type (CPO or PK).	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	RSPO label is not displayed on product-specific communications.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	PT Agro Muko – Mukomuko POM does not use any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products	Complied
5.1.5	If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below	The unit of certification is a palm oil mill implementing RSPO P&C.	Complied
	 RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. Both parties shall inform their certification body in writing about the agreement. The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific	The unit of certification is a palm oil mill implementing RSPO P&C.	Complied

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	communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain		
5.2 Off	pack claims		
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.		Complied
5.2.2	When confirming the sale of certified palm oil 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.	PT Agro Muko stated in sales documents, e.g. Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model IP, and RSPO certified number is available.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.	The unit of certification is a palm oil mill implementing RSPO P&C.	Complied

	• If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2.		
5.3 On	pack claims		
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	PT Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042, originally issued by BSI Services Malaysia Sdn Bhd on 22 February 2011. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
5.3.2	In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:	PT Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042, originally issued by BSI Services Malaysia Sdn Bhd on 22 February 2011. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
	A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:		
	 RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* *Add RSPO TM Licence Number below or next to the claim. 		
	B) or Mass Balance (MB) Certified Products: • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* *Add RSPO TM Licence Number below or next to the claim.	PT Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042, originally issued by BSI Services Malaysia Sdn Bhd on22 February 2011. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
	C) For Partially Certified Products: • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil*	PT Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042, originally issued by BSI Services	Complied



	*Add RSPO TM Licence Number below or next to the claim.	Malaysia Sdn Bhd on22 February 2011. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	
	D) For Products covered with Book and Claim (B&C): • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	PT Agro Muko – Mukomuko POM is an RSPO certificate holder with certificate number RSPO 556042, originally issued by BSI Services Malaysia Sdn Bhd on22 February 2011. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Agro Muko – Mukomuko POM communication has not stated information about the claimant's RSPO membership status.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT Agro Muko – Mukomuko POM and the parent company – SIPEF did not make any communication about their supplier's RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	There is no RSPO Label used.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	There is no on pack claim used.	Complied
MODUL	E A – IDENTITY PRESERVED		
	95% of the palm oil content must be RSPO IP certified.	PT Agro Muko – Mukomuko Palm Oil Mill (POM) physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Bunga Tanjung POM does not process non-certified FFB, hence, all products are 100% RSPO IP certified.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified	PT Agro Muko stating RSPO SG in the sales document. The RSPO SG notation adhere to the requirements of RSPO SCCS. PT Agro Muko – Mukomuko POM and Bunga Tanjung POM is certified against RSPO P&C	Complied

...making excellence a habit."



	palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	and comply to the RSPO SCCS Module Identity Preserved (IP). Whenever PT Agro Muko made an SG claims, it was combination of IP from Mukomuko POM and IP from Bunga Tanjung POM. All of the palm oil mills managed to demonstrate integrity of supply chain against the identity preserved module. During sales of CSPO and CSPK, PT Agro Muko made clear the product is Segregated. Because at the point of shipping, all identity preserved oil palm product have been mixed between PT Agro Muko's palm oil mills.	
Messagir	ng		
	Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements: • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain.www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org	Up to this ASA 2_2, PT Agro Muko — Mukomuko POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached. No messaging conducted by the unit of certification. Therefore, this indicator is Not applicable.	Not Applicable
Product-	Specific Communications Labelling		
	Members are allowed to use the RSPO Label in one of the following ways: • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil".	Up to this ASA 2_2, PT Agro Muko – Mukomuko POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached. Therefore, this indicator is Not applicable.	Not Applicable



MODULE B – MASS BALANCE SPECIFIC RULES		
Mass Balance palm oil content		
95% of the palm oil content must be RSPO MB-certified.	The certification unit only implemented Identity Preserved, therefore, this indicator is not applicable.	Not Applicable
If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	The certification unit only implemented Identity Preserved, therefore, this indicator is not applicable.	Not Applicable
Messaging		
	PT Agro Muko – Mukomuko POM has not use any label and trademark to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached. No messaging conducted by the unit of certification. Therefore, this indicator is Not applicable.	Complied
Product-Specific Communications Labelling	,	
Members are allowed to use the RSPO Label in one of the following ways: • The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil 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.	PT Agro Muko – Mukomuko POM has not use any label and trademark to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached. Therefore, this indicator is Not applicable.	Not Applicable

Respect con Criteria 4.:	H: Respect community and human rights and deliver benefit mmunity rights, provide equal opportunities, maximise benefits from engaged. 1: The unit of certification respects human rights, which includes respecting.	ement and ensure remediation where needed.					
	1: The unit of certification respects human rights, which includes respecting						
411		Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.					
1 1 1	(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. - Critical (Major) compliance -	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented in Human Rights policy (Policy No. QMM-40-01-P02) dated 27 March 2019. The policy stated that the company recognizes that Human Rights are universal and apply to all, without any form of distinction. The company supports the implementation of the international of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at work, as they are transcribed into the laws and regulations of the Republic of Indonesia. Communication to all level workforce, operations and local communities implemented through morning muster (estate/mill workers), put on notice board of village office and through communication by phone. According to interviews with a sample of visited village head, KMD's committee and sample contracted workers (including contractors),	Complied				
I	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	understanding of human rights policy was excellent. PT Agro Muko (Mill and Estate) does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. The company location and conditions in the surrounding community are classified as conducive and safe.	Complied				
-	- Minor compliance -	surrounding community are classified as conducive and safe. This information was verified during stakeholder consultation with affected communities, workers and other relevant stakeholders.					

4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Documented system and complaints or grievance mechanism is available at unit of certification. Information on complaint/grievance procedures does not have any revision from last assessment. PT Agro Muko as subsidiary of SIPEF, also implementing grievance mechanism following the corporate policy and its accessible on the website: https://www.sipef.com/hq/sustainability/policies/responsible-plantations-policy/ . Based on case tracker on RSPO website https://rspo.my.site.com/Complaint/s/casetracker , there are no complaints or grievance delivered to PT Agro Muko.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	All relevant procedures related conflict resolution mechanism are in place, such as: Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019; External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019; Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. For illiterate parties, the mechanism said can be carried out verbally. Employees and other stakeholders who express a concern or grievance according to Group procedures will not be penalized or victimized in any way by the Group or its employees. Non-compliance with this provision by Group employees will result in disciplinary action, up to dismissal, and might also result in legal action.	Complied
		There is no changes or revision on its procedures from the last assessment (previous 12 months). Dissemination information to delivering procedures through posters or pictures on notice board at surrounding villages.	
		Information gathered during interview with affected stakeholder such as Sumber Sari village, Sari Bulan village and Ranah Karya village, clearly informed that conflict resolution mechanism/procedure are understood.	

4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	According to Information gathered during interview with affected stakeholder such as Sumber Sari village, Sari Bulan village and Ranah Karya village, clearly informed that no complaints/grievance submit to the company within last 12 months. However, the affected stakeholder informed that if its happen or occurs, the communities where represented by village committee have understand the process to dealt with.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Based on case tracker on RSPO website https://rspo.my.site.com/Complaint/s/casetracker , there are no complaints or grievance delivered to PT Agro Muko. If conflict occurs, the unit of certification is giving access to independent legal and technical advice which chosen by complainant.	Complied
Criteria	4.3: The unit of certification contributes to local sustainable development as	agreed by local communities.	
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated. - Minor compliance -	The company is committed to improving the quality of life of the surrounding community as outlined in its CSR program. Each unit of mill or estate has set the program to improve the quality of life and beneficial environment, both for Plantation Companies or local and general communities. Those programs developed based on the result of consultation with local communities through annual direct communication and questioner. Those programs written in document namely "Community Development and Corporate Social Responsibility Program", i.e 1. Education; such as donation for public school, apprentice program. 2. Health; such as giving opportunity for local communities to use company's medical clinic. 3. Infrastructure; such as road/bridge maintenance, road hardening	Complied



- 4. Agriculture; such as giving access for communities to cutting grass for their cattle.
- 5. Micro and Small Enterprises
- 6. Sports; Maintenance of sports facilities, provision of facilities by the surrounding village sports facilities and donation for local sports event.
- 7. Art
- 8. Religious; Religious assistance, breaking the fast and Ramadan gifts.
- 9. Socio Economic

For example, the Community Development and Corporate Social Responsibility programs for Sei Kiang Estate, Sei Betung Estate, Air Majunto Estate and Tanah Rekah Estate in 2023. Several program categories include assistance for schools, places of worship and sports facilities in surrounding villages.

Apart from that, the company also carries out business partnerships with local communities in the form of cooperation in developing scheme smallholders and *Kebun Masyarakat Desa*.

All realizations of CSR program implementation are also included in the *Laporan Perkembangan Usaha Perkebunan* (LPUP) which is sent to the Plantation Agency of Mukomuko Regency every six months. For example semester 1 of 2023 has been reporting by *Bukti Penerimaan Elektronik Nomor 252323903* dated 03 August 2023.

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.



4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	In general, there is no change in land rights owned by the company. The company has documents in the form of HGU (Hak Guna Usaha) as the basis for ownership of operational areas.	OFI
	- Critical (Major) compliance -	Mukomuko Estate, Sei Betung Estate & Tanah Rekah Estate	
		 HGU Certificate No. 149 covering an area of 2,286.7 Ha. Valid until 31 December 2044. 	
		 HGU Certificate No. 150 covering an area of 5,150.4 Ha. Valid until 31 December 2044. 	
		 HGU Certificate No. U.32 covering 2,100 Ha. Expired 31 December 2047. 	
		 HGB Certificate No. 01 covering an area of 315 Ha. Valid until March 18, 2031. 	
		Talang Petai Estate	
		 HGU Certificate No. 151/2022 area 2319000 m3 valid 13 December 2056. 	
		HGU No. 152/2022 area 602 m3 valid 13 December 2056.	
		• HGU No. 148/2021 area 2256.3 ha valid 31 December 2044.	
		Sei Kiang Estate	
		 HGU Certificate No. U.30 covering 2,171.03 Ha. Expires: 31 December 2022. 	
		Air Majunto Estate	
		HGU No. 132/2019 area 910,900 m2 valid 18 October 2053.	



negotiated agreements detailing the FPIC process are available and include: - Minor compliance - 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. 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			,	
HGU No. 135/2019 area 5,201,971 m2 valid 18 October 2053. HGU No. 135/2019 area 5,201,971 m2 valid 18 October 2053. For all village community estate and also smallholder schemes that are included in the scope certification, land rights consist of various forms, such as SKT (Land Certificate) and SHM (Ownership Certificate). The company already has land rights for all of its operational areas, however without considering the company can ensure an increase in land rights, especially for the process of issuing HGU certificates with the relevant agencies in the Air Majunto Estate area, it can be but necessary to lead to a future nonconformity if not addressed. Based on public consultation with previous land-owner and village, known that there was no customary right in or near the concession area of PT Agro Muko. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to all affected groups, including in it information about the steps taken to involve them in decision making. 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			HGU No. 133/2019 area 5,081,000 m2 valid 18 October 2053.	
For all village community estate and also smallholder schemes that are included in the scope certification, land rights consist of various forms, such as SKT (Land Certificate) and SHM (Ownership Certificate). The company already has land rights for all of its operational areas, however without considering the company can ensure an increase in land rights, especially for the process of issuing HGU certificates with the relevant agencies in the Air Majunto Estate area, it can be but necessary to lead to a future nonconformity if not addressed. 4.4.2 Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: - Minor compliance - 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. 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			HGU No. 134/2019 area 29,720 m2 valid 18 October 2053.	
included in the scope certification, land rights consist of various forms, such as SKT (Land Certificate) and SHM (Ownership Certificate). The company already has land rights for all of its operational areas, however without considering the company can ensure an increase in land rights, especially for the process of issuing HGU certificates with the relevant agencies in the Air Majunto Estate area, it can be but necessary to lead to a future nonconformity if not addressed. 4.4.2 Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: - Minor compliance - 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. 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			HGU No. 135/2019 area 5,201,971 m2 valid 18 October 2053.	
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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. 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		- Minor compliance -	of PT Agro Muko. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that	
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taken to involve them in decision making. 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			andowners are given the freedom to release their land without coercion.	
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				
4.4.20 Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these to give or withhold their consent to the operations at the time that these resident of Talang Bary village, with an area of 0.65 Ha. The Document		taken to involve them in decision making.		
		to give or withhold their consent to the operations at the time that these	GRTT (Compensation for Growing Crops) No.15 to Mr. Edi Mansur, a	
decisions were taken;		decisions were taken;	resident of Talang bara village, with all area of 0.05 Hd. The bocament	

	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.	includes Certificate of Compensation for Land Claims made by both parties witnessed by each party, Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The Negotiation Process for compensation is outlined in the Land Compensation Certificate including the agreed compensation value, on 11 February 2016. Payment to the recipient was carried out through "Bank Bengkulu", Ipuh Sub-Branch on 11 February 2016 worth Rp.27,950,000 for Mr. Edi Mansur. The document also comes with photos of the compensation handover.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	In the HGU documents owned as land rights, the company has a map with a scale of 1: 40,000 which contains the boundaries of the location of the company's land ownership as the basis for the operational area issued by the Land Office. Based on public consultation with previous land owner and village representatives from Ranah Karya, Sumber Sari and Saribulan Village, it is recognized that they know the legal boundaries owned by PT Agro Muko.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on document Identification of HCV and stakeholder consultation, there was not found customary/indigenous rights in operational area. There were the records of the process of collecting information on the preparation of the High Conservation Values Identification Report and the Social Impact Assessment Report. The recording evidence comprising of participants list and photographs. All land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. All relevant information regarding land acquisition is available in appropriate forms and languages.	Complied

4.4.5	(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. - Critical (Major) compliance -	Currently the company has not carried out any activities to change ownership of land rights. The last land compensation process was carried out in 2016, for example, the Document includes Certificate of Compensation for Land Claims made by both parties witnessed by each party (namely Edi Mansur), Village Head and Sub-District Head on 11 February 2016; Letter of Release on Arable Land made by both parties on 11 February 2016, known by Talang Baru Village Head and Malin Deman Sub-District Head; Map of measurement results together with a scale of 1: 1,500 known by the Village Head of Talang Baru, 26 January 2016. The community represents itself in the process (previous landowner and village head representative). All relevant information regarding land acquisition is available in appropriate forms and languages (Indonesian).	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	Until the surveillance audit activity-2.2 was carried out, there is currently no compensation process or recent change in land ownership. Regarding the implementation of the FPIC process, according to the explanation in indicator 4.4.2, all land compensation has been given to previous land holders.	Complied
	4.5: No new plantings are established on local peoples' land where it can be through a documented system that enables these and other stakeholders to		r FPIC. This is
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There is no land expansion activity during this audit. The company has not currently carried out new planting activities beyond 2018. Based on field observations at Tanah Rekah Estate, Sei Kiang Estate, Air Majunto Estate and Sei Betung Estate, it is known that the company has only carried out replanting activities for areas that were previously included in the scope of certification.	Complied

		As explanation on Indicator 4.4.1, the company has land ownership legality documents in the form of the following documents: - PT Agro Muko Plantation Business License (IUP) which is valid in accordance with Mukomuko Regent Decree No. 709 of 2012 dated 13 December 2012 concerning "Granting Plantation Business Licenses to PT Agro Muko for Palm Oil and Rubber Plantations in the Districts of Kota Mukomuko, Air Dikit, V Koto, Puller, Selagan Raya, Teras Terunjam, Pondok Suguh, Teramang Jaya, Air Rami , Ipuh & Malin Deman District, Mukomuko Regency, Bengkulu Province. The permit covers an area of 22,914 ha and a factory capacity of 60 tons tbs/hour. - NIB No. 8120114022139 dated 23 October 2018 in the name of PT Umbul Mas Wisesa Address Forum Nine Building, Fl. 10, Suites 1 – 11 Jl. Imam Bonjol No. 9 Petisah Tengah Village, Medan Petisah District, Medan City, North Sumatra Province.	
4.5.2	(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. - Critical (Major) compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018. Similar information was also obtained from interviews with representatives of Ranah Karya, Sumber Sari and Sari Bulan Village who stated that in the last 5 years there had been no land compensation process. The village representative stated that the compensation process in the past had been based on the agreement of both parties without any intimidation.	Complied
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	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018. Similar information was also obtained from interviews with representatives of Ranah Karya, Sumber Sari and Sari Bulan Village who stated that in the last 5 years there had been no land compensation	Complied

	local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	process. The village representative stated that the compensation process in the past had been based on the agreement of both parties without any intimidation. Based on the results of field observations at Sei Betung Estate and also a review of the company's operational map documents, there are several areas that have not been compensated by the company within the company's HGU. The company explained that their land was indeed in the company's HGU area but compensation had not been carried out and the community was also unwilling. The landowner also explained that to date there have been no conflicts with the company and there are no obstacles for them to access their land.	
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 -	As a result of interviews with representatives of Ranah Karya, Sumber Sari and Saribulan Village, local communities do not experience any restrictions regarding access to water and food in the company's operational areas, except for conservation areas where there is a prohibition on destroying or hunting protected animals.	Complied
4.5.5	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. - Minor compliance -	As explained on 3.4.1 and 3.4.2, companies can show evidence of social impact assessment documentation with FPIC approach that has been carried out by involving various key parties, such as representatives of village head, government agencies and also the community around the company.	Complied
4.5.6	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. - Minor compliance -	As explained in indicators 4.5.2, based on the results of interviews with community representatives from Saribulan Village and Sumber Sari Village, the village officials said that there were no negative issues related to land acquisition in the company area. Land acquisition has been completed with an agreement between the company and the previous landowner.	Complied

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4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation Critical (Major) compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018.	Complied
	4.6: Any negotiations concerning compensation for loss of legal, customal ocal communities and other stakeholders to express their views through the		les indigenous
4.6.1	(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 -	The company has procedure of Land & Planting Compensation Inside Izin Lokasi of The Company (LCA-01-01/24-01-2020/Rev.1, dated 30 January 2020) related to identifying legal, customary or user rights, and for identifying people entitled to compensation.	Complied
		The purpose of this SOP is as a reference for companies in implementing land compensation and planting (GRTT) correctly and in accordance with applicable laws and regulations and in compliance with FPIC principles.	
		Based on public consultation with previous landowner and village representatives from Ranah Karya, Saribulan & Sumber Sari Village known that they know about the procedure through the socialization given and they agree with the procedure.	
4.6.2	(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.	Policies related to calculating the amount of compensation for the process of transferring land ownership are also contained in the Land & Planting Compensation Inside the Location Permit of the Company (LCA-01-01/30-08-2022/Rev.4, dated 3 October 2022). The procedures	Complied

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	- Critical (Major) compliance -	discussed relate to identifying land ownership, coordination flow mechanisms and also determining the calculation of land compensation value. Regarding price approval, a request will be made by the relevant estate manager and approved by the VPL (Vice President Legal). Based on public consultation with village representatives from Ranah Karya, Saribulan & Sumber Sari Village known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement). - Minor compliance -	Based on document verification of environmental, land use title and public consultation with relevant stakeholder, there's no new planting after 2018. As explained in indicators 4.5.2, based on the results of interviews with community representatives from Ranah Karya, Saribulan & Sumber Sari Village, the village officials said that there were no negative issues related to land acquisition in the company area. Land acquisition has been completed with an agreement between the company and the previous landowner.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them. - Minor compliance -	Until the final assessment was carried out there was no area expansion or new planting. This is proven by the results of public consultations with the community. The certification unit can show land compensation documents including information about the measurement program, master map of the compensation area, land ownership documents, statement of release of land rights, map of the area to be compensated, receipt of compensation payment. The compensation process document has been signed by both parties and is known to local officials such as the village head, sub-district head.	Complied

4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Related to mutually agreed procedure for identifying people has been informed in Land & Planting Compensation Inside Location Permit of The Company (LCA-01-01/30-08-2022/Rev.4, dated 3 October 2022). In this procedure, the GRTT process can only be carried out on land owned by third parties which is within a location permit belonging to a company group and which has the status of other use areas (not forest areas). GRTT is also only carried out on landowners, namely parties who have legal rights to the land and control/work on the land in question based on legal documents (SKT, sale and purchase deed, SHM) issued by government agencies.	Complied
		To ensure the correctness of the landowner, each estate manager is asked to clarify with the local community/neighbors adjacent to the GRTT planned land, village officials and/or other trusted sources.	
4.7.2	(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. - Critical (Major) compliance -	As explained in indicators 4.6.2, Policies related to calculating the amount of compensation for the process of transferring land ownership are also contained in the Land & Planting Compensation Inside the Location Permit of the Company (LCA-01-01/30-08-2022/Rev.4, dated 3 October 2022). The procedures discussed relate to identifying land ownership, coordination flow mechanisms and determining the calculation of land compensation value. Regarding price approval, a request will be made by the relevant estate manager and approved by the VPL (Vice President Legal).	Complied
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 -	The company can show recapitulation of previous landowners who have been compensated. Compensation is only made for the area within HGU areas owned by the company.	Complied

Criteria	4.8: The right to use the land is demonstrated and is not legitimately contest	ted 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 field observations, document review and public consultation with relevant stakeholders (Ranah Karya, Saribulan & Sumber Sari Villages), there are no issues related to land conflicts. Based on the results of field observations at Sei Betung Estate and also a review of the company's operational map documents, there are several areas that have not been compensated by the company within the company's HGU. The company explained that their land was indeed in the company's HGU area but compensation had not been carried out and the community was also unwilling. The landowner also explained that to date there have been no conflicts with the company and there are no obstacles for them to access their land. From the results of field observations, the auditor did not find any indication of conflict between areas occupied by the community and areas owned by the company. The auditor did not see any damage to either the community or the company. The company's consideration of not compensating for losses is because the community still wants to obtain a source of income from the land they planted oil palm, indirectly this is evidence that the company supports the community's decision not to force them to sell their land to the company.	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 -	In order to resolve conflicts, the company has an External Grievance procedure (HRA-04-02/01-02-2018/rev.0, dated 20 March 2018). The procedure informs the following: - External parties can submit complaints via email at http://www.tolantiga.co.id or directly to the management unit. - As evidences that both parties have reached a mutual agreement on the problems that arise, both parties will sign a	Complied

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		collective agreement and also to prevent the same thing from happening in the future. - GM HRAD can form a mediation forum as a third person to resolve problems with stakeholders. Local traditional elders, religious leaders and Muspida should be invited and act as mediators for both parties, stakeholders and the company to resolve the problem. Based on the results of interviews with representatives of surrounding villages, they understand the company's procedures and always	
		coordinate if there are indications of social problems that will arise with the company.	
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 explanation on relevant stakeholders (Sumber Sari, Ranah Karya and Saribulan Villages), There are no issues related land acquisition using intimidation.	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 -	The company shows a map regarding the locations of land areas where compensation has not yet been carried out for each unit, this is due to farmers' unwillingness to release land. The company also admitted that it had not provided compensation for the area occupied by the community in Sei Betung Estate.	Complied
_	e 5: Support smallholder inclusion smallholders in RSPO supply chains and improve their livelihoods through fair	and transparent partnerships.	
Criteria	5.1: The unit of certification deals fairly and transparently with all smallhold	ers (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	During ASA2_2, verified that current and previous period prices for FFB are publicly available to smallholder scheme organization "KMD and	Complied

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	- Minor compliance -	Plasma". Since Mukomuko POM only received FFB from certified sources, therefore the FFB price is not published to other parties except the scheme smallholders.	
		FFB price has been made available by PT Agro Muko – Mukomuko POM to the scheme smallholders, as evidence in "Memorandum Harga Pembelian TBS dari KMD/Plasma".	
		For example, dated 13 October 2023, FFB price for period $1-31$ October 2023, are as follow:	
		a. Category A = Rp 2,277/kg (≥ 94% ripeness)	
		b. Category B = Rp 2,262/kg (86 – 93% ripeness)	
		c. Category C = Rp 2,247/kg (≤ 85% ripeness).	
		Dated 1 November 2023, for FFB price period 1 – 30 November 2023, are as follow:	
		a. Category A = Rp 2,260/kg (≥ 94% ripeness)	
		b. Category B = Rp 2,245/kg (86 – 93% ripeness)	
		c. Category C = Rp 2,230/kg (≤ 85% ripeness).	
		Records of previous FFB price are kept by the company, as example: document of "Memorandum Harga Pembelian TBS" back on 15 March 2020 is still available.	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.- Critical (Major) compliance -	Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. FFB pricing is determined by the unit of certification and disseminate to smallholders in fortnight basis through Memorandum of FFB Price.	Complied
		During interview and onsite visit to:	
		- KMD Pasar Mukomuko which fully managed by Tanah Rekah Estate.	

5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented Critical (Major) compliance -	FFB pricing is agreed with smallholders as former agreement prior to develop the smallholder plantation. FFB price for smallholders set by the unit of certification with specific calculation. The FFB pricing in Indonesia was issued by the government already considering the international price of CPO and FFB quality of smallholders which is using best progeny. The FFB price of PT Agro Muko scheme smallholders and KMD always beyond government price.	Complied
		 KMD Lubuk Pinang and KMD Lalang Luas which fully managed by Sei Kiang Estate. KMD Lubuk Bangko, KMD Setia Budi, KMD Sumber Sari and KMD Pondok Kopi which fully managed by Sei Betung Estate. The management of each smallholder organization (KMD and Plasma) can demonstrate the Memorandum of FFB price, including Invoice or Production report, for example: production report January - September 2023. Available handover notes of "Memorandum Harga Pembelian TBS dari KMD/Plasma" period October 2023 from Estate Manager of Air Manjunto Estate to Koperasi Produksi Plasma Sungai Tenang Sejahtera. Available handover notes of "Memorandum Harga Pembelian TBS dari KMD/Plasma" period October 2023, dated 13 October 2023, from PT Agro Muko to KMD under Sei Betung Estate (Sungai Ipuh Group, Talang Medan, Group C area 53). Available meeting attendance sheet for dissemination of FFB Price period October 2023, dated 19 October 2023, from PT Agro Muko to KMD under Sei Kiang Estate (KMD Lubuk Pinang and KMD Lalang Luas). 	
		- Koperasi Produksi Plasma Sungai Tenang Sejahtera which fully managed by Air Manjunto Estate.	

5.1.4	(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. - Critical (Major) compliance -	Based on interview with sample of smallholder management during ASA2_2: KMD Pasar Mukomuko which fully managed by Tanah Rekah Estate. Koperasai Produksi Plasma Sungai Tenang Sejahtera which fully managed by Air Manjunto Estate. KMD Lubuk Pinang and KMD Lalang Luas which fully managed by Sei Kiang Estate. KMD Lubuk Bangko, KMD Setia Budi, KMD Sumber Sari and KMD Pondok Kopi which fully managed by Sei Betung Estate. It was explained that FFB prices which set by unit of certification Mukomuko POM is higher than other surrounding palm oil mill. The whole smallholders under the unit of certification are fully managed scheme which all activities is controlled and managed by relevant Estates, including the manpower supply. Based on interview with sample of smallholder management during ASA2_2: KMD Pasar Mukomuko which fully managed by Tanah Rekah Estate. Koperasi Produksi Plasma Sungai Tenang Sejahtera which fully managed by Air Manjunto Estate. KMD Lubuk Pinang and KMD Lalang Luas which fully managed by Sei Kiang Estate. KMD Lubuk Bangko, KMD Setia Budi, KMD Sumber Sari and KMD Pondok Kopi which fully managed by Sei Betung Estate.	Complied
		Share-profit of KMD's yield is very transparent and notified in daily news of Radar Mukomuko, including deductions within. Mostly, structure of	



KMD's are dominated by male, but for decision making process are not limited to gender, women and independent representative also involved. Fully managed Village Oil Palm of "KMD's" under Unit of Certification have MoU/contracts for all activities, e.g.:

- KMD Pasar Mukomuko (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.01/PKS/GMO/V/2013, dated 1 May 2013, which fully managed by Tanah Rekah Estate. Proof of land ownership: "Berita Acara Penyerahan SKT-Perorangan Kepada Pengurus KMD Kelurahan Pasar Mukomuko" (Handover notes of land ownership) dated 18 July 2005; consist of Alamsyah (2 Ha), Sukiman SH (2 Ha), Aminullah (2 Ha), Nasrun (2 Ha), Maidi Rasyid (2 Ha), Hamdani Barza (2 Ha), Abdul Kadir (2 Ha), H. Muchtar Mara (1 Ha); total 15 Ha.
- Koperasi Produksi Plasma Sungai Tenang Sejahtera (Perjanjian Kerjasama Tentang Pembangunan dan Pengelolaan Kebun Kelapa Sawit Pola Inti Plasma antara Koperasi Produksi Plasma Sungai Tenang Sejahtera dengan PT Mukomuko Agro Sejahtera, No.7, dated 19 August 2016), which full managed by Air Manjunto Estate. Legality of the Cooperative: "Akta Pendirian Koperasi" No.67, dated 18 April 2013 by Notary Nurhasni Arif; endorse by "Kementerian Negara Koperasi No92/BH/IX.5/DPPKU/VI/2013, dated 12 June 2013. Proof of land ownership:
- KMD Sumber Sari (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.06/PKS/GMO/II/2012, dated 28 February 2012, which fully managed by Sei Betung Estate. Proof of land ownership: "Surat Keterangan Tanah" SKT No.593.3/80/SI D/E.10/2010 (2 Ha); No.593.3/81/SI D/E.10/2010 (0.6 Ha); No.593.3/82/SI D/E.10/2010 (2 Ha); No.593.3/83/SI D/E.10/2010 (0.5 Ha); No.593.3/84/SI D/E.10/2010 (0.6 Ha); No.593.3/85/SI

		 D/E.10/2010 (1.3 Ha); No.593.3/86/SI D/E.10/2010 (0.8 Ha); No.593.3/87/SI D/E.10/2010 (1.7 Ha). KMD Pondok Kopi (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.12/PKS/GMO/II/2012, dated 28 February 2012, which fully managed by Sei Betung Estate. Proof of land ownership: "Surat Keterangan Tanah" – SKT No.593.3/88/SI D/E.10/2010 (1.1 Ha); No.593.3/89/SI D/E.10/2010 (1.0 Ha); No.593.3/90/SI D/E.10/2010 (1.1 Ha); No.593.3/91/SI D/E.10/2010 (2.0 Ha); No.593.3/92/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (0.3 Ha); No.593.3/94/SI D/E.10/2010 (2.0 Ha). 	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	 All smallholders (KMD and Plasma) are fully managed by the unit of certification, which all activities are controlled and managed by relevant Estates, including the manpower supply. There is no contract revision since the previous assessment. Contracts are fair, legal and transparent and have an agreed timeframe for 1 cycle of Oil Palm crops (25 years), sample of KMD's contracts are available, e.g.: KMD Pasar Mukomuko (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.01/PKS/GMO/V/2013, dated 1 May 2013, which fully managed by Tanah Rekah Estate. Proof of land ownership: "Berita Acara Penyerahan SKT-Perorangan Kepada Pengurus KMD Kelurahan Pasar Mukomuko" (Handover notes of land ownership) dated 18 July 	Complied
		 2005; consist of Alamsyah (2 Ha), Sukiman SH (2 Ha), Aminullah (2 Ha), Nasrun (2 Ha), Maidi Rasyid (2 Ha), Hamdani Barza (2 Ha), Abdul Kadir (2 Ha), H. Muchtar Mara (1 Ha); total 15 Ha. Koperasi Produksi Plasma Sungai Tenang Sejahtera (Perjanjian Kerjasama Tentang Pembangunan dan Pengelolaan Kebun Kelapa Sawit Pola Inti Plasma antara Koperasi Produksi Plasma Sungai 	

		 Tenang Sejahtera dengan PT Mukomuko Agro Sejahtera, No.7, dated 19 August 2016), which full managed by Air Manjunto Estate. Legality of the Cooperative: "Akta Pendirian Koperasi" No.67, dated 18 April 2013 by Notary Nurhasni Arif; endorse by "Kementerian Negara Koperasi No92/BH/IX.5/DPPKU/VI/2013, dated 12 June 2013. Proof of land ownership: KMD Sumber Sari (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.06/PKS/GMO/II/2012, dated 28 February 2012, which fully managed by Sei Betung Estate. Proof of land ownership: "Surat Keterangan Tanah" – SKT No.593.3/80/SI D/E.10/2010 (2 Ha); No.593.3/81/SI D/E.10/2010 (0.6 Ha); No.593.3/82/SI D/E.10/2010 (2 Ha); No.593.3/83/SI D/E.10/2010 (0.5 Ha); No.593.3/84/SI D/E.10/2010 (0.6 Ha); No.593.3/85/SI D/E.10/2010 (1.3 Ha); No.593.3/86/SI D/E.10/2010 (0.8 Ha); No.593.3/87/SI D/E.10/2010 (1.7 Ha). KMD Pondok Kopi (Perjanjian Kerjasama Tentang Pembangunan dan Pemeliharaan Kebun Kelapa Sawit), No.12/PKS/GMO/II/2012, dated 28 February 2012, which fully managed by Sei Betung Estate. Proof of land ownership: "Surat Keterangan Tanah" – SKT No.593.3/88/SI D/E.10/2010 (1.1 Ha); No.593.3/89/SI D/E.10/2010 (1.0 Ha); No.593.3/90/SI D/E.10/2010 (1.1 Ha); No.593.3/91/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (0.3 Ha); No.593.3/94/SI D/E.10/2010 (2.0 Ha); No.593.3/93/SI D/E.10/2010 (2.0 Ha); No.593.3/94/SI D/E.10/2010 (2.0 Ha); 	
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 -	Based on interview with KMD and Plasma committee and review of payment documents, agreed payments are made in a timely manner, and receipts specifying price, weight, deductions, and amount paid are given to the committee. Payment documents verified:	Complied

		 Invoice KMDLB No.47 Lubuk Bangko; document No. KM23090116, period September 2023: Quantity 1,810 kg; Rate IDR 2,277/kg; Amount IDR 4,121,370. Invoice KMDLB No.48 Setia Budi; document No. KM23090143, period September 2023: Quantity 4,200 kg; Rate IDR 2,277/kg; Amount IDR 9,563,400. Invoice KMDPMM No.01 Setia Budi; document No. KM23090129, period September 2023: Quantity 34,130 kg; Rate IDR 2,277/kg; Amount IDR 77,714,010; PPh 21 (IDR 388,570); Net IDR 77,325,440. 					
		Description	Quantity (kg)	Rate (Rp)	Amount (Rp)	Deduction (Rp)	
		FFB Sales	34,130	2,277	77,325,440		
		Harvesting	34,130	187		6,382.3	
		Internal Transport	34,130	165		5,631,4	
		FFB Carrier – Transport	34,130	275		9,385,7	
		FFB Carrier - Material	3	55,000		165,0	
		Previous deduction				10,469,8	
		Total			77,325,440	32,034,3	
		Nett paid: IDR 45,291,0	94.				
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	PT Agro Muko – Mukom calibrated according to c		as two we	ighbridge whic	ch has been	Complied
	- Minor compliance -	- "Surat Keterangan DISDAG/XI/2022; a E1215; serial number	calibration	certificat	e for Avery \		

		- "Surat Keterangan Hasil Pengujian" No.510/504/TJ/SKHP/B.8/ DISDAG/XI/2022; a calibration certificate for Avery Weightronix ZM510; serial number 191150158; capacity 40,000 kg. Available letter from CV Berti Ganda Riau (a calibration body) No.12/BGR-MET/XI/2023, dated 7 November 2023, stated calibration of all weighbridges owned by PT Agro Muko will starts on 10 November 2023, due to tight schedule of metrology officer.	
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 -	All smallholders (KMD and Plasma) are fully managed by the unit of certification, which all activities are controlled and managed by relevant Estates, including the manpower supply. Based on interview with sample of smallholder management during ASA2_2: - KMD Pasar Mukomuko which fully managed by Tanah Rekah Estate. - Koperasi Produksi Plasma Sungai Tenang Sejahtera which fully managed by Air Manjunto Estate. - KMD Lubuk Pinang and KMD Lalang Luas which fully managed by Sei Kiang Estate. - KMD Lubuk Bangko, KMD Setia Budi, KMD Sumber Sari and KMD Pondok Kopi which fully managed by Sei Betung Estate. Each committee of KMD and Plasma explained that PT Agro Muko is supports the smallholders for certification. All smallholders are included in RSPO scope of certification. Support given are in form of inspection to the smallholder area and issued recommendation. Available inspection report of KMD Lubuk Pinang, made by Sei Kiang Estate, dated 31 October 2023. Inspection result consist of 4 Opportunities for Improvement regarding field condition.	Complied



		Recommendation issued by inspector with due date December 2023. Status is still on progress. Available inspection report of KMD Lalang Luas, made by Sei Kiang Estate, dated 31 October 2023. Inspection result consist of 2 Opportunities for Improve regarding field condition. Recommendation issued by inspector with due date December 2023. Status is still on progress.	
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. - Critical (Major) compliance -	Up to this ASA 2_2, the unit of certification is still using the same document as previous audit related to mechanism for smallholders and available in procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders.	Complied
		Also, unit of certification has also established Grievance Policy (QMM-40-01-P12/27-03-2019/Rev.0) dated 27 March 2019. Unit of Certification recognize the right of all stakeholders (external and internal) to deliver their concern or grievances about the company activities, and to see such concerns and grievance addressed in a prompt and fair manner.	
		Available Whistleblowing System (IAD-01-07/17-04-2023/Rev.1), dated 6 June 2023. Stated that all grievance and concerns reported to the company reach their destination in a way that guarantees the confidentiality of the information and the person reporting. Information/grievance input can be by direct reporting; dedicated phone number; email and grievance page on company website; or letter to any company's office. Following up complaints in accordance with applicable regulation and company policies. Timeframe for following up grievance is 10 days.	
		It was evident grievance documentation under "Rekaman Keluh Kesah" e.g. KMD Pasar Mukomuko, KMD Lubuk Pinang, KMD Lalang Luas, KMD Lubuk Bangko, KMD Desa Setia Budi, KMD Sumber Sari, KMD Pondok	

		Kopi, and Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera.	
		Based on review to "Rekaman Keluh Kesah" of Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera, there was one grievance reported in September 2022 regarding SHU (profit) which not comply to the result of each member. Management through Field Head Assistant has responded and give explanation that meeting has been done between management and KPPST and agreed that fertilizing of 2 nd Semester will postponned to cut cost. There is no other grievance from smallhoder after September 2022. All issue related to the smallholders can be resolve in a soft negotiation where the smallholders no need to submit official grievance to the management.	
		Based on review to "Rekaman Keluh Kesah" of KMD Sungai Ipuh under management of PT Agro Muko – Sei Betung Esttae, there were several grievances recorded in 2023. Grievance mostly related to condition of block, road, and bridges. Management through Field Head Assistant has responded and followed up the grievances. Status of follow action are recorded as well.	
Criteria	5.2: The unit of certification supports improved livelihoods of smallholders a	nd their inclusion in sustainable palm oil value chains.	
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Based on interview with management representative stated that the whole smallholders under unit of certification is full managed scheme which all activities are controlled and managed by relevant Estates, including the manpower supply. All smallholders are under RSPO certification scope and including certified Mill supply base units.	Complied
		Based on interview with sample of KMD's, the company is concerned to maintain the KMD's area.	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity,	Based on interview with management representative stated that the whole smallholders under unit of certification is full managed scheme	Complied

	quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). - Minor compliance -	which all activities are controlled and managed by relevant Estates, including the manpower supply. All smallholders are under RSPO certification scope and including certified Mill supply base units. The company develops and implements livelihood improvement programmes through specific training which related to RSPO aspects, such as OHS trainings including PPE provision to the workers, and training related HCV area. Moreover, the FFB pricing to the scheme-smallholder is following the FFB pricing from Plantation Agency, which is the highest FFB prices possible for smallholder (not lower middleman buyer prices).	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Based on interview with management representative stated that the whole smallholders under unit of certification is full managed scheme which all activities are controlled and managed by relevant Estates, including the manpower supply. All smallholders are under RSPO certification scope and including certified Mill supply base units. Land status of KMD's is owned by village ownership, while Plasma land status is owned by individual ownership and having ownership certificates. All the FFB's production within unit of certification scope is legal. Based on interview with sample of KMD's, the company is concerned to maintain the KMD's area.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	The smallholder has been trained to supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.	Complied



		The refresh training was held on September 9, 2023 with Field Assistant presenters and attended by 14 spraying workers of SBE.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	The company can show evidences that it reported its mentoring program to farmers, both KMD and Cooperation (Scheme Smallholder) in Plantation Business Report First Semester Report submission to the Agriculture Department of Mukomuko District.	
_	e 6: respect workers' rights and conditions workers' rights and ensure safe and decent working conditions.		
Criteria	6.1: Any form of discrimination is prohibited.		
6.1.1	(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. - Critical (Major) compliance -		Complied

		,	
6.1.2	(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. - Critical (Major) compliance -	Tanah Rekah Estate: Employee list or "Daftar Karyawan" period October 2023. Total workforce is 426 employees, where 328 employees are local communities (77%) and 98 employees (23%) from outside of Muko Muko regency. There is no migrant workers employed in Tanah Rekah Estate Air Manjunto Estate (AME): Employee list or "Daftar Karyawan" period September 2023. Total workforce is 207 employees, where 161 employees are local communities (77.78%) and 45 employees (23%) from outside of Muko Muko regency. There is no migrant workers employed in Air Manjunto Estate. Recruitment process in Agro Muko confirmed that no payment or no fees during recruited, the process is freely in charge from applying, selection until accepted as employees.	Complied
		Based on interviews with plantation, factory and contractor workers, trade unions and gender committees, it was revealed that worker recruitment was based on the needs of the certification unit without regard to ethnicity, religion and specific backgrounds. All prospective employees have the right to have the opportunity to work in accordance with their scientific background and the needs of the certification unit. The workers also informed that there were no fees for the company's work entry process. Workers only prepare the supporting documents needed when applying for work, such as personal identity and work experience information.	
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	When PT Agro Muko hiring new employees, selection of applicants will conduct by several stages. From written test (general and specific), interview, medical test, on job training and join as employees.	Complied



		The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness for the jobs.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Pregnancy testing for female workers in PT Agro Muko is conducted personally through monitoring of menstrual period. If the female workers have late on menstrual periods, then the female workers can report to the medical	Complied
6.1.5	(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 -	A gender committee is in place at each operating unit (mill and estate). Air Manjunto Estate (AME): Minutes of meeting of Gender Committee Contact Group (GCoCG) dated 25 th Aug 2023 at Division office Sangkil. The meeting is attended by 10 participants, involving Estate management and representative of workers. The meeting discussing issues of concern related Maternity Leave and awareness of violence and sexual harassment at workplace. Sei Betung Estate (SBE): Minutes of meeting of Gender Committee Contact Group (GCoCG) dated 26 th Oct 2023 at Main office SBE. The meeting is attended by 5 participants, involving Estate management and representative of workers. The meeting discussing issues of concern related understanding of Marginalization, Stereotyping and Violence definition.	Complied
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	According to sample of payment slip verification period October 2023 as below: Air Manjunto Estate (AME): - Anita Astuti (Spraying), basic salary IDR 2,715,839. Nett salary IDR 2,298,572. Presence (25 days), Absence (1 day). - Anis Marwati (Spraying), basic salary IDR 2,715,839. Nett salary IDR 1,809,972. Presence (25 days), Absence (1 day).	Complied



- Luneh (Harvester), basic salary IDR 2,725,000, Gross salary IDR 3,793,071, Deduction IDR 2,207,103. Nett salary IDR 1,585,968. Presence (22 days), Absence (2 days).
- Idaran (Harvester), basic salary IDR 2,725,000, Gross salary IDR 4,085,304, Deduction IDR 1,077,318. Nett salary IDR 3,007,586. Presence (25 days), Absence (1 day).

Sei Betung Estate (SBE):

- Eko Budi Prasetyo (Harvester), basic salary IDR 2,725,000, Gross salary IDR 4,443,659, Deduction IDR 1,726,712. Nett salary IDR 2,716,947. Presence (25 days), Absence (0 day).
- Jeman (Grass Mower Operator), basic salary IDR 2,725,000, Gross salary IDR 3,854,898, Deduction IDR 2,487,242. Nett salary IDR 1,367,656. Presence (26 days), Absence (0 day).
- Tari Samsiah (Office Servant), basic salary IDR 2,725,000, Gross salary IDR 4,385,193, Deduction IDR 1,366,957. Nett salary IDR 3,018,236. Presence (25 days), Absence (0 day).

Tanah Rekah Estate (TRE):

- Titin (Spraying), basic salary IDR 2,725,000, Gross salary IDR 4,064,557, Deduction IDR 2,325,027. Nett salary IDR 1,739,530. Presence (26 days), Absence (0 day).
- Suswanti (Spraying), basic salary IDR 2,725,000, Gross salary IDR 3,255,757, Deduction IDR 2,207,617. Nett salary IDR 1,048,140. Presence (26 days), Absence (0 day).
- Mulyadi (Harvester), basic salary IDR 2,725,000, Gross salary IDR 4,504,588, Deduction IDR 1,138,222. Nett salary IDR 3,366,366. Presence (26 days), Absence (0 day).
- Sukatno (Harvester), basic salary IDR 2,725,000, Gross salary IDR 5,430,290, Deduction IDR 1,723,418. Nett salary IDR 3,706,872. Presence (26 days), Absence (0 day).

		In terms of basic salary, there is no difference in wages for employees, the difference in wages is due to differences in work output (harvest premiums), deductions (loans/debts) and also insurance payments. Unit of certification can demonstrate for equal pay for the same work scope.	
	6.2: Pay and conditions for staff and workers and for contract workers alwayges (DLW).		provide decent
6.2.1	(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. - Critical (Major) compliance -	Unit of certification employed permanent and temporary workers. Documentation of pay and working conditions for permanent workers is clearly describes in Collaborative Working Agreement or "Perjanjian Kerja Bersama" period Dec 2021 – Dec 2023. While, for temporary workers which categorized as Specified time work agreement or "Perjanjian Kerja Waktu Tertentu/PKWT". Specific procedure governing "PKWT" describes in SOP Recruitment for PKWT/FL (Non-Staff) HRD-01-03/12-12-2022/Rev.3, approved date 3 Feb 2023. The procedure describes: - Free Labour (FL) nor PKWT disallowed for Harvesting and Processing activities. - Referred to national regulation PP No. 35 Tahun 2021, the maximum contracted for PKWT is 5 years. - At the end of contract, employee categorize as PKWT will receives compensation fees in accordance with applicable regulation. - Compensation fees will give to PKWT employee with at least 12 months working period.	Complied



- FL nor PKWT is mandatory registered to health insurance and social insurance (BPJS Kesehatan dan Tenaga Kerja).
- FL nor PKWT will receive a Religion Allowance (THR) in accordance with applicable regulations.
- Basis of FL nor PKWT payment is refer to applicable minimum wage.

Sample or PKWT contract sighted as follow:

<u>Air Manjunto Estate (AME)</u>: sample of workers contract as Specified Time Work Agreement (PKWT).

- Anita Astuti (Spraying), contract signed on 2 Jan 2023 and valid until 31 Dec 2023.
- Anis Marwati (Spraying), contract signed on 1 Jul 2023 and valid until 30 Jun 2024.

<u>Sungai Kiang Estate (SKGE)</u>: sample of workers interviewed as Specified Time Work Agreement (PKWT).

- Kristina Br. Tarigan (Baby Sitter), contract signed on 1 Aug 2023 and valid until 31 Jul 2024.
- Anita Astuti (Manuring), contract signed on 1 Jan 2023 and valid until 31 Dec 2023.

<u>Sei Betung Estate (SBE):</u> sample of workers interviewed as Specified Time Work Agreement (PKWT).

- Poniseh (Manuring), contract signed on 1 Jul 2023 and valid until 30 Jun 2024.
- Julianti Lubis (Manuring), contract signed on 1 Aug 2023 and valid until 31 Jul 2024.
- Meria Zebua (Spraying), contract signed on 1 Feb 2023 and valid until 28 Feb 2024.

		Ratna Yenis (Spraying), contract signed on 1 Feb 2023 and valid until 28 Feb 2024.	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. - Critical (Major) compliance -	 Air Manjunto Estate (AME): sample of workers contract as Specified Time Work Agreement (PKWT). Anita Astuti (Spraying), contract signed on 2 Jan 2023 and valid until 31 Dec 2023. Anis Marwati (Spraying), contract signed on 1 Jul 2023 and valid until 30 Jun 2024. Sungai Kiang Estate (SKGE): sample of workers interviewed as Specified Time Work Agreement (PKWT). Kristina Br. Tarigan (Baby Sitter), contract signed on 1 Aug 2023 and valid until 31 Jul 2024. Payments and conditions of employment are describing in the "PKWT" contract, such as: payments/salary (Article 4); deduction (Article 4); health insurance (Article 5); social insurance (Article 7); reason for 	Complied
6.2.3	(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. - Critical (Major) compliance -	dismissal (Article 8); Normative rules on industrial relations are regulated in Collective Work Agreements or Company Regulations, for example provisions regarding working hours, wage systems, sick leave, absence, business trip, overtime, payment of allowances during being detainee, provisions of premiums, payment of holiday allowance and bonuses, social insurance and aid, work equipment, PPE, recruitment, transfer, promotions and terminations, provisions for motorized vehicles for workers and educators, company and worker obligations, Manpower Settlement Methods. Based on interview with "Serikat Pekerja Agro Mandiri or SPAM (worker union) and worker, stated that the company has realized normative	Complied

		obligation on industrial relation that regulated in Collective Work Agreements (PKB) and Company Regulation (PP).	
6.2.4	(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. - Critical (Major) compliance -	All permanent workers who were employed with PT Agro Muko were provided permanent adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities. Auditor visits housing complex at each sample operation unit (Tanah Rekah Estate, Sungai Kiang Estate, Air Manjunto Estate and Sei Betung Estate), verifying on employees' facilities and interviewing with sample of residents. It was clear that unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities.	Complied
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Facilities for workers already sufficient provided by unit of certification. Each estate located near local communities and traditional market, therefore the workers easily access to buy sufficient and affordable food.	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours. - Minor compliance -	PT. Agro Muko and PT. Mukomuko Agro Sejahtera has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component: - Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2023); - Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2023); - Food cost (with 2100 calory, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; - Housing cost (provided by company);	Complied



 Non-Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company);
- Mandatory deduction (from tax and BPJS levy);
Sub total = Food + Housing + NFNH = IDR $4,065,643$.
Total living basket = Sub Total + 5% * Sub Total = IDR 4,268,925
Net Living Wage = (Total living basket/FTE) = IDR 3,093,519.82
Gross Living Wage = Net Living Wage + Mandatory Deduction = IDR 3,183,487
Prevailing wage at IDR 3,538,604
Gap at IDR 355,116 (positive);

PROCEDURAL NOTE:

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.

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:

- 1. Payment of minimum wages in accordance with applicable regulations
- 2. Assessment of wages paid (prevailing wages) and in-kind benefits.

Once the DLW benchmark is available, this procedural note is no longer applicable.

000 00	office the PEW Benefithark is available, this procedural flote is no longer applicable.		
6.2.7	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to	Permanent fulltime employment is used for all core work performed by operating unit.	Complied
	jobs that are temporary or seasonal.	Based on document verification of employees list per September 2023	
	- Minor compliance -	in Air Manjunto Estate = 94 harvesters is permanent employees; Sei	
		Betung Estate = 106 harvesters is permanent employees; Muko Muko	
		POM = 46 processing employees is permanent.	
		While for temporary workers or PKWT is employed for upkeep and maintenance activities.	

6.3.1	(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. - Critical (Major) compliance -	There are no change regarding policy and workers organization compare to last year audit. PT Agro Muko – Mukomuko POM has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees' representative organizations in creating a constructive working environment". PT Agro Muko – Mukomuko POM implement two type of union, Independent Labour/Worker Union (Serikat Pekerja Agro Mandiri - SAPM) and Bipartite Organization. The organization has been registered to local governance such as: The registration of the PT Agro Muko – Mukomuo POM Bipartite Cooperation Institution is based on the Decree of the Head of the Mukomuko Regency Investment, Licensing and Manpower Service Number 02 of 2023 dated 31 October 2023 and is valid for 3 years. The registration of the Bipartite Cooperation Institution PT Agro Muko – Tanah Rekah Estate is based on the Decree of the Head of the Mukomuko Regency Investment, Licensing and Manpower Service Number 03 of 2022 dated March 30 2022, valid for 3 years. The registration of the PT Agro Muko – Sei Kiang Estate Bipartite Cooperation Institution is based on the Decree of the Head of the Mukomuko Regency Manpower and Transmigration Service Number 01 of 2022 dated 29 August 2023, valid for 3 years.	Complied
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 -	Record of Bipartite Cooperation Institution meeting are: On May 31 2023, discussion of the agenda regarding employee termination of employment	Complied

6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	A documented policy for the protection of children, including prohibition of child labour and remediation is in place and also accessible through the SIPEF corporate website https://www.sipef.com/hq/sustainability/policies/responsible-plantations-policy/ . The documented policy also available and describing in third party service contracts and supplier agreement.	Complied
Criteria	6.4: Children are not employed or exploited.		
	- Minor compliance -	Based on result of interview with labor union representatives, it has also known that there is not any intervention by company to the election of workers representative in Bipartite.	
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.	Based on interview, it is known that the management does not interfere with the formation or operation of registered labour union. There is no coercion and intervention related to membership and the course of the	Complied
		 On January 16 2023, negotiations for the settlement of employee termination of employment due to the employee's death. Employee heirs receive severance pay according to applicable regulations On 26 October 2023, discussion regarding employees who are absent from work, requests for leave and PPE shoes (replacement) Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union held meetings whenever it's needed. The meetings accommodated in bipartite and internal meeting and there has been no labor issue that brought to Manpower Agency. 	

6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	Documented evidence on the fulfilment of worker's minimum age requirements are demonstrated in List of Employees at each operating unit.	Complied
	- Critical (Major) compliance -	Sample on minimum age requirements:	
		Air Manjunto Estate (AME): document of employee list "Daftar Karyawan AME 2023", the minimum age of hire is 18 years old. Sample taken and verified: Taufik Virgo F. (Harvester), born 14 May 2002, join to work at 01 Jul 2020, he is 21 years old during hired; Sadarman (Tractor helper), born 22 Jun 2004, join to work at 01 Oct 2022, he is 19 years old during hired (as Specified Time Work Agreement/PKWT).	
		<u>Sei Betung Estate (SBE)</u> : document of employee list "Daftar Karyawan SBE 2023", the minimum age of hire is 18 years old. Sample taken and verified: Eka Fauzin (Harvester), born 09 Aug 2004, join to work at 01 Nov 2022, he is 19 years old during hired; Mitra Anggara (Harvester), born 2 Dec 2004, join to work at 01 Jul 2023, he is 19 years old during hired.	
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. - Critical (Major) compliance -	PT Agro Muko located in Indonesia, where regulation related to youg person workers was not available. Employment regulation in Indonesia only requires the minimum age (18 years old) can be recruited and no specific job are describing. But the unit of certification has had own policy and working condition that young workers are prohibited assigned to handling hazardous work.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Communication about 'no child labor' policy conducted frequently by unit of certification through muster morning and when recruitment process. Form of communication also demonstrate through the posters and put on notice board at surrounding village, housing complex, operating unit office and website https://www.sipef.com/hq/sustainability/policies/responsible-plantations-policy/ .	Complied



		During interview with sample of workers at Muko Muko POM, Tanah Rekah Estate, Sungai Kiang Estate, Air Manjunto Estate and Sei Betung Estate, all workers have understanding the no child labour policy and can explain that children is disallowing to assist the parents at workplace anytime.	
Criteria	6.5: There is no harassment or abuse in the workplace, and reproductive rig	ghts are protected.	
6.5.1	(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. - Critical (Major) compliance -	 Sexual Harassment Policy PT Tolan Tiga Indonesia (parent company of PT Agro Muko) dated 22 August 2022, stated about: Sexual harassment can take many forms and may include physical contact, verbal comments, propositional jokes, display of offensive material or other behavior All reports of sexual harassment will be handled properly and confidentially to obtain true and fair statements. Workers/people/whistleblowers should not become victims for reporting sexual harassment. Sexual harassment applies equally to both male and female workers This policy has been disseminated to all workforce regularly, the last one was on 11-15 September 2023. Gender committee has been established by the organization. Each estate and mill have appointed representative for gender committee. The committee consider matters such as; dissemination on women's rights, child care facilities to be provided by the growers and millers, women to be allowed to breastfeed up to 2 years before resuming chemical spraying/manuring or usage tasks, and women to be given specific break times to enable effective breastfeeding. Organization has also setting several signboards about this policy in the bulletin board in every office/mill estate. 	Complied



		Based on interview with sample of female workers, it is clearly that they have understood the company's policies on prevention of sexual harassment and others type harassment such as physical violence and verbal violence.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	PT Agro Muko – Mukomuko POM has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with sample of female workers and nurse, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day and not assign in high-risk area (spraying, manuring and or handling chemical substance) for 2 years. Beside that, H-1 and H-2 leave has been granted in accordance with existing regulations.	Complied
6.5.3	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. - Minor compliance -	 The company has identified the need of expectant mother and new mother. Management has fulfilled their need by providing: Clinic including company's doctor and paramedic, for getting regular check-up, consultation and giving birth. Monthly 'Posyandu' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. Maternity leave: 3 months including before and after giving birth in accordance with legal regulation. Company's ambulance for emergency respond, to get to nearest hospital. Daycare/crèche. Breastfeeding time Based on interview with sample of female workers and nurse, it is clearly	Complied
		that company are respectful on protection of reproductive rights. In	

...making excellence a habit."

		example, female workers who has children are given to breastfeeding time for 30-45 minutes every day and not assign in high risk area (spraying, manuring and or handling chemical substance) for 2 years. Beside that, H-1 and H-2 leave has been granted in accordance with existing regulations.	
6.5.4	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. - Minor compliance -	 The company has established procedures related to grievance such as: Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019. Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019. Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. This procedure has been disseminated regularly to all workforce and the last one was on 7 November 2023. Until this audit, based on the document verification, there is no grievance from the internal or external stakeholders submitted. This was supported by recognition from employees who have been interviewed who say that so far there have been no complaints against the company. 	Complied
Criteria	6.6: No forms of forced or trafficked labour are used.		
6.6.1	 (C) All work is voluntary and the following are prohibited: Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker's consent Involuntary overtime; Lack of freedom of workers to resign 	Within the Collaborative Working Agreement or "Perjanjian Kerja Bersama" period Dec 2021 – Dec 2023, contract of specified time work agreement/PKWT, employment procedures (HRD-01-00 Recruitment in general; HRD-01-01 Internal recruitment; HRD-01-02 External recruitment Staff; HRD-01-03 Recruitment for PKWT; HRD-01-04 Promotion to permanent), the unit of certification not applying Retention of ID documents or passports; Payment of recruitment fees; Contract substitution without worker's consent; Involuntary overtime;	Complied



		,	
	 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 Critical (Major) compliance - 	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. This provision is strengthened by the sample of employee's statements during direct interviews in a sample of the operating unit. Sampled employees stated that PT Agro Muko is fair and transparent in the recruitment and promotion process without any pressure, bondage, recruitment fees or ID retention. Apart from that, the workers also explained that there would be no withholding of legal documents, forced labor or fines that could harm workers.	
6.6.2	(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. - Critical (Major) compliance -	Unit of certification employed Permanent and temporary workers with specified time work agreement or "Perjanjian Kerja Waktu Tertentu/PKWT". Specific procedure governing "PKWT" describes in SOP Recruitment for PKWT/FL (Non-Staff) HRD-01-03/12-12-2022/Rev.3, approved date 3 Feb 2023. The procedure describes: - Free Labour (FL) nor PKWT disallowed for Harvesting and Processing activities. - Referred to national regulation PP No. 35 Tahun 2021, the maximum contracted for PKWT is 5 years. - At the end of contract, employee categorize as PKWT will receives compensation fees in accordance with applicable regulation. - Compensation fees will give to PKWT employee with at least 12 months working period. - FL nor PKWT is mandatory registered to health insurance and social insurance (BPJS Kesehatan dan Tenaga Kerja).	Complied



		 FL nor PKWT will receive a Religion Allowance (THR) in accordance with applicable regulations. Basis of FL nor PKWT payment is refer to applicable minimum wage. Based on document verification of employees list per September 2023 in Air Manjunto Estate = 94 harvesters is permanent employees; Sei Betung Estate = 106 harvesters is permanent employees; Muko Muko POM = 46 processing employees is permanent. 	
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	(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. - Critical (Major) compliance -	The responsible in health and safety has been established in accordance with the legal requirements, that is OHS Committee (Struktur P2K3) that has been endorsed by Manpower Agency, and the Secretary is a legal OHS Expert. Record of OHS Committee registration such as: a. Decree of the Head of the Investment and One-Stop Integrated Services Service of Bengkulu Province Number: 503/09.2850/007/DPMPTSP-P.1/2023 dated January 18 2023 concerning the Establishment of the PT Agro Muko — Mukomuko POM Occupational Health and Safety Advisory Committee (P2K3). The decision letter is valid as long as the company and the composition of its management do not change. b. Decree of the Head of the Investment and One-Stop Integrated Services Service of Bengkulu Province Number: 503/09.2850/047/DPMPTSP-P.1/2022 dated 23 August 2022 concerning the Determination of the Occupational Safety and Health Advisory Committee (P2K3) of PT Agro Muko Tanah Rekah Estate. The decision letter is valid as long as the company and the composition of its management do not change.	Complied



- c. Decree of the Head of the Investment and One-Stop Integrated Services Service of Bengkulu Province Number: 503/09.2850/056/DPMPTSP-P.1/2023 dated 18 September 2023 concerning the Establishment of the **PT Agro Muko Sei Kiang Estate** Occupational Safety and Health Advisory Committee (P2K3). The decision letter is valid as long as the company and the composition of its management do not change.
- d. Decree of the Head of the Investment and One-Stop Integrated Services Service of Bengkulu Province Number: 503/09.2850/064/DPMPTSP-P.1/2023 dated 26 October 2023 concerning the Establishment of the PT Agro Muko Sei Betung Estate Occupational Safety and Health Advisory Committee (P2K3). The decision letter is valid as long as the company and the composition of its management do not change.
- e. Decree of the Head of the Investment and One-Stop Integrated Services Service of Bengkulu Province Number: 503/09.2850/054/DPMPTSP-P.1/2023 dated 18 September 2023 concerning the Determination of the Occupational Safety and Health Advisory Committee (P2K3) of PT Mukomuko Agro Sejahtera Air Manjunto Estate. The decision letter is valid as long as the company and the composition of its management do not change.

Records of OHS Expert in each unit are:

- 1. OHS Expert on behalf of Siti Khairunnisa (MMPOM)
 - Certificate Number 5/7891/AS.02.04/XII/2019 dated 4 December 2019
 - Decree on the Appointment of General Occupational Safety and Health Experts from the Ministry of Manpower of the Republic of Indonesia Number 5/18909/AS.01.03/XII/2022 dated 12 December 2022 and is valid for 3 years



- OHS Expert Authorization Card Reg No. 79260/PK3/AJ/12/2022/P1 dated 12 December 2022 and valid until 12 December 2025
- 2. OHS Expert on behalf of Endah Novia Utari (Tanah Rekah Estate)
 - Certificate Number 5/977/AS.02.04/V/2021 dated 31 May 2021
 - Decree on the Appointment of General Occupational Safety and Health Experts from the Ministry of Manpower of the Republic of Indonesia Number 5/5782/AS.02.04/V/2021 dated 31 May 2021 and is valid for 3 years
 - OHS Expert Authorization Card Reg No. 98314/PK3/AJ/16/2021/P0 dated 31 May 2021 and valid until 31 May 2024
- 3. OHS Expert on behalf of Alfid Surachman (Sei Kiang Estate)
 - Certificate Number 5/988/AS.02.04/V/2021 dated 31 May 2021
 - Decree on the Appointment of General Occupational Safety and Health Experts from the Ministry of Manpower of the Republic of Indonesia Number 5/5793/AS.02.04/V/2021 dated 31 May 2021 and is valid for 3 years
 - OHS Expert Authorization Card Reg No. 98325/PK3/AJ/16/2021/P0 dated 31 May 2021 and valid until 31 May 2024
- 4. OHS Expert on behalf of Fachrul Reja Lubis (Sei Betung Estate)
 - Certificate Number 5/978/AS.02.04/V/2021 dated 31 May 2021
 - Decree on the Appointment of General Occupational Safety and Health Experts from the Ministry of Manpower of the Republic



- of Indonesia Number 5/5783/AS.02.04/V/2021 dated 31 May 2021 and is valid for 3 years
- OHS Expert Authorization Card Reg No. 98315/PK3/AJ/16/2021/P0 dated 31 May 2021 and valid until 31 May 2024
- 5. General OHS Expert on behalf of Edi Suriyadi (Air Manjunto Estate)
 - Certificate Number: Ser.18.17853/AK3/U/V/2018 dated 2 May 2018
 - Decree on the Appointment of General Occupational Safety and Health Experts from the Ministry of Manpower of the Republic of Indonesia Number 5/18913/AS.01.03/XII/2022 dated 12 December 2022 and is valid for 3 years
 - OHS Expert Authorization Card Reg No. 53559/PK3/AJ/12/2022/P1 dated 12 December 2022 and valid until 12 December 2025

The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and corrective actions to achieve target and improve the program such as Personal Protective Equipment (PPE), hazard from animal, safety notes, accidents etc. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc.

The quarterly OHS Report has been submitted to Labor Agency, such as :

Letter No. 279/MMPOM/XI/2023 dated 2 November 2023 regarding

		reporting of the P2K3 Report for the third quarter of 2023	
		Letter No. 02/P2K3-LHS/SKGE/VII/2023 dated 2 July 2023 regarding reporting of the P2K3 Report for the second quarter of 2023	
		Beside OHS Expert, in each operational units also have a First Aider Officer that has been trained, such as :	
		Workplace first aid license on behalf of Rasul Yadi and Dionisius Bambang Tri valid until April 13, 2024 (Mukomuko POM)	
		Workplace first aid licenses on behalf of Berlin Siregar, Niko Satria, Krisman Malau, Shilia Eka Sari Tanjung and Sukardi are valid until April 13, 2024 (Tanah Rekah Estate)	
		Workplace first aid licenses on behalf of Muhammad Akhwan, Rudi, Saiful and Sukedi are valid until April 13 2024 (Sei Kiang Estate)	
		Based on the explanation above, it can be concluded that the certification unit has a person in charge of OHS which has been approved by the relevant agency, the availability of documents for periodic meetings between the person in charge and all the interests of all parties related to OHS have been discussed at the meeting.	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first	There are no changes of accident and emergency procedures compare to last year audit.	Complied
	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. - Minor compliance -	The certified units have a qualified OHS Expert and trained First Aider Officer, please refer to indicator 6.7.1 above. The accidents happen has been recorded and using the LTA calculation. Described in more detail in indicator 6.7.5.	
		Land fire emergency response training was conducted on January 26 2023 and February 7 2023	



		Based on the results of field observations in the mill and estate, it is known that the certification unit has carried out the procedures that have been well related to the emergency response, such as the evacuation route in the mill / office / housing area, the availability of first aid kits in the room or those carried by the first aid officer in the field, and every personnel that have responsibility related to this has understood well the procedures that are owned.	
6.7.3	(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. - Critical (Major) compliance -	 PPE Provision Based on document review and interview with workers (5 process workers in MMPOM, 6 workers in facilities area, 12 spraying workers, 9 harvesters and 8 manuring workers), the PPEs are provided to all workers without any charge. The type of PPE is defined based on risk analysis (HIRAC) and/or MSDS. It has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, manuring, mill and harvesting such as: Handover of PPE in the form of shoes to harvesters on August 9-10 2023 Handover of PPE in the form of masks on May 24, 2023 to the spraying team (masks), and rubber gloves on September 6 2023 Handover of PPE in the form of shoes to harvesters on March 18, 2023 Apron handover to the spraying team on August 28, 2023 Handover of egrek and egrek sheaths to harvesters on August 8, 2023 Delivery of safety shoes to workshop employees, harvesters and operators in March 2023 Handover of PPE to the manufacturing team on March 23, 2023 	Complied

	T	I	
		If there is damaged PPE, the worker can request a replacement by reporting it to his superior and handing over the damaged PPE.	
		Sanitation facilities for chemical applicator Sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Division Offices. Therefore, the PPE and working tools are washed and stored in the special place and prohibited to be placed in worker's houses.	
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection. - Minor compliance -	 Medical care The company established the company's clinic, as well as its licensed company's doctor and paramedics. All workers including contractor's workers can use this facility. The company has complied legal compliance toward the clinic facilities and paramedic, sample as follows: a. Tanah Rekah Estate Nurse Registration Certificate No. 090152120-3246480 in the name of Rahma Fitriyah dated March 19, 2020, and valid until February 2 2025 Nursing Practice License (SIPP) Number: 503/0063/D.10/SIPP/X/2022 in the name of Rahma Fitriyah dated 12 October 2022 and valid until 2 February 2023 NIB: 18052200635440011 dated 13 October 2022 for Tanah Rekah Clinic, Tanah Harapan Village Recommendation for a Clinic Operational Permit from the Mukomuko District Health Service Letter No: 440/2459/D.6/VIII/2022 dated 9 August 2022 and valid until 8 August 2027 	Complied



b. Sei Betung Estate

- Nurse Registration Certificate No. 040151120-3384247 in the name of Yoga Prilza dated 10 December 2020 and valid until 24 November 2025
- Nursing Practice License (SIPP) Number: 503/0050/D.10/SIPP/X/2022 in the name of Yoga Prilza dated 5 October 2022 and valid until 24 November 2025
- Midwife Registration Certificate No. 130252220-3262675 in the name of Ike Widia Wati dated 20 April 2020 and valid until 15 October 2025
- Nursing Practice License (SIPP) Number: 503/0131/D.10/SIPB/X/2022 in the name of Ike Widia Wati dated 20 April 2020 and valid until 15 October 2025
- NIB: 18052200635440007 dated 13 October 2022 for Pratama Sei Betung Clinic, Penarik Village
- Recommendation for Clinic Operational Permit from the Mukomuko District Health Service Letter No: 440/2454/D.6/VIII/2022 dated 9 August 2022 and valid until 8 August 2027
- Doctor's Registration Certificate Number 1221100120211600 dated June 1 2020 and valid until May 4 2024

Accident and health insurance

For further medical care are covered in government employment and health insurance programs (BPJS Ketenagakerjaan & BPJS Kesehatan). This insurance has been paid monthly based on document review according to the applicable rule.

The auditor has verified the payment of *BPJS Ketenagakerjaan & BPJS Kesehatan* for period January – October 2023. It can be concluded that

		the payments have been conducted routinely (monthly) in accordance	
		with total worker including family member for national health insurance.	
		Sample of payment reviewed are :	
		National Employment Insurance (BPJS Ketenagakerjaan):	
		Record of payment for October 2023 with amount paid of IDR xx,326,xxx; Payment Code 400000077503 (Mukomuko POM)	
		Record of payment for October 2023 with amount paid of IDR xxx,012,xx; Payment Code 400000077500 (Tanah Rekah Estate)	
		Record of payment for October 2023 with amount paid of IDR xx,591,xxx; Payment Code 400000077661 (Sei Kiang Estate)	
		Record of payment for October 2023 with amount paid of IDR xx,474,xxx; Payment Code 400000077449 (Sei Betung Estate)	
		National Health Insurance (<i>BPJS Kesehatan</i>) has been paid for October 2023 cover all employees and their families.	
		Based on document review and interview with workers (5 process workers in MMPOM, 6 workers in facilities area, 12 spraying workers, 9 harvesters and 8 manuring workers), there is no issue related medical care. If the clinic can not handle the medical care, the patient will be brought to the partner hospital in the city using company's Ambulance.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	PT Agro Muko – Mukomuko POM has shown the record of injuries using lost time accident (LTA) metrics as in "Rekapitulasi Kejadian Kecelakaan Kerja– LTA" period January – October 2023. Record of accident as follow:	Complied
		Work accident report (Form 01-MMOM-2023-04-AC/NM-WP/TA) in the name of Zulkifli, Boiler Operator dated April 19, 2023, type of injury: cracked bone and sprain in the right hand, cause of injury: hit by an object. Lost working days: >7 days.	



Incident investigation report (Form 01-MMOM-2023-04-AC/NM-WP/TA) dated April 19, 2023. The chronology of the incident is explained in detail on the investigation form. The results of the investigation concluded that the root of the problem was that the lever diameter was too small (3.5 cm), causing the lever to slip out of the jack hole (5 cm), causing the worker to fall when jacking; the ditch area that is not covered by the landing. The corrective action is to eliminate the cause by lathing/welding on April 28, 2023. Precautions have been taken, namely socializing the risk of danger when using jacks and installing landings in the boiler trench area.

Work accident report (Form 02-TRE-2023-06-AC-WA) in the name of Amoni Gulo, Harvester dated June 3, 2023, type of injury: Torn wound, cause of injury: using tools. Lost working days: 11 days.
 Incident investigation report (Form 02-TRE-2023-06-AC-WA) dated June 6, 2023. The chronology of the incident is explained in detail on the investigation form. The results of the investigation concluded that the root of the problem was that the victim did not apply the SOP for cutting fruit stalks (WI OPM-05-02-W-05, where when cutting fruit stalks the victim's feet were on the side of the FFB, not behind the FFB.

Preventive measures have been taken, namely refreshing SOP training for victims and all harvesters.

Work accident report (Form 02-AME-2023-07-AC-WA) in the name of Aris Antoni, Harvester dated 17 July 2023, type of injury: stabbed while making fruit at TPH, cause of injury: using tools. Lost working days: > 12 days.

Incident investigation report (Form 02-AME-2023-07-AC-WA) dated July 17 2023. The chronology of the incident is explained in detail on the investigation form. The results of the investigation concluded



		that the root of the problem was that the victim's leg was too close to the TBS to be stabbed. Precautions have been taken, namely refresh training to work safely when loading FFB to victims and all harvesters.	
Principle	e 7: Protect the environment, conserve biodiversity and ensu	re sustainable management of natural resources.	
Criteria	7.1: Pests, diseases, weeds and invasive introduced species are effect	tively managed using appropriate Integrated Pest Management (IPM) techniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The company has a program for integrated pest control, both for core and scheme smallholder plantations. In this program, the company carries out initial identification of the existence of beneficial plants as an initial step in control. If during the detection process a pest attack is found, the company will carry out a census of pest attacks. Control using chemicals is only carried out if the pest attack has crossed the threshold. The auditor also carried out field observations, it was discovered that the company had installed barn owl box as a form of biological control for rat attacks. The following are several monitoring records of census attacks and biological control for several units, including: - Air Majunto Estate in May 2023 recorded that 122 FFB were attacked by rats from 12 census blocks. However, on average, the percentage of attacks is still below the threshold (<5%). - Air Majunto Estate in September 2023 recorded 45 FFB infected by rats from 5 census blocks. However, on average, the percentage of attacks is still below the threshold (<5%). - Monitoring results in October 2023, there are 3 active gupon in Air Majunto Estate. - Monitoring results for July 2023, there are 2 active gupon at Sei Kiang Estate.	Complied

		 There were no pig attacks at Air Majunto Estate based on Pest Detection records for August 2022. Census records of nettle caterpillars and bagworms in Sei Betung from 16 to 17 March 2023 indicate that bagworm attacks are in the light category, so there is no need to carry out chemical control activities. There are no pest attacks in the period Jan-Oct 2023 at Sei Kiang Estate. Monitoring the condition of the barn owl box on June 8 2023 at Sei Kiang Estate. Based on field observation and worker interviews related to pest detection there acknowledge and understand according about pest and disease plan and knowing the types of pests and disease in palm oil plantation. 	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Based on the results of the document review and also field observations, the company does not carry out invasive plant planting activities. However, the company carries out an evaluation regarding the types of invasives that appear in the company's units. Based on the results of the evaluation on October 2 2023 which refers to the book "100 of The World's Worst Invasive Alien Species" by ISSG (Invasive Species Specialist Group) in 2004, 4 types of plants were found that were invasive in the company's environment, namely Imperata cylindrica, Clidemia hirta, Lantana camara & Mimosa pigra. The company carries out control regarding these invasive types by carrying out selective spraying with the active ingredient's glyphosate and triclopyr.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on the results of document reviews and also field observations in Tanah Rekah, Air Majunto, Sei Kiang, Sei Betung and also KMD (Village Community Gardens), it is known that there was no use of fire in	Complied



	- Minor compliance -	consultation with the Karya Village and Saribo	controlling pesticides. This is in line with the results of public consultation with the District Agriculture Service. Mukomuko, Ranah Karya Village and Saribulan Village, that the local community did not find or see the company using fire to control pests.				
Criteria 7	7.2: Pesticides are used in ways that do not endanger health of workers, far	nilies, communities or th	e environment.				
7.2.1	(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. - Critical (Major) compliance -	The company shows rejustification for their fungicides, acaricides and the pesticide brands	Complied				
		Name	Active Ingredients	Justification			
		Smart 486 SL	Glyphosate	Herbicide			
		Garlon 670 EC	triclopyr	Herbicide			
		Ally 20 WG	Methyl Metsulfuron	Herbicide			
		Starane	Fluroxyypyr	Herbicide			
		Decis 25 EC	Deltametrin	Insecticide			
		Marshall 5 G	Karbaril	Insecticide			
		Amistartop 325 SC	Azoxystrobin	Fungisida			
		the 2022 and 2023 period	ods. The list of pesticides	d by the company during s used includes the active and the target of the			

		and interview applicators ha of spray equip	The results of field observation on Tanah Rekah and Air Majunto Estate and interviews with pesticide applicators showed that all pesticide applicators had understood the procedures for spraying and proper use of spray equipment, targeting weeds, prohibiting spraying in river border areas and the actions taken when poisoning occurs in the area.					
7.2.2	(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 -						Complied	
		Pesticide Name	Month	Total Applicati on (litre)	Total Active Ingredient s (gram)	Total Active Ingredie nts per area (gram/ha)		
		Garlon	Sep 23	12	48	0.82		
		Smart	Oct 23	220	4,400	10.11		
		Supremo	Oct 23	3	60	0.17		
		Metsulindo	Oct 23	7,250	1,812,500	2,569.76		
		Sei Kiang Esta	te					



Pesticide I Name	Month	Total Applicati on (litre)	Total Active Ingredie nts (gram)	Total Active Ingredie nts per area (gram/ha
Smart S	Sep 23	160	3,200	1.68
Miracle S	Sep 23	10	4,401	2.31
Basta 9	Sep 23	140	560	0.29
Garlon	Aug 23	8	32	0.02
Sei Betung Es	Estate			
Name	Month	Total Applicati on (litre or gram)	Total Active Ingredie nts (gram)	Total Active Ingredie nts per area (gram/ha)
Name		Applicati on (litre	Active Ingredie nts	Active Ingredie nts per area
Name Metsul	Month	Applicati on (litre or gram)	Active Ingredie nts (gram)	Active Ingredie nts per area (gram/ha)



			ve ingredient content	e type of pesticide, the active t, amount of pesticide used, hectare.	
7.2.3 (C) Any use of pesticides is minimised as part of a plan, eliminated who possible, in accordance with IPM plans. - Critical (Major) compliance -	The company shows e unit each year. Here a		on in pesticide use for each	Complied	
		Sei Betung Estate			
		Active Ingredients	2021 (gr/ha)	2022 (gr/ha)	
		Triclophyr	0.96	0.09	
		Methyl Metsulfuron	0.15	0.08	
		Tanah Rekah Estate Active Ingredients	2022 (liter)	2023 (liter)	
		Deltametrin	27.6	25.4	
		Glyohosate	1,398.07	1,375.35	
	attack census results used as a preventive number of the certification unit has been attack census results.	have passed the thr neasure. nas shown a docume	any only uses it if the pest reshold. Insecticides are not		
		implementation of de	tection activities and	ins the realization of the d census of disease pests. Is and rat census activities in	

		2023 PT Agro Muko, there are no indication of pest attack that has been above the minimum threshold, so no control is needed. The company has shown documents on the use of pesticides for the past three years. Based on this document, the auditor has verified that the company no longer uses paraquat anymore to control weeds and there is no use of pesticides for pest control because there is no pest attack that exceeds economic limits.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -	 In the context of integrated pest control, the company has related procedures in: Pest Control (OPM-07-02/02-10-2017/Rev.2) dated 20 November 2017, concerning pest control of oil palm plants. Disease Control (OPM-07-03/02-10-2017/Rev.2) dated 20 November 2017, concerning control of oil palm plant diseases. Integrated Pest Management (OPM-07-04/02-10-2017/Rev.2) dated 20 November 2017, concerning integrated pest management. Weed Control (OPM-08-01/02-10-2017/Rev.2) dated 20 November 2017, regarding manual and chemical weed control. Census and Detection (OPM-07-01/02-10-2017/Rev.2) dated 20 November 2017, concerning census and detection of plant pests and diseases. 	Complied
		In this procedure, the company establishes an early warning system in carrying out control actions. The company also prioritizes biological control by planting useful plants. Chemical action is only carried out if the census results exceed the threshold. Based on this evidence, the company does not carry out pest control by preventive means (prophylactic).	



		Based on the results	of field video observat	eeds and field conditions. ions and interviews with praying was carried out	
1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as		nation in indicator 7.2. des used in operational	1, the company shows a areas, as follows:	Complied	
	validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	Name	Active Ingredients	Class	
	- Minor compliance -	Smart 486 SL	Glyphosate	III	
	7.2.5a Judgment of the threat and verify why this is a major threat.	Garlon 670 EC	triclopyr	II	
		Ally 20 WG	Methyl Metsulfuron	U	
		Starane	Fluroxyypyr	Pesticides unlikely to present hazard in normal use	
		Decis 25 EC	Deltametrin	II	
		Marshall 5 G	Karbaril	II	
		Amistartop 325 SC	Azoxystrobin	II	
		is no paraquat and V	VHO Class 1A or 1B, o	o pesticide storage, there or that are listed by the pplication from period	



	7.2.5b Why there is no other alternative which can be used.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat	
	7.2.5d Process to limit the negative impacts of the application.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	As explained in 7.2.5, there's no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat	
7.2.6	(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. - Critical (Major) compliance -	In order to increase the understanding and competence of workers in charge of using pesticides by conducting field training related to types of pesticides, how to use them and also how to mitigate them. The following is an example of training recordings shown in the Training Report "Refresh Spraying Management Training" at Sei Betung Estate on September 9 2023. The training was attended by 14 workers.	Complied
		In this training, the company also uses an assessment mechanism in the form of a post-test and pre-test to ensure that workers really understand the technicalities of pesticide management.	
		Based on the results of interviews with members of the spraying team for each estate, it is known that the Company has provided a special mixing chamber for mixed pesticides before they applicated to field. In addition, based on the review of documents and records of pesticide application, the company also provides clean water, soap and a first aid	



		kit to support the sanitation and OHS aspects required by the spraying team.	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices Critical (Major) compliance -	Based on video field observations at the Chemical Warehouse, as well as interviews with operators in each Estate and Mill, it is known that used pesticide containers will be stored in temporary shelters for Hazardous and Toxic waste which were built with OHS and environmental aspects in mind. The water used for rinsing will be reused as mixing water for chemical activities.	Complied
		It is known that pesticide storage activities have been carried out in accordance with best practice, including the availability of MSDS according to the type of pesticide, the pesticide warehouse is equipped with adequate ventilation, the pesticide mixing place is equipped with bunds, the warehouse staff has PPE was given in the form of rubber gloves and masks, and warehouse staff also received special health checks.	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging. - Minor compliance -	The company shown SOP of Hazardous Waste (No. ENC 01-10/04-03-2019/Rev 1 dated 18 March 2019), which explains the mechanism for storing pesticides in a special warehouse, including a place for mixing pesticide ingredients to be used in the field in a special isolated place so that they are not potentially exposed chemicals outside the warehouse. Storage of used pesticide packaging is stored in a temporary storage area for hazardous waste and then sent to collectors who have a permit.	Complied
		The company also washes used sacks of fertilizer or agrochemical packaging in a special washing place by designated officers. In addition, the waste water used for washing is collected and can be reused for further mixing of chemicals. After the washing activity is complete, the packaging is stored, counted, recorded and there is evidence of periodic monitoring, and the amount is accumulated. The company also held a	

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		socialization on the ban on the use of hazardous waste packaging on January 8, 2023, which was attended by 15 people. Based on field visits to pesticide warehouses and hazardous waste storage areas, it is known that pesticide storage areas are well managed, oil traps are available, air ducts are sufficient and isolated so that pesticides are not potentially exposed to leaving the warehouse. Pesticide waste such as used pesticide packaging which is classified as hazardous waste is also found stored in a temporary storage warehouse for hazardous and toxic waste which is properly monitored which is then collected to a licensed collector. Before being stored in the hazardous waste storage, used pesticide packaging in the form of jerry cans is chopped first, this is done by management to avoid reuse of pesticide packaging and to make storage space efficient. Based on interviews with pesticide application employees and foremen at Estate, it is known that all used pesticide packaging containers were returned and sent to the hazardous waste storage and not used for any other purpose than pesticide application activities. Used packaging	
		containers, work tools and work clothing are all stored in special storage areas. Thus, no contaminated goods are brought home. The results of observations in employee housing revealed that used pesticide packaging was not disposed of in the landfill and was not used for other purposes such as trash cans, flowerpots and so on.	
7.2.9	(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. - Critical (Major) compliance -	Based on the results of document reviews and also field observations in Tanah Rekah, Air Majunto, Sei Kiang, Sei Betung and also KMD (Village Community Gardens), it is known that no aerial pesticide control was found. This is in line with the results of public consultation with the District Agriculture Service. Mukomuko, Ranah Karya Village and	Complied



		Saribulan Village, that the local community did not find or see the company applying air spraying.	
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	 PT Agro Muko – Mukomuko POM has conducted the special annual medical surveillance for pesticides operators. This medical check up cooperate with Laboratorium Klinik Kesehatan Spesialis Anugerah Ibu – Medan. Records of MCU in 2023 as follow: Special Health Examination for high-risk employees by Klinik Kesehatan Spesialis Anugerah Ibu on July 20 2023 which was attended by 40 employees. The results of the health examination stated that all employees examined were in good condition. Socialization was carried out on October 14 2023. (Tanah Rekah Estate) Special Health Examination for high-risk employees by Klinik Kesehatan Spesialis Anugerah Ibu on July 21 2023 which was attended by 32 employees. The results of the health examination stated that all employees examined were in good condition. Socialization was carried out on October 24 2023. (Sei Kiang Estate) Special Health Examination for high-risk employees by Klinik Kesehatan Spesialis Anugerah Ibu on July 21 2023 which was attended by 33 employees. The results of the health examination stated that all employees examined were in good condition. Socialization was carried out on 21-27 September 2023. (Sei Betung Estate) Special Health Examination for high risk employees by Klinik Kesehatan Spesialis Anugerah Ibu on July 21 2023 which was attended by 25 employees. The results of the health examination stated that all employees examined were in good condition. Socialization was carried out on September 29 2023. (Air Manjunto Estate) 	Complied



		Based on document review and interview with workers (12 spraying workers), they have attend the MCU in 2023 and the result has been informed to them.	
7.2.11	(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. - Critical (Major) compliance -	Based on document "Absensi Pekerja Spraying/Manuring — Absensi Hamil-Menyusui", obtain information there are no spraying and or manuring workers that working in pregnant or breastfeeding condition. This information later on verified during interview with workers (12 spraying workers and 8 manuring workers) and nurse (3 nurses), where all of them are female workers. They stated that female workers who has children are given to breastfeeding time for 30-45 minutes every day and not assign in high risk area (spraying, manuring and or handling chemical substance) for 2 years. Beside that, H-1 and H-2 leave has been granted in accordance with existing regulations.	Complied
mills on t the age o	g to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning the development and physical, mental and social health of children, the nation of 18 for pesticide spraying. For this reason, the provisions of young workers	onal interpretation mandates that the unit of certifications does not employ under 18 years in indicator 7.2.11 are irrelevant.	
Referring mills on t the age of	g to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning the development and physical, mental and social health of children, the natio	onal interpretation mandates that the unit of certifications does not employ under 18 years in indicator 7.2.11 are irrelevant.	



		 Hazardous waste (used oil, empty chemical container, contaminated material, battery), stored in the permitted temporary storage, and disposed by permitted waste management company/transporter. Wastewater from POM, managed by wastewater pond plant and biogas plant to the GHG emission. Waste from POM, such as EFB applied in the field as mulching, shell and kernel as boiler fuel. 	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	The company shows documents for waste management and identification for the 2023 period which inform waste management in accordance with the sources of waste identification and management plans, including: Hazardous Waste	Complied
		The company has SOPs related to Hazardous and Toxic Waste management which are listed in SOP of Hazardous and Toxic Waste Materials (No. ENC 01-10/04-03-2019/Rev 1 dated 18 March 2019), which explains regarding the management of Hazardous and Toxic materials and Hazardous and Toxic Waste shows that the company has regulated all obligations and responsibilities as well as procedures for storage, storage time, and delivery time to a licensed Hazardous Waste transporter.	
		The company has temporary storage of hazardous and toxic waste in mill and every estate which has been licensed in accordance with the Decree of the Head of the Investment and One-Stop Service Office of Mukomuko Regency.	



Based on field observation and interview with PIC in temporary hazardous storages, it is verified that the waste/chemical container have been stored separately in accordance with its characteristics (refer to applicable regulation and/or instruction on the packaging). Waste input and output (disposed by permitted company) has been recorded in waste logbook. The stores have been completed with alarm, fire extinguisher, spill kit, secondary containment and PPE for operation.

The hazardous waste management reports have been documented quarterly and reported to Government of Mukomuko Regency. The recent report has been submitted electronically on 22 July 2023 (*Tanda Terima Elektronik* ID 1690008869-2858).

Liquid Waste

PT Agro Muko has a Wastewater Treatment Plant. Liquid Waste Monitoring is carried out regularly, every month. The liquid waste test result report is reported regularly (every 3 months) to the Environment Agency of Mukomuko Regency.

Wastewater Treatment Plant procedures are regulated in "SOP Effluent Plant in Agro Muko POM No.POM-10-03", dated November 2, 2017. There is an explanation in the form of WWTP work instructions: Work Instruction / Work Instruction for the Operation of Waste Ponds No.POM-10-03-W01.

The company has a Liquid Waste Disposal Permit to a Water Body based on Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja Kabupaten Mukomuko No. 503/18/D.10/IPALD/IX/2019 dated 03 September 2019 which is valid for 5 years.

		Domestic waste	
		Based on interview with housing residents, and field observations to the landfills, it is verified that every house has had a trash bin, transported to the landfill about three times a week. The landfills are located far from water sources, communities and is outside of conservation areas. The landfills have been protected and have had signboards to avoid disturbance.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	The company does not carry out open burning for waste destruction, this can be proven from field visits to landfills where there was no burning waste. The results of interviews with mill and estate employees also stated that there was no burning of waste because they were aware of the ban on burning activities. Organic waste from housing is managed by means of burial, while inorganic waste is disposed of in a designated place, then transported twice a week and disposed of in a landfill and then stockpiled when the landfill is full. The results of field observations in the employee housing area also showed that there were no traces of burning activities, besides that there were also many warnings about the prohibition of burning waste and the dangers that could arise from burning activities. Interviews with employees who live in the housing also stated that they never burn trash.	Complied
Criteria :	7.4: Practices maintain soil fertility at, or where possible improve soil fertility	y 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.	In order to practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures:	Complied
	- Minor compliance -	Trimming the fronds (OPM-05-04/02-10-2017/Rev.2) dated 20 November 2017, as a guide to reducing the fronds to maximize fruit size.	



- Ablation, Castration and Sanitation (OPM-05-01/02-10-2018/Rev.3) dated 4 February 2019, as guide for ablation and castration on palm oil.
- Inorganic Fertilizer (OPM-06-01/30-03-2023/Rev.4) and Organic Fertilizer (OPM-06-02/15-02-2023/Rev.4) dated 20 November 2017, as fertilizer guidelines based on recommendations fertilization.
- Leaf sampling and rachis sampling (OPM-06-04/02-10-2017/Rev.2) on 20 November 2017.
- Weed Control (OPM-08-01/02-10-2017/Rev.2) dated 20 November 2017, regarding manual and chemical weed control.
- Pest Control (OPM-07-02/02-10-2017/Rev.2) dated 20 November 2017, concerning pest control of oil palm plants.
- Disease Control (OPM-07-03/02-10-2017/Rev.2) dated 20 November 2017, concerning control of oil palm plant diseases.
- Integrated Pest Management (OPM-07-04/17-07-2019/Rev.3) dated 20 November 2017, concerning integrated pest control.
- Weed Control (OPM-08-01/02-10-2017/Rev.2) dated 20 November 2017, regarding manual and chemical weed control.
- Receiving and Inspection Procedures, namely Fruits Grading Procedure (LAB-01-10/08-03-2021/Rev.5) dated March 8 2021, explains the FFB sorting criteria at Palm Oil Mills.
- Harvesting (OPM-05-02/26-10-2021/Rev.6) dated 5 November 2021, as guide for harvesting activities on field.
- POM-01-03; Rev2; dated 03/25/2019; Acceptance of FFB Agro Muko Palm Oil Mill.

DOM 02 02 D 2 Lt 102/25/2040 Ct 11 Ct 11 Lt
 POM-02-03; Rev2; dated 03/25/2019; Sterilizer Station at Agro Muko Palm Oil Mill.
 POM-03-03; Rev1; dated 03/25/2019; Threshing Station at Agro Muko Palm Oil Mill.
 POM-04-03; Rev1; dated 03/25/2019; Pressing Station at Agro Muko Palm Oil Mill.
 POM-05-03; Rev1; dated 03/25/2019; Clarification Station at Agro Muko Palm Oil Mill.
 POM-06-03; Rev3; dated 03/25/2019; Kernel Plant at Agro Muko Palm Oil Mill.
 POM-07-03; Rev1; dated 03/25/2019; Steam Plant at Agro Muko Palm Oil Mill.
 POM-08-03; Rev1; dated 03/25/2019; Power Plant at Agro Muko Palm Oil Mill.
 POM-09-03; Rev1; dated 03/25/2019; Water Treatment at Agro Muko Palm Oil Mill.
 POM-10-03; Rev1; dated 03/25/2019; Effluent Plant at Agro Muko Palm Oil Mill.
 POM-11-03; Rev1; dated 03/25/2019; Storage and Dispatch at Agro Muko Palm Oil Mill.
 POM-12-03; Rev1; dated 03/25/2019; Workshop at Agro Muko Palm Oil Mill.
 POM-13-03; Rev1; dated 03/25/2019; EFB Plant at Agro Muko Palm Oil Mill.

		POM-14-03; Rev1; dated 03/25/2019; Biogas Plant at Agro Muko Palm Oil Mill.	
		MKT-03-06; date 04/03/2019; Supply Chain and Traceability of Palm Oil.	
		Work instructions / SOPs cover all plantation activities starting from land clearing, nursery practice, planting oil palm, planting LCC plants, upkeep of mature and immature and fertilizing, managing pests and diseases, harvesting, and transporting FFB to the mill.	
		Based on the interviews with workers (harvesters, pesticide application workers, and mill operators) it concluded that workers have a sufficient understanding and demonstrated the company procedures.	
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented. - Minor compliance -	The company carries out leaf analysis activities in the context of planning follow-up plant maintenance, including recommendations for fertilizer to be used for each land block. For example, the company carried out a leaf analysis examination for the Tanah Rekah Estate unit which was carried out in March 2022 as a basis for fertilization for the 2023 period. Leaf samples were analyzed in the verdant Plant Nutrition and Soil Laboratory. The standard units of measurement for the leaf and rachis tissue analysis are N, P, K, Mg and Ca in percentage of dry matter and for B in parts per million.	Complied
		In addition, there are also soil analysis records for each company unit, for example:	
		 Records of soil testing at Sei Kiang Estate carried out from 15 to 17 June 2020 by Verdant Bioscience PT Timbang Deli Indonesia (Sipef Group) in the certificate letter RD-BG/RMO/87/2020 with PO number PTAM043685 with a total of 	

		Air Majunto Estate	
7.4.4	Records of fertilizer inputs are maintained Minor compliance -	The company has records of fertilizer use in the 2023 Fertilizer Recommendations document. Below are some samples of fertilizer use records for several units:	Complied
	- Minor compliance -	 Record of Actual EFB utilization (to date October 2023) on Sei Betung Estate Block 14G02 as amount as 1,268 MT with recommendation is 1,049.24. Record of Actual EFB utilization (to date November 2023) on Tanah Rekah Estate Block 22C01A as amount as 1,170.27 MT with progress is 97% from recommendation. 	
7.4.3	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.	The company carries out nutrient recycling strategy activities by implementing empty bunches in the field as a substitute for inorganic fertilizer. Here are some of the recordings:	Complied
		The results of the analysis are used as fertilizer recommendations in 2023.	
		 N total 0.12%; Clay 19%; Silt 20%; Sand 61%; B 15 ppm; OM 15%. Records of soil testing at Sei Betung Estate carried out on 2 – 24 2020 by Verdant Bioscience PT Timbang Deli Indonesia (Sipef Group) with a total of 6 soil samples. For example, in the soil sample for block 14G02 with a depth of 0-20 cm the test results show a pH of 4.50; N total 0.15%; Clay 15%; Silt 20%; Sand 65%; B 39 ppm; OM 4.3%. 	
		8 soil samples . For example, in the soil sample for block 17B03 with a depth of 0-20 cm the test results showed a pH of 4.70;	

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Division	Date	Block	Туре	Amount (kg)
2	2 Sep 23	12F01	NPK 12-12- 7-2	4,700
2	4 Sep 23	12F02	NPK 12-12- 7-2	5,000
2	26 Aug 23	12G01	NPK 12-12- 7-2	3,800
Sei Betung E	state			
Division	Date	Block	Туре	Amount (kg)
F1	24 March 23	12A01A	Urea	3,825
F1	23 March 23	12A02A	Urea	4,108
F1	25 March 23	12B01A	Urea	6,354
Tanah Rekah	n Estate			
Division	Date	Block	Туре	Amount (kg)
II	March 2023	19B13A	Urea	1,755
II	March 2023	19B14A	Urea	2,479

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		II	March 2023	19B15A	Urea	1,374		
		Based on the review of fertilization realization documents, it was concluded that the fertilization realization was appropriate based on the fertilizer recommendations set.						
		Based on document review and interviews with staff, the realization of fertilization in each estates reached 100% in 2022, it was completed according to the program.						
		Estate and	results of field Sei Betung fertilization	Estate, it is	known that	workers	have	
Criteria 7.5: Practices minimise and control erosion and degradation of soils.							_	
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available Critical (Major) compliance -	Detailed Lan	y has maps rod d Survey repo ments shown:					Complied
		Tanah Rekah	Estate, there	is an area witl	n slopes:			
		- 5 - 10° v - 10 - 15° - 15 - 20°	th 2.044,04 Havith 1.638,84 Havith 358,03 Havith 53,73 Hawith 6,58 Ha.	la; a;				

		 Sei Kiang Estate demonstrates topographic map, indicating the area varies between 0-5 o up to 15-25°. Area with slope ≥ 25° sets aside as HCV area. No peat soil in Sei Kiang Estate. Mukomuko Estate demonstrates topographic map, indicating the area varies between 0-2 o up to 10-25°. Area with slope ≥ 25° sets aside as HCV area. Based on a review of the soil analysis document, the following information is provided: Topography of the area ranges from flat to very steep hill. It is estimated about 10,332 ha of the area are undulating to hilly and 1,114 ha are steep to very steep. A total of 12 dominant soil series have been identified. Majority of these soils are developed over sedimentary rocks and basalat, with some riverine alluvium. Peat soil constitutes about 3% of total area. The lowest mean annual rainfall was in Sei Betung Estate (Penarik II Division) with 2,611 mm. the Highest rainfall was in Sei Kiang Estate with 4,560 mm. 	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	From the results of field observations at the Tanah Rekah, Air Majunto and Sei Kiang Estate, it is known that replanting activities are not carried out with slopes above ≥ 25° as stipulated in Minister of Agriculture Regulation No. 131 of 2013 concerning Guidelines for Good Palm Oil Cultivation.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on the results of field observations in the replanting area in Air Majunto and also Sei Kiang Estate, the auditor did not find any planting of oil palm plants with a slope above $\geq 25^{\circ}$ as stipulated in Minister of	Complied



		Agriculture Regulation No. 131 of 2013 concerning Guidelines for Good Palm Oil Cultivation.	
Criteria operatio	7.6: Soil surveys and topographic information are used for site planning ons.	in the establishment of new plantings, and the results are incorporated in	into plans and
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	 The company carried out soil analysis activities for PT Agro Muko which were previously carried out in March and June 2010. Based on a review of the soil analysis document, the following information is provided: Topography of the area ranges from flat to very steep hill. It is estimated about 10,332 ha of the area are undulating to hilly and 1,114 ha are steep to very steep. A total of 12 dominant soil series have been identified. Majority of these soils are developed over sedimentary rocks and basalat, with some riverine alluvium. Peat soil constitutes about 3% of total area. The lowest mean annual rainfall was in Sei Betung Estate (Penarik II Division) with 2,611 mm. the Highest rainfall was in Sei Kiang Estate with 4,560 mm. On sloping land, the unit of certification applies contour stakes and terracing, builds horseshoe (individual terraces), conservation plants, and so on. 	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	PT Agro Muko has an SOP for land clearing including land preparation which is stated in the SOPs as follows: - General Information: New Development Areas and Replanting (OPM-03-00/02-10-2017/Rev.2) dated 20 November 2017. - Survey and Mapping (OPM-03-01/02-10-2017/Rev.2) dated 20 November 2017. - Land Cleaning (OPM-03-02/02-10-2017/Rev.2) dated 20 November 2017.	Complied

7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	There were no new plantings in the peat area after 15 November 2018. There was also no addition or expansion of the area from the previous assessment. The company only carries out replanting activities for areas	Complied
Criteria	7.7: No new planting on peat, regardless of depth after 15 November 2018 a	and all peatlands are managed responsibly.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	As explained in indicators 7.6.2, The company carried out replanting activities by considering the results of the soil analysis previously carried out in 2020. The results of a semi-detailed land survey conducted by the company of PT Agro Muko which contains information related to soil types and slope levels in the company's operational area and serves as a guide for determining the location of roads and infrastructure in the company's operational areas	Complied
		 Land Preparation (OPM-03-03/02-10-2017/Rev.2) dated 20 November 2017. Planting Ground Cover Legumes – Mucuna bracteata (OPM-03-00/04-10-2017/Rev.2) dated 20 November 2017. Planting oil palm in the field (OPM-03-05/02-10-2017/Rev.2) dated 20 November 2017. Field visits for replanting activities were carried out at Sei Kiang Estate and Tanah Rekah. Based on a review of documents and field visits, PT Agro Muko does not use fire/burning in land clearing activities. Land clearing for replanting is influenced by topography (flat or hilly which requires terraces) as well as the presence of low areas which require ridges (platforms). 	



•		<u>, </u>	
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	Previously, there was a soil type assessment carried out in August 2017 for Rekah Estate Land in the Soil Science Laboratory document, Faculty of Agriculture - Bengkulu University. In this document, it is known that there is land with the Typic Haplosaprist type covering an area of 583.46 ha and Terric Haplosaprist covering an area of 6.82 ha. So the total peat area is 590.28 ha.	Complied
		The company carried out a soil type assessment again in February 2022 which was carried out independently prepared by Malaysian Environmental Consultants & commissioned by PT Tolan Tiga Indonesia (SIPEF).On that document, there's classification based analysis results, where the reclassification of soil peat area of Tanah Rekah Estate is based on organic matter and organic carbon content in the samples especially for areal zona A (147.83 ha). The samples record presents the reclassification is based on all the 32 samples (from each block) having less than 65% organic matter. Samples that are identified as having between 35% to 65% organic matter are reclassified as muck and not peat (based on RSPO Organic & Peat Soil Classification, November 2018). Mineral soils in the samples recorded between 19& to 32& organic matter. In line with the analysis presented in report, the area previously identified as peat in Tanah Rekah Estate are now recognized as organic matter deposits in swales (linear depressions) and do not constate as pear.	
		The recommendation from that report also explain that the area is dominated by mineral soils, and drainage dynamics are complex because of its coastal occurrence. Therefore, it should not be subjected to any form of assessment as it cannot be declared as peat, primarily because of its liner morphology, separation, and non-connectivity (hydrology). A simplistic approach, determining drainage is not applicable. However,	



the hydrology of the individual strips should be managed to minimize any degradation of the linear organic matter deposits.

Regarding this assessment, the company has informed the RSPO of the results of the assessment of the peat area, especially zone A with an area of 147.83 ha, to the RSPO via email in March 2023. The RSPO accepted that the zone A area with an area of 147.83 ha does not require a drainability assessment because does not include areas with peat land types.

Regarding the 2nd submission of peat inventory reporting, the company has sent it to the RSPO on November 5, 2023, for all peat land information in the SIPEF group with the following details:

	<u> </u>
Plantation/Estate Name	Total Planted on Peat (ha)
Citra Sawit Mandiri	1,720.5
Toton Usaha Mandiri	1,134.95
Umbul Mas Wisesa North	2,596.45
Umbul Mas Wisesa South	4,459.99
Sei Rupit	1,890.4
Sei Liam	2,373.85
Sei Mandang	3,821.98
Muko-muko	539.52
Tanah Rekah	430.74

PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).

7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	Based on the soil type assessment in 2017 which informed the existence of peatlands, the company has carried out monitoring of peat subsidence in the records. To monitor peat degradation, the company has also created subsidence benchmarks. Establishment of peat subsidence benchmarks to monitor the decline in peat surface every 2 times a year, for example at subsidence stake number 01 in Block A18A there has been no subsidence of peat until October 2023.	Complied
7.7.4	(C) Availability of implementation evidence of the water and land cover management program Critical (Major) compliance -	For peatland management, the company has documented Water Management Work Instructions. The IK was created as a guideline for monitoring water management performance. The SOP and IK are in accordance with the regulations and laws in force in Indonesia, namely Government Regulation No. 57 of 2016 Amendment to Government Regulation No. 71 of 2014 concerning Protection and Management of Peat Ecosystems. Monitoring and recording of surface water and ground water levels is carried out every 2 weeks – while immediate action is taken to open or close floodgates, to maintain optimal water levels. This activity is supported by trained Agronomy Assistants and Foremen. The company has installed and maintained water gates, main drainage gates, main drainage, secondary drainage and collection drainage. Drainage maintenance is carried out regularly. To monitor surface water levels, the company has installed water level measuring poles in the block trenches and near the sluice gates; to monitor groundwater levels the company has installed a Groundwater Level Monitoring Well (TMAT) in the block; To monitor peat degradation, the company has also created subsidence benchmarks. Details of the infrastructure for regulating	Complied
		groundwater levels are as follows: - Construction of surface water level measuring poles near sluice gates to monitor surface water levels.	



		 Construction of piezometers in blocks to monitor groundwater levels every 2 weeks, for example the data logger recording in block C05A in the first week of November 2023 was -60 cm. Establishment of peat subsidence benchmarks to monitor the decline in peat surface every 2 times a year, for example at subsidence stake number 01 in Block A18A there has been no 	
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation. - Critical (Major) compliance -	 subsidence of peat until October 2023. The company carried out drainability assessment activities in 2019 as a basis for replanting activities carried out at Tanah Rekah Estate. The drainability assessment provides the following summary: In 2015 – June 2021 for Zone 1 & Zone 2, peat surface subsidence measured averagely 0.54 cm.year and its estimated that the subsidence level will be lower in the incoming years because the peat has undergone the final decomposition process. From area of 307.17 ha, there was 306.44 ha has the value of drainage base (DDB) is higher that peat thickness (DP), so in this area the DLT is not needed because although the peat was completely subsided, the drainage base is under the Basalt contact and theses area will never be flooded. From area of 307.17 ha, there was 0.73 ha has the value of peat thickness (DP) is higher than drainage base (DDB), so in this area the DLT is needed. From area of 0.73 ha, there was 0.73 ha have drainage limit time (DLT) of 105.31 – 518.07 years, meaning that they can be replanted while still maintaining buffer time of 2 generation (40 years) before reaching the drainage base. From the area of 0.73 ha, there was 0 ha have drainage limit time under 40 years, this meaning that they can be replanted 	Complied

		because it will not reach the drainage base in 2 generation (40 Years). Based on the results of the study, it is known that all mineral soil layers under peat are clay-type mineral materials and are still suitable for replanting. Based on the explanation in indicator 7.7.2, for the zone A area in Tanah Rekah Estate covering an area of 147.83 there is no need for a drainability assessment because it is not an area with peat land. For the Zone B area, currently the company is still carrying out land reclassification assessment activities to confirm the type of soil in that location. From the results of field observations and document review, the area in zone B has not yet carried out replanting activities.	
currently and will i unit of ce units that The unit	DURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assess being adjusted / tested by the RSPO Working Group on Peatlands (Peatland include additional Guide on the steps to be followed after deciding not to repertification concerned. It is recommended that the trial methodology period is put have plantations on peat) to utilize the methodology and provide input to Professional Certification has the option to delay replanting until the issuance of the rebilitation of natural vegetation will be regulated by the PLWG.	sment Guide along with related concepts and detailed actions is contained in the Working Group / PLWG). The final version must obtain PLWG approval in eplant and the consequences for other stakeholders, farmers, local communication be extended for 12 months for all relevant management units (ie PLWG so that existing procedures can be further refined as needed before	January 2019 nities, and the management January 2020.
7.7.6	(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 -	The company has installed and maintained water gates, main drainage gates, main drainage, secondary drainage and collection drainage. Drainage maintenance is carried out regularly. To monitor surface water levels, the company has installed water level measuring poles in the block trenches and near the sluice gates; to monitor groundwater levels the company has installed a Groundwater Level Monitoring Well (TMAT) in the block; To monitor peat degradation, the company has also created	Complied



subsidence benchmarks. Details of the infrastructure for regulating groundwater levels are as follows:

- Construction of surface water level measuring poles near sluice gates to monitor surface water levels.
- Construction of piezometers in blocks to monitor groundwater levels every 2 weeks, for example the data logger recording in block C05A in the first week of November 2023 was -60 cm.
- Establishment of peat subsidence benchmarks to monitor the decline in peat surface every 2 times a year, for example at subsidence stake number 01 in Block A18A there has been no subsidence of peat until October 2023.
- Planting Vertiver grass as a way to strengthen canal edges and allow ferns to grow in canals.
- Make a stop block/termination of embankments and sluice gates to regulate the availability of water in the middle trench of the block

Water management monitoring is carried out by carrying out routine inspections and recording water levels, piezometers, subsidence stakes and sluice gates. Peat subsidence benchmarks are found in several areas such as Block P20C15A Division 3, Block E15A Division 5, Block D21 Division 4 Tanah Rekah Estate.

Based on the results of interviews with PICs monitoring peat areas, workers were able to explain the technicalities of monitoring groundwater levels and peat subsidence, both manually and with loggers. Workers also understand the thresholds for water

		measurements that need to be maintained in accordance with environmental regulations.	
7.7.7	(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. - Critical (Major) compliance -	Based on the results of a soil analysis study carried out by the company in 2010 and field observation at Tanah Rekah Estate, the company did not plant any peat areas categorized as deep peat (>3 m) or conservation areas.	Complied
Criteria	7.8: Practices maintain the quality and availability of surface and groundwat	er.	
7.8.1	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: - Minor compliance - 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	The company has had procedure Management of Riparian Area (SND-01-19/01-08-2023/Rev.0), explains inventory, classification, identification, and management of riparian zones. The procedure states that the method for establishing a buffer zone for replanting is to cut down all existing palm trees and rebuild natural vegetation using species from a list approved and provided by the Sustainability Department. From these documents, it is known that the company is committed to protecting river banks in accordance with statutory regulations, namely large rivers (border width 100 m) and small rivers (border width 50 m). The water management plan has been covered in SEIA management and monitoring plans RKL & RPL (<i>Rencana Pengelolaan dan Pemantauan Dampak Lingkungan</i>). Moreover, mill and estate has had more specific annual Water Management Plan. The aspects of management and monitoring plan are:	Complied

	,
	- Palm oil mill effluent (e.g pond management, quality testing, biogas plant).
	- Hazardous and domestic waste.
	- Drainage from mill and workshop management.
	- Pesticide and fertilizer usage (e.g pesticide mixing only in mixing house).
	- Riparian and HCV management (e.g no chemical application on riparian, will not replant the planted riparian).
	- Soil erosion management (measurement, making individual and/or contour terrace).
	- Ground water and surface water quality testing.
	The company does not limit access to clean water or does not pollute the water used by the community.
7.8.1b Workers have adequate access to clean water.	The company has provided access to clean water for the workers by providing deep water wells at estate and clean water from Mill for workers Housing.
	The quality of clean water has been tested every year in a KAN accredited laboratory, for example testing for the 2022 period was carried out on 22 October 2022 with test results for all parameters in accordance with quality standards (<i>Permenkes</i> Number 32 of 2017), while for the 2023 period it was carried out in November, but the test results have not yet been published.
	Based on field visits, to resident house of Tanah Rekah Estate, Division I of Sei Kiang Estate, and Sei Betung Estate it was discovered that the source of clean water was from drilled wells which were channelled to

		workers' housing via pipes. And based on interview with the housing residents, it is verified that the company has provided sufficient clean water for domestic usage and there was no negative issue related to this.	
7.8.2	(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 -	The company has had procedure Management of Riparian Area (SND-01-19/01-08-2023/Rev.0), explains inventory, classification, identification, and management of riparian zones. The procedure states that the method for establishing a buffer zone for replanting is to cut down all existing palm trees and rebuild natural vegetation using species from a list approved and provided by the Sustainability Department.	Complied
		Based on field observation, it can be concluded that for unplanted riparian has been managed properly. For planted riparian areas, it can be concluded that the water courses have been protected by not applying chemical and inorganic fertilizer. The riparian wide is about five trees and has been marked. It also can be found some planks to inform those protected areas.	
7.8.3	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. - Minor compliance -	The mill effluent from Mukomuko POM is utilized in biogas plant to produce electricity, then disposed to water course. Mukomuko POM has shown the permit to disposed waste wate to water course as <i>Keputusan Kepala Dinas Penanaman Modal, Pelayanan Perizinan dan Tenaga Kerja</i> Mukomuko Regency Number 503/18/D.10/IPALD/IX/2019 dated 16 January 2019 valid until 5 years.	Complied
		Mukomuko POM has monitored the mill effluent to comply toward the disposal permit and national regulation, documented in quarterly POM's Wastewater Report.	

		The mill effluent quality testing has been conducted by accredited environmental testing and laboratory with registered number: LP-001-IDN. The national regulation as reference is Decree Letter from Governor of Bengkulu Province No 92 of 2001 related Quality Standard of Palm Oil Mill Effluent. The result of monitoring in Semester I of 2023 as follows:									
		Para meter	Unit	Quality Standard	Jan	Feb	Mar	Apr	May	Jun	
		рН	-	6 – 9	7.9	7.06	7.3	7.5	7.8	7.4	
		TSS	mg/L	250	170	40	52	63	90	80	
		BOD	mg/L	100	71.3	46.1	31.1	28.1	21.1	26.5	
		COD	mg/L	350	240.3	109.7	102.8	111.6	118.3	110.7	
		N Total	mg/L	40	22.7	19.4	16.1	15.9	17.3	18.9	
		Oil & Fat	mg/L	25	14.1	17.3	15.4	12.8	4.1	5.1	
			Based on the result of monitoring above, all the parameters are complied with regulation (Decree of Bengkulu Governor No. 92 of 2001).								
		that visual has been	ly the m verified	ervation to the orial effluent was the original to the original to the original effects of the origina	vas qui Isultatio	te clea on with	r and h the Vi	ias no illage H	smell. leads,	It also	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	PT Agro Muko – Mukomuko POM has a permit to use water resources from <i>Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat</i> No.1297/KPTS/M/2023, dated 26 September 2023 concerning the <i>Pemberian Izin Pengusahaan Sumber Daya Air kepada PT Agro Muko untuk Usaha Industri</i> on the Betung River, Mukomuko Regency, Bengkulu Province, valid for 5 years.					Complied				



Location: Betung River, Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, coordinates 02° 35' 45.06" S and 101° 16' 49.26" E. In the utilization permit, the maximum water discharge is 35 liters per second, with a taking schedule of 16 hours/day for 25 days/month (50,400 m³/month). Obligations of the permit holder: carry out periodic calibration of volumetric measuring instruments once a year, accompanied by evidence of report; installing a water level measuring device near the intake location, reporting to *Kepala Balai Wilayah Sungai Sumatera VII* periodically every 3 months. The water usage budget for the process at the Mukomuko POM is 1.25 m3/ton FFB.

Records of water usage per ton of FFB at Mukomuko POM for the period January to October 2023 are as follows:

Month	FFB Process (MT)	Water Usages (MT)	Water usage per ton of FFB (M³/MT)
January	18,195	16,119	0.89
February	13,593	11,862	0.87
March	15,193	13,055	0.86
April	14,969	12,973	0.87
May	27,219	21,830	0.80
June	27,121	20,068	0.74
July	31,440	23,177	0.74
August	28,023	24,153	0.86
September	25,611	23,123	0.90
October	22,878	19,825	0.87



		Total	224,242	186,185	0.83	3	
		FFB processe water usage	s at Mukomuko F budget.	e above, it is known OM is in accordance ter use per tonne of	e with the determ	nined	
Criteria	7.9: Efficiency of fossil fuel use and the use of renewable energy is optimise	ed					
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	of the use of t e.g:		rated the record or optimize renewable			Complied
		Moi		SD oil usage /ton F	ER (I/mt EER)		
		January	iicii ri	0.56	rb (i/ilic rrb)		
		February		0.72			
		March		0.31			
		April		0.64			
		May		0.83			
		June		1.28			
		July		0.72			
		August		0.12			
		September		0.16			
		October		0.15			



HSD Oil usage is high in May to July 2023, due to damage to the gas engine.

Mukomuko POM – Total of renewable Energy (fibres, shell) /Ton of CPO produced (Kcal/Ton CPO) to date 2023:

Month	Total of renewable Energy/ Ton of CPO produced (Kcal/kg CPO)
January	2,224
February	2,320
March	2,186
April	2,288
May	2,291
June	2,301
July	2,355
August	2,313
September	2,234
October	2,245

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.



		follows:	dentification, mitig Mitigation Plan	Implementation	
		- Handling emis consist of guid fibre and shell air damper for basis, to minim heat exchange manner; monit meter; monito laboratory; rec - Handling en WI/PROD/010 the generator replace air filt (every 500 hor replace engine sighted – checinjection pum independent la	eline for minimizing feed; minimize she ignition, avoid exception and interest of boiler exhaust or boiler exhaust or boiler emission from expected any problem. In the consist of guidelic operating at perfer element (every lurs), replace oil filt is lubricant every is engine load; shoup; monitor engine liboratory.	boiler No.AMPOM-WI/PROD/009E, g soot pollution/particulate: ensure ell to prevent black smoke; setting cess air; dumping grate on regular noot blowing every 4 hours to clean dust collector operating in good emission through smoke density every 6 months by independent engine generator No.AMPOMine for minimizing emission: ensure emitted load (80% from design); 1,250 hours), replace fuel filter ter (250 hours) – on regular basis; 250 hours; should black smoke all the black smoke sighted – check e emission every 6 months by	
7.10.1	(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. - Critical (Major) compliance -	have been set in t - SOP of Calcula provide guida company ope	hese SOPs: ation and Mitigation nce to register so ration, monitor an	n of Green House Gases, whereby curce of emissions as a result of nd reduce the use of materials e GHG emission from operational	Complied

Preparation			
Land	Zero burning	- Memorandum from Director of	
clearing/tree felling	Planting trees to absorb emission	Estate Department on zero burning - Restoration (tree planting)	
	Identification of HCV and restore HCV area	record - HCV map - Topographic map	
	Implement oil palm best management practice	- HCV assessment - Land clearing SOP	
	River riparian/buffer zone management		
	Planting trees in river riparian/buffer zone and critical area		
	Socialization to all level of worker on GHG mitigation plan during land clearing		
Use of vehicle and heavy machinery	Maintenance the vehicle/ heavy machinery	Vehicle maintenance recordPlanting record	

	Vehicle emission test on regular basis Transportation arrangement (effective and efficient) Socialization to all level of worker on GHG mitigation	- Evaluation on vehicle use (incl. fuel efficiency)
Planting on peat	plan related to use of fossil fuel Not recommended If needed, implement best management practices Manages the river riparian/buffer zone	 To manages the peat area as per regulation such as controlling the water level; Avoid peat with depth >3 meters Restore river riparian/buffer zone as conservation/HCV HCV map
	Planting trees in river riparian/buffer zone Socialization to all level of worker on GHG mitigation plan related to land clearing on peat	

application on river buffer zone/riparian area Socialization to all level of worker on GHG mitigation plan related to impact of fortilizer.	impact of fertilizer application Upkeep and harvesting Use of fossil fuel for vehicle on regular transportation (FFB, fertilizer, manpower) Maintenance the vehicle on regular basis Planting trees - Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl. fuel efficiency)	Upkeep and harvesting Use of fossil fuel for transportation (FFR fertilizer (FFR fertilizer) Upkeep and harvesting Maintenance the vehicle on regular basis - Vehicle maintenance record - Planting record - Evaluation on vehicle use (incl.
	for vehicle on regular transportation (FFB, fertilizer,	for transportation (FFB, fertilizer, manpower) vehicle on regular basis Planting trees Transportation arrangement (effective and
Upkeep and harvesting		Transportation arrangement (effective and

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Fertilizer pesticide application	and use of fossil fuel and Effective fertilizer application as per recommendation No fertilizer and pesticide application in rainy season No fertilizer and pesticide application on river buffer zone/riparian area Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer and pesticide application	- Leaf sampling analysis for accurate fertilizer recommendation - Implement SOP fertilizer application - Utilize recommended pesticide
Housing Use of fossil	fuel Maintenance the	- Vehicle maintenance record
	ruel Maintenance the ctric machinery (genset) on regular basis Socialization to all level of worker on	Planting record Evaluation on Genset's fuel efficiency
	GHG mitigation plan related to machinery use	

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	and use of fossil fuel; and electricity efficiency Emission monitoring on regular basis	
Waste decomposition in landfill	Waste collection to landfill	Landfill in each estate
FFB processing i	n palm oil mill	
Waste management	Using methane capture and utilize the biogas	Methane capture and biogas plant in POM Install EFB shredder in POM
	Utilize EFB as boiler fuel	
Use of fossil fuel for transportation	Maintenance the vehicle on regular basis	Vehicle maintenance recordEvaluation on electricity efficiency
(FFB, CPO, PK, EFB)	Socialization to all level of worker on GHG mitigation plan related to electricity efficiency	
Operation of POM's machinery including boiler	Maintenance the POM's machinery on regular basis	Machinery maintenance recordEvaluation on boiler's efficiencyEmission monitoring report
	Socialization to all level of worker on	Emission monitoring report



GHG mitigation plan related to emission	
Emission monitoring on regular basis	

The company has carried out a GHG inventory contained in the 2023 Greenhouse Gas Emission Mitigation Program document, based on document analysis it can be concluded that the company has identified GHG sources produced by the Mukomuko POM unit and its suppliers. Identification of significant GHG emission sources identified and mitigation plans have been developed by the company covering mills and plantations. Significant GHG emissions include changes in land use, processing of POME, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plan includes, among other things, the proper use and dosage of fertilizers according to recommendations, reducing reuse and recycling actions, limiting electricity use, transportation, and machine maintenance, as well as regular air quality tests. The company has also reported the results of GHG calculations to the public which are submitted to the RSPO GHG website.

Based on a review of documents such as monitoring pesticide use, diesel fuel monitoring, HCV identification and others, it is known that accurate data has been entered into the RSPO GHG Calculator version 4.0.

The summary of GHG Calculation can be seen in Appendix B of this audit report.

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7.10.2	(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). - Critical (Major) compliance -	The scope of Mukomuko POM, i.e Mukomuko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate, Air Majunto Estate, and Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera carried out developed/planted before 2014. However, for Kebun Masyarakat Desa (KMD), there was some areas that developed after 2014. For these units has been assessed by HCS assessment in 2017 by Koompasia Enviro Institute. Based on this assessment, the HCS areas have been set aside from development and managed as HCV area.	Complied
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored. - Critical (Major) compliance -	The company has prepared strategy to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality and noise level. Plans to reduce or minimize them are implemented and monitored. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government.	Complied
Criteria	7.11: Fire is not used for preparing land and is prevented in the managed a	rea.	
7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	Based on document review, field observation, and interview with the stakeholders, it is known that there was no new planting within the certification scope, but only replanting.	Complied
		On the replanting areas (e.g in Sei Kiang Estate Division 2 Block 23i02 and Sei Betung Estate, Division 3, Block P23i01), can be found that the company only conducted replanting mechanically, as stated in the company's procedures and contractual agreements with the replanting contractors. Fire fighting tolls, storage, and teams are ready in every unit of certification.	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	Based on document review, field observation, and interview with the stakeholders, it can be found that the unit of certification has set fire prevention and control in the terms of:	Complied

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- Minor compliance -



-				
	7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	Based in interview with management and Village Heads, the collaboration started by dissemination of high-risk area to the	Complied
		- Minor compliance -	communities, then the community will inform management whether	
		rimor compilance	they found fire in the surrounding company. Moreover, the company will	
			help to fight the fire even though the fire appears outside the company's	
			operational area.	
			The participation of stakeholder has been mentioned and reported in	
			document "Laporan Kesiapsiagaan Sistem Sarana dan Prasarana	
			Pengendalian Kebakaran Lahan dan Perkebunan Perkebunan PT Agro	
			Muko dan PT. Mukomuko Agro Sejahtera Tahun 2022".	
			The report has been submitted to the Mukomuko Regency	
			Environmental Service via Company Letter No.61/RMO-G/X/2022 dated	
			21 October 2022. The report includes the plantation land fire control	
			task force, human resources for plantation fire control, fire control	
			operations plantation land: fire danger rating, board/flag, fire hazard	
			map, situation map, water source map and fire control resources.	

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 **(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.

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).

- Critical (Major) compliance -

The HCV assessment carried out in 2010 by "Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation – YASBI Foundation)" using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified. The HCV assessment report concluded that PT. Agro Muko has already set aside conservation areas of a total 2,304.9 Ha consisting of natural vegetation in between palm planting to provide habitat and corridors for wildlife.

- Air Buluh Estate with total area conservation is 275.73 Ha
- Air Bikuk Estate with total area conservation is 186.53 Ha
- Bunga Tanjung Estate with total area conservation is 402.87 Ha
- Mukomuko Estate with total area conservation is 199.15 Ha
- Sei Betung Estate with total area conservation is 301.76 Ha
- Sei Jerinjing Estate with total area conservation is 416.55 Ha
- Sei Kiang Estate with total area conservation is 251.43 Ha
- Talang Petai Estate with total area conservation is 283.23 Ha
- Tanah Rekah Estate with total area conservation is 539.81 Ha

Laporan Identifikasi & Penataan Area KBKT Definitif (Bagian Rencana Aksi Pengelolaan NKT) PT Agro Muko by PT Perencana Karya Hijau Konsultan in 2018. The results of analysis, delineation and arrangement are as follows:

- Air Buluh Estate with total area conservation is 241.90 Ha
- Air Bikuk Estate with total area conservation is 180.32 Ha
- Bunga Tanjung Estate with total area conservation is 388.85 Ha

Complied



- Mukomuko Estate with total area conservation is 193.86 Ha
- Sei Betung Estate with total area conservation is 308.76 Ha
- Sei Jerinjing Estate with total area conservation is 363.17 Ha
- Sei Kiang Estate with total area conservation is 263.44 Ha
- Talang Petai Estate with total area conservation is 389.08 Ha
- Tanah Rekah Estate with total area conservation is 597.65 Ha

Laporan Identifikasi & Penataan Area KBKT Definitif (Bagian Rencana Aksi Pengelolaan NKT) PT Mukomuko Agro Sejahtera by PT Perencana Karya Hijau Konsultan in 2018. The results of analysis, delineation and arrangement are as follows:

• Sungai Teramang Estate with total area conservation is 126.98 Ha.

Laporan Identifikasi & Penataan Area KBKT Definitif (Bagian Rencana Aksi Pengelolaan NKT) PT Mukomuko Agro Sejahtera by PT Perencana Karya Hijau Konsultan in 2018. The results of analysis, delineation and arrangement are as follows:

- Air Majunto Estate, with total area conservation is 311.95 Ha (total scope area study is 1,800 Ha).
- Malin Deman Estate, with total area conservation is 149.64 Ha (total scope study is 1,167.00 Ha)

Integrated HCV-HCSA Assessment PT Agro Muko – Sei Kiang Estate, Sei Betung Estate, Air Bikuk Estate, Talang Petai Estate and Bunga Tanjung Estate. Assessment start date in March 2022 by Hijau Daun. Date of submission to HCVRN on 23 November 2022. QP Feedback Satisfactory on 15 May 2023. In area 10,799.48 Ha with total HCV area 1,427.14 Ha

		 and total HCS area 1,252.20 Ha. Area Statement (ha) – areas within the assessment area as folows: Air Bikuk Estate, total HCV is 194.01 Ha and HCS is 167.55 Ha Bunga Tanjung Estate, total HCV 445.60 Ha and HCS is 433.58 Ha Sei Betung Estate, total HCV 313.68 Ha and HCS is 257.23 Ha Sei Kiang Estate, total HCV 237.95 Ha and HCS is 216.03 Ha Talang Petai Estate, total HCV 235.93 Ha and HCS is 177.82 Ha Integrated HCV-HCSA Assessment PT Agro Muko – Air Buluh Estate and Lubuk Talang Smallholders. Assessment start date in February 2022 by Hijau Daun. Date of submission to HCVRN on 14 November 2022. QP Feedback Satisfactory on 02 March 2023. In area 3,254.39 Ha/3,674.06 Ha with total Conservation area 419.67 Ha and total HCS area 300.30 Ha. Area Statement (ha) – areas within the assessment area as folows: Air Buluh Estate, total HCV area is 218.23 Ha and total HCS is 123.35 Ha. Lubuk Talang, total HCV 201.44 Ha, total HCS is 176.94 Ha (Total concession is 1,157.79 Ha). Based on verification, the area in the certification scope for Lubuk Talang is 106.99 Ha, so the HCV area within that scope is 18.01 Ha. 	
7.12.2	(C) HCV and HCS forests, and other conservation areas are identified as follows: - Critical (Major) compliance - 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.	The HCV assessment carried out in 2010 by "Yayasan Sawit Berkelanjutan (Indonesia Sustainable Palm Oil Foundation — YASBI Foundation)" using the guidance of Indonesia HCV Toolkit 2008 to monitor the possible extent of HCV inside the estates as well as area adjacent to it. All HCV mapped and identified. The HCV assessment report concluded that PT. Agro Muko has already set aside conservation	Complied



areas of a total 2,304.9 Ha consisting of natural vegetation in between palm planting to provide habitat and corridors for wildlife.

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Laporan Identifikasi & Penataan Area KBKT Definitif (Bagian Rencana Aksi Pengelolaan NKT) PT Agro Muko by PT Perencana Karya Hijau Konsultan in 2018. The results of analysis, delineation and arrangement are as follows:

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Laporan Identifikasi & Penataan Area KBKT Definitif (Bagian Rencana Aksi Pengelolaan NKT) PT Mukomuko Agro Sejahtera by PT Perencana Karya Hijau Konsultan in 2018. The results of analysis, delineation and arrangement are as follows:

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Laporan Identifikasi & Penataan Area KBKT Definitif (Bagian Rencana Aksi Pengelolaan NKT) PT Mukomuko Agro Sejahtera by PT Perencana Karya Hijau Konsultan in 2018. The results of analysis, delineation and arrangement are as follows:

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- Sei Kiang Estate, total HCV 237.95 Ha and HCS is 216.03 Ha
- Talang Petai Estate, total HCV 235.93 Ha and HCS is 177.82 Ha

7.12.3	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. (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	Integrated HCV-HCSA Assessment PT Agro Muko – Air Buluh Estate and Lubuk Talang Smallholders. Assessment start date in February 2022 by Hijau Daun. Date of submission to HCVRN on 14 November 2022. QP Feedback Satisfactory on 02 March 2023. In area 3,254.39 Ha/3,674.06 Ha with total Conservation area 419.67 Ha and total HCS area 300.30 Ha. Area Statement (ha) – areas within the assessment area as folows: • Air Buluh Estate, total HCV area is 218.23 Ha and total HCS is 123.35 Ha. • Lubuk Talang, total HCV 201.44 Ha, total HCS is 176.94 Ha (Total concession is 1,157.79 Ha). Based on verification, the area in the certification scope for Lubuk Talang is 106.99 Ha, so the HCV area within that scope is 18.01 Ha. There is no new land clearing after 15 November 2018. No new oil palm planting within scope of certification. During onsite visit, auditor did not find new planting.	Complied
	consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies. - Critical (Major) compliance -		
PROCED	URAL NOTE for 7.12.3:		
Indicator	7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or	PT Agro Muko – Mukomuko POM and its supply base located in Bengkulu Province, Indonesia. Based on document "RSPO No Deforestation	Complied



enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).

- Critical (Major) compliance -

Consultancy: High Forest Cover Countries – Consultancy report on definitions and recommendations to the RSPO, June 2018" by Proforest; Indonesia fall into "High Remaining Forest, High Rate of Deforestation/HFHD". Refer to "Section 4.6 Statistics on potential high forest cover countries" – Indonesia categorized to have 53% forest cover; 15% Intact Forest Landscape; 54.2% forest (national source); 5.4% Oil Palm Land Area; 0.7%/year deforestation rate (FAO); Increasing Deforestation Trend; 0.9%/year deforestation rate (national source); constant deforestation rate/trend.

PT. Agro Muko's NDPE policy; General Information: New Development Area and Replanting No.OPM-03-00/02-10-2017, dated 20 November 2017. Stipulates "land clearing and replanting on peat land will be influenced by the type and depth of peat".

General Information: Survey and Mapping No.OPM-03-01/02-10-2017, dated 20 November 2017. Stipulates company views on peat: "Especially for extensive peat soil, the distribution, level of maturity and depth of peat must be explained"; company view on conservation area: "the presence or absence of national park, production forest and limited production forest. Whether or not there is riparian reserves and conservation area".

SOP Planting Plant – Approval No.ESD-01-02/11-03-2019 dated 27 March 2019. The planting approval process will review information on planting material (incl. seed certificate), soil information (soil type, peat depth map, drainage ability assessment, water management plan, drainage and Watergate map), topographic and slope information, presence of conservation area, OHS requirement and fire risk.

		Based on HCV assessment document, there is no HCV area located on local community's land, and/or local communities with legal or customary rights. Company demonstrated recognition of legal and customary lands based on participatory land use planning by preparing scheme smallholder plantation on clean-and-clear land. The local community proposed their plantation to become oil palm plantation (replanting).	
7.12.5	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 Minor compliance -	No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly 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. - Minor compliance -	The company has developed and determined an HCV management plan in the 2023 with the scope of manage for each unit estate. The integrated management plan is developed in consultation with relevant stakeholders and covers areas that are directly managed and takes into account the relevant wider landscape level carried out in conjunction with Realization and Review of HCV Plantation Management Documents for each Unit. HCV is maintained and cared for by the company by providing boundary piles, nameplates and providing boundary markers that mark the boundaries of the HCV area in the form of a ditch that surrounds the entire peat HCV area. Management and monitoring plans are implemented for each type of HCV with the following programs:	Complied
		 Monitoring areas that have been designated as HCV areas and riparian areas on a regular basis to see threats. Conduct outreach to all employees and the surrounding community, as well as invite the community to carry out participatory monitoring of HCV areas. Conducting rapid surveys for inventory of flora and fauna. 	

		 Making, installation and maintenance of boundary stakes in the form of stakes or yellow paint as well as adding or replacing damaged stakes. Monitor and maintain information boards. Periodic inspection or riparian monitoring for signs of damage. Plant enrichment in riparian areas with local plant species. Create transects to observe animals and install camera traps. Creating and developing forest plant nurseries. Identify and establish communication with communities already working in HCV areas. Control of invasive plants in HCV areas. 	
7.12.7	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. - Minor compliance -	No new oil palm planting within scope of certification. During field visit, auditor did not found new planting. HCV management plan are still existed and applicable.	Complied
7.12.8	(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. - Critical (Major) compliance -	No new oil palm planting within scope of certification. During onsite visit, auditor did not found new planting.	Complied



Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Mukomuko Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0 The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO₂e/tProduct		
СРО	0.74		
PK	0.74		

Extraction	%
OER	23.49
KER	4.47

Production	t/yr
FFB Process	255,892.27
CPO Produced	60,087.54
PK Produced	11,463.22

Land Use		На
OP Planted Area		12245.86
OP Planted on peat		938.50
Conservation (forested)		1891.02
Conservation (non-forested)		0
	Total	15,075.38

Summary of Field Emission and Sink

	Own Crop	*	Group		3 rd Party	/	Total	
	tCO ₂ e	tCO₂e / FFB	tCO₂e	tCO ₂ e / FFB	tCO₂e	tCO ₂ e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	110458.44	0.48	9682.45	0.79	5439.41	0.00	125580.31	1.27
CO ₂ Emission from fertilizer	11966.14	0.05	1175.50	0.10	190.51	0.00	13332.15	0.15
N ₂ O Emission from Peat	7053.61	0.03	0.00	0.00	0.00	0.00	7053.61	0.03
N₂O Emission from Fertilizer	8393.20	0.04	726.66	0.06	118.31	0.01	9238.16	0.11
Fuel Consumption	3141.03	0.01	324.28	0.03	39.89	0.00	3505.30	0.04
Peat Oxidation	51447.92	0.22	0.00	0.00	0.00	0.00	51447.92	0.22
Sink	Sink							
Crop Sequestration	-103394.17	-0.45	-9177.67	-0.74	-4509.55	0.00	-117081.39	-1.19
Conservation Sequestration	-14480.07	-0.06	-5198.20	-0.42	0.00	0.00	-19678.27	-0.48
Total	74586.09	0.32	-2466.87	-0.20	1278.57	0.00	73397.78	0.12

*Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB
Emission		
POME	657.36	0.00
Fuel Consumption	803.13	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-1112.68	0.00
Sales of PKS	-22709.41	-0.09
Sales of EFB	0.00	0.00
Total	-22361.60	-0.08

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
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 (%)	0	

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

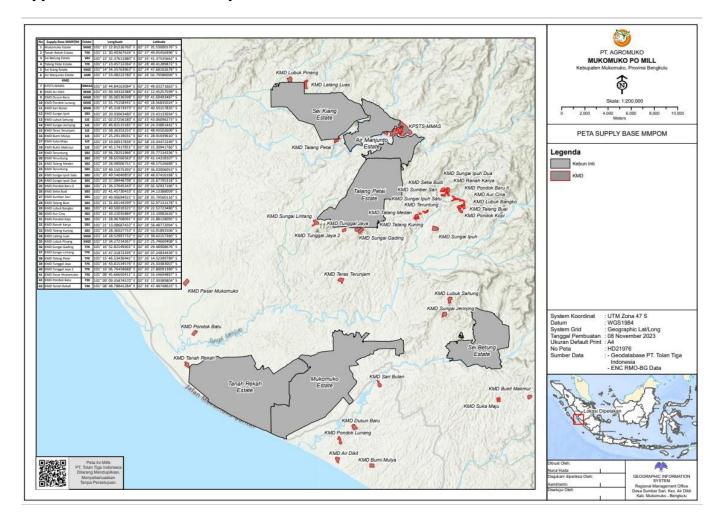


Appendix C: Location Map of Certification Unit and Supply bases

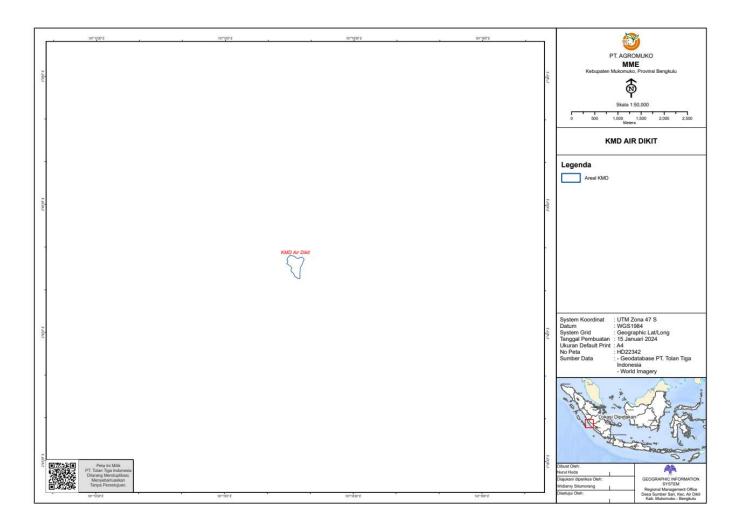




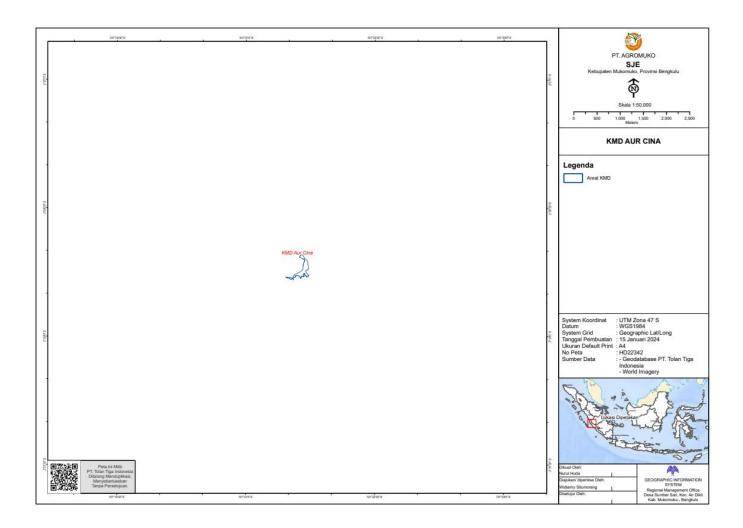
Appendix D: Estate Field Map



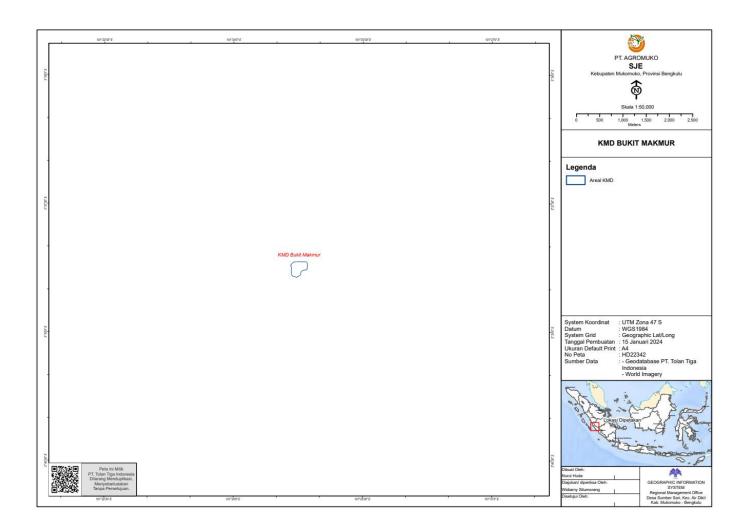




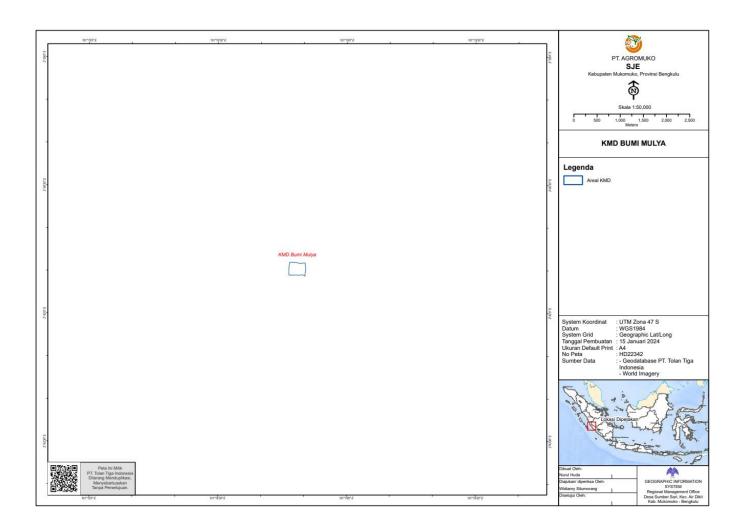




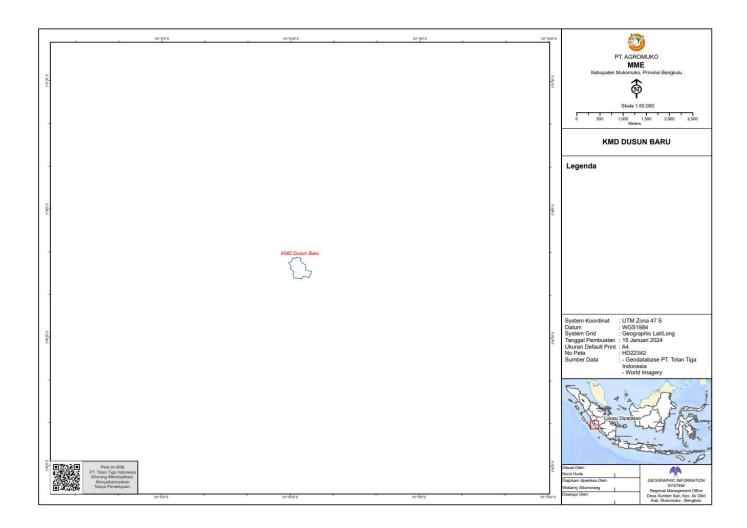




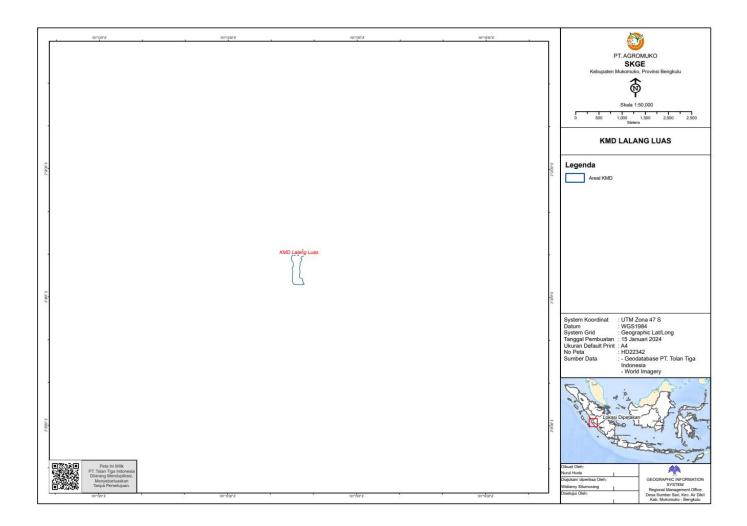




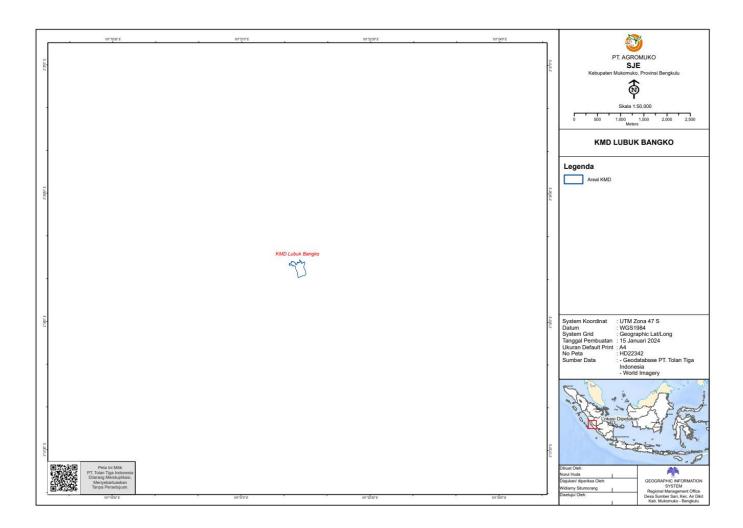




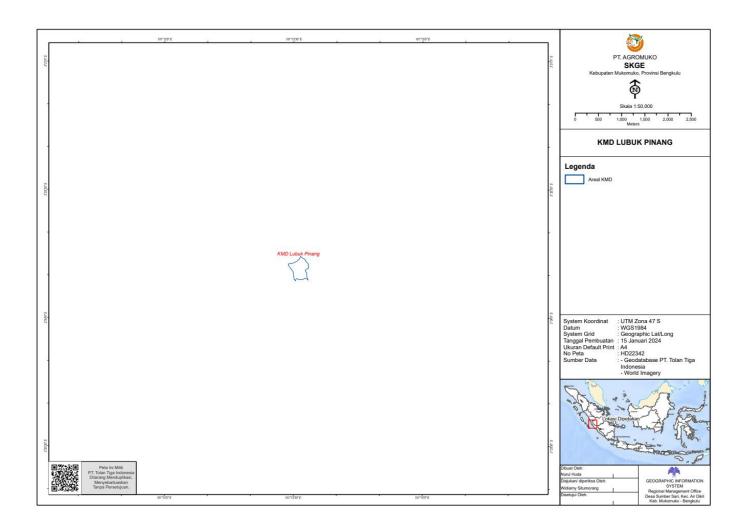




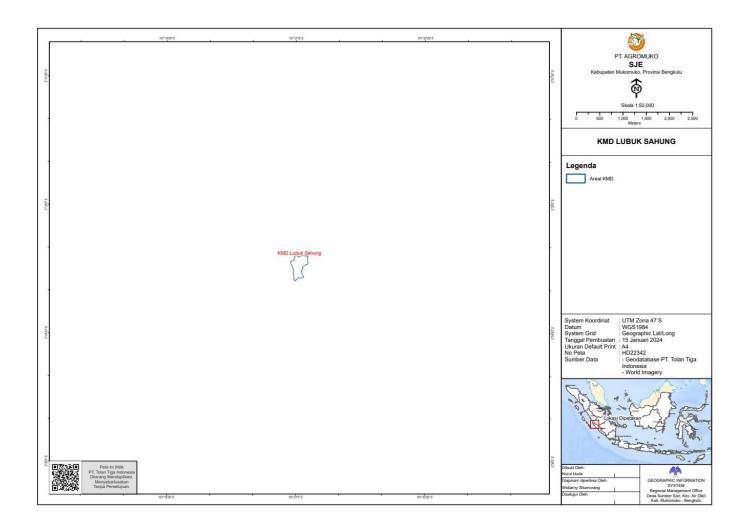




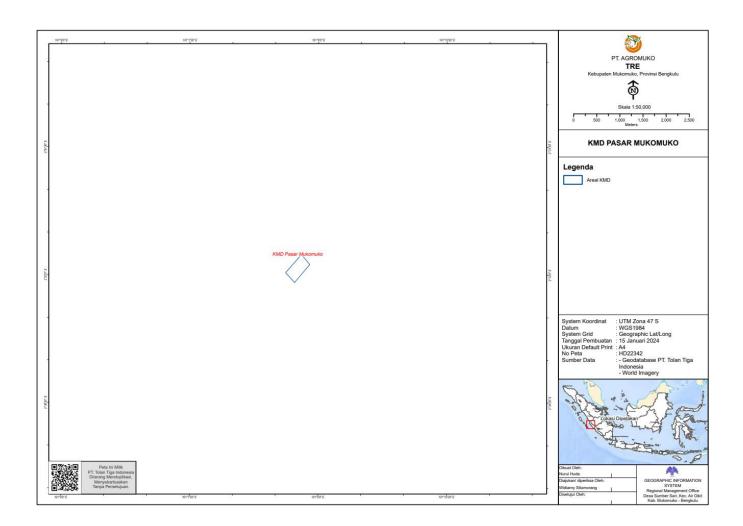




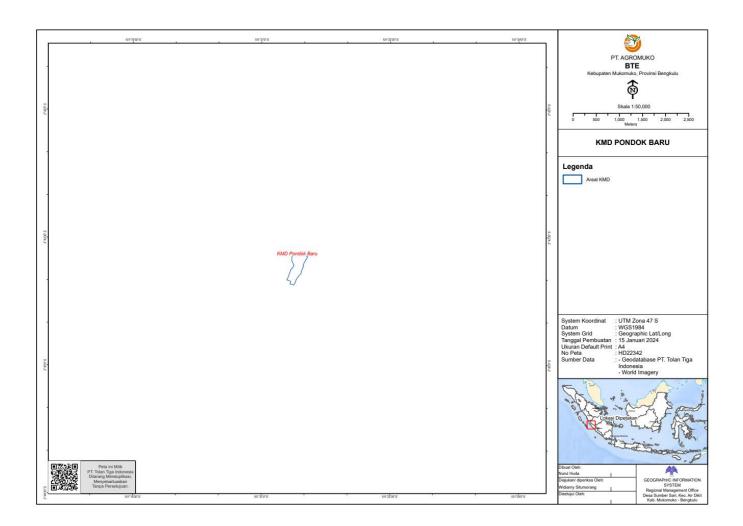




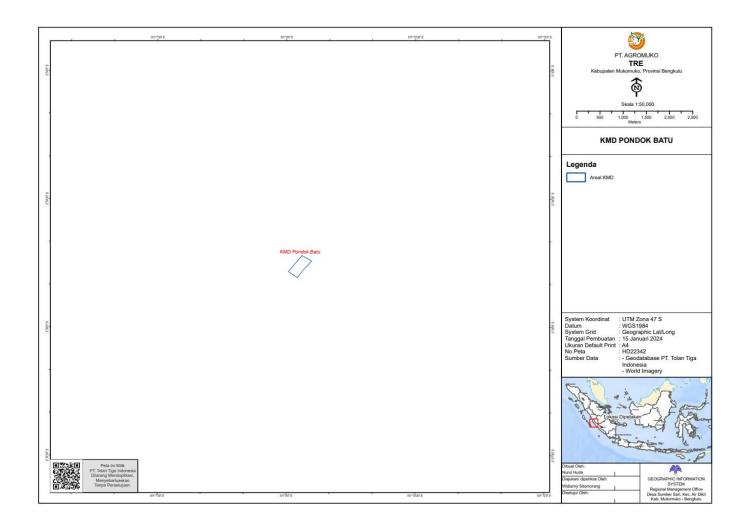




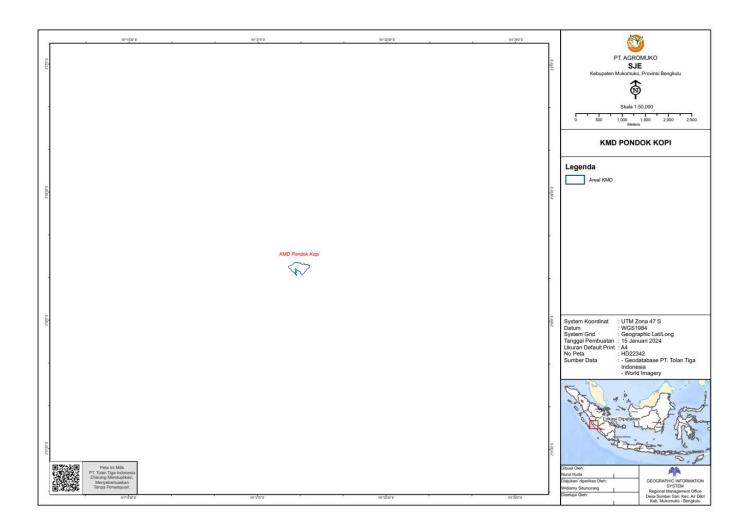




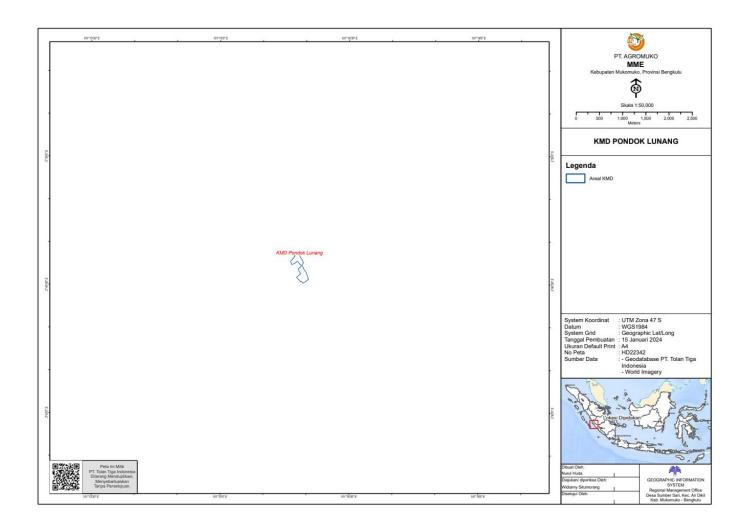




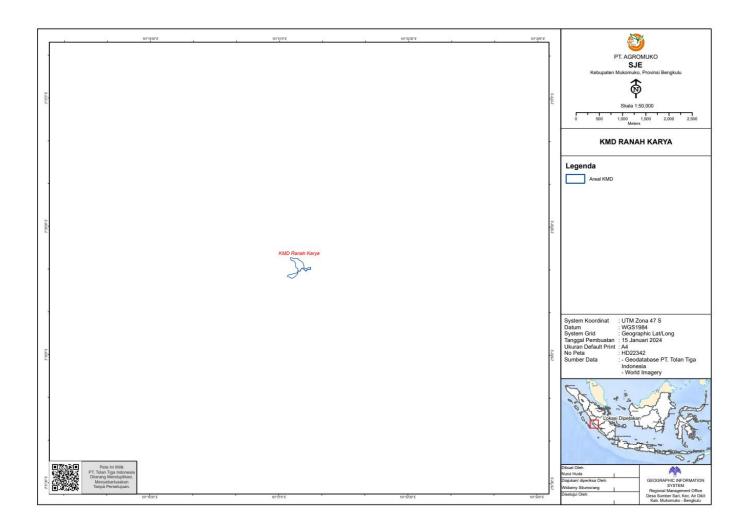




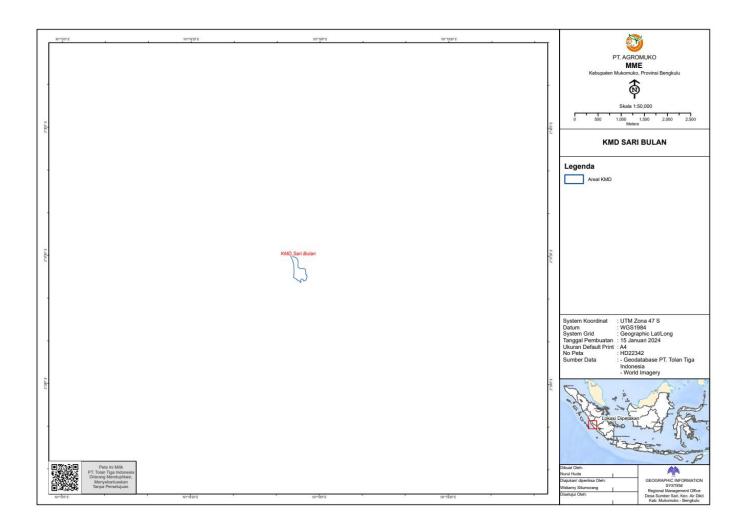




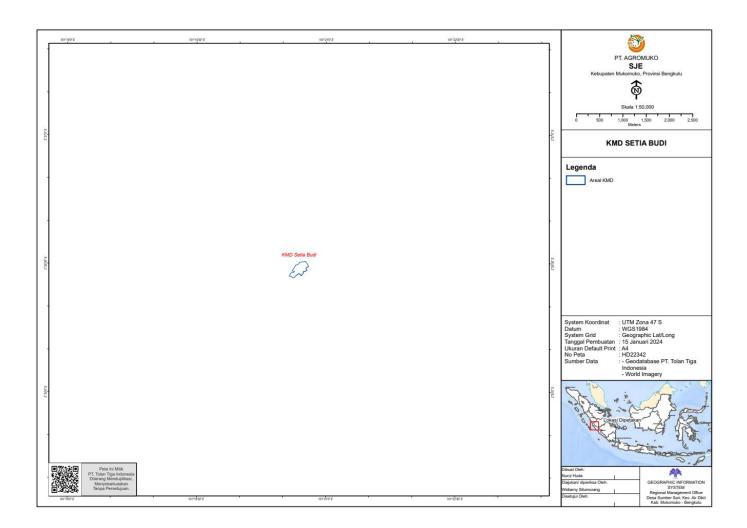




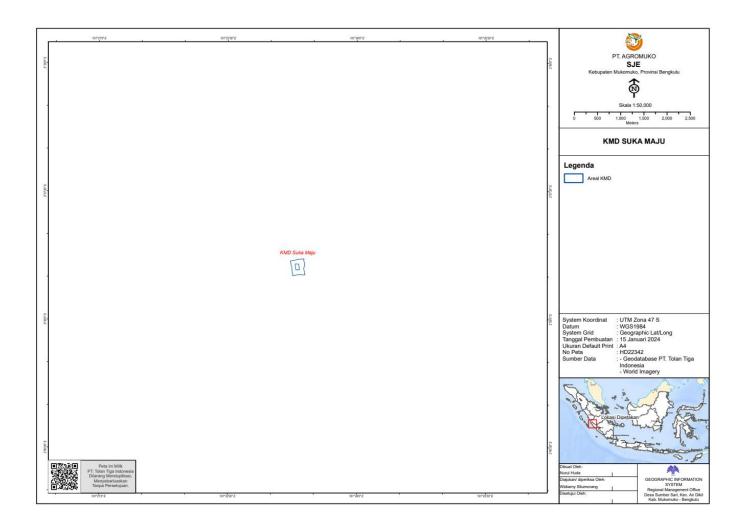




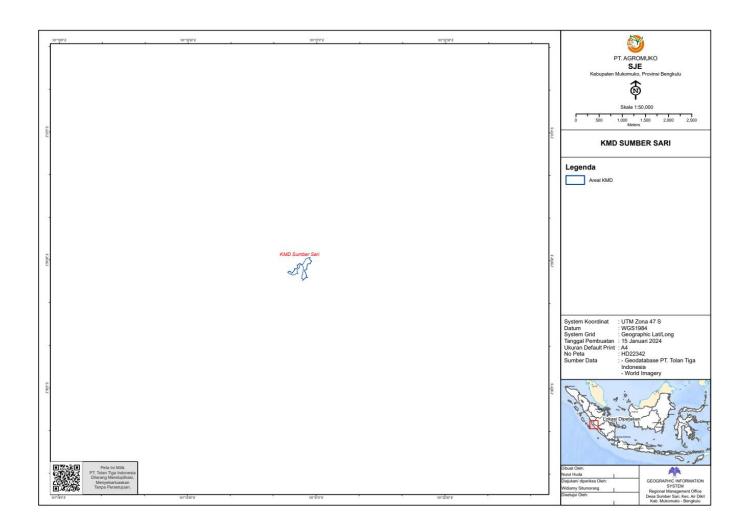




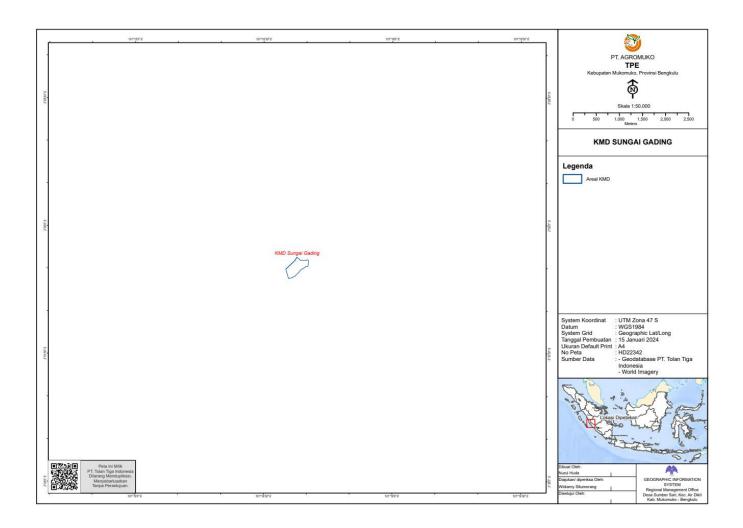




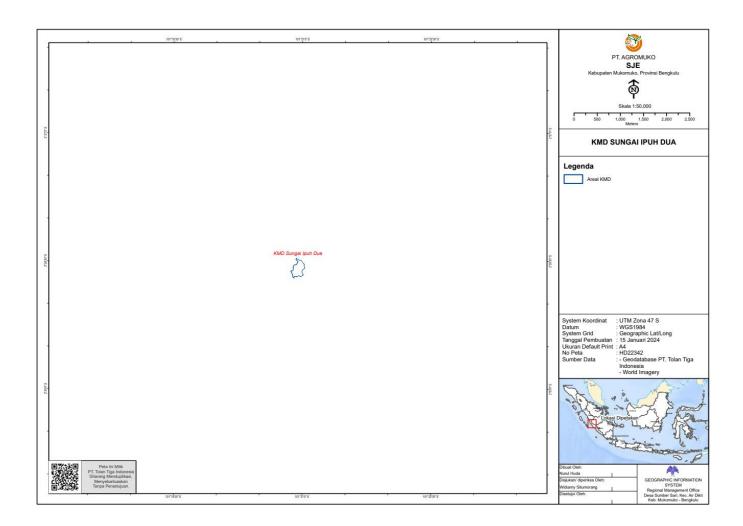




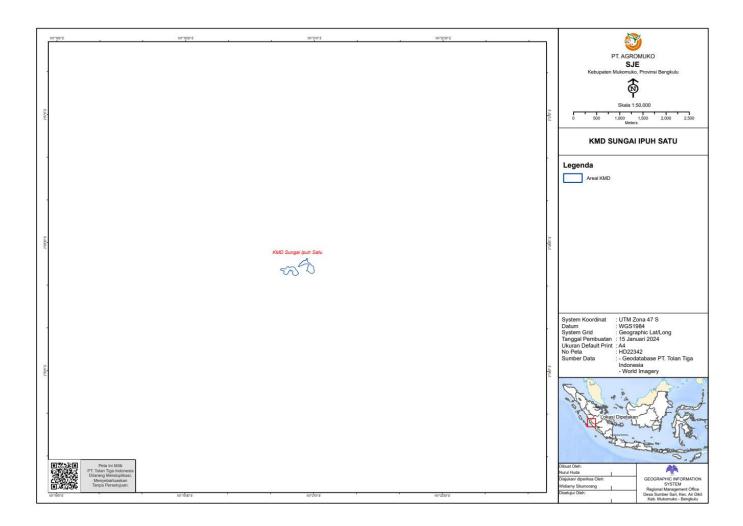




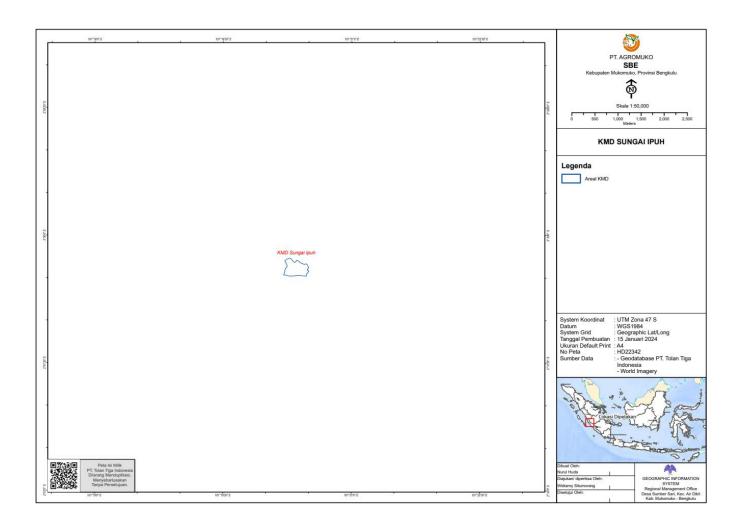




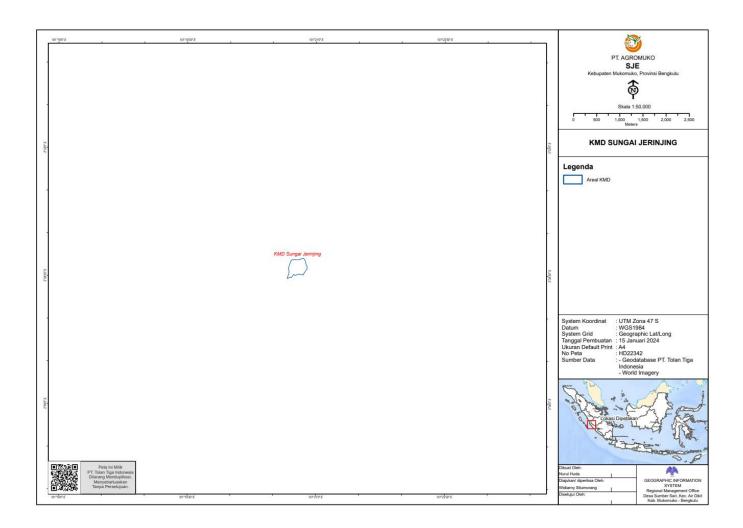




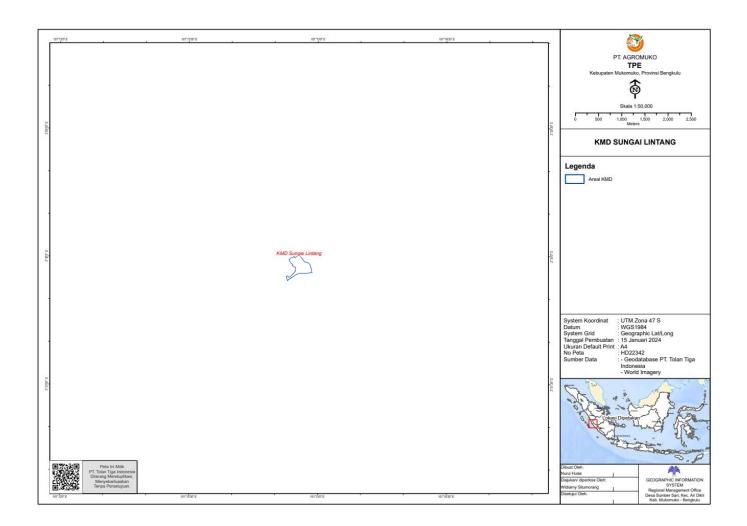




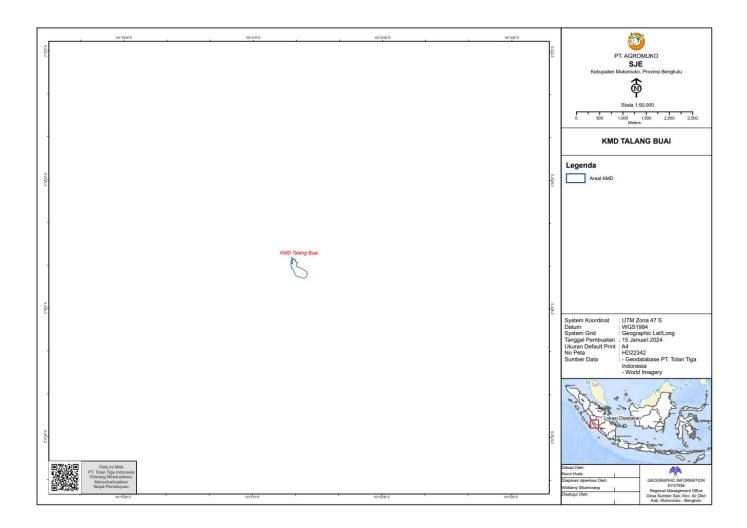




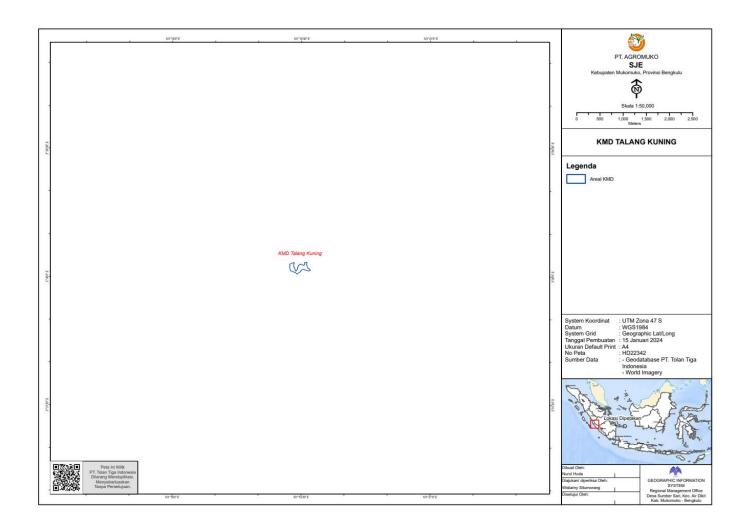




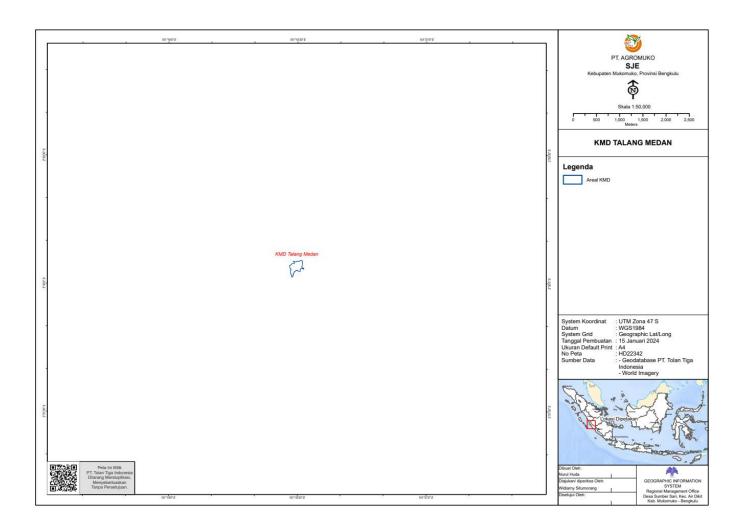




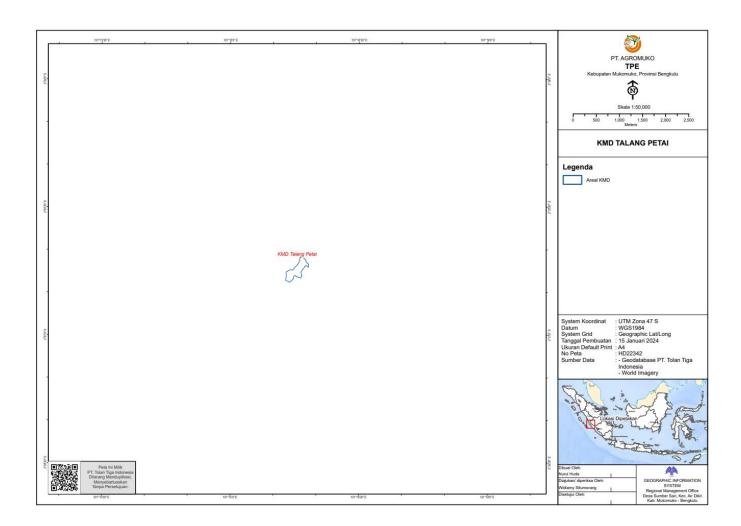




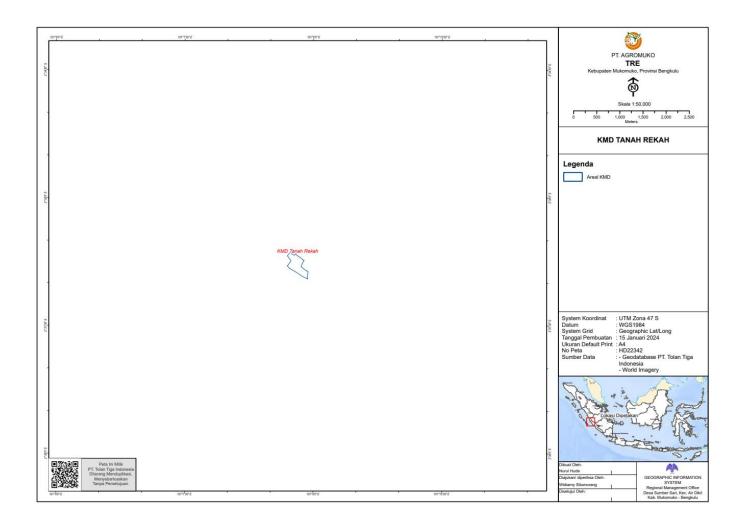




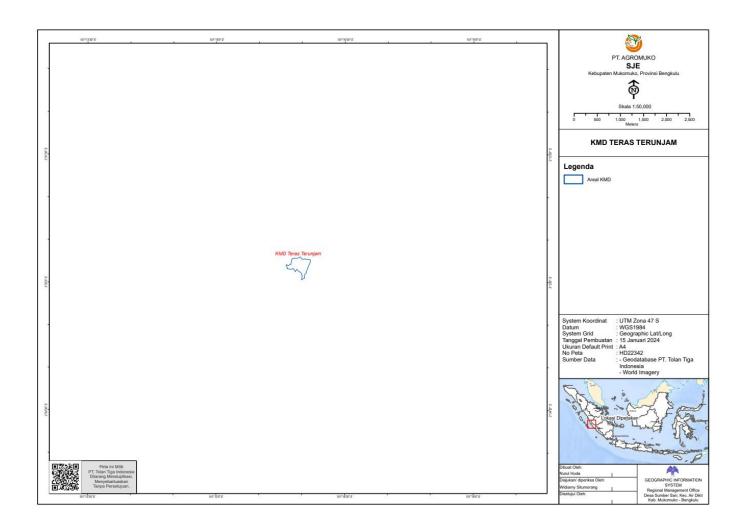




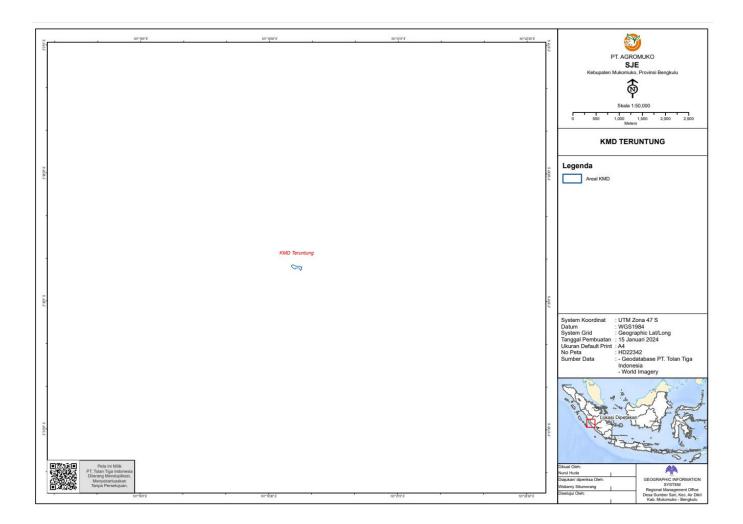




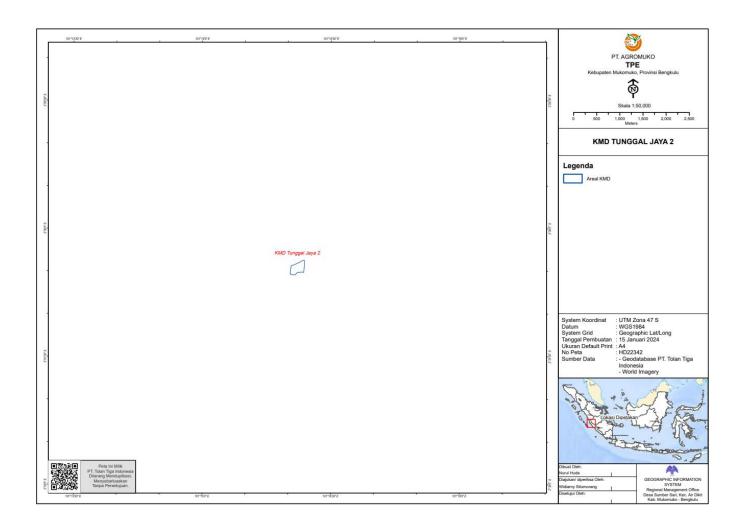




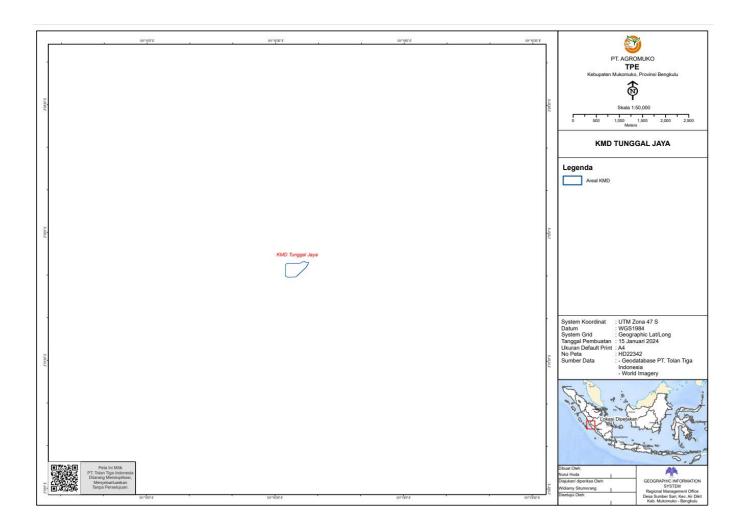














Appendix E: List of Smallholder Registered and/or sampled

Smallholder in Mukomuko POM categorized as land owned by village and full managed by Certificate Holder. Sample of Kebun Masyarakat Desa (KMD) or full managed smallholder visited within ASA2.2 are:

- 1. KMD No. 1 Desa Pasar Mukomuko managed by Tanah Rekah Estate.
- 2. KMD No. 47 Desa Lubuk Bangko managed by Sei Betung Estate.
- 3. KMD No. 48 Desa Setia Budi managed by Sei Betung Estate.
- 4. KMD No. 49 Desa Sumber Sari managed by Sei Betung Estate.
- 5. KMD No. 50 Desa Pondok Kopi managed by Sei Betung Estate.
- 6. KMD No. 09 Desa Lubuk Pinang managed by Sei Kiang Estate.
- 7. KMD No. 10 Desa Lalang Luas managed by Sei Kiang Estate.



Appendix F: List of Abbreviations

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMS Environmental Management System

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil
IS - CSPKO Independent Smallholder Certified Sustainable Palm Kernel Oil

IS – CSPKO Independent Smallholder Certified Sustainable Palm Kernel Expeller

IS – CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

KMD Kebun Masyarakat Desa (Village Community Estate)

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

RTE Rare, Threatened or Endangered species SCCS Supply Chain Certification Standard

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure