

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: PT. Inti Indosawit Subur
Client company Address: Head Office: Jl Palembang Kav 35-37, Jakarta 10230, Indonesia
Certification Unit: PT Gunung Melayu - Gunung Melayu II Mill
Location of Certification Unit: Gonting Malaha Village, Bandar Pulau District, Asahan Regency, Sumatera Utara, Indonesia
Date of Final Report: 27/06/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 February 2006
Address	Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Gunung Melayu - Gunung Melayu II Mill		
Location / Address	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, Sumatera Utara, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr Ivan Novrizaldie	E-mail	Ivan_novrizaldie@asianagri.com
Telephone	021 2301119	Facsimile	021 2301120

2. Certification Information			
Certificate Number	RSPO 620707	Certificate Start Date	23/01/2022
Date of First Certification	08/07/2015	Certificate Expiry Date	22/01/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT FFB/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10/06/2026
EU-ISCC-Cert-DE100-02729122	ISCC	SGS	07/07/2024
SGS-ID-ISPO-0068	ISPO	SGS	05/12/2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Gunung Melayu II Mill	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra, Indonesia	2° 44' 58.00" N	99° 28' 11.00" E
Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra, Indonesia	2° 42' 12.00" N	99° 26' 35.00" E
Aek Tarum Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra, Indonesia	2° 42' 05.00" N	99° 23' 12.00" E

Note:

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Aek Tarum Estate	2,283.00	39.56	349.00	2,671.56	85.46%
Batu Anam Estate	3,160.00	95.85	284.00	3,539.85	89.27%
Total	5,443.00	135.41	633.00	6,211.41	87.63%

Note:

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Aek Tarum Estate	0.00	2,283.00	0.00	0.00	2,283.00	0.00
Batu Anam Estate	0.00	1,097.00	2,063.00	0.00	3,160.00	0.00
Total (ha)	0.00	3,380.00	2,063.00	0.00	5,443.00	0.00

Note: Only Mature area is considered as production area

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan – Dec 2023)	Actual (Dec 2022 – Nov 2023)		Forecast (Jan – Dec 2024)
		Previous license period (Dec 2022)	Current license period (Jan – Nov 2023)	
Aek Tarum Estate	48,987.00	3,578.93	42,475.64	48,288.00
Batu Anam Estate	68,032.00	5,078.78	59,788.85	67,931.00
Extension volume	39,699.00			
	48,257.00			
Total	204,975.00	110,922.20		116,219.00

Note: From RSPO PalmTrace record, the RSPO Secretariat has approved Extension of Volume on 30/10/2023 and 04/03/2024.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan – Dec 2023)	Actual (Dec 2022 – Nov 2023)		Forecast (Jan – Dec 2024)
		Previous license period (Dec 2022)	Current license period (Jan – Nov 2023)	
Pulau Maria Estate		2,870.06	31,429.03	
Total		34,299.09		

Note: Pulau Maria Estate is under certification unit PT Saudara Sejati Luhur with certificate number RSPO 620755 (under same parent Company PT Inti Indosawit Subur)

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan – Dec 2023)	Actual (Dec 2022 – Nov 2023)		Forecast (Jan – Dec 2024)
		Previous license period (Dec 2022)	Current license period (Jan – Nov 2023)	
Third Party Supplier	N/A	7,840.00	79,230.00	N/A
Total		87,070.00		

Note:

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9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	December 2022	11,527.77	7,840.00	19,367.77
2	January 2023	9,660.11	7,748.00	17,408.11
3	February 2023	8,381.10	6,928.00	15,309.10
4	March 2023	8,219.09	7,502.00	15,721.09
5	April 2023	6,958.08	6,279.00	13,237.08
6	May 2023	11,122.13	9,773.00	20,895.13
7	June 2023	12,771.15	7,560.00	20,331.15
8	July 2023	15,349.17	7,039.00	22,388.17
9	August 2023	16,843.19	7,436.00	24,279.19
10	September 2023	16,065.18	6,786.00	22,851.18
11	October 2023	15,454.18	6,614.00	22,068.18
12	November 2023	12,870.15	5,565.00	18,435.15
TOTAL		145,221.29	87,070.00	232,291.30

Note: FFB certified supply base has include FFB certified from other certified unit Pulau Maria Estate

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Jan – Dec 2023)	Actual (Dec 2022 – Nov 2023)		Forecast (Jan – Dec 2024)
	Previous license period (Dec 2022)	Current license period (Jan – Nov 2023)	
FFB	FFB		FFB
136,713.92 mt	11,527.77 mt	133,693.52 mt	116,219.00 mt
	TOTAL	145,221.29 mt	
CPO (OER: 25.54 %)	CPO (OER: 24.03 %)		CPO (OER: 24.54 %)
32,830.42 mt	2,707.00 mt	32,186.00 mt	28,253.00 mt
	TOTAL	34,894.00 mt	
PK (KER: 5.00 %)	PK (KER: 4.71 %)		PK (KER: 4.70 %)
6,594.92 mt	563.00 mt	6,283.00 mt	5,463.00 mt
	TOTAL	6,846.00 mt	

Note: From RSPO PalmTrace record, the RSPO Secretariat has approved Extension of Volume on 30/10/2023 (36,699 MT) and 04/03/2024 (48,257 MT) total extension 84,956 MT

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	December 2022	2,707.00	563.08
2	January 2023	2,366.00	447.07
3	February 2023	2,055.00	399.06
4	March 2023	2,038.00	382.06
5	April 2023	1,726.00	320.05
6	May 2023	2,696.00	523.08
7	June 2023	3,100.00	573.08
8	July 2023	3,590.00	687.10
9	August 2023	3,988.00	768.11
10	September 2023	3,794.00	747.11
11	October 2023	3,723.00	847.12
12	November 2023	3,111.00	589.09
TOTAL		34,894.00	6,846.00

Note:

11. Summary of Actual Volume sold					
Current License period (Jan – Nov 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	30,154.06	-	-	30,154.06
PK (MT)	6,275.12	-	-	-	6,275.12
Credits	-	-	-	-	-
Previous License period (Dec 2022)					
CPO (MT)	-	2,027.29	-	-	2,027.29
PK (MT)	462.32	-	-	-	462.32
Credits	-	-	-	-	-

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

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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 Saudara Sejati Luhur – Gunung Melayu I KCP	RSPO_PO1000002914	-	6,662.64
2	PT Hari Sawit Jaya – Negeri Lama II KCP		-	74.80
TOTAL			-	6,737.44
Note:				

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 Sari Dumai Sejati	ISCC	32,181.85	-
TOTAL			32,181.85	
Note:				

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. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO									
IS-CSPKO									
IS-CSPKE									
CSPK									

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

Note: 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (key in period)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				

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

Note:

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
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Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **21 – 25 November 2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on.

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

The Critical NC close out on-site assessment was conducted on **20 February 2024**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Gunung Melayu II Mill	X	X	X	X	X
Batu Anam Estate	X	X	X	X	X
Aek Tarum Estate	X	X	X	X	X

Tentative Date of Next Visit: December 2, 2024 - December 6, 2024

Total Number of Mandays: 15

2.2 BSI Assessment Team

Name	Role	Competency
Mujinius Jalaraya (MJ)	Team Leader	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training, Endorsed RSPO ISH Auditor course and Endorsed RSPO Refresher course</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

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<p>Briyogi Shadiwa (BS)</p>	<p>Team Member</p>	<p>Education: Holds an associate degree in Palm Oil Plantation, Bogor Agricultural University (IPB).</p> <p>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.</p> <p>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 (<i>Ahli K3 Umum</i>), and Endorsed RSPO Refreshment Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Edy Widodo (EW)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended:</p> <p>Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
Sansan Suhendar	Observer (BSI)

2.3 Assessment Plan

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

ASA1.2 Assessment Plan:

Date	Time	Subjects	BS	MJ	EW
Monday, 20/11/2023	07.05 – 09.30	Flight Jakarta – Kualanamu (GA-182)	√	√	√
	09.45 – 17.00	Travel from Kualanamu to PT Gunung Melayu – Gunung Melayu II POM	√	√	√
Tuesday, 21/11/2023	08.00 – 09.00	Opening Meeting - Presentation by PT Gunung Melayu – Gunung Melayu I POM & Supply bases - Presentation by BSI Indonesia	√	√	√
	09.00 – 12.00	Field Visit to Aek Tarum Estate: • Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. • Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. • Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee.	√	√	√ √
	09.00 – 15.00	Stakeholder consultation: • Local Government of Asahan Regency (DLH, Disbun, Disnakertrans & BPN), Village Head, surrounding community, previous land owner/user, NGO, contractor.			√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.00	Field Visit to Gunung Melayu II POM: • Inspection of processing, warehouse, workshop, mill wastes management, effluent ponds, OHS, environment issues, POME application, workers interview, Supply Chain for CPO mill, review on SEIA documents and records, document review, etc. • Audit Supply Chain for CPO Mills (RSPO SCCS) • Interview workers.	√	√	√
	16.00 – 17.00	Document Review	√	√	√
Wednesday, 22/11/2023	08.00 – 12.00	Field Visit to Batu Anam Estate: • Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc.	√	√	

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		<ul style="list-style-type: none"> • Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. • Boundaries inspection, worker interviews, social amenities, etc. • Interview with: Labor Union and Gender Committee. 			<p>√</p> <p>√</p>
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Document Review Gunung Melayu II POM: <ul style="list-style-type: none"> • Occupational Health and Safety, Environment Aspect, time bound plan. • Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. • Best Management Practice for Mill & Supply chain. • Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 	√	√	√
Thursday, 23/11/2023	08.00 – 12.00	Document Review Gunung Melayu II POM, Aek Tarum & Batu Anam Estate: <ul style="list-style-type: none"> • Occupational Health and Safety, HCV, Environment Aspect, time bound plan. • Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. • Best Management Practice for Mill and supply chain for mill. • Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Audit Continue for document review	√	√	√
Friday, 24/11/2023	08.00 – 12.00	Document Review Gunung Melayu II POM, Aek Tarum & Batu Anam Estate: <ul style="list-style-type: none"> • Occupational Health and Safety, HCV, Environment Aspect, time bound plan. • Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. • Best Management Practice for Mill and supply chain for mill. Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√
	12.00 – 14.00	Break	√	√	√

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	14.00 – 17.00	Audit Continue for document review	√	√	√
Saturday, 25/11/2023	08.00 – 10.00	Report Preparation	√	√	√
	10.00 – 12.00	Closing Meeting	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Reporting	√	√	√

NCR Close Out Assessment Plan:

Date	Time	Subjects	MJ
Monday, 19/02/2024	07.05 – 09.30	Flight Jakarta – Kualanamu (GA-182)	√
	10.00 – 16.00	Travel from Kualanamu to site	√
Tuesday, 20/02/2024	08.00 – 08.30	Opening Meeting <ul style="list-style-type: none"> • Presentation by PT Gunung Melayu – Gunung Melayu II POM & Supply bases • Presentation by BSI Indonesia 	√
	08.30 – 12.00	Verification of CAP and its implementation PT Gunung Melayu – Gunung Melayu II POM NCR #2423887-202311-M1, indicator 6.2.3 NCR #2423887-202311-M2, indicator 3.4.3 NCR #2423887-202311-N1, indicator 2.2.2 Field Visit to Gunung Melayu II POM & Estate Interview with workers and related PIC	√
	12.00 – 14.00	Break	√
	14.00 – 15.30	Continue for NCR Close Out verification	√
	15.30 – 16.00	Report preparation	√
	16.00 – 17.00	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>There are remaining mill and estate that has not certified yet:</p> <ul style="list-style-type: none"> • Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024; • Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat; • Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat); • Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of Time bound plan has been approved by RSPO on 19 April 2023. The submission is according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	Complied
<p>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.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p> <p><i>Note:</i></p>	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied

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Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023.	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 is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023. Justification as below: <ul style="list-style-type: none"> • Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024; • Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat; • Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat); • Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. This has been consistent with ACOP reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No any fundamental failure to justify delay in planning the assessments.	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.	According to internal audit result and HCV assessment for uncertified unit it was confirmed that there is no primary forest or HCV areas replace for plantation. All uncertified unit was existing plantation since 1990 and some of the plantation has been replanting.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new planting after January 2010. RaCP for Bahilang and Sentral Estate still on-going process, Concept Note still on Progress and submit to RaCP team at Q2 2023.	Complied

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<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>According to internal audit result on 14 – 19 August 2023 in Bahilang Estate, 22 – 27 May 2023 in Teluk Panji Estate, 10 – 16 May 2023 in Topaz Estate and 8 – 16 August 2023 in Sentral Estate, there is no land conflict occur in area of uncertified units: Topaz Estate, Bahilang Estate, Teluk Panjie Estate and Sentral Estate.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) updated on 25 March 2024, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU’s with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 2 units • Concept Note submitted (MUs): 0 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 1 • Remediation Plan approved (MUs): 0 	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. Report of internal audit are available. Result of internal audit:</p> <ul style="list-style-type: none"> • Bahilang Estate, Teluk Panji Estate and Sentral Estate has complies to relevant regulation, no issue regarding the legal compliance. 	<p>Complied</p>

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	<ul style="list-style-type: none"> No complaint or grievances and disputes from stakeholders and affected parties. No labor disputes occur since the latest audit. No land conflict; Documents related to the history of land tenure and the actual legal or customary use of the land are available. No new plantings are established on local peoples land and no HCV area replacement. 	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result, there is no 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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders consultation already conducted during internal audit for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. There is no issue from stakeholder consultation.	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? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.	Complied

Approved Time Bound Plan

Name of Mill	Mill Address	Name of Supply Bases	Estate Address	Time Bound for Certification	Status
Buatan I Mill – PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill - PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011

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					Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Estate Ulu	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal (Plasma) Ulu	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency, Jambi	Muara Estate Bulian	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
		Muara (Plasma) Bulian	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate 1	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
		Topaz Estate 2	Petapahan Village, Tapung District, Kampar Regency, Riau	2026	Planned to be certified in 2026
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village,	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh	2015	Certified on 20 February 2015

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	Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District,	Teluk Panjie Estate (3,885 Ha)		2015	Certified on 21 April 2015

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	Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate (801 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	2026	HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat)
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015
		Peranap (Plasma)		2016	Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District,	Aek Tarum & Batu Anam Estate		2015	Certified on 8 July 2015

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	Asahan Regency, North Sumatra	Sentral Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2024	Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified on 2018
		Aek Kuo (501 Ha)		2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill

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 2 (two) Critical; 1 (one) Minor nonconformities and no Opportunity For Improvement raised. The PT Gunung Melayu – Gunung Melayu II POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2423887-202311-M1	Issued Date	25/11/2023
Due Date	25/02/2024	Closure Date	20/02/2024
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Based on Documents review and interviews with several workers and labour union, there is no evidence that the worker contract (PHL/PKWT work contract) has include PHL/PKWT compensation in accordance with Government Regulation No. 35 year 2021.		
Requirement Reference:	(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.		
Objective Evidence:	<ul style="list-style-type: none"> • Based on interviews with several workers and labor unions, they do not understand the PHL/PKWT compensation in accordance with PP no. 35/2021. • Perjanjian Kerja Untuk Jangka Waktu Tertentu document does not explain the provision of PHL/PKWT compensation at the end of the employment agreement period. In Article IV; Compensation only explains the worker's wages/salary and income tax, for example: <ol style="list-style-type: none"> 1. Perjanjian Kerja Untuk Jangka Waktu Tertentu No. 429/KAT/SPK/VII/2023 dated 1 July 2023 in the name of Suratmin (Harvester) at Aek Tarum Estate. The agreement expires until 31 December 2023. 2. Perjanjian Kerja Harian Lepas No. 630/PKHL/KBA/09/2023 dated 1 September 2023 on behalf of Rahma Wati BR Rambe on position Sparayer/TUS at Batu Anam Estate 3. Perjanjian Kerja Harian Lepas No. 666/PKHL/KBA/09/2023 dated 27 September 2023 on behalf of Rusmiana on position fertilizer application worker. • <i>Peraturan Pemerintah No. 35 Tahun 2021; Bagian Ketiga; Pemberian Kompensasi [Pasal 15 & 16].</i> <i>[Pasal 15]:</i> <ol style="list-style-type: none"> 1. <i>Pengusaha wajib memberikan uang kompensasi kepada Pekerja/Buruh yang hubungan kerjanya berdasarkan PKWT.</i> 2. <i>Pemberian uang kompensasi dilaksanakan pada saat berakhirnya PKWT.</i> 		

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	<p>3. <i>Uang kompensasi sebagaimana dimaksud pada ayat (1) diberikan kepada Pekerja/Buruh yang telah mempunyai masa kerja paling sedikit 1 (satu) bulan secara terus menerus.</i></p> <p>4. <i>Apabila PKWT diperpanjang, uang kompensasi diberikan saat selesainya jangka waktu PKWT sebelum perpanjangan dan terhadap jangka waktu perpanjangan PKWT, uang kompensasi berikutnya diberikan setelah perpanjangan jangka waktu PKWT berakhir atau selesai.</i></p> <p>5. <i>Pemberian uang kompensasi tidak berlaku bagi tenaga kerja asing yang dipekerjakan oleh pemberi kerja dalam Hubungan Kerja berdasarkan PKWT.</i></p> <p><i>[Pasal 16]: Besaran uang kompensasi;</i></p> <p>1. <i>Besaran uang kompensasi diberikan sesuai dengan ketentuan sebagai berikut:</i></p> <p style="padding-left: 40px;"><i>a. PKWT selama 12 (dua belas) bulan secara terus menerus, diberikan sebesar 1 (satu) bulan Upah;</i></p> <p style="padding-left: 40px;"><i>b. PKWT selama 1 (satu) bulan atau lebih tetapi kurang dari 12 (dua belas) bulan, dihitung secara proporsional dengan perhitungan :</i> <i>(masa kerja/12) x 1 (satu) bulan Upah;</i></p> <p style="padding-left: 40px;"><i>c. PKWT selama lebih dari 12 (dua belas) bulan, dihitung secara proporsional dengan perhitungan: (masa kerja/12) x 1 (satu) bulan Upah.</i></p> <p><i>Pasal 10:</i></p> <p style="padding-left: 40px;"><i>(1) PKWT sebagaimana dimaksud pada ayat (1) dapat dilakukan dengan Perjanjian Kerja harian.</i></p> <p style="padding-left: 40px;"><i>(2) Perjanjian Kerja harian sebagaimana dimaksud pada ayat (2) dilakukan dengan ketentuan Pekerja/Buruh bekerja kurang dari 21 (dua puluh satu) hari dalam 1 (satu) bulan.</i></p>
Corrections:	Coordinate with HRD (Medan Head Office) to correct and complete the redaction documents in the contract worker agreement (PHL/PKWT) as required by Government Regulation no. 35 of 2021 [Articles 15 and 16] which applies, relates to compensation provisions. With the follow-up review of the work agreement, it is hoped that this will become a form of socialization of Legal Compliance related to describing regulatory changes relevant to conditions in detail.
Root Cause Analysis:	The PIC's (HR) lack of proactiveness in implementing its duties as an evaluator in the current updated regulatory changes has resulted in a lack of understanding in the management unit to fulfill the relevant regulation PP 35 of 2021, as a detailed description of the basic requirements of labor law.
Corrective Actions:	<ul style="list-style-type: none"> • Develop a mechanism for implementing PP 35 of 2021 guided by updated procedures in the employment aspect. • Develop the contract template in accordance with PP 35 and amend all the workers contract according to the new template contract. • Reaffirmation to the management unit and PIC in the form of a Memorandum from the highest leadership (Group Manager) regarding the implementation and evaluation of compliance with relevant regulatory requirements (PP35) with mechanisms in the management unit.

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Assessment Conclusion:	<ul style="list-style-type: none"> • The internal audit team comprehensively evaluates the implementation of PP35/2021 on internal audit activities which are carried out at least once a year.
Assessment Conclusion:	<ul style="list-style-type: none"> • PT Gunung Melayu has made coordination with HRD (Medan Head Office) to correct and complete the redaction documents in the contract worker agreement (PHL/PKWT) as required by Government Regulation no. 35 of 2021 [Articles 15 and 16] which applies, relates to compensation provisions. Template of workers contract can be shown during audit as present in "Perjanjian Kerja Waktu tertentu". The workers contract template has been review and approved by Dinas Tenaga Kerja Kabupaten Asahan dated 6 February 2024 to be implemented. In article 4 compensation it was stated that company will paid the compensation in accordance with labor regulation: The company will pay compensation in accordance with applicable regulations if (a) work agreement ends, (b) The company extended the employment relationship. • Company also has made the mechanism of compensation calculation and payment according to PP35/2021. The mechanism also has been review and approved by Dinas Tenaga Kerja Kabupaten Asahan dated 6 February 2024. • During interview with Dinas tenaga Kerja Kabupaten Asahan on 21 February 2024 it was confirmed that they have aware the letter from PT SSL regarding the request to review the draft contract of PKWT and the mechanism of compensation payment according to PP 35/2021; letter No. 003/HR-RO1/EXT/1/2024 dated 2 February 2024. Dinas Tenaga Kerja Kabupaten Asahan (head of the industrial relations disputes section) confirmed that: <ul style="list-style-type: none"> ✓ The implementation of PP35/2021 can only be implemented in 2023 after a material review of the UU Cipta Kerja which was carried out for 2 years from 2021 to 2023. ✓ With the publication of PP35/2021, adjustments need to be made, it will takes time for companies to implement them. In 2023 the government issued Law No. 6 year 2023 concerning the enactment of the UUU Cipta Kerja into law including its derivative regulations (PP 35/2021). ✓ PKWT contract template has been discuss and socialize to the labor union. Interview with head of union labor PT SSL also confirmed that he has acknowledge the draft of contract PKWT and compensation mechanism and the labor union will supervise and monitor the implementation of the PKWT contract and the implementation of the compensation mechanism in accordance with PP35/2021. • Sampled of PKWT contract was verified during NCR Close out and interview with workers confirmed that they have aware regarding the new contract template and the compensation mechanism according to PP35/2021. • Sustainability PT Gunung Melayu has coordination with Internal audit department to review and check the implementation of PP35/2021 during next internal audit. Email correspondence of the discussion can be shown during audit.

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Non-conformity			
NCR Ref #	2423887-202311-M2	Issued Date	25/11/2023
Due Date	25/02/2024	Closure Date	20/02/2024
Indicator & Category (Critical / Minor)	3.4.3		
Statement of Nonconformity:	The social and environmental management and monitoring implementation report (RKL-RPL) has not explained the implementation of management and monitoring of all environmental impacts required in the RKL-RPL matrix and the company also cannot show a report on the implementation of the social impact management program as in the SIA document.		
Requirement Reference:	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.		
Objective Evidence:	<p>Based on document review, the company has presented the implementation of environmental management and monitoring (RKL-RPL) report for semester II of 2022 and semester I of 2023. And it has been reported to the Asahan Regency Environmental Agency on January 25, 2023 for semester II 2022 and on October 27, 2023 for semester I 2023.</p> <p>However, these two reports do not fully explain the important impacts required in the RKL-RPL matrix, such as: Opening employment opportunities, increasing community income, appearance hazardous waste, disturbing the existence of wild animals, appearance solid waste, emerging attitudes and perceptions community, and the decline community health.</p> <p>The Company already has SIA document as per "Laporan Efektivitas Upaya Pengelolaan Sosial PT. Gunung Melayu – PKS Gunung Melayu II, Kabupaten Asahan, Provinsi Sumatera Utara", which includes a social impact management program, however the company cannot shown the implementation report of the SIA management program accordingly.</p>		
Corrections:	<ul style="list-style-type: none"> • Collect data on management of social aspects and complete the report regarding the scope of social impacts by ongoing operational activities and operational activities that will be developed in the RKL-RPL report. • Conduct surveys of the surrounding community regarding social issues and community perceptions of the company's existence and its impact on society • Complete the SIA study and the latest SIA review for 2023 which is pending 		
Root Cause Analysis:	<ul style="list-style-type: none"> • There is a lack of supporting data in the social aspects arising from operational activities of company so that detailed of the management and monitoring of the company's social aspects are not included in the discussion in the RKL/RPL report. • On the other hand, the Company is also in the process of completing the latest SIA review and review of social impact studies to prepare social impact management and monitoring plans. 		
Corrective Actions:	<ul style="list-style-type: none"> • Issued Work Instructions (WI) as a reference in preparation RKL-RPL report document in which the WI states how to collect social aspect data and reporting. 		

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	<ul style="list-style-type: none"> • Coordination with environment division to review the RKL-RPL report before submission to related government agency each semester.
Assessment Conclusion:	<ul style="list-style-type: none"> ➤ The Company has collected data related to the management and monitoring of social impacts and reported on the management and monitoring of social impacts carried out by the Company including: <ul style="list-style-type: none"> • Management and monitoring of social impacts on increasing community income • Management and monitoring of social impacts on public health. • Social conditions Increase in community income & attitudes and perceptions of the community ➤ Revision of RKL-RPL report period semester I and II year 2023 was sighted and in accordance with matriks of management and monitoring of social and environmental assessment (RKL-RPL matriks). ➤ PT Gunung Melayu has conducted a survey of local community perceptions of the company's existence and its impact on them. Survey conducted by public relation division on 6 december 2023 to responden of Batu anam village. Evidence of survey by quisioner can be demonstrated during NCR Close out. ➤ PT Gunung Melayu has complete the SIA study and the latest SIA review for 2023 cooperate with independent consultant Lingkar Komunitas Sawit (LINKS). Final report of SIA study and review are available in "Laporan Social Impact Assessment PT Gunung Melayu 2023". SIA study report will be the reference of management and monitoring of social impact beside RKL-RPL matrix. ➤ PT Gunung Melayu has issued the WI No. 021/EST-GM/MEMO/I/24 dated 8 January 2024 concerning RKL-RPL reporting procedure.including procedures for collecting data on social aspects. Sustainability division and environmental division has made coordination to review the revision of RKL-RPL report which is include the management and monitoring of social aspect. Report revision of RKL-RPL semester I and II year 2023 has been review and submit to environmental agency of Asahan regency. Receipt of RKL-RPL report can be shown during audit.

Non-conformity			
NCR Ref #	2423887-202311-N1	Issued Date	25/11/2023
Due Date	25/02/2024	Closure Date	20/02/2024
Indicator & Category (Critical / Minor)	2.2.2		
Statement of Nonconformity:	There has not been sufficient evidence that the contractors have complied with the applicable regulations.		
Requirement Reference:	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.		
Objective Evidence:	Based on the document review, there are several contractors who have collaborations with the company, for example CV Rimba Nusantara, PT Jasa		

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	Sumber Asahan & PT Jasa Sahabat Abadi (transporter CPO/PK). However, they have not been able to show sufficient evidence that the contractors have complied with the applicable regulations.
Corrections:	Provide the contractor compliance evaluation record and filling the record in the Gunung Melayu office.
Root Cause Analysis:	Contractor evaluation compliance has not been recorded and well documented.
Corrective Actions:	Assigned PIC to filling the compliance evaluation record for each contractor.
Assessment Conclusion:	To be verify in the next surveillance assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2097225-202108-M1	Issued Date	23-12-2022
Due Date	22-03-2023	Closure Date	21-03-2023
Indicator & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	Workers do not use appropriate personal protective equipment (PPE) at workplace.		
Requirement Reference:	(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.		
Objective Evidence:	Workers do not use hand gloves and mask during loading of fertilizer (Dolomite) on truck at Block B09h/B10j Afdeling 2 Aek Tarum Estate.		
Corrections:	Ensure use in the muster morning and provide PPE to fertilizer employees who do not use PPE.		
Root Cause Analysis:	<ul style="list-style-type: none"> • There is still neglect by supervisors (Assistant and Foreman) about the importance of implementing OSH for workers who do not use PPE. • There is still a perception of workers that the obligation to use PPE does not make work comfortable and reduces the speed of completing work. 		

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Corrective Actions:	<ul style="list-style-type: none"> • Providing socialization regarding HIRAC to all employees through the HIRAC socialization program to supervisors related to warehouse and workshop operational activities. • Providing socialization to all employees about the dangers of working without using PPE. • Make a circular letter of firm action to all Afdeling and Factory employees regarding the call for the use of PPE in every activity in the work area (sticked at each station and public place)
Assessment Conclusion:	<p>Verification NCR Close-out on 21 March 2023: Auditor attend the muster morning at Division 1 Aek Tarum Estate to ensure that all workers are announced to use PPE at workplace. At 11 am, auditor random to visit manuring activity at Block D09 and FFB transport at collection road Block E/F. Auditor sighted that all workers use PPE as required. The corrective action made was effectively implemented. This NC can be CLOSED.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>During field audit, workers are use appropriate personal protective equipment (PPE) at workplace. Company has provide PPE free of charge. During interview with workers, they have aware about their obligation to use appropriate PPE and obey the safety rules determined by company. OHS monitoring are conducted by safety officer/Ahli K3 Umum. There is no issue related to PPE usage by workers in this audit.</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2097225-202108-M2	Issued Date	23-12-2022
Due Date	22-03-2023	Closure Date	21-03-2023
Indicator & Category (Critical / Minor)	7.3.2 minor (escalate to MAJOR)		
Statement of Nonconformity:	Corrective action on disposal of waste material procedure is demonstrated ineffective.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<ul style="list-style-type: none"> • Field visit to Hazardous Waste storage (TPS LB3) at Batu Anam Estate, there are found that non-hazardous material are stored inside (such as wheelbarrow, bucket, cement scoop, barn owl boxes frame) and no appropriate symbol are place. • Field visit to warehouse area at Batu Anam Estate, fertilizer packaging waste and warehouse repair material used are placed not properly surrounding the storage. • Field visit to Batu Anam Estate housing complex, used lubricant is store at employee house. 		
Corrections:	<ul style="list-style-type: none"> • Installed signboard of Hazardous Waste at Chemical Warehouse and Hazardous Waste Storage. • Clean up of fertilizer sacks to providing point/place. • Conduct inspection schedule for lubricant and chemical container transportation at housing complex. 		

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Root Cause Analysis:	<ul style="list-style-type: none"> Less understanding of warehouse head officer related standardization of implementation, monitoring and management of environment and reporting of Environmental Permit therefore no monitoring program develop.
Corrective Actions:	<ul style="list-style-type: none"> Allocate one employee for collecting fertilizer sacks at warehouse. Conduct verification once a week by monitoring the transport of Hazardous waste every week and transported it to hazardous waste warehouse in the workshop.
Assessment Conclusion:	<p>Verification NCR Close-out on 21 March 2023, auditor interview Mr. SA**** to ensure that corrective action made was implemented:</p> <ol style="list-style-type: none"> Fertilizer plastic was collected and store at the hazardous storage by assigned person. This person also assigned to monitor and collect hazardous waste (if any) from housing complex once a week (on Friday). The assigned person making report to field assistant if still founded hazardous waste at housing complex. GM conduct unannounced visit to every housing complex and filled the report. Latest visit on 16 Mar 2023. <p>During field observation to housing complex at Batu Anam Estate, auditor did not found any hazardous waste. The corrective action made was effectively implemented. This NC can be CLOSED.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>During field audit to Batu Anam Estate and Aek Tarum Estate it was noted that the Hazardous waste are managed accordingly in accordance with company procedure and national regulation and law. Hazardous waste are store on licenced hazardous waste storage (temporary stored) and deliver to licenced collector and transporter. Record of hazardous waste incoming and outgoing are well maintained, report of hazardous waste management are regularly (quarterly) submitted to Environmental Agency of Asahan Regency. Evidence of hazardous waste management could be demonstrated during audit. There is no issue related to hazardous waste management in this audit.</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2097225-202108-M3	Issued Date	23-12-2022
Due Date	22-03-2023	Closure Date	21-03-2023
Indicator & Category (Critical / Minor)	7.3.3 minor (escalate to MAJOR)		
Statement of Nonconformity:	Open fire for waste disposal practice still carried out by employee		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Based on field visit to Aek Tarum compound/housing complex, former open fire for waste disposal practice still found.		
Corrections:	<ul style="list-style-type: none"> Clean up all domestic waste at Pondok Coklat housing properly, as inspection minutes No. 025/BA/KPM/III/2023, dated 11 March 2023. 		

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	<ul style="list-style-type: none"> Installed the signboard related domestic waste management surrounding the housing complex. Issuing memorandum by GM to all Estate and Mill manager concerning cleanliness of housing complex refer to letter no: 01/GM-GME/Int/I/2023, dated 3 January 2023.
Root Cause Analysis:	<ul style="list-style-type: none"> Not all resident has well awareness regarding domestic waste management. Inspection program and monitoring by PIC was not implemented consistently
Corrective Actions:	<ul style="list-style-type: none"> Creating unannounced inspection program by GM in monthly basis, where inspection visit is GM authority. Socializing the risk of domestic waste burning and domestic waste disposal to all housing residents. Provides additional domestic waste bin points surrounding the housing complex, in every row of housing. Giving reward for housing cleanest award annually with Program Clean Village Award refer to RSPO standard.
Assessment Conclusion:	<p>Verification during NCR Close-Out visit on 21 March 2023</p> <ul style="list-style-type: none"> Visiting at Aek Tarum housing complex, sighted that additional domestic waste bin points are build in every housing row and separated between organic and inorganic wastes. Housing inspection program created by Group Manager, dated 3 January 2023 with unannounced inspection period from January to December. This inspection only recognized and conducted by GM without any person announced. Inspection minutes to the housing complex of Aek Tarum Estate conducted by Sustainability Assistant dated 21 January 2023. Sighted that banner of "Do not open fire for domestic waste disposal" are more installed in public access at housing complex. <p>According to the onsite visit and actual inspection program implemented, concludes that the system has been effectively implemented. This non-conformity is CLOSED satisfactorily.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>During field audit to Aek Tarum Estate and Batu Anam Estate it was noted that there is no use open fire for waste disposal, particularly for domestic waste. Company has manage domestic waste by land fill and separated the organic and inorganic waste. During interview with workers they aware about the domestic waste handling and management.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2291295-202212-N1	Issued Date	23-12-2022
Due Date	ASA1.2	Closure Date	ASA1.2
Indicator & Category (Critical / Minor)	2.1.2 minor		
Statement of Nonconformity:	Documented system related evaluation of track changes to the law with relevant regulation was not implemented appropriately.		

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Requirement Reference:	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.
Objective Evidence:	<ul style="list-style-type: none"> Peraturan Pemerintah No. 22 Tahun 2021 tentang Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup was not listed and evaluated. This is related to Hazardous Waste license which has been expired since 22 November 2022 and should follow the requirement refer to Article 295 and 296 within this regulation. Peraturan Pemerintah No. 36 Tahun 2021 tentang Pengupahan was not listed and evaluated. This is related document of "Perjanjian Kerja Bersama" where not been approved by relevant government department. The context of "Perjanjian Kerja Bersama" should be considered to follow the requirements of this regulation.
Corrections:	Coordinating with the SSL Head Office Officer Medan to improve and complete the Legal Compliance Evaluation document which is related to the description of regulatory changes that are relevant to the conditions in detail so that the reciprocal impacts are known which are given in this document.
Root Cause Analysis:	The PIC's lack of proactivity in implementing the main duties of public relations as an evaluator in the current updated regulatory changes.
Corrective Actions:	<ul style="list-style-type: none"> Reaffirmation of the Public Relations PIC in the form of a memorandum from the highest leadership regarding the main task of Public Relations seeking information and evaluating changes in regulations relevant to the unit. PIC Creates a masterlist of regulatory updates that are reported per Semester to the Group Manager
Assessment Conclusion:	A documented system for ensuring legal compliance, Unit of Certification implement updating law and regulations periodically. An updating law and regulations was documented within "Evaluasi Kepatuhan Peraturan PT Gunung Melayu", dated 2 Januari 2023. There are 5 updated national regulation that were identified in 2023. Person in charge for updating this document is Administration Head with supported by Sustainability Team and Legal Department as evaluation team. All relevant legal requirement has been listed and evaluated for the compliance.

Previous Audit Minor Non-conformity			
NCR Ref #	2291295-202212-N2	Issued Date	23-12-2022
Due Date	ASA1.2	Closure Date	ASA1.2
Indicator & Category (Critical / Minor)	6.5.3 minor		
Statement of Nonconformity:	Assessment the needs of new mothers including evidence of consultation with new mothers was not conducted by unit of certification		
Requirement Reference:	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.		

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Objective Evidence:	Based on interview with child nanny and children presence list in creche at Aek Tarum Estate, identified that 8 babies (age < 12 months) are placed. Child nanny at creche as one of new mother that have baby aged 5 months years old. She is explained that assessment the needs of new mothers is not conducted by the company to her.
Corrections:	Inventorying and identifying/re-censusing data on female employees who are breastfeeding and surveys are required in the Assessment of the needs of breastfeeding mothers in the plantation and factory units so that all the correct data fields are completed.
Root Cause Analysis:	There is no coordination between the Sustainability Department and the plantation and factory units, so there has not been an update on the new clause regarding the implementation of the 2020 INA NI RSPO P&C, specifically the mechanism for assessing the needs of breastfeeding mothers which is carried out by medical personnel and KTU.
Corrective Actions:	Develop a standard mechanism and format for recording progress for the implementation of data collection related to the assessment of the needs of breastfeeding mothers in plantation units and factories so that the required data can be available and complete before the next audit.
Assessment Conclusion:	The company has Inventorying and identifying/re-censusing data on female employees who are breastfeeding mothers. Company has conducted a consultation and survey of the needs of new mothers conducted by medical personnel (clinic doctors; dr. Wira Ranata Geronde) and paramedics in the period August – September 2023. The survey was conducted on 31 new and lactating mothers out of 39 new and pregnant and lactating mothers. Result and quisioner for consultation and survey of the needs of new mothers can be shown during audit.

Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 2291295-202212-I1 Indicator 3.6.1 (Critical)</p> <p>Mitigation plans of H&S issues in all operational activities shall be improved, such as:</p> <ul style="list-style-type: none"> • Completeness of hazardous symbols in fertilizer storage and lubricant/grease storage at Aek Tarum Estate. • Accelerate progress of eyewash equipment procurement process at Aek Tarum Estate. • Accelerate progress of fuel nozzle procurement process at Batu Anam Estate. <p>Verification / Follow-up actions:</p> <ul style="list-style-type: none"> - Company has complete all hazardous waste symbol in fertilizer storage and lubricant/grease storage including chemical storage in accordance with national regulation. - Eyewash equipment has been provide and made available near to chemical storage and hazardous waste storage both in Batu Anam Estate and Aek Tarum Estate. - Fuel nozzle has been provided and made available in Batu Anam Estate, Aek Tarum Estate and Gunung Melayu II POM. Checklist of monitoring are available.

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2097519-202108-M1	Major	6.2.2 C	26 Aug 2021	Closed, 15 Nov 2021
2097519-202108-N1	Minor	3.2.2	26 Aug 2021	Closed, 22 Dec 2022
2097519-202108-N2	Minor	6.4.4	26 Aug 2021	Closed, 22 Dec 2022
2097519-202108-N3	Minor	7.3.2	26 Aug 2021	Open, Escalate to Major
2097519-202108-N4	Minor	7.3.3	26 Aug 2021	Open, Escalate to Major
2097519-202108-N5	Minor	7.12.7	26 Aug 2021	Closed, 22 Dec 2022
2097225-202108-M1	Critical	6.7.3	23 Dec 2022	Closed, 22 Mar 2023
2097225-202108-M2	Critical (escalate)	7.3.2	23 Dec 2022	Closed, 22 Mar 2023
2097225-202108-M3	Critical (escalate)	7.3.3	23 Dec 2022	Closed, 22 Mar 2023
2291295-202212-N1	Minor	2.1.2	23 Dec 2022	Closed, 25 Nov 2023
2291295-202212-N2	Minor	6.5.3	23 Dec 2022	Closed, 25 Nov 2023
2423887-202311-M1	Critical	6.2.3	25 Nov 2023	Closed, 20 Feb 2024
2423887-202311-M2	Critical	3.4.3	25 Nov 2023	Closed, 20 Feb 2024
2423887-202311-N1	Minor	2.2.2	25 Nov 2023	Open, Next Surveillance

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 Gunung Melayu – Gunung Melayu II 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	Gender Committee	Face to face
Union	Worker Union	Face to face
Governmental Department	Asahan Regency Manpower Office Asahan Regency Lands Office Asahan Regency Agriculture and Plantation Office Asahan Regency Environmental Office	By phone
Communities	Batu Anam Village	Face to face
NGO	LKLH (Lembaga Konservasi Lingkungan Hidup Sumatera Utara)	By phone

Stakeholders comment	
1.	<p>Feedbacks: Asahan Regency Manpower Office</p> <ul style="list-style-type: none"> - Wage determination is in accordance with the 2023 Asahan Regency Minimum Wage - All workers have been registered as BPJS Ketenagakerjaan and BPJS Kesehatan participants - There are no issues related to child or underage labor - The company has provided PPE to its workers according to their risk level. - The company has a valid permit for lifting and carrying equipment, pressure vessels, etc. including carrying out periodic inspections; and the operator has registered with the operator's license. - The company has formed a Workers Union and has been registered under the names PUK FSPPPSPSI and PUK KSPSI 1973 - During the 2023 period there were no reported industrial relations cases. - It is recommended that PP no. 35 of 2021 concerning Specific Time Work Agreements, Outsourcing, Working Time and Rest Time and Termination of Employment Relations. <p>Audit Team verification and response: Audit team has verified with indicator related to worker welfare, occupational health and safety and found aligned.</p>
2.	<p>Feedbacks: Asahan Regency Lands Office</p> <ul style="list-style-type: none"> - PT Gunung Melayu has a valid Land Title/HGU in 2004 and is still valid - Reporting related to the use of HGU has been submitted consistently - There were no issues related to land conflicts in this 3 year period. <p>Audit Team verification and response: The auditor team has verified the HGU certificate; 3. Land Title/Cultivation Rights (HGU): HGU Certificate No. 1 (23 Apr 2004); NIB: 02.07.02.17.00100 Reference: Decree of the Head of BPN No. 20/HGU/BPN/2001</p>

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	<p>(7 August 2001) and No. 20/HGU/BPN/2001/A/28 (19 Dec 2001). Measurement Letter No: 01/Gonting Malaha/2004, 21 Apr 2004. Area 10,414,331 Ha</p> <p>Field observations were carried out and it was observed that the maintenance of the boundary markers was well maintained and the use of the HGU land was in accordance with its intended purpose.</p>
<p>3.</p>	<p>Feedbacks: Asahan Regency Agriculture and Plantation Office</p> <ul style="list-style-type: none"> - PT Gunung Melayu had a Plantation Business License (SPUP) in 2001 and underwent changes in 201 regarding the addition of Mill capacity from 30 tons of FFB per hour to 60 tons of FFB per hour - The company has submitted a mandatory report on plantation business development in statistical format. - Partnerships have been established with farmers in villages around the plantation not using the Inti-plasma scheme - The company's FFB price is based on market prices, and is not binding on the FFB price determined by the North Sumatra Provincial Government. Based on community input, the FFB price set by PT Gunung Melayu has a better FFB structure compared to other companies in the area. - There are no issues related to land conflicts or complaints from the surrounding community. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The audit team verified indicators related to legal compliance, support to small farmers, community development and found compliance. - Implementation of partnership programs through the CSV (Corporate Share Value) program; - Up to September 2023 there have been 18 smallholder groups/"farmer groups" with 867 smallholder members and 2,999 Ha area registered under the CSV program.
<p>4.</p>	<p>Feedbacks: Asahan Regency Environmental Office</p> <ul style="list-style-type: none"> - The company has an environmental permit, analysis documents regarding environmental impacts, environmental management and monitoring; and report its implementation to the Environmental Office every 6 months (per semester) consistently - The company has managed B3 Waste and has a legal temporary storage place for B3 Waste in accordance with regulations and has reported consistently every 3 months (quarterly) - There are no reports or issues regarding environmental pollution from factory and plantation operations from communities around the plantation. - there are environmental issues reported by the NGO LKLH Medan via social media: https://www.kabarriau.com/berita/9715/lklh-sumut-bangunan-kebun-sawit-pt-inti-indosawit-subur-bersertifikat-rspo-dan-iscc-di-duga <p>Audit Team verification and response:</p> <p>Audit team verified against the indicator related to legal compliance, environmental management system, water quality and found in compliance.</p> <p>Regarding the issue raised by the NGO LKLH (Lembaga Konservasi Lingkungan Hidup Sumatera Utara) in August 2023, the auditor team has carried out verification via telephone to the Chair of the LKLH NGO, Mr. Indra Mingka.</p> <p>Based on verification and interview with NGO LKLH, the complaint has been respond by the Management of PT Gunung Melayu, the issue has been addressed and solved.</p> <p>During field visit to Piasa river border Block C10E Afdeling I Sentral Estate, it was noted that Sentral Estate has designated the Piasa river border as HCV area since HCV assessment 2014. The boundary of the HCV</p>

	<p>area, 50 meters wide from the river bank, has been marked and stakes have been installed. HCV information boards have also been installed at river border locations.</p> <p>It was noted that Piasa River border has include in the remediation plan of PT Gunung Melayu II POM.</p>
<p>5.</p>	<p>Feedbacks: Village communities Batu Anam Village</p> <ul style="list-style-type: none"> - Communication has been well established - The company is always open and responds well to every problem that occurs in society - The CSR program was created based on surveys and consultations with Batu Anam Village. Realized every year in accordance with the program that has been communicated. - So far there have been no land conflicts - There are no violations of human rights or forced labor and discrimination in its operations <p>The use of labor is prioritized for village communities around the plantation. And the surrounding village community feels helped</p> <hr/> <p>Audit Team verification and response: Audit team verified against the indicator related to transparency, legal compliance, support to smallholder, community development and found in compliance. This comment recorded as positive comment.</p>
<p>6.</p>	<p>Feedbacks: Gender Committee</p> <ul style="list-style-type: none"> - The Gender Committee understands the mechanism for submitting complaints, including protecting anonymity, especially if harassment or violence occurs against female workers - The Gender Committee has an annual work program: meetings, socializing female workers' rights to female workers, holding training or general outreach to new mothers on plantations. - Routinely (every month) hold POSYANDU (Integrated Service Post) activities for mothers who have just given birth - Gender committee meetings are held every 3 months. Coordinating the activities of the PT gender committee. Mount Malay. - The company has demonstrated efforts to protect the rights of female workers: menstrual leave, maternity leave, special health checks for female workers in high-risk areas, pregnancy tests for sprayers and fertilizers. - To date, there have been no complaints regarding sexual harassment, domestic violence against female workers, and/or violations of women's reproductive rights. <hr/> <p>Audit Team verification and response: The audit team verified indicators related to worker welfare, no discrimination, occupational health and safety, protection of women workers' rights, handling complaints and found compliance. Verify the rights of female workers regarding menstrual leave and maternity leave</p>
<p>7.</p>	<p>Feedbacks: Worker Union</p> <ul style="list-style-type: none"> - The normative rights of workers (wages, BPJS Employment and Health) have been implemented by the company - Members of this trade union are permanent workers (SKUH and SKUB), while non-permanent workers (PKWT and PKHL) have an Employment Contract drawn up. - Personal Protective Equipment (PPE) is provided to workers free of charge to all workers in the field

	<ul style="list-style-type: none"> - The company has provided facilities to workers in the form of housing, clinics, school buses, sports facilities, places of worship, lighting and clean water. - To date there are no indications of human rights violations, acts of violence, coercion, discrimination or use of child labor. - To date there have been no industrial relations cases <p>Implementation of PP no. 35/2021 related to providing compensation to PKWT after the contract period expires, has not been implemented by the company.</p>
	<p>Audit Team verification and response:</p> <p>Audit team verified against the indicator related to worker welfare, no discrimination, occupational health and safety, protection on female worker rights, complaint handling and found in compliance.</p> <p>Regarding the implementation of PP no. 35/2021, indicator 6.2.3 in this report has been verified (and is a record of non-conformity (please refer to NC #2423887-202311-M1) that must be followed up).</p>
<p>8.</p>	<p>Feedbacks:</p> <p>NGO LKLH (Lembaga Konservasi Lingkungan Hidup) Medan</p> <p>There was a complaint from the Medan Environmental Conservation Institute (LKLH) NGO which was submitted via letter directly to the Medan Head Office on 23 August 2023 and also via online media: https://www.kabarriau.com/berita/9715/lklh-sumut-besarkan-kebun-sawit-pt-inti-indosawit-subur-certified-rspo-dan-iscc-di-duqa on 15 September 2023.</p> <p>PT Gunung Melayu has respond the letter from LKLH and the issue has been follow up and addressed by company.</p> <p>Complaint details are as follows:</p> <ol style="list-style-type: none"> 1) On August 23 2023, NGO LKLH sent letter No. 127/DPW/LKLH-SU/VIII/2023 to the Main Director of PT Inti Indo Sawit Subur in Medan, there are several things that are complained about: Conditions in the Piasa river border field which is directly adjacent to the PT Inti Indosawiti Subur - PT Gunung Melayu Sentral Estate area (KSN) planted with oil palm so that it is damaged and not protected. So the NGO LKLH asked for clarification and commitment steps from PT Gunung Melayu regarding this matter. 2) The Piasa river border area in question is the Sentral Estate (KSN) area for palm oil plantations in the 2003/2004 planting year which is not included in the scope of RSPO certification and is still in the RaCP assessment process by the RSPO. 3) LKLH has carried out a field investigation on Monday 11 September 2023 to the Piasa river border, and it is true that the Piasa river border has been planted with oil palm by PT Gunung Melayu Kebun Sentral (KSN). 4) On September 17 2023, a meeting was held between PT Gunung Melayu, represented by Public Relations Mr. Agus Salim with NGO LKLH represented by Mr. Indra Mingka in Medan. 5) Furthermore, on September 19 2023, send another notification letter via letter No. 138/DPW/LKLH-Su/IX/2023 containing alleged environmental violations, namely not protecting and managing the protected area along the Piasa River, proven by converting it to oil palm plantations. Through this letter, LKLH also explained that PT Gunung Melayu / Asian Agri Group had made a clarification or explanation on Monday 18 September 2023 in Medan to DPW LKLH North Sumatra so that everything was clear and no misunderstanding were found, but the company would continue to improve the performance of environmentally friendly and sustainable palm oil plantations in accordance with RSPO principles. <p>PT Gunung Melayu has designated and conserve the river border of Piasa river in HCV management plan program. PT Gunung Melayu has planted 1500 trees for these woody plants. After replanting is carried out, the river border is remain conserve as HCV area and will be monitor regularly.</p>

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	<p>The company has explained openly that the area (Piasa River Border) has been designated as a river border HCV area in the Central Plantation of PT Gunung Melayu and has indeed been planted with oil palm in the 2003/2004 planting year, and has been programmed to that after replanting, it will not be disturbed as an HCV area and wood trees will be planted in that area. The NGO LKLH will always monitor the area so that the HCV environment can be preserved.</p>
	<p>Audit Team verification and response:</p> <p>Regarding issues or complaints from NGO LKLH, the auditor team has carried out verification by contacting directly the head of NGO LKLH, Mr. Indra Martin.</p> <p>Based on this verification, the complaint has been respond by the Management of PT Gunung Melayu, the issue has been addressed and solved.</p> <p>During field visit to Piasa river border Block C10E Afdeling I Sentral Estate, it was noted that Sentral Estate has designated the Piasa river border as HCV area since HCV assessment 2014. The boundary of the HCV area, 50 meters wide from the river bank, has been marked and stakes have been installed. HCV information boards have also been installed at river border locations.</p> <p>It was noted that Piasa River border has include in the remediation plan of PT Gunung Melayu II POM.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A	-	-	-	-	-
PT Gunung Melayu – Gunung Melayu II POM has been established since 1975. Currently the palm oil has been replanted since 2008.					



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

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 Gunung Melayu – Gunung Melayu II POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that PT Gunung Melayu – Gunung Melayu II POM is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Grhyate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT Gunung Melayu – Gunung Melayu II POM
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 20 March 2024	Date: 1 April 2024

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>The Company PT Gunung Melayu through Group Manager of PT Gunung Melayu have established a List of documents accessible to stakeholders/the public, based on Internal Memorandum No. 12/GM-GME/Int/V/2021, dated 17 May 2021 the Unit of Certification has defined publicly accessible documents by stakeholders. Those documents such as:</p> <ul style="list-style-type: none"> - Location Permit - Environmental Management Document and SEIA - Plantation Permit - Historical of Land Use or "Risalah Panitia B" - Measurement of land rights - Decree of granting land rights - Decree of land rights renewal - Membership of sumatra worker union body <p>Based on interviews with affected and relevant stakeholders around the plantation company (Batu Anam Village, NGO LKLH), informed that if stakeholders wants to access or seen the certain license, then must contact to Legal and Stakeholder Engagement Department or Manager Unit.</p>	<p>Complied</p>

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>The Company PT Gunung Melayu melalui Group Manager PT Gunung Melayu and PT Saudara Sejati Luhur have established a List of documents accessible to stakeholders/the public, based on Internal Memorandum No. 12/GM-GME/Int/V/2021, dated 17 May 2021 the Unit of Certification has defined publicly accessible documents by stakeholders. Those documents such as:</p> <ul style="list-style-type: none"> - Location Permit - Environmental Management Document and SEIA - Plantation Permit - Historical of Land Use or "Risalah Panitia B" - Measurement of land rights - Decree of granting land rights - Decree of land rights renewal - Membership of sumatra worker union body <p>The provision of publicly available document segregates based on stakeholder category. Based on review of documents mentioned above, the information is provided in Indonesian language (Bahasa Indonesia). Based on interviews with affected and relevant stakeholders around the plantation company (Batu Anam Village, NGO LKLH), informed that if stakeholders wants to access or seen the certain license, then must contact to Legal and Stakeholder Engagement Department or Manager Unit.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Since 2011, unit certification has established communication procedures and there has been no change until now, i.e. SOP of Information Request from Stakeholder No. SOP; AA-GL-5008.1-R1) dated 22nd August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will be responded according to respective authorities, starts</p>	Complied

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		<p>from Humas (Public Relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respond information request on 14 working days.</p> <p>Recording information requests can be seen in Logbook of incoming and outgoing mail. From the Logbook review, there was several request of information on 2023 period, such as:</p> <ul style="list-style-type: none"> - Letter from the NGO Lembaga Konservasi Lingkungan Hidup (LKLH) North Sumatra Province dated 23 August 2023, and was responded to on 18 September 2023 by meeting in person in Medan City. - A request for information from the Asahan Regency Government on 6 January 2023 regarding requests for participation in the MTQ event, was responded to on 6 February 2023 by providing funding participation for assistance with the MTQ event. - A request for information from the Asahan Regency Agricultural Service on 23 March 2023 regarding requests for participation in the Agricultural Exhibition, was responded to on 14 March 2023 by bringing FFB for exhibition materials. <p>The company has submitted regularly mandatory reports to government agencies such as Report on Environment Management and monitoring (RKL-RPL SMII/2022) have been submitted on 25 January 2023, OHS Committee reports, CSR Reports, Plantation Development Report (LPUP), Employment Report.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Since latest audit, unit certification has established communication procedures and there has been no change until now, i.e. SOP of Information Request from Stakeholder No. SOP; AA-GL-5008.1-R1) dated 22nd August 2011.</p> <p>The procedure described that information request can be receive by oral or written, or by representative of communities; the company will be responded according to respective authorities, starts from Humas (Public</p>	Complied

		<p>Relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respond information request on 14 working days.</p> <p>The company has nominated Public Affair Staff as per “Memorandum Regional Head Plantation-1 No.071/HR-RO1/MEMO/02/17” dated 25 February 2017 as Personnel in Charge related to consultation and communication with local communities and other stakeholders on behalf of Agus Salim Batubara.</p> <p>Based on public stakeholder consultation with local contractor, NGO and public official, it was revealed that company has disseminated the procedure. However, they has not yet request for certain information to the management.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>The list of stakeholder list updated annually by Public Relation. Last update performed in July 2023. This list contains the name of the agency/stakeholder, address, contact person, telephone number and linkage/interest with PT Gunung Melayu. The flat stakeholders consist of 27 stakeholders which related to company operations, as follows:</p> <ul style="list-style-type: none"> - Government institutions consist of surrounding Villages, District Head, and related Agency of Asahan Regency (Dinas Lingkungan Hidup, Dinas Pertanian and Perkebunan, Dinas Tenaga Kerja, BPN, BPPPM and BAKORTIBA). - Informal Institution around the company, e.g. DPC F-SP.PP SPSI Asahan, Public Figure, Worker Union and Gender Committee. - NGO around the company i.e.: Icon RI, etc. 	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>There were no changes of company policy regarding Code of Conduct, i.e. company policy dated 1 December 2019 in Medan which has been ratified by the Managing Director. The corporate policy confirms the Code of Conduct behaviour in business at point 2); Policy on the conduct</p>	Complied

		<p>of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>This company policy has socialization to all employees on 13 May 2023 in Aek Tarum Esatate, Gunung Melayu Mill and Batu Anam Estate.</p> <p>Based on interview with KTU and several employees on field observation, that in the employee recruitment process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviors that must be complied with. while in the PKB (<i>Perjanjian Kerja Bersama</i>) is a joint working agreement for permanent workers period 2022-2024, also confirmed about the conduct of business ethics in article 16 related of the behavior of the business ethics in Unit of Certification.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>System to monitor compliance and implementation of its policy applied through poster which distribute in all units. Poster with title "<i>Bantu Perusahaan Kita Tetap Bersih/Keep Our Company Clean</i>" is publicly accessible. If there is any violation or illegal action within Unit of Certification, is available through hotline (call) and email to whistleblow@rgei.com.</p> <p>Other ways to monitor the compliance are conducted by RSPO internal audit, operation internal audit (Visit Agronomi and Visit Engineering), and financial audit. Visit of the Dept. of Agronomy (VA) at Aek Tarum Estate and Batu Anam Estate on 23-27 May 2023 and on 8-16 August 2023 at Gunung Melayu Dua Mill</p> <p>Based on interview with the several workers on field observation, obtained information that there is no violation in terms of code of conduct during recruitment or promotion process.</p>	<p>Complied</p>
<p>Principle 2: Operate legally and respect rights</p>			

Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations.	<p>In complying with applicable laws and regulations relating to company operations, PT Gunung Melayu has procedure of identification and evaluation of legal requirements "<i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i>" (SOP AA-GL-5001.1-R0), dated 5 December 2009. Person in charge to identify and evaluate was legal staff in coordinate with unit head.</p> <p>Apart from that, the Company has an evaluation document regarding regulatory compliance which is carried out once a year (January-December). There are more than 160 regulations contained in the PT Gunung Melayu's legal compliance evaluation.</p> <p>Legal requirements for PT GM consist of:</p> <ol style="list-style-type: none"> 1. Nomor Induk Berusaha (NIB): 8120009830495, tanggal 9 Agustus 2018. 2. NPWP: 01.200.619.3-115.000. 3. Land Title/Hak Guna Usaha (HGU): Sertipikat HGU No. 1 (23 Apr 2004); NIB: 02.07.02.17.00100 Reference: SK Kepala BPN No. 20/HGU/BPN/2001 (7 Agus 2001) dan No. 20/HGU/BPN/2001/A/28 (19 Des 2001). Surat Ukur No: 01/Gonting Malaha/2004, 21 Apr 2004. Luas 10,414.331 Ha. 4. Plantation Permit/Surat Pendaftaran Usaha Perkebunan (SPUP): Extension Mill Capacity: Persetujuan Bupati Asahan No: 503/IUP-PKIP/BPPM/861/VI/2016, tertanggal 29 Juni 2016. Isi surat: Menyetujui penambahan kapasitas unit pengolahan PT. GM dari 30 Ton TBS/jam menjadi 60 Ton TBS/jam. 5. Deed of Establishment/Akta Perubahan Data Terakhir Perseroan Terbatas: Akta Notaris No. 53 Tanggal 20 November 2017, Oleh 	Complied

		<p>Notaris Linda Herawati, SH.</p> <p>6. Approval from KEMENKUMHAM No: AHU-AH.01.03-0194432, dated 24 November 2017.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>A documented system for ensuring legal compliance, Unit of Certification implement updating law and regulations periodically. An updating law and regulations was documented within "Evaluasi Kepatuhan Peraturan PT Gunung Melayu", dated 2 Januari 2023. There are 5 updated national regulation that were identified in 2023. Person in charge for updating this document is Administration Head with supported by Sustainability Team and Legal Department as evaluation team. For example:</p> <ol style="list-style-type: none"> 1. <i>PermenLHK nomor 2 tahun 2021 tentang Tata Cara Penerbitan Persetujuan Teknis Dan Surat Kelayakan Operasional Bidang Pengendalian Pencemaran;</i> 2. <i>Peraturan Pemerintah nomor 35 tahun 2021 tentang Perjanjian kerja waktu tertentu, alih daya, waktu kerja dan istirahat, dan pemutusan hubungan kerja;</i> 3. <i>Peraturan Pemerintah nomor 36 tahun 2021 tentang Pengupahan;</i> 4. <i>Peraturan Pemerintah nomor 5 tahun 2021 tentang Penyelenggaraan Perizinan Berusaha Berbasis Risiko;</i> 5. <i>Peraturan Pemerintah nomor 22 tahun 2021 tentang Penyelenggaraan Perlindungan dan pengelolaan Lingkungan Hidup.</i> 	Complied
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>Based on document verification and field observations to see the HGU stakes, the legal boundaries of the land in the field have been carried out properly and clearly, so that no operations are carried out outside the HGU area.</p> <p>Certificate holders have a program to maintain HGU boundaries once a year. HGU stake maintenance was last carried out in December 2022 in both of Aek Tarum Estate and Batu Anam Estate.</p>	Complied

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		<p>In this audit, field observations were carried out and several samples of HGU pegs were taken, such as:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Poles #</th> <th style="width: 20%;">GPS coordinates monitoring on 2 December 2022</th> <th style="width: 20%;">GPS coordinates verified by auditor</th> <th style="width: 20%;">Location</th> <th style="width: 10%;">Condition</th> </tr> </thead> <tbody> <tr> <td colspan="5">Aek Tarum Estate</td> </tr> <tr> <td>GM67</td> <td>02° 42' 22.47" N ; 99° 23' 44.85" E</td> <td>2° 42' 22.60" N ; 99° 23' 44.96" E</td> <td>Blok A12a Afdeling I</td> <td>good maintain</td> </tr> <tr> <td>GM68</td> <td>02° 42' 20.31" N ; 99° 23' 41.23" E</td> <td>2° 42' 41.74" N ; 99° 23' 41.76" E</td> <td>Blok A12b Afdeling I</td> <td>good maintain</td> </tr> <tr> <td>GM70</td> <td>02° 43' 19.17" N ; 99° 23' 34.81" E</td> <td>2° 43' 19.08" N ; 99° 23' 34.82" E</td> <td>Blok A12c Afdeling I</td> <td>good maintain</td> </tr> <tr> <td colspan="5">Batu Anam Estate</td> </tr> <tr> <td>GM42</td> <td>2° 44' 9.07" N ; 99° 32' 56.07" E</td> <td>2° 44' 38.06" N ; 99° 32' 51.20" E</td> <td>Blok G11g Afdeling IV</td> <td>good maintain</td> </tr> <tr> <td>GM41</td> <td>2° 44' 38.14" N ; 99° 32' 50.99" E</td> <td>2° 45' 8.45" N ; 99° 32' 49.03" E</td> <td>Blok G11g Afdeling IV</td> <td>good maintain</td> </tr> <tr> <td>GM36</td> <td>2° 45' 48.73" N ; 99° 33' 22.89" E</td> <td>2° 45' 48.56" N ; 99° 33' 22.85" E</td> <td>Blok G11i Afdeling IV</td> <td>good maintain</td> </tr> </tbody> </table>	Poles #	GPS coordinates monitoring on 2 December 2022	GPS coordinates verified by auditor	Location	Condition	Aek Tarum Estate					GM67	02° 42' 22.47" N ; 99° 23' 44.85" E	2° 42' 22.60" N ; 99° 23' 44.96" E	Blok A12a Afdeling I	good maintain	GM68	02° 42' 20.31" N ; 99° 23' 41.23" E	2° 42' 41.74" N ; 99° 23' 41.76" E	Blok A12b Afdeling I	good maintain	GM70	02° 43' 19.17" N ; 99° 23' 34.81" E	2° 43' 19.08" N ; 99° 23' 34.82" E	Blok A12c Afdeling I	good maintain	Batu Anam Estate					GM42	2° 44' 9.07" N ; 99° 32' 56.07" E	2° 44' 38.06" N ; 99° 32' 51.20" E	Blok G11g Afdeling IV	good maintain	GM41	2° 44' 38.14" N ; 99° 32' 50.99" E	2° 45' 8.45" N ; 99° 32' 49.03" E	Blok G11g Afdeling IV	good maintain	GM36	2° 45' 48.73" N ; 99° 33' 22.89" E	2° 45' 48.56" N ; 99° 33' 22.85" E	Blok G11i Afdeling IV	good maintain	
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

2.2.1	A list of contracted parties is available.	<p>Certificate holder has latest list of contractor for each unit, here's the detail:</p> <ul style="list-style-type: none"> - Gunung Melayu POM : 2 Contractors 	Complied
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		<ul style="list-style-type: none"> - Aek Tarum Estate : 2 Contractors - Batu Anam Estate : 5 Contractors <p>Contractor list has been in line with information in stakeholder list. All third party has been listed such as CPO transporter, hazardous waste contractor, machineries maintenance in mill, etc.</p>	
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p>	<p>In contracts owned by companies and contractors, the company stipulates several clauses that must be fulfilled by the contractor, especially regulations set by the government, for example:</p> <ul style="list-style-type: none"> - Point 8 (a): Payment of wages in accordance with local government minimum wage provisions. - Point 8 (b): Guarantee that workers are not child workers, victims of human trafficking, forced labor or those prohibited by applicable labor laws and regulations. - Point 8 (c): Must maintain the sustainability of environmental functions. <p>The following are several examples of contractor work agreements that contain these legal requirements:</p> <ul style="list-style-type: none"> - Work Agreement with PT Teknik Jaya Abadi (No.08/SPJ/LEG-GM/I/23, 2 January 2023). - Work Agreement with Nawi Kora Nginda (No.256/E1KBA/08/23, 21 Augusts 2023). <p>Non conformity raised during audit:</p> <p>However, based on the document review, there are several contractors who have collaborations with the company, for example CV Rimba Nusantara, PT Jasa Sumber Asahan & PT Jasa Sahabat Abadi. However, they have not been able to show sufficient evidence that the contractors have complied with the applicable regulations.</p>	<p>Non-compliance</p>

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		Based on those objective evidences, there has not been sufficient evidence that the contractors have complied with the applicable regulations.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	As explained in indicators 2.2.2, the work agreement already include clause related to prohibition to use child worker, forced and trafficked labour.	Complied
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>Based on the records of FFB receipts, the company has a list of FFB suppliers originating from Inti Plantation (Aek Tarum & Batu Anam Estate), plantations that are part of the Asian Agri group and collecting agents. Following are the details for suppliers who send to Gunung Melayu II POM:</p> <ul style="list-style-type: none"> • Sinar Bakti (Private Ownership) • PT Sawit Trading Sejahtera 2 (FFB collector and trader) • PT Sawit Trading Sejahtera L 2 (FFB collector and trader) • PT Sawit Trading Sejahtera A 2 (FFB collector and trader) • CV Ronauli Tani (FFB collector and trader) • Soelianto 2 (Private Ownership) • PT Sawit Trading Sejahtera KT 2 (FFB collector and trader) • PT Sawit Trading Sejahtera S 2 (FFB collector and trader) • PT Sawit Trading Sejahtera A (CSV) (FFB collector and trader) • PT Sawit Trading Sejahtera L (FFB collector and trader) 	Complied
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.	Based on the explanation of indicator 2.3.1, there is a FFB collecting agent who sends FFB to Gunung Melayu II POM on behalf of PT Sawit Trading Sejahtera. The company shows geolocation data and area size for each farmer who sells FFB to the collector. Here are some examples:	Complied

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		Farmer Name	Legal	Area (ha)	Geolocation	
		Barium	SHM	25	2° 49' 10.01" N & 99° 39' 55.94" E	
		H. Usman	SHM	50	2° 48' 57.76" N & 99° 39' 39.92" E	
		Muliadi	SHM	35	2° 48' 59.48" N & 99° 40' 10.27" E	
		Parjo	SHM	45	2° 48' 54.82" N & 99° 39' 25.24" E	
<p>The indirect supplier data also contains land ownership information for each farmer, consisting of SHM (ownership certificate), SKGR (Compensation Certificate) and sub-district head letter.</p>						

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	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>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:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>FFB (Ton)</td> <td>379,780</td> <td>380,172</td> <td>381,113</td> <td>383,112</td> <td>383,774</td> </tr> <tr> <td>CPO (Ton)</td> <td>89,179</td> <td>88,957</td> <td>90,103</td> <td>91,392</td> <td>92,129</td> </tr> </tbody> </table>	Description	2024	2025	2026	2027	2028	FFB (Ton)	379,780	380,172	381,113	383,112	383,774	CPO (Ton)	89,179	88,957	90,103	91,392	92,129	Complied
Description	2024	2025	2026	2027	2028																
FFB (Ton)	379,780	380,172	381,113	383,112	383,774																
CPO (Ton)	89,179	88,957	90,103	91,392	92,129																

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		PK (Ton)	12,739	12,759	12,905	13,072	13,360									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The company has a replanting plan for each management unit. Replanting is carried out by considering plant age, productivity and plant density. The following are details of replanting projections for the next 5 years:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Estate</th> <th>2025 (ha)</th> <th>2026 (ha)</th> </tr> </thead> <tbody> <tr> <td>Aek Tarum</td> <td>202</td> <td>353</td> </tr> <tr> <td>Batu Anam</td> <td>424</td> <td>191</td> </tr> </tbody> </table> <p>The replanting plan will be carried out early in 2025 for each estate for plants that are over 20 years old.</p>					Estate	2025 (ha)	2026 (ha)	Aek Tarum	202	353	Batu Anam	424	191	Complied
Estate	2025 (ha)	2026 (ha)														
Aek Tarum	202	353														
Batu Anam	424	191														
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>Management review has shows through several documents, for example as follows:</p> <ul style="list-style-type: none"> - Management review records at Aek Tarum Estate on September 11 2023. - Management Review records at Batu Anam Estate on October 9 2023. <p>This management review activity discusses all matters related to the company's operational dynamics, for example internal audit results, process performance, consumer feedback, production achievements and continuous improvement. This activity was attended by all management representative from assistants and also unit managers.</p>					Complied									
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>																
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.	<p>The company has a record of implementing continuous improvement. This is a note in Kaizen Event Frame Work 2023. The document which contains, among others:</p>					Complied									

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		<ul style="list-style-type: none"> - Continuous Improvement (Kaizen) program related to increasing Harvest Productivity from 1.85 tons/HK to 2.13 tons/HK with the standard criteria for harvesting 1 fresh bunch on a plate for proven land class at Aek Tarum Estate in October 2023. - Continuous Improvement (Kaizen) program related to reducing press fibre oil losses from 4.28% to <4.00% for samples with semi-realtime closed loop process control at Gunung Melayu II POM in October 2023. - Continuous improvement program related to preventing road dust pollution by watering roads around employee housing and surrounding community housing and planting <i>Terminalia catapa</i> trees to absorb dust pollution. - Increasing community income through productive business programs for the surrounding community, such as providing assistance with goat livestock and fish seeds for the surrounding community; recruit local workers. <p>The implementation of continuous improvements carried out by the company has considered 3 important points in sustainability, namely company profits (profit), social and employment (people) and also consideration of environmental impact and natural conditions (planet).</p>	
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.	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 implemented and monitored.			

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<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>In order to practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures:</p> <ul style="list-style-type: none"> - AA-APM-OP-1100.01.R5 <i>Pembibitan</i> - AA-APM-OP-1100.02.R3 <i>Persiapan Lahan</i> - AA-APM-OP-1100.03.R2 <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> - AA-APM-OP-1100.04.R3 <i>Pembuatan dan Pemeliharaan Parit</i> - AA-APM-OP-1100.05.R3 <i>Konservasi Tanah Air</i> - AA-APM-OP-1100.06.R5 <i>Menanam Kacangan</i> - AA-APM-OP-1100.07.R6 <i>Menanam Kelapa Sawit</i> - AA-APM-OP-1100.08.R6 <i>Pengendalian gulma</i> - AA-APM-OP-1100.09.R8 <i>Pemupukan</i> - AA-APM-OP-1100.10.R10 <i>Pengendalian HPT</i> - AA-APM-OP-1100.11.R1 <i>Pestisida dan Pengolahannya</i> - AA-APM-OP-1100.12.R4 <i>Kastrasi</i> - AA-APM-OP-1100.13.R3 <i>Tunas Pokok</i> - AA-APM-OP-1100.14.R3 <i>Sensus dan Identifikasi Pokok</i> - AA-APM-OP-1100.15.R2 <i>Sensus Produksi</i> - AA-APM-OP-1100.16.R1 <i>Konsolidasi Pokok Tumbang</i> - AA-APM-OP-1100.17.R1 <i>Pengelolaan Air</i> - AA-APM-OP-1100.18.R3 <i>Potong Buah</i> - AA-APM-OP-1100.19.R1 <i>Pengelolaan Transport</i> - AA-APM-OP-1100.20.R8 <i>Peremajaan (Replanting)</i> - AA-APM-OP-1100.21.R2 <i>Riparian</i> 	<p>Complied</p>
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		<ul style="list-style-type: none"> - AA-APM-OP-1100.22.R0 <i>Pengelolaan Areal Nilai Konservasi Tinggi (NKT).</i> - AA-MPM-OP-1400.02-R2: Stasiun Penerimaan (FFB receiving station). - AA-MPM-OP-1400.03-R1: Stasiun Rebusan (Sterilizer station). - AA-MPM-OP-1400.04-R1: Stasiun Pemisahan Berondolan (Threshing station). - AA-MPM-OP-1400.05-R1: Stasiun pengadukan dan pengempaan (Pressing station). - AA-MPM-OP-1400.06-R1: Stasiun pemurnian (Clarification station). - AA-MPM-OP-1400.07-R1: Stasiun pemisahan nut dan fiber (Depericarper station). - AA-MPM-OP-1400.08-R1: Stasiun kernel (Kernel station). - AA-MPM-OP-1400.09-R1: Stasiun boiler (Boiler station). - AA-MPM-OP-1400.10-R1: Stasiun engine room (Engine room station). - AA-MPM-OP-1400.11-R1: Stasiun water treatment (Water treatment station). - AA-MPM-OP-1400.12-R1: Laboratorium (Laboratory station). - AA-MPM-OP-1400.13-R1: Stasiun pengelolaan limbah (Palm oil mill effluent treatment). - AA-MPM-OP-1400.14-R2: Stasiun penimbunan dan pengiriman CPO dan kernel (CPO and PK bulking and dispatch operation). - AA-MPM-OP-1400.15-R1: Perawatan (Preventive maintenance). - AA-MPM-OP-1400.19-R2: Manajemen dan Metode Menghitung Emisi Gas rumah kaca (GHG management and mitigation). 	
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		<ul style="list-style-type: none"> - AA-MPM-OP-1400.18-R4: Book Keeping. - AA-MPM-OP-1400.17-R6: Traceability. <p>Based on procedure documents review, field visit at harvesting Block and process activity in mill , it could be concluded that the oil palm agronomy, processing and safety procedures are still relevant with current situation and covers all main aspects from the field to the mill. All procedures are available in Bahasa. However, estates and mill employees understanding towards technical and safety matters is considered very satisfactory.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>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:</p> <ul style="list-style-type: none"> - Internal Audit Sustainability Record on Kebun Aek Tarum and Kebun Batu Anam on 8 – 16 August 2023. - Internal Audit Sustainability Record on PKS Gunung Melayu II on 8 – 16 August 2023. <p>Based on that record, there’s no non-conformities has been found from internal audit assessment.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>The company has records in monitoring operational activities for each unit, here are some of them:</p> <p>Mill</p> <ul style="list-style-type: none"> - CPO Production todate October 2023 : 45,805 ton - PK Production todate October 2023 : 9,172 ton - EFB Production todate October 2023 : 30,880 ton - POME Production todate October 2023 : 100,016 ton - CPO FFA Average todate October 2023 : 3.30% - Moist todate October : 0.22% 	Complied

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		<ul style="list-style-type: none"> - Number of Shift Hours : 4,001 hrs - Mill Throughput : 57 ton/hrs - Oil Extraction Rate : 23.50% - Kernel Extraction Rate : 4.70% <p>Estate</p> <ul style="list-style-type: none"> - Batu Anam Estate FFB production todate October 2023 : 57,986 ton - Batu Anama FFB grading average todate October 2023 : Raw 0.2%; Ripe 92.5%; Overripe 2.9%; Empty Bunch 0.1%. - Aek Tarum Estate FFB production todate October 2023 : 41,716 ton - Aek Tarum FFB grading average todate October 2023 : Raw 0.2%; Ripe 92.6%; Overripe 3.2%; Empty Bunch 0.2%. <p>Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.</p>	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>There were no changes related to the environmental permits and SIA held by the company at the time of surveillance audit 1.2, the environmental permits were still the same as the results of the previous year's surveillance audit. PT Gunung Melayu has approved environmental impact assessment in form of "Dokumen Studi Evaluasi Lingkungan (SEL) Perkebunan dan Pabrik Kelapa Sawit PT Gunung Melayu, PT Gunung Melayu dan PT Sumber Sawit Makmur di Kabupaten Asahan – Sumatera Utara", prepare by CV Andalen Persada Konsultan</p>	Complied

		<p>in 1994. The assessment team for AMDAL has meet the requirements at the time, comprise of:</p> <ul style="list-style-type: none"> • Team Leader: Dr. Hemat R. Bramana, MSc • Coordinator: Ir. Juliarto Barus, MS (AMDAL A/B) • Agronomy/Soil science: Ir. Bahtera Purba and Ir. Jansen Sinulingga • Water and air quality: Drs. Ahmad Darwin, MSc (AMDAL A) and Drs. Satriana • Social, economy, culture: Abdul Rahman SH, MH, and Drs. Johannes Karo-Karo • Production technology: Dr. R. Kamrol D, MSc and Renalson • Water biology: Dra. Retno Widhiastuti and Drs. Mimpin Ginting, MS • Machinery technic: Ir. Rejeki Maha and Juna B • Programmer: Drs. Sehat Sembiring and Roshermida <p>The said environmental impact assessment document has been approved through "Surat Komisi Pusat AMDAL, Departemen Pertanian No.220/687/B/IV/1994" dated 18 April 1994. The document has described the positive and negative impact from oil palm plantation and palm oil mill construction and development from pre-operation phase until operational, in Gunung Melayu.</p> <p>PT Gunung Melayu has demonstrated environmental document for capacity upgrade "Upaya Pengelolaan dan Pemantauan Lingkungan (UKL-UPL) Pekebunan Kelapa Sawit, Peningkatan Kapasitas Produksi Pabrik CPO 60 Ton TBS/Jam dan Pembangunan Pabrik KCP 200 Ton/Hari dan Biogas Plant". The environmental permit approved through "Keputusan Kepala Kantor Lingkungan Hidup Kabupaten Asahan Provinsi Sumatera Utara No.660.1/0779/LH/2015 tentang Izin Lingkungan PT Gunung Melayu", dated 17 June 2015.</p> <p>PT Gunung Melayu –Gunung Melayu II POM has identified/evaluate the environmental aspect and impact as documented under "Evaluasi Aspek</p>	
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		<p>dan Dampak Lingkungan”, latest review 7 January 2020 in each operating unit, plantation and mill.</p> <p>Social impact assessment for PT Gunung Melayu explained under “Laporan Identifikasi dan Upaya Kelola Sosial” including the impact assessment, prepared in 2017. Company has also issued a report on social management effectiveness, prepared by Tim Corporate Social Responsibility in year 2017, titled “Laporan Efektivitas Upaya Pengelolaan Sosial PT. Sejati Saudara Luhur – PKS Gunung Melayu II, Kabupaten Asahan, Provinsi Sumatera Utara”.</p> <p>The social impact assessment describing the condition: social interaction, organization, community structure, local community livelihood, economic impact, health condition, education, presence of worker union, presence of gender committee. During the preparation of document, management and assessment team involving community through interview and meetings with village peoples, smallholders, village authorities, regency authorities, etc. Record of meeting with impacted stakeholders available and demonstrated. Social impact assessment carried out 25-29 April 2017.</p> <p>PT Gunung Melayu – Gunung Melayu II POM carried out meeting with stakeholders, surrounding communities and they filled up questionnaire on May 2018. Record sighted: 4 questionnaires filled up “Kuesioner Pendapat Masyarakat Sekitar Kegiatan Usaha” dated 14 May 2018 to villagers of Dusun VIII Batu Anam village, Dusun VI Sidomulyo village, Dusun III Gonting Malaha village, from Bandar Pulau district. The questionnaire discussing social relation between company and community, basic needs, information transparency, job vacancy and/or opportunity for business/economic development, input/comments, grievance handling satisfaction, environmental impact, community perception.</p> <p>On 12 April 2022, PT Gunung Melayu - Gunung Melayu II POM carried out consultation meeting to review social impact management program</p>	
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		<p>with Batu Anam village, Gonting Malaha village, Sidomulyo village. Document under "Berita Acara Review Efektivitas Penilaian Dampak Sosial PT Gunung Melayu – POM Gunung Melayu II", dated 4 March 2023. The meeting attended by 15 villagers. Photograph evidence provided.</p> <p>Apart from that, the company has carried out a reassessment of the social impacts at PT. Gunung Melayu covers the villages around the company and all housing for employees, staff and management of PT. Gunung Melayu, in collaboration with the "Lingkar Komunitas Sawit (LINKS)", assessment activities have been carried out starting in June 2022 and were completed and signed in June 2023 as stated in the PT Gunung Melayu Social Impact Assessment (SIA) Report. The report contains a description of the social impacts, external impacts in the form of direct positive impacts, indirect positive impacts, direct negative impacts and indirect and accumulative negative impacts. Internal social impacts consist of positive social impacts and negative social impacts.</p> <p>The SIA report also contains Recommendations for the Social Management Plan (RKS) and Social Monitoring Plan (RPS). Which will be the basis for implementing management and monitoring of the company's social impacts (Implementation will start in 2024).</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>The environmental management and monitoring plan has been implemented by the company every semester and is contained in the environmental management and monitoring implementation report. The report has explained the effectiveness evaluation of the environmental management and monitoring plan. The reports are:</p> <ul style="list-style-type: none"> - "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) Periode July-December 2022, has been reported to Dinas Lingkungan Hidup dan Kehutanan Provinsi Sumatera Utara,". The report sent 5 March 2023. 	Complied

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		<p>- "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) disampaikan kepada Dinas Lingkungan Hidup dan Kehutanan Provinsi Sumatera Utara, Periode Januari – Juni 2023". The report sent 16 September 2023.</p> <p>The company has carried out a reassessment of the social impacts at PT. Gunung Melayu covers the villages around the company and all housing for employees, staff and management of PT. Gunung Melayu, in collaboration with the "Lingkar Komunitas Sawit (LINKS)", assessment activities have been carried out starting in June 2022 and were completed and signed in June 2023 as stated in the PT Gunung Melayu Social Impact Assessment (SIA) Report. The report contains a description of the social impacts, external impacts in the form of direct positive impacts, indirect positive impacts, direct negative impacts and indirect and accumulative negative impacts. Internal social impacts consist of positive social impacts and negative social impacts.</p> <p>The assessment has involved the surrounding village communities of Sidomulyo Village, Batu Anam Village and Gonting Malaha Village as well as company employees in plantation and mill operational units.</p> <p>The results of the assessment include 5 Social Management Plan (SRP) recommendations and 4 Social Monitoring Plans (PSP). Which will be the basis for implementing the management and monitoring of the company's social impacts in the coming year.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>The document for EIA monitoring plan, implementation report and correction plan (if findings raised) included in the environmental report which prepared and submitted to Environmental Office.</p> <p>The impacted parties can convey their view through representative or their spoke person - freely chosen during impact identification, review finding and mitigation plan. The social impact assessment carried out</p>	Non-compliance

		<p>through: focus group discussion, in-depth interview, structured interview and field observation.</p> <p>The social impact assessor and management has involved community participation from preparation stage: with village communities, village authorities and regency authorities.</p> <p>The meeting records with impacted parties and other stakeholders can be shown. Last meeting on June 2017; feedback from stakeholders become consideration in preparing the mitigation plan and social impact management plan 2022.</p> <p>The company has shown the environmental management and monitoring implementation report (RKL-RPL) for the second semester of 2022 and the first semester of 2023. And has been reported to the Asahan District Environmental Agency on January 25, 2023, for the second semester of 2022 and on October 27, 2023, for the first semester of 2023. In addition, the company has also reported it through SIMPEL to the Ministry of Environment and Forestry with ID number 17007045823944 and print date on November 23, 2023.</p> <p>Based on document review, The company has presented the implementation of environmental management and monitoring (RKL-RPL) report for semester II of 2022 and semester I of 2023. And it has been reported to the Asahan Regency Environmental Agency on January 25, 2023, for semester II 2022 and on October 27, 2023 for semester I 2023.</p> <p>Non conformity raised during audit:</p> <p>However, these two reports (semester I & II) do not fully discuss the important impacts required in the RKL-RPL matrix, such as: Opening employment opportunities, increasing income, appearance hazardous waste, disturbing the existence of wild animals, appearance solid waste, emerging attitudes and perceptions community, and decline community health.</p>	
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		<p>And the Company already has SIA document "Laporan Efektivitas Upaya Pengelolaan Sosial PT. Sejati Saudara Luhur – PKS Gunung Melayu II, Kabupaten Asahan, Provinsi Sumatera Utara" of 2017 which includes a social impact management program, however the company cannot shown the implementation report of the SIA management program.</p>	
<p>Criteria 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>Since 2009, procedures related to worker recruitment have not changed, i.e: SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), Unit of Certification will accept new employee based on their capabilities and qualifications. This policy has been communicated to workers. Socialization conducted in 9 August 2022 at Batu Anam Estate and Gunung Melayu 2 Mill and socialized again on 24-25 January 2023 at Aek Tarum Estate to all workers and related stakeholders.</p> <p>3 steps in employee recruitment such as:</p> <ol style="list-style-type: none"> 1. Request recruitment of estate employee <ol style="list-style-type: none"> a. Letter of application for recruitment from Site Management devoted to management via the General Section b. Letter of approval for recruitment from management (Head Office) 2. The selection process: <ol style="list-style-type: none"> a. The collection of application file b. Selection of administration c. Announcement of the selection schedule d. Test questions and physical tests e. Summary of selection results f. Announcement of selection results 	<p>Complied</p>

		<p>3. Provision of a cover letter MCU to candidates who pass the selectionImplementation of medical check-up (MCU).</p> <p>The procedure is available in Bahasa Indonesia Language and has been communicated to all workers. The procedure and its content already comply with applicable laws and regulation in Indonesia related workforce/employment. This procedure ware communicated to all employees in the workplace and stakeholders. Socialization conducted in 9 August 2022 at Batu Anam Estate and Gunung Melayu 2 Mill and socialized again on 24-25 January 2023 at Aek Tarum Estate to all workers and related stakeholders.</p> <p>Based on interview with the chief of labour union PUK FSPPP SPSI and PUK KSPSI 1973 (Bpk. Jalaludin S. and Muhammad Aqib), that they understood related to the processes of recruitment, selection, hiring, promotion, retirement and termination</p>	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Company periodically evaluate all employees, as one of the aspects considered for promotion and carry out talent tests before promotion. Evaluation of employees will be carried out in December 2023, evaluation results can be displayed during this audit.</p> <p>In 2023, there was no new recruitment process for new employee. Only PKWT/PHL workers were promoted to permanent workers.</p> <p>Sample taken of workers promoted during audit.</p> <p>Promotion of temporary workers (PHL) to Permanent (SKUH) at:</p> <ul style="list-style-type: none"> - Aek Tarum Estate: In the period January – November 2023 there were promoted PHL workers to SKU as many as 17 harvester workers at Aek Tarum Estate. The decision letter from the HRD Dept. in the form of a Memorandum can be shown. - Batu Anam Estate: 	Complied

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		<p>In the period January – February 2023 there were promoted of PHL workers to SKU as many as 9 harvester workers at Aek Tarum Estate. Decision letter based on Memorandum from HR Ops Plantation 1 No. #244-257/HR-RO1/MEMO/2/2022 dated 27 February 2023.</p> <p>Pada periode Maret – Juni 2023, telah dipromosikan pemanen sebanyak 16 pemanen, berdasarkan Memorandum dari HR Ops 1 No. #324-339/HR-RO1/MEMO/6/6/2023 tanggal 30 Juni 2023.</p> <ul style="list-style-type: none"> - Gunung Melayu II Mill: Based on the Memorandum from HR Ops. 1 dated January 1 2023, there were 10 PHL workers appointed to SKU. <p>According to SOP: AA-HR-305.2-R0 dated 1 February 2009 related to Recruitment and Selection of Employee, Unit of Certification will accept new employee based on their capabilities and qualifications. Although in the 2023 period there will be no recruitment of new workers.</p>	
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>Certificate Holder has established the health and safety policy under "Kebijakan Perusahaan", signed by Managing Director of Asian Agri Group, on 1st December 2019 Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. The policy has not changes during this surveillance audit.</p> <p>Unit of certification conducted the OHS risk assessment review annually. The OHS risk assessment procedure refer to "SOP Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" Number AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control has considered on planning of risk control.</p>	<p>Non-compliance</p>

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		<p>The last risk assessment updated on 15 February 2023 (Aek Tarum Estate), 5 January 2023 (Batu Anam Estate) covering for all activities both in Gunung Melayu II POM, Aek Tarum Estate and Batu Anam Estate. Such as: mill (boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank) and estate (chemical mixing, fertilizer warehouse, herbicide and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance).</p> <p>PT Gunung Melayu - Gunung Melayu II POM has prepared and documented the OHS Plan as in "Program Management K3 PT Gunung melayu – PMKS Gunung Melayu Dua Tahun 2023", such as:</p> <ul style="list-style-type: none"> • Identification of hazard and risk analysis and risk control determination • P2K3 meeting monthly • P2K3 work program evaluation • Safety briefing • Emergency response handling dan monitoring • Operator training • Implementation of risk assessment • Zero Accident and consistent on using of PPE • Review of accident report • OHS inspection 	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>In order to evaluate to evaluate effectiveness of H&S plan, unit of certification has demonstrated the record on monitoring effectiveness of the H&S plan to address health and safety risks.</p> <p>H&S Plan addressing health and safety risk of people are monitored as below:</p>	Complied

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		<ul style="list-style-type: none"> - PPE usage monitoring: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Daftar Periksa APD". PPE monitoring period 2023 can be demonstrated during audit. - OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2023 were sighted. - Safety committee meeting, conducted each month to review the effectiveness of OHS program and to discuss the OHS issue. Latest meeting conducted on 22 March 2023. Minutes of Safety committee meeting are available and reported in P2K3 report. <p>Effectiveness of OHS implementation was reported in P2K3 report which submitted to Manpower office "Disnakertrans Provinsi Sumatera Utara". Report submission receipt can be shown during audit. Sample seen report P2K3 period January – March 2023 reported on 22 May 2023 to Dinas tenaga Kerja Labuhan Batu and provinsi Sumatera Utara.</p> <p>Person who has responsibility to monitored the H&S implementation is safety officer/OHS expert on behalf of Brian Reza Kawalta Tarigan Sibero (Gunung Malayu II POM), Hans Pangaribuan (Batu Anam Estate) and Daniel P. Sinulingga (Aek Tarum Estate).</p> <p>Based on field visit to the harvesting activity in estate concluded that all the harvester has equipped with appropriate PPE such as safety boot (rubber), helm and google. Other than that, they also used the chisel cover to avoid accident during moving to another harvesting plot.</p>	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
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	The company has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2023/2024 training program recorded in the year 2023/2024	Complied

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	<p>aspects of P&C Principles, in a form they understand and includes assessment of the training.</p>	<p>training calendar including Estate and Mill. Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed. The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers. There is no discrimination for female to attend the training.</p>	
<p>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis.</p>	<p>The training realizes based on the Training calendar period 2022/2023, among others:</p> <ol style="list-style-type: none"> 1. Training Basic safety and Job safety analysis, dated 11 Sept 2023 for staff Gunung Melayu II POM, Aek Tarum Estate and Batu Anam Estate. 2. Basic fire introduction training on 23 February which was attended by emergency response team and workers of Gunung Melayu II POM, Aek tarum Estate and Batu Anam Estate. 3. Training HCV, dated 22 September 2023 for workers Gunung Melayu II POM, Aek Tarum Estate and Batu Anam Estate. 4. Sustainability Awareness training dated 10 April 2023 for workers and staff Gunung Melayu II POM, Aek Tarum Estate and Batu Anam Estate. 5. First Aid Training dated 8 July 2023 for field supervisor of Gunung Melayu II POM, Aek Tarum Estate and Batu Anam Estate. 6. Company Policy training dated 13 May 2023 for workers of Gunung Melayu II POM, Aek Tarum Estate and Batu Anam Estate. 7. RSPO SCCS training for mill personel dated 30 November 2022. <p>The company has also made recording for all trainings that have been</p>	<p>Complied</p>

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		attended by employees in the recording of "Personal Data Training". Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2023, the list of participants attending the trainees, and some photographs of the activities at the time of training.	
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.	PT Gunung Melayu – Gunung Melayu II POM has prepare the training program 2023 including RSPO SCCS training. In year 2023, RSPO SCCS refreshment training scheduled on 18 December 2023. Latest training has been conducted on 30 November 2022 attended by 12 participants. Person who attended the training on behalf of mill manager, administration clerk, field assistant, weighbridge operator and security team.	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	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>There is no change in the supply chain module since last assessment.</p> <p>PT. Gunung Melayu - Gunung Melayu II POM holds current RSPO P&C Certificate No. RSPO 620707, first certification since 8 July 2015, recertification issued on 23 January 2022 and expired on 22 January 2027. In the current certificate, facilities use Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate: Batu Anam and Aek Tarum Estate.</p> <p>Not applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be</p>	<p>There is no change in the supply chain module since last assessment.</p>	Complied

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	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.	Gunung Melayu II Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance. In the current certificate, facilities use Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate: Batu Anam and Aek Tarum Estate.	
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.	During ASA1_2, it was known that PT Gunung Melayu – Gunung Melayu II POM is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Tanjung Selamat Estate, Pangkatan estate and Third-Party supplier, extraction rates, processing capacity, working hour, utilization, etc. The actual tonnage produced are recorded in each annual surveillance report. The estimated tonnage of CPO and PK has been recorded in BSI’s summary report and registered in palmtrace. Production estimated as follows (Jan – Dec 2023): FFB: 117,019 MT CPO: 28,717 MT PK: 5,851 MT The actual CPO and PK produced verified during each subsequent visit to ensure that certified mill only deliver the allowed tonnage for the year	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT. Gunung Melayu - Gunung Melayu II POM is a subsidiary of PT. Inti Indosawit Subur, which is a member of RSPO with membership number 1-0022-06-000-00, since 6 February 2006. PT. Gunung Melayu - Gunung Melayu II POM has been registered in RSPO IT Platform with ID number RSPO_PO1000002608, sub license ID CB129477.	Complied

<p>3.8.5</p>	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Duriung this audit ASA 1.2 there is no change in term of procedure related to supply chain.</p> <p>PT. Gunung Melayu - Gunung Melayu II POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, from the proportion of certified FFB receiving from company-owned estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; 	<p>Complied</p>
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		<ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>During the audit, personnel in charge in mill (mill manager, KTU and weighbridge officer) able to demonstrate their competency in RSPO supply chain implementation started from FFB receive until CPO/PK dispatch.</p> <p>In accordance with Procedure of Traceability (AA-MPM-OP-1400.17-R7), PT. Gunung Melayu - Gunung Melayu II POM has appointed the mill manager as the person having overall responsibility for and authority over the implementation of RSPO SCCS requirements and compliance with all applicable requirements.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p>	<p>In accordance with Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities</p>	Complied

	<p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. The site has effectively implemented and maintains the standard requirement by performing internal audit. The latest internal audit conducted on 8 – 16 August 2023 against RSPO P&C Indonesia NI 2020 that include Supply Chain requirement. There are no findings against supply chain indicator. Report of internal audit documented in Integrated Internal Audit Sustainability Integrasi 2023 prepared by Internal Audit Department.</p> <p>Unit of certification conducted management review annually. The last management review conducted on 11 September 2023. Input of management review consist of:</p> <ul style="list-style-type: none"> • Internal audit result. • Customer feedback. • Proses performance and product conformity. • Status of Corrective and Preventive Action. • Follow up previous management review. <p>Change that could effect to the management system</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT Gunung Melayu – Gunung Melayu II POM receive FFB from certified and non-certified source. Certified source consists of own estate, Aek Tarum Estate and Batu Anam Estate.</p>	<p>Complied</p>

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		<p>Non-certified FFB sourced from Sentral Estate and third party supplier: PT Sawit Trading Sejahtera.</p> <p>Tonnage of certified and non-certified FFB are recorded in Laporan Harian Pabrik (Mill Daily Report).</p> <p>Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) explains that Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. During this audit there were overprojection and PT Gunung melayu has request the extension volume of FFB and approved by RSPO as below:</p> <ul style="list-style-type: none"> - 30/10/2023 extend volume 36,699 MT - 04/03/2024 extend volume 48.257 MT <p>In the case on non-conforming raw material entering the process, PT Gunung Melayu – Gunung Melayu II POM has the mechanism to handle non-conforming material and/or document. Gunung Melayu II POM demonstrated the simulation on recall of non-conforming material.</p> <p>Record seen:</p> <p>FFB Certified</p> <ul style="list-style-type: none"> ▪ Weighbridge Ticket No. PGDA123224451 dated 29/10/2023; from Batu Anam Estate Afd. 1; to PT Gunung Melayu – Gunung Melayu II POM; Delivery date is 29/10/2023; Commodity is Certified FFB; Net weight 4,510 kg; Block E04d, E04e, E04f (196 bunches); certificate no. RSPO620707; Transport Internal; Delivery Note KBADT4920231029141304; Vehicle register No. BK8784PR; Driver: Dedi Irwansyah; Batch No. 13-100-01646121-2709461B. ▪ Weighbridge Ticket No. PGDA123224476 dated 29/10/2023; from Aek Tarum Estate Afd. 1; to PT Gunung Melayu – Gunung Melayu II POM; Delivery date is 29/10/2023; Commodity is Certified FFB; Net weight 5,720 kg; Block A10c, A11i (187 bunches); certificate no. RSPO620707; Transport Internal; Delivery Note 	
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		<p>KBADT4920231029141304; Vehicle register No. BK8784PR; Driver: Dedi Irwansyah; Batch No. 13-100-01646121-2709461B.</p> <ul style="list-style-type: none"> ▪ Weighbridge Ticket No. PGDA123226324 dated 20/11/2023; from Batu Anam Estate Afd. 2; to PT Gunung Melayu – Gunung Melayu II POM; Delivery date is 20/11/2023; Commodity is Certified FFB; Net weight 6,080 kg; Block P05e, P05c (313 bunches); certificate no. RSPO620707; Transport Internal; Delivery Note 00003; Vehicle register No. BM8093TK; Driver: Rusman; Batch No. 13-100-01646121-27101203. ▪ Weighbridge Ticket No. PGDA123226248 dated 20/11/2023; from Aek Tarum Estate Afd. 1; to PT Gunung Melayu – Gunung Melayu II POM; Delivery date is 20/11/2023; Commodity is Certified FFB; Net weight 6,020 kg; Block A11h, A12d (280 bunches); certificate no. RSPO620707; Transport Internal; Delivery Note KATDT4420231120082602; Vehicle register No. BK9579BP; Driver: Hendra Ramadhan; Batch No. 13-100-01646121-2709461B. <p>FFB Non-Certified:</p> <ul style="list-style-type: none"> ▪ Weighbridge Ticket No. PGDA123224437 dated 29/10/2023; from Sentral Estate Afd. 4; to PT Gunung Melayu – Gunung Melayu II POM; Delivery date is 29/10/2023; Commodity is FFB; Net weight 4,150 kg; Block H08l, H08m (180 bunches); Transport Internal; Delivery Note 0001; Vehicle register No. BK8094TK; Driver: Bambang; Batch No. 13-100-01646121-27100936. ▪ Weighbridge Ticket No. PGDA523103506 dated 23/06/2023; from PT STS - A; to PT Gunung Melayu – Gunung Melayu II POM; Delivery date is 23/06/2023; Commodity is Third Party FFB; Net weight 7,438 kg; Gonting (372 bunches); Transport Third Party FFB; Delivery Note 01/06/23; Vehicle register No. BK8844RR; Driver: Muhlisin; ID A215. • Weighbridge Ticket No. PGDA523103520 dated 24/06/2023; from PT STS - L; to PT Gunung Melayu – Gunung Melayu II POM; Delivery 	
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		<p>date is 24/06/2023; Commodity is Third Party FFB; Net weight 3,886 kg; Nagali (194 bunches); Transport Third Party FFB; Delivery Note 05/06/23; Vehicle register No. BK8262CP; Driver: Mahadi; ID A213.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>PT Gunung Melayu – Gunung Melayu II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.17.R7), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt, etc.), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: (Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>Sample of Sales Documents:</p> <ul style="list-style-type: none"> - Sales contract number 08007/CC27/13/23; Seller: PT Gunung Melayu – Gunung Melayu II POM; Address: Bandar Pulau PO BOX 1168 Medan; Buyer: PT Saudara Sejati Luhur; Address: Jl. Palembang Kav 35 – 37 Kebon Melati Tanah Abang Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Comodity: Palm Kernel RSPO; Supply chain model: Mass Balance; Certificate number RSPO 620707; document issued date 25 August 2023; Expired date: 27 January 2027; Quantity: 150,000 kg; Delivery Loco Gunung Melayu II POM. - DO Number 08007/DC27/13/23 dated 25 August 2023, From PT Gunung Melayu – Gunung Melayu II POM to PT Saudara Sejati Luhur 	<p>Complied</p>

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		<ul style="list-style-type: none"> - KCP Gunung Melayu I, commodity Palm Kernel, Supply chain modul: Mass Balance, moisture 8%, dirt 8%, Quantity 150,000 kg, RSPO Cert number RSPO 620707. - Weighbridge ticket number PGDC223200250 dated 28/08/2023, seller: PT Gunung Melayu – Gunung Melayu II POM, buyer: PT Saudara Sejati Luhur; DO number 08007/DC27/13/23; commodity: PK certified RSPO; Supply chain model: Mass Balance; Certificate number RSPO 620707; Nett weight: 25,930 kg; Transporter: Jasa Sumber Asahan; Driver: Selamat Saragih; Delivery note number 03/VIII/23; Seal number 6517705-6517714. - Sales contract number 01001/CC27/13/23; Seller: PT Gunung Melayu – Gunung Melayu II POM; Address: Bandar Pulau PO BOX 1168 Medan; Buyer: PT Saudara Sejati Luhur; Address: Jl. Palembang Kav 35 – 37 Kebon Melati Tanah Abang Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Comodity: Palm Kernel RSPO; Supply chain model: Mass Balance; Certificate number RSPO 620707; document issued date 25 August 2023; Expired date: 27 January 2027; Quantity: 150,000 kg; Delivery Loco Gunung Melayu II POM. - DO number 01001/DC27/13/23 dated 4 January 2023; Seller: PT Gunung Melayu – Gunung Melayu II POM; Buyer: PT Saudara Sejati Luhur – Gunung Melayu I KCP; commodity: Palm Kernel RSPO; Succply Chain model: Mass Balance; Quantity: 150,000 kg; certificate number: RSPO 620707; Moist 8%; Dirt 8%. - Weighbridge ticket number PGDC223200005 dated 06/01/2023, seller: PT Gunung Melayu – Gunung Melayu II POM, buyer: PT Saudara Sejati Luhur; DO number 01001/DC27/13/23; commodity: PK certified RSPO; Supply chain model: Mass Balance; Certificate number RSPO 620707; Nett weight: 26,320 kg; Transporter: Jasa 	
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		Sumber Asahan; Driver: Selamat Saragih; Delivery note number 03/I/23; Seal number 6224523-6224532.	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Gunung Melayu - Gunung Melayu II POM did not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV. Jasa Sumber Asahan who is the same transporter every year. Contract documents were available. There is no change of the transporter until ASA1_2.</p> <p>During transport, the mill has legal ownership of the product delivered by CV Jasa Sumber Asahan.</p> <p>PT. Gunung Melayu - Gunung Melayu II POM have a contract agreement with transporter as below: "Perjanjian Pengangkutan Nomor: 12/X/JSA-GM/2022" dated 12 September 2022 between PT. Saudara Sejati Luhur and CV Jasa Sumber Asahan. Contract transport for CPO & PK.</p> <p>Section 2 "Perjanjian Pengangkutan" conveyed that the term of the agreement is in accordance with the agreement of both parties.</p> <p>Based on the contract that stated in the article 7 (Responsibility and Obligation), point 1.m. stated that the contractor willing to meet the requirements of the Supply Chain Certification System when transporting raw materials and be willing to be audited by a second party internal auditor and an external party auditor from the certification body appointed by the second party if necessary.</p> <p>The contract has been signed by both parties means that the outsourcing party understood the RSPO Supply Chain requirements.</p> <p>PT. Gunung Melayu - Gunung Melayu II POM control the CPO transporter by "Surat Perintah Kerja (SPK)" and "Daftar Periksa Kesiapan Kerja Pengiriman".</p> <p>SPK covered information as explain in indicator 5.5.2 b. while "Daftar Periksa Kerja" is the tool to control the transporter:</p>	Complied

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		<ul style="list-style-type: none"> • Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out); • After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition); <p>The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>During field audit and document verification can be demonstrated that the transporter is under control of PT. Gunung Melayu - Gunung Melayu II POM.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The site kept the contract of CPO and PK transporter which include name and contact detail of the contractors/transporter.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The site committed to inform CB related name and contact details of any new contractors as mentioned in "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>PT. Gunung Melayu - Gunung Melayu II POM maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weighbridge ticket for FFB receiving - Weighbridge ticket for CPO delivery - Weighbridge ticket for PK delivery - Daily Production Report - Delivery Order - Sales contract - Shipping Announcement 	Complied

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<ul style="list-style-type: none"> - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Gunung Melayu II POM" period 2023: January – March, April – June, July – September, October and period 2022: October – December.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Gunung Melayu II POM only deliver Mass Balance sales from a positive stock.</p> <p>PT. Gunung Melayu - Gunung Melayu II POM can demonstrate sales contract with customer.</p>	
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2023, the estimated average extraction rate from FFB into CPO is 22.64%, whilst from FFB to PK is 5.00%. OER for own estate is estimated 24.15% and KER is 5%.</p> <p>Year 2022 actual vs budget average extraction rate:</p> <p>Actual: OER 22.39% and KER 5%</p> <p>Budget: OER 23.15% and KER 5%</p>	<p>Complied</p>
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>OER and KER are updated periodically to ensure accuracy against actual performance.</p> <p>Based on Daily Production Figure as per 20 November 2023, actual average extraction rate ratios from FFB into CPO is 24.20% (year todate</p>	<p>Complied</p>

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		2023 is 23.54%), whilst from FFB to PK is 4.62% (year to date 2023 is 4.70%).																																																	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>PT. Gunung Melayu - Gunung Melayu II POM implement Mass Balance Module.</p> <p>This indicator is not applicable.</p>	Not Applicable																																																
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Gunung Melayu – Gunung Melayu II POM has made Shipping Announcement for certified CSPO and CSPK sold.</p> <p>Sampled of Shipping Announcement:</p> <table border="1" data-bbox="1131 758 1982 1157"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Shipping/BL date</th> </tr> </thead> <tbody> <tr> <td>TR-96969706-3909</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>890.63</td> <td>30/09/2023</td> </tr> <tr> <td>TR-b5d4a2b3-74e6</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>860.79</td> <td>21/09/2023</td> </tr> <tr> <td>TR-777f5ef1-d813</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>74.8</td> <td>21/09/2023</td> </tr> <tr> <td>TR-ec69347e-b28b</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>520.85</td> <td>30/09/2023</td> </tr> <tr> <td>TR-f5bb557d-99f1</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>1,842.27</td> <td>21/09/2023</td> </tr> <tr> <td>TR-bdae3b57-05e3</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>426.64</td> <td>31/01/2023</td> </tr> <tr> <td>TR-6f076794-5556</td> <td>PT SSL</td> <td>CSPK</td> <td>MB</td> <td>1,487.44</td> <td>31/12/2023</td> </tr> </tbody> </table> <p>Remove:</p> <p>Unit of certification has removed the CSPO with total volume 23,292.42 MT under stock transaction ID ST-TR-c0438700-bca4 dated 22 November 2023. Reason for removal: sold as ISCC.</p>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Shipping/BL date	TR-96969706-3909	PT SSL	CSPK	MB	890.63	30/09/2023	TR-b5d4a2b3-74e6	PT SSL	CSPK	MB	860.79	21/09/2023	TR-777f5ef1-d813	PT SSL	CSPK	MB	74.8	21/09/2023	TR-ec69347e-b28b	PT SSL	CSPK	MB	520.85	30/09/2023	TR-f5bb557d-99f1	PT SSL	CSPK	MB	1,842.27	21/09/2023	TR-bdae3b57-05e3	PT SSL	CSPK	MB	426.64	31/01/2023	TR-6f076794-5556	PT SSL	CSPK	MB	1,487.44	31/12/2023	Complied
Transaction ID	Buyer	Product	Supply Chain Model	Volume	Shipping/BL date																																														
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TR-6f076794-5556	PT SSL	CSPK	MB	1,487.44	31/12/2023																																														
3.8.17	Claims	PT. Gunung Melayu - Gunung Melayu II POM has not made claims regarding the support of RSPO certified oil palm products. However, the	Complied																																																

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	<p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>organization aware about the RSPO Rules on Market Communications and Claims.</p> <p>The procedure for claims is stated in SOP for Traceability (AA-MPM-OP-1400.17-R7) dated 1 October 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Mass Balance model are only stated in sales documents of RSPO certified product.</p>	
<p>General corporate communications</p>			
<p>4.1</p>	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT Gunung Melayu is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com.</p>	<p>Complied</p>
<p>4.2</p>	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> 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 licence number to promote its RSPO membership 	<p>Corporate communication in Asian Agri website:</p> <ul style="list-style-type: none"> • Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006. • Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. • State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." • State the member's history with regards to the RSPO: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. 	<p>Complied</p>

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		<ul style="list-style-type: none"> Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo. <p>There is no change until ASA1_2.</p>	
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.	Asian Agri website did not display the RSPO Corporate Logo.	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 the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not Applicable
4.5	<p>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:</p> <ul style="list-style-type: none"> "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)." "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." 	<p>Corporate communication in Asian Agri website:</p> <ul style="list-style-type: none"> Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." State the member's history with regards to the RSPO: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo. 	Complied

		There is no change until ASA1_2.	
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>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.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>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.</p> <p>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".</p>	<p>PT Gunung Melayu is a certified member as a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com. Asian Agri website did not display the RSPO Corporate Logo.</p>	Not Applicable
Product-specific communications			
5.1 General			
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 such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	PT Gunung Melayu Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model MB.	Complied
5.1.2	Product-specific communications are voluntary.	PT Gunung Melayu stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied

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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.	PT Gunung Melayu did not display the RSPO label for product-specific communications	Not Applicable
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 Gunung Melayu did not use RSPO trademark or any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products	Not Applicable
5.1.5	<p>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</p> <ul style="list-style-type: none"> • 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. 	PT Gunung Melayu - Gunung Melayu II Mill is a palm oil mill; thus, this indicator is not applicable.	Not Applicable
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 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	PT Gunung Melayu - Gunung Melayu II Mill is a palm oil mill; thus, this indicator is not applicable.	Not Applicable

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.	PT Gunung Melayu did not use RSPO trademark or logo in the product specific communication. PT Gunung Melayu Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model MB. PT Gunung Melayu stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	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.	It was verified that when selling certified oil palm product, PT Gunung Melayu stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	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: <ul style="list-style-type: none"> • 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. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	PT Gunung Melayu - Gunung Melayu II Mill is a palm oil mill; thus, this indicator is not applicable.	Not Applicable
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	PT Gunung Melayu sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable

	<p>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.</p>		
5.3.2	<p>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:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Gunung Melayu sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Gunung Melayu sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Gunung Melayu sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* 	PT Gunung Melayu sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable

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	<ul style="list-style-type: none"> Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
5.3.3	On pack claims shall not include information about the claimant’s RSPO membership status.	PT Gunung Melayu sold its oil palm product in bulk, there was no on-pack claim used.	Not Applicable
5.3.4	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	The communication of PT Gunung Melayu has not mentioned to consumers information about their suppliers’ 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.	PT Gunung Melayu sold its oil palm product in bulk, up to this moment, PT Gunung Melayu has not use RSPO label or trademark.	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.	PT Gunung Melayu sold its oil palm product in bulk, up to this moment, PT Gunung Melayu has not use RSPO label or trademark.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Gunung Melayu is producing and selling CPO and PK; All certified product sold are 100 % content oil palm RSPO MB-certified. No such cases as the certified material is bulk intermediate product. By default, the material is either 100% claimed under RSPO or not RSPO.	Complied
	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.	There is no percentage of non-certified oil palm within the certified product. All certified product produced and sold are 100% Mass Balance. PT Gunung Melayu was not produce end consumer goods. The production are CPO and PK.	Complied
Messaging			

	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> • [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. • The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	<p>PT Gunung Melayu was not use storytelling in product-related communications.</p>	<p>Complied</p>
<p>Product-Specific Communications Labelling</p>			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • 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. • The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	<p>No product related communications are found. Information provided in Cooperate website includes the total certified units, traceability of the supply chain and commitment to have all units certified.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit</p>	<p>There are no changes related to the corporate policy that has been set on 1 December 2019 which has been ratified by the Managing Director (Kevin Tio). The policy relating to human rights, is explained in point 13, stating that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and</p>	<p>Complied</p>

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	<p>of certification and contracted services, including contracted security forces.</p>	<p>working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age".</p> <p>Separately, the company has also a policy related a Human Rights Defender (HRD), which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment".</p> <p>Corporate policy has been socialized/delivered to all levels of PT Gunung Melayu, latest refreshment on 13 May 2023.</p> <p>The policy is also published to use posters at any strategic places Batu Anam Estate and Gunung Melayu II POM.</p> <p>Corporate policy has been socialized/deseminastion to all levels of PT Gunung Melayu employees and stakeholders (including local contractors).</p> <p>Based on interviews with several workers at field visits, in general workers understand the company policy related the human right.</p> <p>Verification of contract document has been conducted during this audit. Several contracted serevice on estate operasion, such as:</p> <ol style="list-style-type: none"> 1. SPK No. 125/E1KBA/03/23 dated 29 July 2023 on behalf of PT Lamtamas Maruli Nauli for paving work at Batu Anam Estate. 2. SPK No. 069/E1KBA/07/23 dated 31 July 2023 on behalf of CV Graha Mandiri for paving work at Batu Anam Plantation. 	
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>Based on the interview with stakeholder and documents review with the head of the Head of Simpang Perak Jaya and Kumbara Utama Village, Chief of Gender committee that PT IIS - Buatan Group, there is no any use of employees from mercenaries and paramilitaries use in the operations.</p>	<p>Complied</p>

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		Up to this Surveillance audit, there is no issue or case related to the acts of violence against the employees of the company.	
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	PT Gunung Melayu has been establish since the 1970s and most of its employees come from nearby villages. Based on interviews with local village heads, since the company was founded, there have been no cases of violence or harassment in its operations. The company also does not use mercenaries or paramilitaries to protect plantations, that security is carried out by patrols carried out by the surrounding village community or also called "Centeng."	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Unit of Certification has established a mechanism to handle complaint from external party, as written in " <i>Mekanisme Penanganan Keluhan</i> " – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under " <i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> " – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in " <i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i> ". The company will endeavor to resolve complaints within 15 working days. Any grievance or illegal action within Unit of Certification also is available through hotline (call) and email to whistleblow@rgei.com . These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities. While for the internal parties (all level employees at PT Gunung Melayu has been communicated, latest socialization on 13 May 2023. Through this communication, the company explained about the mechanism of submission of complaints	Complied

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		<p>in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.</p> <p>According to interview with management representatives and sustainability staff and also several of employees during the audit, there is no illiterate parties in estate or mill.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>There were no changes related to the mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>These mechanisms have communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities in 12 February 2021.</p> <p>Through this communication, PT Gunung Melayu - Gunung Melayu II POM explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion),</p> <p>The procedure on handling complaint and grievances, Unit of Certification keeps confidential complainer and whistleblower. Complaint and grievances were recorded in LogBook and in "<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>".</p> <p>Based on the interview with stakeholder and documents review with the internal stakeholder (labour union, gender committee and random worker in field) and external stakeholder (village head and previous landowners) all policy/procedures are in place and understood by all stakeholders.</p> <p>During this surveillance audit, there was information related to complaints from the NGO Lembaga Konservasi Lingkungan Hidup Medan (LKLH) which were submitted via letter directly to the Medan Head Office on 23 August 2023 and via online media:</p>	Complied

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		<p>"https://www.kabarriau.com/berita/9715/lklh-sumut-buktikan-kebun-sawit-pt-inti-indosawit-subur-bersertifikat-rspo-dan-iscc-di-duga" on September 15 2023.</p> <p>Complaint details are as follows:</p> <ol style="list-style-type: none"> 6) On August 23 2023, NGO LKLH sent letter No. 127/DPW/LKLH-SU/VIII/2023 to the Main Director of PT Inti Indo Sawit Subur in Medan, there are several things that are complained about: Conditions in the Piasa river border field which is directly adjacent to the PT Inti Indosawti Subur - PT Gunung Melayu Sentral Estate area (KSN) planted with oil palm so that it is damaged and not protected. So the NGO LKLH asked for clarification and commitment steps from PT Gunung Melayu regarding this matter. 7) The Piasa river border area in question is the Sentral Estate (KSN) area for palm oil plantations in the 2003/2004 planting year which is not included in the scope of RSPO certification and is still in the RaCP assessment process by the RSPO. 8) LKLH has carried out a field investigation on Monday 11 September 2023 to the Piasa river border, and it is true that the Piasa river border has been planted with oil palm by PT Gunung Melayu Kebun Sentral (KSN). 9) On September 17 2023, a meeting was held between PT Gunung Melayu, represented by Public Relations Mr. Agus Salim with NGO LKLH represented by Mr. Indra Mingka in Medan. 10) Furthermore, on September 19 2023, send another notification letter via letter No. 138/DPW/LKLH-Su/IX/2023 containing alleged environmental violations, namely not protecting and managing the protected area along the Piasa River, proven by converting it to oil palm plantations. Through this letter, LKLH also explained that PT Gunung Melayu / Asian Agri Group had made a clarification or explanation on Monday 18 September 2023 in Medan to DPW LKLH 	
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		<p>North Sumatra so that everything was clear and no misunderstanding were found, but the company would continue to improve the performance of environmentally friendly and sustainable palm oil plantations in accordance with RSPO principles.</p> <p>Based on an interview with Mr. Bayu (Sustainability Assistant) that PT Gunung Melayu has a river border conservation program through HCV management plan, namely planting woody plants on river borders. PT Gunung Melayu has planted 1500 trees for these woody plants. The plan is that after the replanting is carried out, the river border will become an HCV area and will be planted with woody plants.</p> <p>Based on an interview with the Chairman of the NGO LKLH, Mr. Indra Mingka, that the company has explained openly that the area (Piasa River Border) has been designated as a river border HCV area in the Central Plantation of PT Gunung Melayu and has indeed been planted with oil palm in the 2003/2004 planting year, and has been programmed to that after replanting, it will not be disturbed as an HCV area and wood trees will be planted in that area. The NGO LKLH will always monitor the area so that the HCV environment can be preserved.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>There were no changes related to the mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>Based on the verification of complaints from NGO LKLH above (4.2.3), the company has implemented procedures (Doc. No. SOP AA-GL- 5005-RO 01), namely by responding to complaints and providing clarification with the party submitting the complaint (NGO LKLH).</p>	Complied

Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.

<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on an interview with the Batu Anam village head, he stated that the CSR program had coordinated with the heads of surrounding villages through SIA reports (using a Discussion Group approach) and also coordinated through meetings in the Village every year, i.e. The 2023 Musrembang meeting was held in February.</p> <p>Realization of the 2022 CSR program, for example:</p> <ol style="list-style-type: none"> 1. Date 01.11.2022; carrying out cheap market activities selling packaged cooking oil by PT Gunung Melayu and PT Saudara Sejati Luhur for the people of Batu Anam Village. 2. On 03/28/2022 provided electronic equipment assistance to the Bandar Pulau Regent's office in Gonting Malaha Village. 3. Date 05/20/2022; provided 156 basic food packages (rice @ 5 kg, cooking oil and noodles) to Sei Apung Jaya Village. <p>In 2022, a CSR program of IDR 128,238,620 has been realized from a planned budget of IDR 131,000,000 or a realization of 97.89%.</p> <p>PT Gunung Melayu has also established a CSR program for the 2023 period where there are 6 sectors (social, health, education, economic empowerment infrastructure and alternative economics) with 18 activities that will be carried out with a budget of IDR 100,000,000. As of October 2023, a CSR program of IDR 37,424,150 or 37% has been realized, as follows:</p> <ol style="list-style-type: none"> 1. Eid al-Fitr Dhuafa Package Assistance (260 packages), for Batu Anam Village (85 packages), Sidomulyo Village (60 packages) and Gonting Village, 115 packages. The program will be implemented on April 15 2023. 2. Assistance for the Celebration of the Nasyid & Imtaq Festival for Rahuning District, Bandar Pulau, Tinggi Raja, to be held on April 17 2023. 	<p>Complied</p>
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		<ol style="list-style-type: none"> 3. Computer Assistance for the Rahuning Subdistrict Office for the Rahuning Subdistrict Office will be held on April 23 2023 4. Construction of elementary school toilets of SD Negeri 017139 Batu Anam was implemented on 14-15 June 2023 5. Construction a prayer room of SMP Negeri Satu Atap in Batu Anam Village will be carried out on June 27 2023. 6. Assistance for furniture and play equipment at PAUD (Early Childhood Education) Salwa Gonting Malaha Village will be held on 4-6 July 2023 7. Providing assistance for Mass Circumcision activities (15 Children) for Batu Anam Village, Sidomulyo, Bandar Pulau, held on 15-16 August 2023. 8. Provision of 50 Palm Oil Seedlings assistance to independent farmers in Batu Anam Village will be carried out on May 20 2023. <p>Thus, based on verification of documents for the realization of the 2022-2023 CSR program and also interviews with several village heads, PT Gunung Melayu has implemented the CSR program in accordance with the village development program around the plantation.</p>	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
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.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. The data and documents are still the same as the previous year's audit results. The company is existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.	Complied

		<p>During the audit the unit of certification able to show legal ownership documents as below:</p> <ol style="list-style-type: none"> 1. Location Permit based on the decision of the Governor of North Sumatra Level 1 with number 593/27309 in 1983 concerning Determination of location and size of land for the purpose of oil palm plantation, Palm Oil Mill and cooking oil Mill under the name of PT Gunung Melayu. 2. Land Title/Hak Guna Usaha (HGU): Sertipikat HGU No. 1 (23 Apr 2004); NIB: 02.07.02.17.00100 Reference: SK Kepala BPN No. 20/HGU/BPN/2001 (7 Agus 2001) dan No. 20/HGU/BPN/2001/A/28 (19 Des 2001). Surat Ukur No: 01/Gonting Malaha/2004, 21 Apr 2004. The area is 10,414.331 hectares and is valid for 25 years since its establishment. <p>Until this audit, there is no new updating of the license. PT Gunung Melayu has fulfill the requirement such as land title, environmental permit and plantation permit such as stated in indicator 2.1.1</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. The data and documents are still the same as the previous year's audit results. The company is existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>Besides that, PT. Gunung Melayu does not compensated land from previous landowners. The company was acquired the land and shift the land title from PT. Balai Asahan. Details of legality as per document "Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981.</p>	Complied

	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Based on documents review and interview with local government and local communities surrounding the company, there is no change from the previous audit that it was noted no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>	<p>Based on documents review and interview with local government and local communities surrounding the company, there is no change from the previous audit that it was noted no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. PT Gunung Melayu has legal ownership as Land Use Title or Hak Guna Usaha, completed with map "Peta Bidang Tanah" scale 1:10,000. This land title certificate issued based on Minutes of Multi-stakeholder "Risalah Panitia Tanah-B".</p> <p>There is no land expansion of PT Gunung Melayu.</p> <p>However, there is a land occupation by "Kelompok Tani Tangkisan Mariam (KTTM)" within HGU area which is not planted and sets aside as conservation area by PT. Gunung Melayu. Total area cultivated by "Kelompok Tani Tangkisan Mariam (KTTM)" was 645.5 ha with 317 members of "Kelompok Tani Tangkisan Mariam (KTTM)".</p>	<p>Complied</p>

		<p>PT. Gunung Melayu and "Kelompok Tani Tangkisan Mariam (KTTM)" have made the Letter of Agreement dated 1 August 2002 witnessed by local government "Kecamatan Bandar Pulau", "Kepala Desa Batu Anam", "Sekretaris Kecamatan", "Kepala Seksi Pembangunan", "Kepala Seksi Polisi Pamong Praja", "Danton PT AGG". In the agreement stated that KTTM can harvest their oil palm crop in their cultivated area with the schedule determined on date 1, 2, 3, 15, 16 and 17 each month. It is stipulated the "Kelompok Tani Tangkisan Mariam (KTTM)" cannot harvest the company's oil palm crop and prohibit to add the new planting in the cultivated area. This area of 645.5 ha was excluded from certified area.</p> <p>PT. Gunung Melayu – Aek Tarum Estate have prepared a map identifying area occupied by communities. The map identifies 721 Ha area was occupies by 128 individuals. Sample sighted: Mr. Untung (from Simpang Empat) occupied 4 Ha in block B09k; Mr. Lamudin (from Bandar Pulau) occupied 5 Ha in block A12a.</p>	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. PT Gunung Melayu has legal ownership as Land Use Title or Hak Guna Usaha, Izin Lokasi, Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981.</p> <p>All relevant information is available in appropriate forms and in Bahasa language, including assessment of impact or AMDAL and RKL-RPL.</p>	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.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. PT Gunung Melayu has legal ownership as Land Use Title or Hak Guna Usaha, Izin Lokasi, Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981. All relevant information is available in appropriate forms and in Bahasa language, including assessment of impact or AMDAL and RKL-RPL.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The company is existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. PT Gunung Melayu has legal ownership as Land Use Title or Hak Guna Usaha, Izin Lokasi, Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981. All relevant information is available in appropriate forms and in Bahasa language, including assessment of impact or AMDAL and RKL-RPL.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Gunung Melayu.	Complied

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		As explained above: PT. Gunung Melayu does not compensated land from previous landowners. The company was acquired the land and shift the land title from PT. Balai Asahan. Details of legality as per document "Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981. Documents related to legal ownership has completed as written in indicator 2.1.1.	
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.	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there is no new planting or any new planting plan in PT Gunung Melayu. As explained above: PT. Gunung Melayu does not compensated land from previous landowners. The company was acquired the land and shift the land title from PT. Balai Asahan. Details of legality as per document "Salinan Surat Keputusan Menteri Dalam Negeri No.SK.6/Iz/DJA/1981" dated 7 March 1981. Documents related to legal ownership has completed as written in indicator 2.1.1.	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 local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected local communities understand that they have the right to say 'agree' or 'disagree' to the planned operations on their lands before and during initial discussions, during the information gathering and related consultation stages, during negotiations, and until agreement with a unit of certification signed and endorsed by the local community. Negotiated agreements are non-coercive and voluntary and are entered into prior to new operations.	Complied
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples,	Based on document verification, management unit has no land expansion since November 2005.	Complied

	the full range of food and water provisioning options are considered. There is transparency of land allocations process.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected local communities understand that they have the right to say 'agree' or 'disagree' to the planned operations on their lands before and during initial discussions, during the information gathering and related consultation stages, during negotiations, and until agreement with a unit of certification signed and endorsed by the local community. Negotiated agreements are non-coercive and voluntary and are entered into prior to new operations.	
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.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected local communities understand that they have the right to say 'agree' or 'disagree' to the planned operations on their lands before and during initial discussions, during the information gathering and related consultation stages, during negotiations, and until agreement with a unit of certification signed and endorsed by the local community. Negotiated agreements are non-coercive and voluntary and are entered into prior to new operations.	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.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that communities or their representatives provide approval for the initial planning stage of operations prior to the issuance of new concessions or land titles to operators.	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in	Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land	Complied

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	<p>cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Gunung Melayu has been established since 1975. Since 2002 - 2008, Unit of Certification started replanting in the second planting cycle. There were no new expansions during the replanting period. There were no expansions after November 2018.</p>	
<p>4.5.8</p>	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, there are no changes related to the legality of the company's land ownership / tenure. There is no land expansion. The data and documents are still the same as the previous year's audit results. The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Gunung Melayu has been established since 1975. Since 2002 - 2008, Unit of Certification started replanting in the second planting cycle. There were no new expansions during the replanting period. There were no expansions after November 2018.</p>	<p>Complied</p>
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			

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4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. According to the earlier land title document, PT Gunung Melayu has been established since 1975. Since 2002 - 2008, Unit of Certification started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>The Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.</p>	Complied

		<p>The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Gunung Melayu has been established since 1975. Since 2002 - 2008, Unit of Certification started replanting in the second planting cycle. There were no new expansions during the replanting period.</p>	
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).	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. The Company is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear.</p> <p>According to the earlier land title document, PT Gunung Melayu has been established since 1975. Since 2002 - 2008, Unit of Certification started replanting in the second planting cycle. There were no new expansions during the replanting period.</p> <p>Based on stakeholder consultation show that the surrounding communities feels company provide job vacancy to absorb manpower from surrounding village.</p>	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.	<p>Based on the results of document verification and interviews with stakeholders and company management in this 1.2 surveillance audit, the data and documents are still the same as the previous year's audit results. According to the earlier land title document, PT Gunung Melayu has been established since 1975. Since 2002 - 2008, Unit of Certification started replanting in the second planting cycle. There were no new expansions during the replanting period. There was no compensation made.</p>	Complied

<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Company refer to mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighbouring parties – in the boundary of the conflicted area (if any).</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Unit of certification is an existing plantation company, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. Based on stakeholder consultation show that the surrounding communities feels company provide job vacancy to absorb manpower from surrounding village. In addition, company developed CSV program to assist oil palm planter to organized and strive for independent smallholder organization.</p>	Complied
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			

4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, 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.	Unit of certification is an existing plantation company since 1970s, therefore no more land compensation against developing new plantation because no expansion area for this unit. Currently, the plantation is in step of replanting period and all legal document and status are clean and clear. However, where there are land disputes occurs, unit of certification have mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has considered FPIC Guide for RSPO Member, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). Based on communication with affected stakeholders, including surrounding villages, land disputes/conflict in PT Gunung Melayu managed area.	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.	Based on communication with affected stakeholders, including surrounding villages, land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes is following their procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015.	Complied
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).	Based on communication with affected stakeholders, including surrounding villages, no customary land or other legal rights within the certified area.	Complied

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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).	Based on communication with affected stakeholders, including surrounding villages, land conflict is not present in the unit of certification.	Complied
Principle 5: Support smallholder inclusion			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	<p>The company has a mechanism for determining the price of external FFB in the SOP for Purchasing External FFB (AA-MM-506.1-R4). The procedure informs the following:</p> <ul style="list-style-type: none"> - FFB purchase manager will create a price list for local POM and other sources for price comparison. Then the FFB Purchase Manager will calculate the price of FFB that can be purchased based on the CPO and PK prices from the marketing party obtained from the CPO and PK tender. - From the CPO and PK prices obtained, transport costs to the nearest port will be deducted along with tax calculations. After that, the CPO and PK prices will be multiplied by the OER produced by POM. - From the results of this multiplication, processing costs from the factory will be deducted which at the end of the month will be adjusted again according to the recorded processing cost realization. <p>The price approved by the Head of FFB Purchase will be conveyed to the FFB supplier.</p> <p>The FFB price that has been determined be informed to the FFB supplier via WA by the head of FFB purchasing and updated FFB price information also be posted on the information board at the Mill entrance.</p>	Complied

5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	The company informs the FFB price on the notice board at the factory, so that it can be seen by FFB suppliers. The company also provides communication via WhatsApp application for FFB price information to suppliers.	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	The company does not accept FFB from smallholder schemes, the company only accepts FFB from collector agents in the name of PT Sawit Trading Sejahtera and outgrower (Sinar Bakti). From the results of a review of recorded agreements with third parties, it is known that the seller and buyer agree that the FFB sale and purchase price is in accordance with the PMKS daily price mechanism determined by PT Gunung Melayu.	Complied
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.	The company does not accept FFB from smallholder schemes, the company only accepts FFB from collector agents in the name of PT Sawit Trading Sejahtera and outgrower (Sinar Bakti). From the results of a review of records of agreements with third parties, approval was carried out by company representatives and also PT Sawit Trading Sejahtera.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	The company has a contract with an external supplier on behalf of PT Sawit Trading Sejahtera (No.: 001/TBS/GM/2020, 1 May 2020). The contract states several things: <ul style="list-style-type: none"> - Term of the contract - FFB unit price - Terms of payment - Product quality/quality - Prohibition of originating from Protected Forest Areas, stolen proceeds and other criminal acts. This agreement was agreed upon by company representatives and also the FFB supplier.	Complied

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		An example of payment verified by the auditor is invoice and proof of payment for period for July 2023 where the calculation of payment is in accordance with the amount of FFB acceptance in Mill and the price set.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	The company shows proof of recorded payment for FFB to external suppliers on behalf of PT Sawit Trading Sejahtera in the recorded proof of payment for the period April 28 to May 1 2023. In the proof of payment, the FFB price refers to the TBS price determination mechanism determined by the company. IDR 1,995 /kg. In this pricing mechanism, the company considers the current prices of CPO and Kernel, processing operational services and also transportation services.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	The company shows recordings of weigh calibrations at palm oil processing factory units, along with details of the results: <ul style="list-style-type: none"> - Minutes of Handover of Brand/Type PSC 7801 Serial Number PSM210040 Capacity 50,000 kg on October 11 2023 by a technician with the result "The scales have been re-calibrated and stamped with the 2023 tera seal". - Minutes of Handover of Brand/Type PSC 7801 Serial Number PSB17AA2301 50,000 kg capacity on October 11 2023 by a technician with the result "The scales have been re-weighted and stamped with the 2023 stamp". 	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	The company supports independent smallholders in the CSV (Create Share Value) program. The program was created in the context of coaching independent smallholders to develop their palm oil plantation management skills so that they can achieve optimal FFB production results with good quality and meet standards, while still paying attention to aspects of sustainable and sustainable palm oil plantation management. The following are some of the Collaboration records shown:	Complied

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		<ul style="list-style-type: none"> - Partnership Cooperation Agreement between PT Gunung Melayu and the Berumbung Atas Makmur Farmers Group (No.81/CSV/GM/VII/2019, 3 July 2019). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sejahtera Farmers Group (No.79/CSV/GM/VII/2019, 1 July 2019). - Partnership Cooperation Agreement between PT Gunung Melayu and the Jaya Tani Farmers Group (No.82/CSV/GM/VII/2019, 4 July 2019). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sidomulyo Makmur Prosperous Farmers Group (No.80/CSV/GM/VII/2019, 2 July 2019). 	
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.	<p>PT Gunung Melayu does not have direct control to the development on smallholder. However, through program Create Share Value (CSV) the CH demonstrate commitment to assist surrounding oil palm planter to be organized and establish independent smallholder organization.</p> <p>Company has a mechanism for complaint handling for smallholder partner, under "SOP Penanganan Komplain No. XX-HR-308.5-R0" dated 11 December 2009.</p> <p>Gunung Melayu II POM, has several FFB suppliers from smallholders collected by PT Sawit Trading Sejahtera (STS)</p> <p>Based on interview with surrounding communities during audit for example head of Batu Anam Village (Bpk. Sunanto), so far no complaint related to smallholder development, and/or FFB payment.</p>	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess	PT Gunung Melayu through the Create Share Value (CSV) program shows its commitment to helping surrounding oil palm planters to organize and form independent small farmer organizations.	Complied

	<p>their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>The target of the CSV program is to develop small farmers to improve economic conditions through sustainable development and receive FFB at the company's factory - POM Gunung Melayu II.</p> <p>PT Gunung Melayu has a program to develop oil palm farmers around plantations with the target of improving the community's economy through the development of sustainable oil palm plantations which will later receive FFB yields from Gunung Melayu II oil palm mills. The commitment is stated in the memorandum of understanding between the two parties, the MoU is as follows:</p> <ol style="list-style-type: none"> 1. Memorandum of Understanding/MoU with "Kelompok Sejahtera Sidomulyo Makmur" year 2017 with 28 smallholder members, total area 150 Ha in Sido Mulyo village; 2. Memorandum of Understanding /MoU with "Kelompok Petani Mekar Jaya" year 2017 with 30 smallholder members, total area 43 Ha in SIdo Mulyo village; 3. Memorandum of Understanding/MoU with "Kelompok Tani Keluarga Tani" year 2017 with 7 smallholder members, total area 78 Ha in Rahuning village. 4. Memorandum of Understanding/MoU with "Kelompok Rezeki Makmur Desa Rahuning" year 2017 with 6 smallholder members, total 30 Ha in Rahuning village. 5. Memorandum of Understanding/MoU with "Kelompok Subur Desa Rahuning" year 2018 with 6 smallholder members, total 70 Ha in Rahuning village. 6. Memorandum of Understanding/MoU with "Kelompok Tani Sejahtera Desa Rahuning" year 2018 with 17 smallholder members, total 171 Ha in Rahuning village. 7. Partnership agreement "Perjanjian Kemitraan No.01/SL/CSV/VII/2020 antara PT Gunung Melayu – PT Gunung 	
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		<p>Melayu dengan Kelompok "Soelianto Aminudin" (Desa Gunung Berkat)" dated 20 July 2020, comprise of 1 family head total 100 Ha.</p> <p>8. Partnership agreement "Perjanjian Kemitraan No.05/SSM/CSV/VIII/2017 antara PT Gunung Melayu – PT Gunung Melayu dan Kelompok Tani Sejahtera Sidomulyo Makmur, Desa Sidomulyo" dated 10 August 2017, member 40 family head total 100 Ha.</p> <p>9. Partnership agreement "Perjanjian Kemitraan No. 10/MJ/CSV/VIII/2017 antara PT Gunung Melayu – PT Gunung Melayu dan Kelompok Tani Mekar Jaya, Desa Sidomulyo" dated 24 August 2017, member 30 family head, total 43 Ha.</p> <p>10.Partnership agreement "Perjanjian Kemitraan No.08/SM/CSV/VIII/2017 antara PT Gunung Melayu – PT Gunung Melayu dan Kelompok Tani Suka Maju, Desa Sidomulyo" dated 14 August 2017, member 25 family head total 50 Ha.</p> <p>11.Partnership agreement "Perjanjian Kemitraan No.08/SM/CSV/VIII/2017 antara PT Gunung Melayu – PT Gunung Melayu dan Kelompok Tani Berumbun Atas Makmur, Desa Teladan" tanggal 14 August 2017,comprise of 11 family head total 75 Ha.</p> <p>12.Partnership agreement "Perjanjian Kemitraan No.63/TS/CSV/VIII/2018 antara PT Gunung Melayu – PT Gunung Melayu dan Kelompok Tani Tani Sejahtera, Desa Batu Anam" tanggal 28 August 2018, comprise of 17 family head total 37,5 Ha.</p> <p>13.Partnership agreement "Perjanjian Kemitraan No.39/JT/CSV/XI/2017 antara PT Gunung Melayu – PT Gunung Melayu dan Kelompok Tani Jaya Tani, Desa Buntu Maraja" dated 30 November 2017, comprise of 10 family headtotal 310 Ha.</p> <p>14.Partnership agreement "Perjanjian Kemitraan No. 16/BTJ/CSV/IX/2017 antara PT Gunung Melayu – PT Gunung Melayu</p>	
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		<p>dan Kelompok Tani Berkat Tani Jaya, Desa Gunung Berkat” tanggal 13 September 2017, comprise of 38 family head total 552 Ha.</p> <p>On 2023 period, company support independent smallholder under program Created Share Value/CSV in surrounding village such as:</p> <table border="1" data-bbox="1131 507 1971 1029"> <thead> <tr> <th>NO.</th> <th>PROGRAM</th> <th>LOKASI</th> </tr> </thead> <tbody> <tr> <td colspan="3">B. PROGRAM CSV</td> </tr> <tr> <td>1</td> <td>Introduction to RSPO and ISPO Certification</td> <td>Asosiasi Petani Anugerah Gonting Malaha Village</td> </tr> <tr> <td>2</td> <td>Farmer Group Dynamics Training</td> <td>Asosiasi Petani Anugerah Gonting Malaha Village</td> </tr> <tr> <td>3</td> <td>Training on Fertilization</td> <td>Asosiasi Petani Anugerah Gonting Malaha Village</td> </tr> <tr> <td>4</td> <td>Training on Harvest Ripe Criteria & Road Maintenance</td> <td>Asosiasi Petani Anugerah Gonting Malaha Village</td> </tr> <tr> <td>5</td> <td>CSV Team Coordination Meeting with Farmers</td> <td>Asosiasi Petani Anugerah Gonting Malaha Village</td> </tr> <tr> <td>6</td> <td>Making an Owl Cage (3 Units)</td> <td>Field of Farmer Group at Batu Anam Village and Gonting Malaha</td> </tr> <tr> <td>7</td> <td>Road Repair Assistance:</td> <td></td> </tr> <tr> <td></td> <td>~ Grader Heavy Equipment (150 HM)</td> <td>Road improvements in Batu Anam Village, Sidomulyo and Gonting Malaha</td> </tr> <tr> <td></td> <td>~ Road Paving with Sirtu 150 M3</td> <td>Road improvements in Batu Anam Village, Sidomulyo and Gonting Malaha</td> </tr> <tr> <td></td> <td>~ Road Paving with Bomag 80 HM</td> <td>Road improvements in Batu Anam Village, Sidomulyo and Gonting Malaha</td> </tr> <tr> <td>8</td> <td>Rehab Assistance and Office Equipment</td> <td></td> </tr> <tr> <td></td> <td>~ Reward for the Best Harvester</td> <td>KT participants from Batu Anam, Sidomulyo and Gonting Malaha Villages</td> </tr> <tr> <td></td> <td>~ Making a Rain House</td> <td>Field of Farmer Group-Kelompok Tani Gonting Malaha village</td> </tr> </tbody> </table>	NO.	PROGRAM	LOKASI	B. PROGRAM CSV			1	Introduction to RSPO and ISPO Certification	Asosiasi Petani Anugerah Gonting Malaha Village	2	Farmer Group Dynamics Training	Asosiasi Petani Anugerah Gonting Malaha Village	3	Training on Fertilization	Asosiasi Petani Anugerah Gonting Malaha Village	4	Training on Harvest Ripe Criteria & Road Maintenance	Asosiasi Petani Anugerah Gonting Malaha Village	5	CSV Team Coordination Meeting with Farmers	Asosiasi Petani Anugerah Gonting Malaha Village	6	Making an Owl Cage (3 Units)	Field of Farmer Group at Batu Anam Village and Gonting Malaha	7	Road Repair Assistance:			~ Grader Heavy Equipment (150 HM)	Road improvements in Batu Anam Village, Sidomulyo and Gonting Malaha		~ Road Paving with Sirtu 150 M3	Road improvements in Batu Anam Village, Sidomulyo and Gonting Malaha		~ Road Paving with Bomag 80 HM	Road improvements in Batu Anam Village, Sidomulyo and Gonting Malaha	8	Rehab Assistance and Office Equipment			~ Reward for the Best Harvester	KT participants from Batu Anam, Sidomulyo and Gonting Malaha Villages		~ Making a Rain House	Field of Farmer Group-Kelompok Tani Gonting Malaha village	
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5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>PT Gunung Melayu has a program to develop oil palm farmers around plantations with the target of improving the community's economy through the development of sustainable oil palm plantations which will later receive FFB yields from Gunung Melayu II oil palm mills. The commitment is stated in the memorandum of understanding between the two parties.</p> <p>Up to September 2023 there has been 18 smallholder group/”kelompok tani” with 867 smallholder members and 2,999 Ha area registered under CSV program.</p>	Complied																																													

		Company has recorded the smallholder member name, GPS coordinates of the oil palm plantation and the copy of land legality.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>The company supports independent smallholders in the CSV (Create Share Value) program. The program was created in the context of coaching independent smallholders to develop their palm oil plantation management skills so that they can achieve optimal FFB production results with good quality and meet standards, while still paying attention to aspects of sustainable and sustainable palm oil plantation management. The following are some of the Collaboration records shown:</p> <ul style="list-style-type: none"> - Partnership Cooperation Agreement between PT Gunung Melayu and the Berumbung Atas Makmur Farmers Group (No.81/CSV/GM/VII/2019, 3 July 2019). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sejahtera Farmers Group (No.79/CSV/GM/VII/2019, 1 July 2019). - Partnership Cooperation Agreement between PT Gunung Melayu and the Jaya Tani Farmers Group (No.82/CSV/GM/VII/2019, 4 July 2019). - Partnership Cooperation Agreement between PT Gunung Melayu and the Sidomulyo Makmur Prosperous Farmers Group (No.80/CSV/GM/VII/2019, 2 July 2019). <p>In this agreement, the company collaborates in developing independent farmers, including in terms of receiving and purchasing production results (fresh fruit bunches), including supporting TBS that comes from areas that have legal validity (not from production forest areas/areas and also conflict).</p>	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Currently the company does not have a smallholder scheme within the scope of its operational area. However, it has a CSV (Create Share	Complied

		<p>Value) program to support local farmers around the company to improve their welfare by cultivating oil palm. The company carries out training activities related to pesticides for several villages, for example:</p> <ul style="list-style-type: none"> - Recording of GAP (Good Agriculture Practice) Training in Gonting Malaha Village on March 4 2023. - Recording of GAP (Good Agriculture Practice) Training in Gunung Berkat Village on July 15 2023. <p>The training materials include the implementation of a pest census and its control.</p>	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	The management unit has conducted periodic reviews and made public reporting on the development of support to farmers on a regular basis which is carried out annually for all units under Asian Agri Group. This can be seen in the CSV sustainability report which is available in all company units.	Complied
<p>Principle 6: respect workers’ rights and conditions Protect workers’ rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>Since 2014, PT Gunung Melayu group has had company police regarding discrimination adn equal opportunity fo all employeesn and during audit that policy there were no changes i.e. “Kebijakan Perusahaan”, dated 1st December 2014 “Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.</p> <p>This policy has been informed to all employees and being placed into noticed board in public area and easily accessed and also sosilaization</p>	Complied

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		<p>to all employees on 13 May 2023 in Aek Tarum Esatate, Gunung Melayu Mill and Batu Anam Estate.</p> <p>In the process of recruiting workers, the company already has procedures i.e. SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Requitment and Selection of Employee), Unit of Certification will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to the rights of local, migrant, or urban worker.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that Unit of Certification does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p> <p>Based on documents verification during audit, Master List of Employee on October 2023 period:</p>	
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		<p>Aek Tarum Estate</p> <table border="1"> <thead> <tr> <th>Gender</th> <th>Number of Employee</th> <th>Persetage (%)</th> <th>Religion</th> <th>Number of Employee</th> <th>Persetage (%)</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>147</td> <td>73%</td> <td>Muslim</td> <td>147</td> <td>73%</td> </tr> <tr> <td>Female</td> <td>54</td> <td>27%</td> <td>Christian</td> <td>54</td> <td>27%</td> </tr> <tr> <td>Total</td> <td>201</td> <td>100%</td> <td>Total</td> <td>201</td> <td>100%</td> </tr> </tbody> </table> <p>Batu Anam Estate</p> <table border="1"> <thead> <tr> <th>Gender</th> <th>Number of Employee</th> <th>Persetage (%)</th> <th>Religion</th> <th>Number of Employee</th> <th>Persetage (%)</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>261</td> <td>74%</td> <td>Muslim</td> <td>147</td> <td>73%</td> </tr> <tr> <td>Female</td> <td>91</td> <td>26%</td> <td>Christian</td> <td>54</td> <td>27%</td> </tr> <tr> <td>Total</td> <td>352</td> <td>100%</td> <td>Total</td> <td>201</td> <td>100%</td> </tr> </tbody> </table> <p>Gunung Melayu II Mill</p> <table border="1"> <thead> <tr> <th>Gender</th> <th>Number of Employee</th> <th>Persetage (%)</th> <th>Religion</th> <th>Number of Employee</th> <th>Persetage (%)</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>76</td> <td>96%</td> <td>Muslim</td> <td>68</td> <td>86%</td> </tr> <tr> <td>Female</td> <td>3</td> <td>4%</td> <td>Christian</td> <td>11</td> <td>14%</td> </tr> <tr> <td>Total</td> <td>79</td> <td>100%</td> <td>Total</td> <td>79</td> <td>100%</td> </tr> </tbody> </table> <p>This employee list proves that Unit of Certification does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p> <p>Based on interviews with several workers during field visits and union leaders and chief of Gender Committee, until now there have never been discriminatory practices in operations at PT Gunung Melayu.</p>	Gender	Number of Employee	Persetage (%)	Religion	Number of Employee	Persetage (%)	Male	147	73%	Muslim	147	73%	Female	54	27%	Christian	54	27%	Total	201	100%	Total	201	100%	Gender	Number of Employee	Persetage (%)	Religion	Number of Employee	Persetage (%)	Male	261	74%	Muslim	147	73%	Female	91	26%	Christian	54	27%	Total	352	100%	Total	201	100%	Gender	Number of Employee	Persetage (%)	Religion	Number of Employee	Persetage (%)	Male	76	96%	Muslim	68	86%	Female	3	4%	Christian	11	14%	Total	79	100%	Total	79	100%	
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6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>During this audit, evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated</p> <p>According to the latest employee's data as per October 2023. Those workers come from different gender, religion, originated area (local or outsiders) and races. Based on interview with labour representative (labour union, gender committee) and random workers that interviewed</p>	Complied																																																																								

		during field visit obtained information that there is no discrimination between them. Since the audit – October 2023, there was no migrant worker hired in estate or mill.	
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.	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness result. up to October 2023, unit of certification is focussed on promoting daily workers to be permanent workers. There is no new recruitment is hire in Estate and Mill. Based on promoting workers as above mentioned, the skills, capabilities, qualities and medical fitness is already tested and qualified to be promoted.	Complied
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.	Unit of certification is prohibiting pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test. Estate management has kept the record that spraying is not conducted by pregnant or breast-feeding women. Female workers is voluntary to own test for menstrual cycle and informed Polyclinic to be review by nurse and recorded in monthly basis. The lates pregnancy test was conducted on 10 October 2023 to 64 female workers.	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.	PT Gunung Melayu has formed a Gender Committee at Gunung Melayu 1 Mill, Aek tarum Esatate and Batu Anam Estate. Gender committees play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers. In 2023 Gender Committee Work Program has been established	Complied

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		<p>including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Improving maternal and child health through Posyandu (integrated service post), immunization and vitamin supplement activities. - Conduct regular gender committee meetings at least every 4 months - Provision of supplementary food (during Posyandu) - Sports activities for employees - Environmental cleanliness in residential areas - Assessment of healthy housing for employees - Religious activity <p>The regular monthly gender committee meeting was held on June 2023 which discussed the protection of the rights of women workers from Unit of Certification, the meeting was attended by 12 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit).</p> <p>Based on the records of the routine meeting and interviews with management, that during the period 2022-2023 there were no cases related to women workers regarding violence, discrimination, protection of women workers and sexual harassment.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>The determination of wages at PT Gunung Melayu is based on the Decree of the Governor of North Sumatra for the minimum wage for the 2023 period, i.e. Decree of the Governor of North Sumatra No. 188.44/1005/KPTS/2022 dated 7 December 2022 concerning the Determination of the Minimum Wage of Asahan Regency in 2023 amount IDR 3,024,300.76 per month.</p> <p>The Company, through Regional Head Plantation I, has issued Memorandum no. 023/HR-RO1/MEMO/05/2023 dated May 2, 2023 concerning Wage Increase for PHL, SKUH and SKUB Year 2023:</p> <ul style="list-style-type: none"> - PHL (temporary worker) of IDR 3,24,300 per month 	Complied

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- SKUH permanent workers get a monthly increase of IDR 30,000.
- SKUB permanent workers: wage increase based on the wage scale for the 2023 period, which is IDR 30,000 per month.

The company has also set harvest labor wages based on units of volume (Premium) as of October 2, 2023. In addition, there is also a non-harvest premium that has been set as wages for fertilization work, until fertilizer separating fertilizer to small piece, spraying and pruning.

Daftar Premi Tenaga Kerja Lapangan Plantation 1

No	Posisi/Jabatan	Berlaku saat ini	Propose 1 Des'19	Ket
A. Mandor Lapangan				
1	Mandor TUS/Semprot	Rp 12,500 - 25,000	Rp 15,000	/HKE
2	Mandor Pupuk	Rp 5,000 - 25,000	Rp 15,000	/HKE
3	Mandor Tunas	Rp 7,000 - 12,500	Rp 15,000	/HKE
4	Mandor Pemeliharaan	Rp 5,000 - 15,000	Rp 10,000	/HKE
5	Mandor Untilan	Rp 5,000 - 15,000	Rp 10,000	/HKE
6	Mandor EFB	Rp 10,000 - 25,000	Rp 10,000	/HKE
7	Mantri Hama & Penyakit (Speksi)	Rp 5,000 - 20,000	Rp 10,000	/HKE
8	Mandor Replanting (Korlap)	Rp 20,000 - 25,000	Rp 15,000	/HKE
9	Mandor bibitani	Rp 0 - 20,000	Rp 10,000	/HKE
10	Mandor Semprot EPS	Rp 0 - 20,000	Rp 15,000	/HKE
11	Mandor HPT	Rp 0 - 10,000	Rp 10,000	/HKE
12	Mandor Progeni	Rp 0 - 12,000	Rp 10,000	/HKE
B. Karyawan Lapangan				
1	Karyawan Penaburan Pemupukan	Rp 700 - 2,500	Rp 2,500	/HKE
2	Karyawan Semprot TUS	Rp 2,000 - 7,500	Rp 2,500	/HKE
3	Pengawas Water Management	Rp 10,000 - 17,000	Rp 5,000	/HKE
4	Karyawan Fogging	Rp 0 - 2,500	Rp 2,500	/HKE

- Catatan :
1. Tidak ada Premi Jaga Malam Alat Berat (Berlaku hanya HK)
 2. Tidak ada Premi Karyawan Siram Bibit (Berlaku hanya HK)
 3. Tidak ada Premi Karyawan/Operator Chain Saw (Berlaku hanya HK)
 4. Tidak ada Premi Karyawan Sortasi ke Pabrik (Berlaku hanya HK)
 5. Tidak ada Premi Karyawan Kutib Goni Brondolan (Berlaku hanya HK)

Based on the interview with the female workers (pesticide applicator and IPM census) obtain information there is no difference of the payments between the men or women workers. All are equal. Those information are aligned with the payroll document when the minimum wage are applied to all workers.

Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>Unit of certification has stated the documentation of pay and working conditions in accordance with applicable labor laws refer to Decree of North Sumatra Governor SK No. 188.44/1005/KPTS/2022 dated 7 December 2022; regarding: "<i>Penetapan Upah Minimum Kabupaten Asahan Tahun 2023</i>" amount of IDR 3,024,300.76 per month.</p> <p>The Company, through Regional Head Plantation I, has issued Memorandum no. 023/HR-RO1/MEMO/05/2023 dated May 2, 2023 concerning Wage Increase for PHL, SKUH and SKUB Year 2023:</p> <ul style="list-style-type: none"> - PHL (temporary worker) of IDR 3,024,300 per month - SKUH permanent workers get a monthly increase of IDR 30,000. - SKUB permanent workers: wage increase based on the wage scale for the 2023 period, which is IDR 30,000 per month. <p>Unit of Certification has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2022 is IDR 9,500/kg.</p> <p>Salary scale structure for the period 2023 for all level of workers has shown during audit, this structure is based on Decree of North Sumatra Governor SK No. 188.44/1005/KPTS/2022, dated 7 December 2022.</p> <p>Unit of Certification has provided a scripts/slip salary to employees, salary slip contains basic salary, allowances, premium, labor health coverage (<i>BPJS Tenaga Kerja and Kesehatan</i>) and deduction.</p> <p>Based on interview with upkeep workers in the field (lowest grade) and payment slip of some workers with lowest grade (Sardi, as upkeep worker, and Nurhamiah; female; as spraying worker), it is known that they received wage amount IDR 3,024,300 per month.</p>	Complied

		<p>Sample have taken:</p> <ol style="list-style-type: none"> 1. Payslip on October 2023 period on behalf of Muhammad Fauzan (PHL at Batu Anam Estate): for 20 workdays, basic salary: IDR 2,419,440, premiums allowance: IDR 1,104,990; deduction: BPJS Ketenagakerjaan IDR 60,486 and BPJS Kesehatan IDR 30,243 and electricity IDR 15,000, Net Salary IDR 3,418,701 2. Payslip on October 2023 period on behalf of Nanang Kurniawan (PHL at Aek tarum Estate): for 18 workdays, basic salary: IDR 2,177,496, premiums allowance: IDR 5,000; deduction: BPJS Ketenagakerjaan IDR 60,486 and BPJS Kesehatan IDR 30,243, Net Salary IDR 2,091,767 3. Payslip on September 2023 period on behalf of Hary Firmansyah (PHL at Gunung Melayu II POM): for 20 workdays, basic salary: IDR 2,419,440, premiums allowance: IDR 2,849,481; deduction: BPJS Ketenagakerjaan IDR 60,486 and BPJS Kesehatan IDR 30,243 and cooperative IDR 1,222,500, Net Salary IDR 3,925,449. <p>Based on document verification and interview with several worker at the time of field visit during audit, that the wages has been implemented according with the labour law and regulation.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>Employment contracts and related documents detailing payments and conditions of employment described in <i>the Collective Labor Agreement (PKB period 2022-2024) and the daily labour contract of the wage was presented in Bahasa Indonesia.</i></p> <p><i>Collective Labour Agreement are contain the detail of working condition among others: responsibility each parties, recognition of company and trade union rights, work relationship, workers admission and requirement, job placement and transfer, working days and working hour, overtime, weekly rest and official holidays, annual leave, menstruation leave pregnancy and pregnancy loss, prevention of sexual harassment, permission to leave work of worship and permission of</i></p>	Complied

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		<p>illness, wage component and wage system, wage increase, holiday allowance (THR), care and medication, occupational safety and health, work equipment, education, sports & entertainment facilities, school children's facilities, work rules, etc.</p> <p>Meanwhile, PHL and PKWT workers use separate work agreements. This Employment Agreement also explains related to wages, working hour, jobs and responsibility, Holiday allowances, work safety, regulations and rules regarding the despicable deeds / actions of ape workers.</p> <p>Sample taken:</p> <ul style="list-style-type: none"> - <i>Perjanjian Kerja Untuk Jangk Waktu Tertentu</i> - Employment Agreement for a Specific Period No. 429/KAT/SPK/VIII/2023 dated 1 July 2023 in the name of Suratmin (Garden Care) at Aek Tarum Estate Afdeling II, ending on 31 December 2023. - <i>Perjanjian Kerja Harian Lepas</i> - Daily Freelance Work Agreement No. 666/PKHL/KBA/09/2023 dated 27 September 2023 in the name of Rusmiana (fertilizer worker) with an agreement period of 1 year. <p>Based on the verification of the documents above, the details related to regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. are in accordance with the rules and regulations. Meanwhile, the salary slip has been verified as 6.2.1 above and is in accordance with applicable regulations and legislation.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>The Collective Labor Agreement (PKB Periode tahun 2022-2024) document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment.</p> <p>PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of</p>	Complied

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		<p>Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT GM - Gunung Melayu Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>Sighted the employment contract that has explained the period of agreement, wages and payment (IDR 3.024.300,76,- per month or IDR 120,972 per day) in accordance with the Governor's Decree on Wages in 2023 period), allowances (holidays and others), attachments related to disgraceful acts/actions; which explains related to discrimination, child labor, workers' code of ethics, no sexual harassment and coercion or force labor.</p> <p>Taken for example of the employee's annual leave filing :</p> <ul style="list-style-type: none"> - BHL/SKU/Employee Leave Application Form on behalf of Hendra S. (Driver DT 103) Batu Anam Estate, application for annual leave on November 6-7, 2023 (2 working days) and has received approval from the Estate Manager on October 5, 2023 - BHL/SKU/Employee Leave Application Form on behalf of Riswanto (Mechanic) Aek Tarum Estate, application for annual leave on November 6, 2023 (1 working day) and has received approval from the Estate Manager on October 5, 2023 <p>Based on the verification of the documents above, that the company has implemented regular working hours, deductions, overtime, sickness,</p>	
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		<p>holiday entitlement and also maternity leave in accordance with applicable labor regulations.</p> <p>Related to the implementation of Government Regulation No. 35 of 2021; regarding the provision of incentives for PKWT workers, the company has not been able to demonstrate the evidence of its application.</p> <p>Non conformity raised during audit:</p> <p>Based on Documents review and interviews with several workers and labour union head, the worker contract (PHL/PKWT work contract) does not explain PHL/PKWT compensation in accordance with Government Regulation No. 35 of 2021 [Articles 15 and 16].</p> <p>Objective evidence:</p> <ul style="list-style-type: none"> - Based on interviews with several workers and labor unions, they do not understand the PHL/PKWT compensation in accordance with PP no. 35/2021. - <i>Perjanjian Kerja Untuk Jangka Waktu Tertentu document does not explain the provision of PHL/PKWT compensation at the end of the employment agreement period. In Article IV; Compensation only explains the worker's wages/salary and income tax, for example:</i> <ol style="list-style-type: none"> 1) <i>Perjanjian Kerja Untuk Jangka Waktu Tertentu No. 429/KAT/SPK/VII/2023 dated 1 July 2023 in the name of Suratmin (Harvester) at Aek Tarum Estate. The agreement expires until 31 December 2023.</i> 2) <i>Perjanjian Kerja Harian Lepas No. 630/PKHL/KBA/09/2023 dated 1 September 2023 on behalf of Rahma Wati BR Rambe on position Sparayer/TUS at Batu Anam Estate</i> 3) <i>Perjanjian Kerja Harian Lepas No. 666/PKHL/KBA/09/2023 dated 27 September 2023 on behalf of Rusmiana on position fertilizer application worker.</i> 	
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		<p>- Peraturan Pemerintah No. 35 Tahun 2023; Bagian Ketiga; Pemberian Kompensasi [Pasal 15 & 16].</p> <p>[Pasal 15]:</p> <ol style="list-style-type: none"> (1) Pengusaha wajib memberikan uang kompensasi kepada Pekerja/Buruh yang hubungan kerjanya berdasarkan PKWT. (2) Pemberian uang kompensasi dilaksanakan pada saat berakhirnya PKWT. (3) Uang kompensasi sebagaimana dimaksud pada ayat (1) diberikan kepada Pekerja/Buruh yang telah mempunyai masa kerja paling sedikit 1 (satu) bulan secara terus menerus. (4) Apabila PKWT diperpanjang, uang kompensasi diberikan saat selesainya jangka waktu PKWT sebelum perpanjangan dan terhadap jangka waktu perpanjangan PKWT, uang kompensasi berikutnya diberikan setelah perpanjangan jangka waktu PKWT berakhir atau selesai. (5) Pemberian uang kompensasi tidak berlaku bagi tenaga kerja asing yang dipekerjakan oleh pemberi kerja dalam Hubungan Kerja berdasarkan PKWT. <p>[Pasal 16]: Besaran uang kompensasi;</p> <p>(1) Besaran uang kompensasi diberikan sesuai dengan ketentuan sebagai berikut:</p> <ol style="list-style-type: none"> a. PKWT selama 12 (dua belas) bulan secara terus menerus, diberikan sebesar 1 (satu) bulan Upah; b. PKWT selama 1 (satu) bulan atau lebih tetapi kurang dari 12 (dua belas) bulan, dihitung secara proporsional dengan perhitungan : (masa kerja/12) x 1 (satu) bulan Upah; 	
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		<p>c. <i>PKWT selama lebih dari 12 (dua belas) bulan, dihitung secara proporsional dengan perhitungan: (masa kerja/12) x 1 (satu) bulan Upah.</i></p>																	
<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>During onsite visit to workers compound at Batu Anam Estate and Gunung Melayu II POM, all workers facilities was provided by Unit of Certification free.</p> <p>The following is a list of housing and facilities in Aek Tarum Estate:</p> <table border="1" data-bbox="1131 619 1758 1018"> <thead> <tr> <th>NO</th> <th>Facilities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Mosque</td> </tr> <tr> <td>2</td> <td>Churches</td> </tr> <tr> <td>3</td> <td>TPA (Tempat Penitipan Anak)-Child Care</td> </tr> <tr> <td>4</td> <td>Clinics</td> </tr> <tr> <td>5</td> <td>Preschools</td> </tr> <tr> <td>6</td> <td>Employee housing</td> </tr> <tr> <td>7</td> <td>Electricity and clean water (Generator)</td> </tr> </tbody> </table> <p>The list of housing and facilities in Batu Anam Estate:</p>	NO	Facilities	1	Mosque	2	Churches	3	TPA (Tempat Penitipan Anak)-Child Care	4	Clinics	5	Preschools	6	Employee housing	7	Electricity and clean water (Generator)	<p>Complied</p>
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>The unit of certification is located closest to the town (only 3 km to Sei Piring traditional market). Then the workers is accessible to the market for buying affordable food.</p> <p>The Company has provided facilities and infrastructure (infrastructure and other public facilities) to meet the welfare of workers, including the provision of convenience to obtain food.</p>	Complied																																																																											
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>PT Gunung Melayu - Gunung Melayu II POM has also demonstrated the slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>PT Gunung Melayu - Gunung Melayu II POM has calculations the DLW, based on the wages given to employees as costs.</p>	Complied																																																																											

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		<p>Minimum Wages on 2023 period is based on SK Gubernur Sumatera Utara SK No. 188.44/1005/KPTS/2022 dated 7 December 2022; regarding: "Penetapan Upah Minimum Kabupaten Asahan Tahun 2023" amount of IDR 3,024,300.76 per month. The PT Gunung Melayu Group provided Decent Living Wages (DLW); total cost of kind benefit amount IDR 840,747, average monthly take home salary per worker on 2022 period amount IDR 3,028,497 and total value of prevailing wage amount IDR 3,869,244 is above the minimum wage on 2023 period of IDR 3,024,300.76.</p>	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p>In this surveillance audit, verification was carried out on the use of workers (core work) for harvesters at PT Gunung Melayu. as follows: <u>Batu Anam Estate:</u> In 2023 has been promoted for harvester PHL (temporary worker) to SKU (Permanent worker) in 3 period:</p> <ul style="list-style-type: none"> - Period I; Based on Memorandum from HR Ops. Plantation I dated 27 February 2023 No. 244/HR-RO1/MEMO/2/2023 as much as 9 Harvester. - Period II; Based on Memorandum from HR Ops. Plantation I dated 30 June 2023 No. 321/HR-RO1/MEMO/6/2023 as much as 16 Harvester. 	Complied

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		<p>- For Period III; PHL harvester promotion has been submitted to HR Ops. Plantation 1 on 23 November 2023 has 35 harvesters, although there has been no approval</p> <p>Based on employee master on November 2023, there are no Harvesters with PHL status.</p> <p><u>Aek Tarum Estate:</u></p> <p>The following are the promotions of harvesters with the status PHL (Daily worker) / PKWT (Temporary worker) in the 2023 period as many as 17 harvesters:</p> <p>Promotion of PHL/PKWT Harvester Workers</p> <p>Aek Tarum Estate</p> <p>Period in 2023</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #2e8b57; color: white;"> <th>NO</th> <th>UNIT</th> <th>EMPL. CODE</th> <th>NAMA</th> <th>Unit Kerja (Afd/Ktr/Tra ksi/WS)</th> <th>JABATAN</th> <th>TMK PHL (mm/dd/yy)</th> </tr> </thead> <tbody> <tr><td>1</td><td>KAT</td><td>00455</td><td>SURIADI</td><td>AFD-1</td><td>Harvester</td><td>1-Feb-22</td></tr> <tr><td>2</td><td>KAT</td><td>02030</td><td>NASIB LUMBAN RAJA</td><td>AFD-3</td><td>Harvester</td><td>19-Jul-22</td></tr> <tr><td>3</td><td>KAT</td><td>02050</td><td>IBRAHIM</td><td>AFD-3</td><td>Harvester</td><td>9-Aug-22</td></tr> <tr><td>4</td><td>KAT</td><td>02090</td><td>WIRANDA FIKRI</td><td>AFD-1</td><td>Harvester</td><td>13-Oct-22</td></tr> <tr><td>5</td><td>KAT</td><td>02091</td><td>AMAR ILHAM SITORUS PANE</td><td>AFD-2</td><td>Harvester</td><td>13-Oct-22</td></tr> <tr><td>6</td><td>KAT</td><td>02145</td><td>JULI HARIADI</td><td>AFD-1</td><td>Harvester</td><td>4-Mar-23</td></tr> <tr><td>7</td><td>KAT</td><td>02146</td><td>SAFI,I</td><td>AFD-3</td><td>Harvester</td><td>4-Mar-23</td></tr> <tr><td>8</td><td>KAT</td><td>02149</td><td>FADLI SIPAHUTAR</td><td>AFD-3</td><td>Harvester</td><td>24-Mar-23</td></tr> <tr><td>9</td><td>KAT</td><td>02153</td><td>SUTRISNO SITORUS</td><td>AFD-3</td><td>Harvester</td><td>3-May-23</td></tr> <tr><td>10</td><td>KAT</td><td>02154</td><td>IBNU HAJAR</td><td>AFD-2</td><td>Harvester</td><td>3-May-23</td></tr> <tr><td>11</td><td>KAT</td><td>02155</td><td>KELIWON</td><td>AFD-2</td><td>Harvester</td><td>3-May-23</td></tr> <tr><td>12</td><td>KAT</td><td>02162</td><td>RISKY PRANANDA</td><td>AFD-1</td><td>Harvester</td><td>8-May-23</td></tr> <tr><td>13</td><td>KAT</td><td>02167</td><td>TRI FADLI SYAHALAM</td><td>AFD-1</td><td>Harvester</td><td>8-May-23</td></tr> <tr><td>14</td><td>KAT</td><td>02171</td><td>IRLAMSYAH</td><td>AFD-1</td><td>Harvester</td><td>22-May-23</td></tr> <tr><td>15</td><td>KAT</td><td>02172</td><td>M. TAUFIK SURIA PRATAMA</td><td>AFD-1</td><td>Harvester</td><td>22-May-23</td></tr> <tr><td>16</td><td>KAT</td><td>02181</td><td>MISDIANTO BARUS</td><td>AFD-1</td><td>Harvester</td><td>7-Jun-23</td></tr> <tr><td>17</td><td>KAT</td><td>02182</td><td>MANAN</td><td>AFD-1</td><td>Harvester</td><td>7-Jun-23</td></tr> </tbody> </table> <p>Thus, all harvester workers with PHL/PKWT status at Aek tarum Estate have been promoted to permanent workers – SKUH. Based on the</p>	NO	UNIT	EMPL. CODE	NAMA	Unit Kerja (Afd/Ktr/Tra ksi/WS)	JABATAN	TMK PHL (mm/dd/yy)	1	KAT	00455	SURIADI	AFD-1	Harvester	1-Feb-22	2	KAT	02030	NASIB LUMBAN RAJA	AFD-3	Harvester	19-Jul-22	3	KAT	02050	IBRAHIM	AFD-3	Harvester	9-Aug-22	4	KAT	02090	WIRANDA FIKRI	AFD-1	Harvester	13-Oct-22	5	KAT	02091	AMAR ILHAM SITORUS PANE	AFD-2	Harvester	13-Oct-22	6	KAT	02145	JULI HARIADI	AFD-1	Harvester	4-Mar-23	7	KAT	02146	SAFI,I	AFD-3	Harvester	4-Mar-23	8	KAT	02149	FADLI SIPAHUTAR	AFD-3	Harvester	24-Mar-23	9	KAT	02153	SUTRISNO SITORUS	AFD-3	Harvester	3-May-23	10	KAT	02154	IBNU HAJAR	AFD-2	Harvester	3-May-23	11	KAT	02155	KELIWON	AFD-2	Harvester	3-May-23	12	KAT	02162	RISKY PRANANDA	AFD-1	Harvester	8-May-23	13	KAT	02167	TRI FADLI SYAHALAM	AFD-1	Harvester	8-May-23	14	KAT	02171	IRLAMSYAH	AFD-1	Harvester	22-May-23	15	KAT	02172	M. TAUFIK SURIA PRATAMA	AFD-1	Harvester	22-May-23	16	KAT	02181	MISDIANTO BARUS	AFD-1	Harvester	7-Jun-23	17	KAT	02182	MANAN	AFD-1	Harvester	7-Jun-23
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		<p>Employee Master for the October 2023 period, Aek Tarum Estate has no harvesters with daily worker or irregular worker status.</p> <p><u>Gunung Melayu Dua Mill:</u> The promotion of PHL/PKWT workers at Gunung Melayu Mill in the 2023 period has occurred 2 submissions, namely:</p> <ul style="list-style-type: none"> - In the January 2023 period, 10 PHL/PKWT workers were proposed. - In the October 2023 period, 14 workers were proposed to promote PHL/PKWT. - Until October 2023, there are no workers with status PHL/ status or specific time working agreement in Gunung Melayu Dua Mill. 	
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Statement recognizing freedom of association and right to collective bargaining policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1st December 2014 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i>".</p> <p>This policy has been informed to all employees and being placed into public area easily accessed.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Labour Union has regularly meet with representative of management. Minutes of meeting we available at list of attendance was sighted. The minutes were made readily available to employees upon request, e.g: Minute of Meeting dated 27 August 2023, to discuss:</p> <ul style="list-style-type: none"> - PPE replacement is proposed for 2 times a year (mill) - Day Off implementation 	Complied

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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 with sample of employees at Mill and Batu Anam Estate, informed that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers operation of registered labour organizations/unions, or other freely elected representatives for all workers.	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>Since 2014, there were no changes of company policy regarding protection of children, including prohibition of child labour and remediation is stated in parent company Policy, which was signed by Managing Director dated 1st December 2014, that stated: "It is not allowed all children to work in every activities/process in company".</p> <p>Based on document review of list of workers as per Ovctober 2023 and interview with workers during field visit, workers hired with less than 18 years old is not found at Batu Anam Estate, Aek Tarum Estate and Gunung Melayu POM.</p> <p>Sample seen during audit:</p> <p>The youngest workers at Batu ANam Estate namely Adrian Difa (Birth date 01-03-2004; Join date 01-08-2022) have age 18 years and 5 months, at Aek Tarum Estate namely Dimas Syahputra Harahap (Birth date 05-05-2003; Join date 09-08-2021) have age 18 years and 3 months and at Gunung Melayu II POM namely Darma Kurniawan (Birth date 15-07-2000; Join date 18-10-2021) have age 21 years and 3 months.</p> <p>During this surveillance audit, no new recruitment in 2023 as young workers.</p>	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	Based on document review of list of workers as per October 2023, interview with workers and observation during field visit, workers hired with less than 18 years old is not found.	Complied

		<p>Sample seen during audit:</p> <p>The youngest workers at Batu ANam Estate namely Adrian Difa (Birth date 01-03-2004; Join date 01-08-2022) have age 18 years and 5 months, at Aek Tarum Estate namely Dimas Syahputra Harahap (Birth date 05-05-2003; Join date 09-08-2021) have age 18 years and 3 months and at Gunung Melayu II POM namely Darma Kurniawan (Birth date 15-07-2000; Join date 18-10-2021) have age 21 years and 3 months.</p> <p>During this surveillance audit, no new recruitment in 2023 as young workers.</p>	
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>Based on document review of list of workers as per October 2023, interview with workers and observation during field visit, workers hired with less than 18 years old is not found.</p> <p>Sample seen during audit:</p> <p>The youngest workers at Batu ANam Estate namely Adrian Difa (Birth date 01-03-2004; Join date 01-08-2022) have age 18 years and 5 months, at Aek Tarum Estate namely Dimas Syahputra Harahap (Birth date 05-05-2003; Join date 09-08-2021) have age 18 years and 3 months and at Gunung Melayu II POM namely Darma Kurniawan (Birth date 15-07-2000; Join date 18-10-2021) have age 21 years and 3 months.</p> <p>During this surveillance audit, no new recruitment in 2023 as young workers.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>Based on interview with stakeholders gender committee and worker union leader, company has communicated no child labour policy. Interview with surrounding village communities, shows company has communicated that recruitment policy is not for worker under 18 years old.</p>	Complied

		<p>Based on document review of list of workers as per October 2023, interview with workers and observation during field visit, workers hired with less than 18 years old is not found.</p> <p>Sample seen during audit:</p> <p>The youngest workers at Batu ANam Estate namely Adrian Difa (Birth date 01-03-2004; Join date 01-08-2022) have age 18 years and 5 months, at Aek Tarum Estate namely Dimas Syahputra Harahap (Birth date 05-05-2003; Join date 09-08-2021) have age 18 years and 3 months and at Gunung Melayu II POM namely Darma Kurniawan (Birth date 15-07-2000; Join date 18-10-2021) have age 21 years and 3 months.</p>	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>There were no changes related to the harassment and violence policy i.e. Company Policy dated 1 December 2019 was signed by Kelvin Tio as Managing Director, its stated on point 15 that Prevent sexual harassment and various forms of violence against women and protect their reproductive rights.</p> <p>This company policy has socialization to all workers on May 2023.</p> <p>PT Gunung Melayu - Gunung Melayu II POM has implemented policy on prevention of sexual harassment and violence, the policy is prominently displayed on notice boards at the Mill and Estates muster areas.</p> <p>Based on interviews of female workers and union representatives confirmed that the company implemented the sexual harassment policy. (which is the latest circular letter to complement previous circulars).</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>There were no changes related to the harassment and violence policy i.e. Company Policy dated 1 December 2019 was signed by Kelvin Tio as Managing Director, its stated on point 15 that Prevent sexual harassment and various forms of violence against women and protect their reproductive rights.</p>	Complied

		<p>This company policy has socialization to all workers on May 2023.</p> <p>PT Gunung Melayu - Gunung Melayu II POM has implemented policy on prevention of sexual harassment and violence, the policy is prominently displayed on notice boards at the Mill and Estates muster areas.</p> <p>Based on interviews of female workers and union representatives confirmed that the company implemented the sexual harassment policy. (which is the latest circular letter to complement previous circulars).</p> <p>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides.</p> <p>The company routinely carries out pregnancy checks on female workers, the latest pregnancy test was conducted on 10 October 2023 to 64 female workers.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>The company has conducted a consultation and survey of the needs of new mothers conducted by medical personnel (clinic doctors; dr. Wira Ranata Geronde) and paramedics in the period August – September 2023. The survey was conducted on 31 new and lactating mothers out of 39 new and pregnant and lactating mothers. From the results of the survey, it was concluded that the needs of new mothers giving birth and breastfeeding are:</p>	Complied

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		<ul style="list-style-type: none"> - There is a nursing mother room; The company has provided a room for breastfeeding mothers in the garden clinic (Pojok ASI at Estate Clinic). - Give time/permission to breastfeeding mothers to breastfeed their children. The company has set a policy to provide 1 hour of breastfeeding time in the breastfeeding room. - The need for nutritious food; The Company has facilitated an Employee Cooperative that provides the nutritional needs of breastfeeding mothers. - Health needs for both mother and child. The company has collaborated with Batu Anam Village Health Center with Kebun Clinic to organize Posyandi every month. - Health insurance for mothers and children. The company has registered all its employees to become members of BPJS Kesehatan. <p>Sample taken of questionnaire:</p> <ul style="list-style-type: none"> - Kuesioner Identifikasi Kebutuhan Ibu Menyusui dated 6 August 2023 namely Ibu Suriani (36 YO) as fertilizer application worker. - Kuesioner Identifikasi Kebutuhan Ibu Menyusui dated 6 August 2023 namely Ibu Hasanah (32 YO) as child care officer. - Kuesioner Identifikasi Kebutuhan Ibu Menyusui dated 10 September 2023 namely Ibu Ratna Sari Dewi (30 YO) as administration at Aek tarum Estate. - Kuesioner Identifikasi Kebutuhan Ibu Menyusui dated 10 September 2023 namely Ibu Anipah (30 YO) as child care officer. 	
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.	PT Gunung Melayu - Gunung Melayu II POM has prepared "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" prepared by Public Relation officer PT. Gunung Melayu on 01/12/2015. The mechanism has explained policy to protect complainant/whistle blower anonymity – if requested.	Complied

		<p>"<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (No. SOP-AA-GL-5005- R0 01) is documented procedure to response complaint from external party. For internal, the mechanism described under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (No. SOP-AAHR-3008- R0 05).</p> <p>These mechanisms have been communicated to external parties and disseminated to all employees.</p> <p>Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company including anonymity policy.</p> <p>In the 2023 period, there were complaints from local NGOs on behalf of LKLH (Lembaga Konservasi Lingkungan Hidup Medan) regarding conservation areas. This complaint/complaint/grievance has been acted upon and has been declared over by both parties (Company and NGO LKLH).</p> <p>This has been conveyed, please see indicator 4.2.3 above.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement 	<p>PT Gunung Melayu - Gunung Melayu II POM has employee recruitment and selection procedures (SOP-AA-HR-305-7-RO); regarding <i>Seleksi, Penerimaan dan Pengangkatan Tenaga Kerja Non Staff</i> effective since 14 September 2021 and the Memorandum No. 085/EXT-PGM/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Gunung Melayu - Gunung Melayu II POM where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators)</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • Debt bondage • Withholding of wages 	<p>are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.</p> <p>Based on those procedure, there is no specific request to bonding the employee (especially the new employee).</p> <p>Based on interview with sample of 8 workers at Batu Anam Estate, Aek Tarum Estate and labour union head, stated that the unit of certification does not practice such thing as follows:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>PT Gunung Melayu - Gunung Melayu II POM has employee recruitment and selection procedures (SOP-AA-HR-305-7-RO); regarding <i>Seleksi, Penerimaan dan Pengangkatan Tenaga Kerja Non Staff</i> effective since 14 September 2021 and the Memorandum No. 085/EXT-PGM/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Gunung Melayu - Gunung Melayu II POM; where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators) are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.</p> <p>Based on Memorandum document verification from HR Dept. In HO Medan in the 2023 period, there are several PHL/PKWT – Specific Time</p>	Complied

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		Working Agreement workers who have been promoted to become SKUH (permanent workers), please see 6.2.7 above.	
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.	<p>PT Gunung Melayu – Gunung Melayu II POM and Estate has appointed the responsible person) for H&S is identified as per P2K3 (Safety Committee Meeting). P2K3 has an approval from Manpower and Transmigration Office.</p> <p><u>Gunung Melayu II POM</u></p> <p>P2K3 Gunung Melayu II POM has been formed and updated in 2023 and has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat Keputusan Kepala Dinas Ketenagakerjaan Provinsi Sumatera Utara Nomor: 500.15.18/485-7/DISNAKER/XI/2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Gunung Melayu – PMKS Gunung Melayu Dua (PGD)" dated 15 November 2023. Head of P2K3 was Mill Manager Norton Sitorus. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Brian R K Tarigan has a license from Ministry of Manpower and certificate number 5/5847/AS.02.04/IX/2021.</p> <p><u>Batu Anam Estate</u></p> <p>P2K3 Batu Anam Estate has been formed and updated in 2023 and has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Nomor: KEP.185-7/P2K3/WIL-IV/DTK/SU/2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan" dated 10 July 2023. Head of P2K3 was Esatate Manager Dompok Manurung. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Hans Pangaribuan has a license from Ministry of Manpower according to "Keputusan Menteri Ketenagakerjaan Republik Indonesia Nomor 5/19593/AS.01.03/XII/2022 Tentang Penunjukan Ahli K3 Umum Menteri</p>	Complied

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		<p>Ketenagakerjaan Republik Indonesia” dated 16 December 2022 valid untuil 3 years.</p> <p><u>Aek Tarum Estate</u></p> <p>P2K3 Aek Tarum Estate has been formed and has an endorsement/approval from Manpower Office Sumatera Utara Province according to Surat keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga Kerja Provinsi Sumatera Utara Nomor : KEP.184-7/P2K3/WIL-IV/DTK/SU/2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan” dated 10 July 2023. Head of P2K3 was estate manager Henrik F. Ambaruta. Safety Officer or “Ahli K3 Umum” OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Daniel Pernando Sinulingga has a license from Ministry of Manpower according to “Keputusan Menteri Ketenagakerjaan RI Nomor 5/477/AS.01.03/I/2023 Tentang Penunjukan Ahli K3 Umum Menteri Ketenagakerjaan RI” dated 31 January 2023, valid until 3 years.</p> <p>Concerns of all parties about health, safety and welfare are discussed at P2K3 meetings which is conducted monthly. Sample seen on P2K3 meeting period Q3 dated 27/07/2023, 26/09/2023, and 25 August 2023. Any issues raised during meeting are recorded in Minutes of P2K3 meetings. Record of meeting also attached in the report of P2K3 Q3 year 2023 and submitted to Manpower office of Asahan Regency dated 16/10 2023. Receipt of P2K3 meeting report available in “Daftar Distribusi Eksternal”.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Unit of certification has prepared the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> – Nomor AA-KL-11-EFP tentang Penangan Tumpahan di Laboratorium – Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan 	Complied

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		<ul style="list-style-type: none"> - Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 - Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya - Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor - Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap - PT Saudara Sejati Luhur – Gunung Melayu II POM has also prepared the procedure on work accident under "Standard Operasioanal Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018. <p>Those procedures have socialized and available in notice board in site, during interviewed with workers, it was seen that they understood. Emergency call phone also is available in all site operation. All procedure written in Bahasa Indonesia.</p> <p>During the audit, sighted that all the first aid kit in estate and mill has been comply with the national regulation (21 items and no expired items).</p> <p>Record of all accident are kept by Safety officer and paramedic in clinic and review monthly by P2K3 meeting; sample verified for minutes of meeting P2K3 period January – September 2023; sample seen on minutes of P2K3 meeting Batu Anam Estate dated 26/09/2021. Safety performance and P2K3 activity are reported each quarter to Manpower office of Sumatera Utara; sample seen P2K3 report Q3 (July - September) 2023 Aek Tarum Estate, Batu Anam Estate and Gunung Melayu II POM has been reported on 16/10/2023. Evidence of report submission can be shown in "Daftar Distribusi Eksternal".</p>	
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<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>During the onsite audit, the auditor team notes that the workers in mill and estate has used appropriate PPE refer to the HIRADC in each station. All the PPE distributed are for free. Sample seen:</p> <ul style="list-style-type: none"> • Loading ramp operator provide with safety boot, hand glove and mask. • Sterilizer station operator provide with safety shoes, hand gloves, mask, safety glasses and ear plug. • Boiler operators provide with ear plug, mask, hand gloves, safety shoes and safety glasses. • Engine room operator provide with safety shoes, hand gloves, earmuff and mask. • Welder provides with safety shoes, hand gloves, apron, and safety goggles dedicated for welder. • Harvester in estate provide with helm, safety goggles and safety boots. Along with their harvesting equipment is chisel cover to avoid the accident during moving to another harvesting plot. • Chemical weeding applicator provide with safety boots, mask, hand gloves, safety goggles and apron. They also provided with dedicated uniform for chemical weeding applicator. <p>PT Gunung Melayu is provided appropriate personal protective equipment (PPE) 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. Evidence of PPE provision and handover to workers can be shown during audit in " <i>Tanda Terima APD</i>". During field visit and interview to Gunung melayu II POM and Estate it was sighted that all workers has use appropriate PPE during working and they explained that PPE is provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE.</p>	<p>Complied</p>
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		<p>PPE usage monitoring conducted with General mill inspection "Form AA-SOP-HSE-10B" and General Estate inspection "Form AA-SOP-HSE-10A" which is conducted monthly. Sample seen for General Mill Inspection dated 28/10/2023, General Estate inspection Batu Anam Estate dated 26/10/2023 and General Estate inspection Aek tarum Estate dated 31/10/2023.</p> <p>Unit of certification also provide rinse and wash station namely 'rumah bilas' for chemical applicator (weeding and manuring). As explained by the chemical applicators team and manuring team during field visit, auditor team noted that all chemical workers shall change their clothes with the uniform in 'rumah bilas' before started to work. And after work, all of them, including field supervisor shall back to the 'rumah bilas' to take a shower, changing their clothes and washing their PPE and uniform before back home. Meaning that all workers must be cleaned when they back home to minimize the residual risk of pesticide.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan).</p> <p>The insurances were still valid as seen by the recent slip payment in January – October 2023 for estate and mill.</p> <p>Several insurance payments are reviewed and are in accordance with the number of workers. For example, auditor has verified the BPJS Ketenagakerjaan (Accident and pension insurance) and Kesehatan receipt of payments period of October 2023 for total of 567 workers of Batu Anam Estate, 400 workers of Aek Tarum Estate and 93 workers of Gunung Melayu II POM. Evidence of BPJS payment are recorded in "Rincian Pemnayaran BPJS Ketenagakerjaan" and "Rincian Pembayaran BPJS Kesehatan".</p> <p>Based on interview with sampled worker during the field visit in estate and mill, the affected workers received appropriate medical treatment from the insurance policy.</p>	Complied

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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Gunung melayu – Gunung Melayu II POM EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury. The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: Report of P2K3 period Jan – Jun 2023.</p> <p>Unit of certification has shown the record of injuries using lost time accident (LTA) metrics as in “Rekapitulasi Kejadian Kecelakaan Kerja PT Gunung Melayu – LTA” 2023 ytd October 2023. According to accident report and LTA Metric it was noted that there is no accident in Gunung Melayu II POM since January – October 2023; in Batu Anam Estate there were 22 case of accident (consist of 15 cases of minor injuries and 7 cases of first aid) with Lost Time Injuries 18 hours; in Aek Tarum Estate there were 84 cases of accident (consist of 35 cases of minor injuries and 49 cases of first aid) with lost time injuries 535 hours.</p> <p>All the accidents have followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records.</p>	Complied
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Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	The company has a program for integrated pest control. 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.	Complied
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		<p>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.</p> <p>The following are several monitoring records of census attacks and biological control for several units, including:</p> <ul style="list-style-type: none"> - Recapitulation of the results of the Leaf-Eating Pest Census for the October Period in Batu Anam Estate, it is known that there were no pest attacks. - Recapitulation of the results of the Leaf-Eating Pest Census for the October Period in Aek Tarum Estate, it is known that there were no pest attacks. - Counting record of rat and tirataba attacks for the September 2023 period at Aek Tarum Estate revealed that there were no rat and tirataba attacks. - Counting record of rat and tirataba attacks for the period October 2023 at Batu Anam Estate revealed that there were no rat and tirataba attacks. - The results of the Ganoderma attack census in Batu Anam Estate for the September 2023 period showed 516 infected trees in Afdeling I. The company took follow-up action by dismantling and chipping all the affected trees. 	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p>	<p>The company does not plant or maintain useful plants that include into the invasive category in accordance with Minister of Environment Regulation No. 96/2016 about Invasive Types.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p>	<p>Based on the results of document reviews and also field observations in Aek Tarum and Batu Anam Estate, it is known that there was no use of fire in controlling pesticides. This is in line with the results of public consultation with the District Agriculture Service of Asahan Regency,</p>	Complied

		that the local community did not find or see the company using fire to control pests.																						
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the 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.	<p>The company shows records of the list of pesticides used along with justification for their use, consisting of herbicides, insecticides, fungicides, acaricides and rodenticides. Following is some information on the pesticide brands used by the company:</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Active Ingredients</th> <th>Justification</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480 EC</td> <td>Trychlopyr: 480 gr/ltr</td> <td>Herbicide</td> </tr> <tr> <td>Kenrane 288 EC</td> <td>trifluroksipir-1 Metil heptil ester: 288 gr/ltr</td> <td>Herbicide</td> </tr> <tr> <td>Solusi</td> <td>Amonium Glufosiat</td> <td>Herbicide</td> </tr> <tr> <td>Glufo</td> <td>Amonium Glufosiat</td> <td>Herbicide</td> </tr> <tr> <td>Gulmaron 80 WP</td> <td>Diuron</td> <td>Herbicide</td> </tr> <tr> <td>Supremo</td> <td>Isopropil Amina Glifosat</td> <td>Herbicide</td> </tr> </tbody> </table> <p>The results of field observation on Batu Anam 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.</p>	Name	Active Ingredients	Justification	Kenlon 480 EC	Trychlopyr: 480 gr/ltr	Herbicide	Kenrane 288 EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Herbicide	Solusi	Amonium Glufosiat	Herbicide	Glufo	Amonium Glufosiat	Herbicide	Gulmaron 80 WP	Diuron	Herbicide	Supremo	Isopropil Amina Glifosat	Herbicide	Complied
Name	Active Ingredients	Justification																						
Kenlon 480 EC	Trychlopyr: 480 gr/ltr	Herbicide																						
Kenrane 288 EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Herbicide																						
Solusi	Amonium Glufosiat	Herbicide																						
Glufo	Amonium Glufosiat	Herbicide																						
Gulmaron 80 WP	Diuron	Herbicide																						
Supremo	Isopropil Amina Glifosat	Herbicide																						
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.	<p>The company has records related to pesticide use in the document "Quantity of Hazardous Chemical Period 2023". In this document, the company records pesticide use starting from total solution use, total active ingredients, total active ingredients per area and total active ingredients per production. Here are some recording notes for several sample units:</p>	Complied																					

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		<p>Aek Tarum Estate</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Total Application</th> <th>Total Ingridient</th> <th>Active</th> <th>Total Application</th> <th>Area</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480 EC</td> <td>72.20</td> <td>29</td> <td></td> <td>835 ha</td> <td></td> </tr> <tr> <td>Glufu</td> <td>5.10</td> <td>4.41</td> <td></td> <td>340 ha</td> <td></td> </tr> <tr> <td>Gulmaron 80 WP</td> <td>25.00</td> <td>21.63</td> <td></td> <td>5,265 ha</td> <td></td> </tr> <tr> <td>Supremo</td> <td>1,674.30</td> <td>1,448.26</td> <td></td> <td>7,010 ha</td> <td></td> </tr> </tbody> </table> <p>Batu Anam Estate</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Total Application</th> <th>Total Ingridient</th> <th>Active</th> <th>Total Application</th> <th>Area</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480 EC</td> <td>298</td> <td>119</td> <td></td> <td>1,260 ha</td> <td></td> </tr> <tr> <td>Glufu</td> <td>496</td> <td>429</td> <td></td> <td>1,200 ha</td> <td></td> </tr> <tr> <td>Supremo</td> <td>2,067</td> <td>1,788</td> <td></td> <td>7,539 ha</td> <td></td> </tr> </tbody> </table> <p>The document for each estate describes the type of pesticide, the active ingredient, LD50, active ingredient content, amount of pesticide used, area of pesticide use, and pesticide use per hectare.</p>	Name	Total Application	Total Ingridient	Active	Total Application	Area	Kenlon 480 EC	72.20	29		835 ha		Glufu	5.10	4.41		340 ha		Gulmaron 80 WP	25.00	21.63		5,265 ha		Supremo	1,674.30	1,448.26		7,010 ha		Name	Total Application	Total Ingridient	Active	Total Application	Area	Kenlon 480 EC	298	119		1,260 ha		Glufu	496	429		1,200 ha		Supremo	2,067	1,788		7,539 ha		
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<p>7.2.3</p>	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>The company shows evidence of a reduction in pesticide use for each unit each year. Here are some examples:</p> <p>Aek Tarum Estate</p> <table border="1"> <thead> <tr> <th>Pestiside Name</th> <th>2022 (ltr)</th> <th>2023 (ltr)</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480 EC</td> <td>170.30</td> <td>72.20</td> </tr> <tr> <td>Glufu</td> <td>40.80</td> <td>5.10</td> </tr> </tbody> </table>	Pestiside Name	2022 (ltr)	2023 (ltr)	Kenlon 480 EC	170.30	72.20	Glufu	40.80	5.10	<p>Complied</p>																																													
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Pesticide Name	2022 (ltr)	2023 (ltr)										
Kenlon 480 EC	524.68	298										
Supremo	3,106.52	2,067										
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p>	<p>In the context of integrated pest control, the company has related procedures in:</p> <ul style="list-style-type: none"> - SOP Weed Control (AA-APM-OP-1100.08-R6) - SOP Pest and Disease Control (AA-APM-OP-1100.10-R8) - SOP for Pesticides and Their Management (AA-APM-OP-1100.11-R1) <p>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).</p> <p>The use of pesticides is always based on the needs and field conditions. Based on the results of field observation and interviews with spraying workers, workers explained that spraying was carried out selectively.</p>	Complied									
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p>	<p>In line with the explanation in indicator 7.2.1, the company shows a recorded list of pesticides used in operational areas, as follows:</p> <table border="1" data-bbox="1133 1281 1971 1372"> <thead> <tr> <th>Name</th> <th>Active Ingredients</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480 EC</td> <td>Trychlopyr: 480 gr/ltr</td> <td>II</td> </tr> </tbody> </table>	Name	Active Ingredients	Class	Kenlon 480 EC	Trychlopyr: 480 gr/ltr	II	Complied			
Name	Active Ingredients	Class										
Kenlon 480 EC	Trychlopyr: 480 gr/ltr	II										

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<p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<table border="1"> <tr> <td>Kenrane 288 EC</td> <td>trifluorokspir-1 Metil heptil ester: 288 gr/ltr</td> <td>Pesticides unlikely to present hazard in normal use</td> </tr> <tr> <td>Solusi</td> <td>Amonium Glufosiat</td> <td>II</td> </tr> <tr> <td>Glufo</td> <td>Amonium Glufosiat</td> <td>II</td> </tr> <tr> <td>Gulmaron 80 WP</td> <td>Diuron</td> <td>III</td> </tr> <tr> <td>Supremo</td> <td>Isopropil Amina Glifosat</td> <td>III</td> </tr> </table>	Kenrane 288 EC	trifluorokspir-1 Metil heptil ester: 288 gr/ltr	Pesticides unlikely to present hazard in normal use	Solusi	Amonium Glufosiat	II	Glufo	Amonium Glufosiat	II	Gulmaron 80 WP	Diuron	III	Supremo	Isopropil Amina Glifosat	III	<p>Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.</p>	
	Kenrane 288 EC	trifluorokspir-1 Metil heptil ester: 288 gr/ltr	Pesticides unlikely to present hazard in normal use															
	Solusi	Amonium Glufosiat	II															
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Supremo	Isopropil Amina Glifosat	III																
<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>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</p>																	
<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>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</p>																	
<p>7.2.5d Process to limit the negative impacts of the application.</p>	<p>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</p>																	
<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>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</p>																	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion</p>	<p>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 applied to field. In addition, based on the review of documents and records of pesticide</p>	<p>Complied</p>															

	3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	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.	<p>The company has procedures related to pesticide management in the Pesticides and Management SOP (AA-APM-OP-1100.11-R1). The procedure informs the following things:</p> <ul style="list-style-type: none"> - Classification of pesticides based on target, chemical properties and mode of action. - Safety instructions for using pesticides. - Pregnant and breastfeeding women are prohibited from applying pesticides. - Empty pesticide packaging must be returned to the warehouse and then sent to hazardous waste temporary storage. - Pesticides must be stored in a special place and separately according to their respective groups. - First aid for pesticide poisoning - Occupational safety and health equipment. <p>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.</p>	Complied
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.	From the results of field visit in housing area at Batu Anam Estate, it was found that there were no traces of chemical packaging used as water reservoirs or other housing activities. From the results of documents review, in the form of waste manifests and Hazardous Waste Processing Data for washing log book and management purposes, it is	Complied

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		used as a water container for spray activities. Based on interviews with employees and the foreman of pesticide application Muara Wahau Estate, it is known that all pesticide packaging is collected at the designated storage area and the company coordinates with collectors to recycle and not be used for purposes other than pesticide application activities.	
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.	Based on the results of document reviews and also field observations in Batu Anam and Aek tarum 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 of Asahan Regency that the local community did not find or see the company applying air spraying.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	The certification unit regularly have a medical examination for manuring and pesticide operator. Aek Tarum and Batu Anam has a list of the latest pesticide operator as many as 62 (KAT) and 85 (KBA) workers. All manuring and pesticide operator has examined health through inspection types of medical checkup and cholinesterase, to ascertain the condition of workers in good health. Auditor conduct interviews with spraying workers in Batu Anam Estate and they admit that they have not been exposed to skin disease and itches because they always use PPE while working.	Complied
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.	Based on field observation and interview with pesticide operator in Batu Anam & Aek Tarum Estate, known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.	Complied
Note For 7.2.11			

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

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

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>	<p>A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020. The document covered all operation in mill, estate PT Gunung Melayu - Gunung Melayu II POM and Batu Anam Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Gunung Melayu - Gunung Melayu II POM has prepared a procedure to handle waste:</p> <ul style="list-style-type: none"> - For hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP dated 22 April 2016 explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter. - Procedure for non hazardous waste "SOP Penanganan Sampah Industri Non B3 Dokumen No.AA-KL-05-EFP" dated 1 February 2008. - Procedure for medical waste "SOP Penanganan Limbah Medis Dokumen No. AA-KL-07-EFP" dated 5 April 2017. The procedure stated medical waste treated as hazardous waste. <p>Procedure for laboratory waste "SOP Penanganan Limbah Laboratorium Dokumen No.AA-KL-11-EFP" dated 15 November 2008. The procedure stated waste from mill laboratory treated as hazardous waste.</p> <p>The company has 2 permits for hazardous waste storage, namely:</p> <ol style="list-style-type: none"> 1. The company has a temporary storage permit for hazardous waste (TPS LB3) for POM based on the Asahan Regent Decree number: 	Complied
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		<p>503/LB3/DPMPSTSP/0001/II/2018 concerning the granting of a temporary storage permit for hazardous waste (TPS LB3) to PT Gunung Melayu PMKS Gunung Melayu II, on 23 February 2018 and is valid for 5 years until 23 February 2023. Hazardous waste that is permitted to be stored in TPS LB3 are used lubricants, used accu, used oil filters, used diesel filters, used gloves, used lamps, medical waste, used chemical containers, used electrical tools and paint cans. However, the company has shown its extension progress by sending a request for technical recommendation for TPS LB3 PT Gunung Melayu - PMKS GM.II to the Asahan Regency Environment Agency on 9 September 2023. And until this audit took place, there has been no reply from the relevant Office.</p> <p>2. The company has a temporary storage permit for hazardous waste (TPS LB3) for the Plantation based on the Asahan Regent Decree number: 503/LB3/DPMPSTSP/0010/X/2019 concerning the granting of temporary storage permit for hazardous waste to PT Gunung Melayu - Kebun Gunung Melayu II, on 7 October 2019 and is valid for 5 years until 7 October 2024. Hazardous waste that is permitted to be stored in TPS LB3 is Used Lubricants, used accu, used oil filters, diesel filters, used gloves, used lamps, medical waste, used chemical containers, used electrical tools and paint cans.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Company carried out waste management following the procedures.</p> <ul style="list-style-type: none"> - Fibre and kernel shell used as boiler fuel. - POME used in the land application as organic fertilizer. - Hazardous waste has been stored in licensed storage and disposed of using licensed transporter. PT Gunung Melayu II using licensed transporter PT. Hazmat Techno Indonesia, permit for transporting hazardous waste "Izin Pengangkutan No.SK.00107/AJ.309/1/DJPD/2018". <p>Record of hazardous waste disposal, in form of manifest:</p>	Complied

		<p>POM</p> <ul style="list-style-type: none"> - Manifest for electronic waste; Volume: 0.042 Ton, No. KLHK-1695315929; transporter PT Hazmat Techno Indonesia on 07 July 2023. - Manifest for used lamp waste; Volume: 0.015 Ton, No. KLHK-1695315853; transporter PT Hazmat Techno Indonesia on 07 July 2023. - Manifest for used oil waste; Volume: 0.04 Ton, No. KLHK-1695288425; transporter PT Hazmat Techno Indonesia on 07 July 2023. - Manifest for used rags waste; Volume: 0.039 Ton, No. KLHK-1697437828; transporter PT Hazmat Techno Indonesia on 07 July 2023. - Manifest for used chemical container waste; Volume: 0.042 Ton, No. KLHK-1695116771; transporter PT Hazmat Techno Indonesia on 07 July 2023. <p>Estate (plantation)</p> <ul style="list-style-type: none"> - Manifest for used battery waste; Volume: 0.228 Ton, No. KLHK-1695364440; transporter PT Hazmat Techno Indonesia on 07 July 2023. - Manifest for medical waste; Volume: 0.001 Ton, No. KLHK-1663457874; transporter PT Hazmat Techno Indonesia on 28 July 2023. - Manifest for used oil waste; Volume: 1.62 Ton, No. KLHK-1695364505; transporter PT Hazmat Techno Indonesia on 07 July 2023. - Manifest for used rags waste; Volume: 0.285 Ton, No. KLHK-1695363789; transporter PT Hazmat Techno Indonesia on 07 July 2023. 	
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		<p>- Manifest for used chemical container waste; Volume: 0.102 Ton, No. KLHK-1695364082; transporter PT Hazmat Techno Indonesia on 07 July 2023.</p> <p>The company has shown evidence of sending liquid waste and solid waste reports to the Asahan Regency Environment and Forestry Service on a quarterly basis, the last reporting was done on 8 November 2023.</p> <p>The company has shown evidence of sending hazardous waste reports for POM and Estate to the Asahan Regency Environment and Forestry Service on a quarterly basis, the last reporting was done on 8 November 2023.</p> <p>In addition, to manage domestic waste from employee housing, the company has managed by providing waste bins in the housing and providing waste pickers from the housing to the final landfill in a location far from the housing.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	Based on the results of field visits to the Batu Anam Plantation housing, Aek Tarum Plantation and at other operational locations that were sampled, no traces of open or closed burning of waste were found, besides that the hazardous waste produced has been collected in the temporary storage of hazardous waste from the plantation and mill and then handed over to the third party hazardous waste transporters and collectors who have a permit, namely PT Hazmat Techno Indonesia.	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>In order to practice the best management of oil palm plants, the company has procedure and guidelines which are contained in the following procedures:</p> <ul style="list-style-type: none"> - AA-APM-OP-1100.01.R5 <i>Pembibitan</i> - AA-APM-OP-1100.02.R3 <i>Persiapan Lahan</i> 	Complied

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		<ul style="list-style-type: none"> - AA-APM-OP-1100.03.R2 <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> - AA-APM-OP-1100.04.R3 <i>Pembuatan dan Pemeliharaan Parit</i> - AA-APM-OP-1100.05.R3 <i>Konservasi Tanah Air</i> - AA-APM-OP-1100.06.R5 <i>Menanam Kacangan</i> - AA-APM-OP-1100.07.R6 <i>Menanam Kelapa Sawit</i> - AA-APM-OP-1100.08.R6 <i>Pengendalian gulma</i> - AA-APM-OP-1100.09.R8 <i>Pemupukan</i> - AA-APM-OP-1100.10.R10 <i>Pengendalian HPT</i> - AA-APM-OP-1100.11.R1 <i>Pestisida dan Pengolahannya</i> - AA-APM-OP-1100.12.R4 <i>Kastrasi</i> - AA-APM-OP-1100.13.R3 <i>Tunas Pokok</i> - AA-APM-OP-1100.14.R3 <i>Sensus dan Identifikasi Pokok</i> - AA-APM-OP-1100.15.R2 <i>Sensus Produksi</i> - AA-APM-OP-1100.16.R1 <i>Konsolidasi Pokok Tumbang</i> - AA-APM-OP-1100.17.R1 <i>Pengelolaan Air</i> - AA-APM-OP-1100.18.R3 <i>Potong Buah</i> - AA-APM-OP-1100.19.R1 <i>Pengelolaan Transport</i> - AA-APM-OP-1100.20.R8 <i>Peremajaan (Replanting)</i> - AA-APM-OP-1100.21.R2 <i>Riparian</i> - AA-APM-OP-1100.22.R0 <i>Pengelolaan Areal Nilai Konservasi Tinggi (NKT).</i> <p>The scope of fertilizing activities in the SOP covers all activities related to fertilizing oil palms in nurseries, Immature Producing Plants and Producing Plants both inorganic fertilizing and by oil palm products based on the results of soil and leaf analysis.</p>	
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7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p>	<p>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 each estate:</p> <ul style="list-style-type: none"> - Records of leaf testing at Aek Tarum Estate carried out on 14 April 2023 by PT Nusa Pusaka Kencana Analytical & QC Laboratory with Ref. Order 44/LSU-AGR/04/2023 with a total of 20 leaf samples . For example, in the leaf sample for block B09a, the test results showed a Ash 11.68%; N 2.40%; P 0.153%; K 1.02%; Mg 0.21%. - Records of leaf testing at Batu Anam Estate carried out on 28 March 2023 by PT Nusa Pusaka Kencana Analytical & QC Laboratory with Ref. Order 22/LSU-AGR/03/2023 with a total of 20 leaf samples . For example, in the leaf sample for block E04d, the test results showed a Ash 12.90%; N 2.27%; P 0.132%; K 0.88%; Mg 0.16%. <p>In addition, there are also soil analysis records for each company unit, for example Records of soil testing at Batu Anam Estate carried out on 25 October 2018 by Research and Development Asian Agri Group in the 3-sample location. Here's the detail:</p> <ul style="list-style-type: none"> - Block H08v with depth 0-15 cm with: N 0.18%; C 1.34%; P 1280.89 ppm; Class texture Sandy Clay Loam. - Block E04d with depth 77-140 cm with: N 0.02%; C 0.10%; P 37.49 ppm; Class texture Sandy Clay Loam. - Block G03b with depth 15-35 cm with: N 0.10%; C 0.79%; P 142.17 ppm; Class texture Sandy Clay Loam. 	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>The company has procedures and policies regarding the use of organic fertilizer in Procedure AA-APM-OP-1100.09.R8. This procedure explains the technicalities related to organic fertilization such as the application of EFB, Ash, Solid Decanter, compost, and Palm Oil Effluent. This procedure contains application techniques starting from dosage,</p>	Complied

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		<p>application method, occupational health and safety equipment and recording.</p> <p>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:</p> <ul style="list-style-type: none"> - Record of Actual EFB utilization (todate October 2023) on Batu Anam Estate Block F08c as amount as 453 MT with recommendation is 530 MT. - Record of Actual EFB utilization (todate October 2023) on Batu Anam Estate Block F11f as amount as 131 MT with recommendation is 987 MT. 																																				
7.4.4	Records of fertilizer inputs are maintained.	<p>The company has records of fertilizer use in the 2023 Fertilizer Recommendations document. Below are some samples of fertilizer use records for several units:</p> <p>Batu Anam Estate</p> <table border="1" data-bbox="1131 903 1912 1166"> <thead> <tr> <th>Division</th> <th>Date</th> <th>Planting Year</th> <th>Type</th> <th>Amount (kg)</th> </tr> </thead> <tbody> <tr> <td>I</td> <td>September</td> <td>2008</td> <td>Urea</td> <td>71,443</td> </tr> <tr> <td>II</td> <td>September</td> <td>2009</td> <td>Urea</td> <td>24,590</td> </tr> <tr> <td>III</td> <td>July</td> <td>2011</td> <td>RP</td> <td>38,037</td> </tr> <tr> <td>IV</td> <td>May</td> <td>2003</td> <td>MOP</td> <td>29,296</td> </tr> </tbody> </table> <p>Aek Tarum Estate</p> <table border="1" data-bbox="1131 1257 1912 1375"> <thead> <tr> <th>Division</th> <th>Date</th> <th>Planting Year</th> <th>Type</th> <th>Amount (kg)</th> </tr> </thead> <tbody> <tr> <td>I</td> <td>October</td> <td>2010</td> <td>ZA</td> <td>45,754</td> </tr> </tbody> </table>	Division	Date	Planting Year	Type	Amount (kg)	I	September	2008	Urea	71,443	II	September	2009	Urea	24,590	III	July	2011	RP	38,037	IV	May	2003	MOP	29,296	Division	Date	Planting Year	Type	Amount (kg)	I	October	2010	ZA	45,754	Complied
Division	Date	Planting Year	Type	Amount (kg)																																		
I	September	2008	Urea	71,443																																		
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IV	May	2003	MOP	29,296																																		
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I	October	2010	ZA	45,754																																		

		<table border="1" data-bbox="1131 363 1915 502"> <tr> <td>II</td> <td>October</td> <td>2009</td> <td>HGFB</td> <td>3,740</td> </tr> <tr> <td>III</td> <td>October</td> <td>2009</td> <td>Urea</td> <td>39,533</td> </tr> <tr> <td>III</td> <td>October</td> <td>2015</td> <td>Urea</td> <td>10,162</td> </tr> </table> <p>Based on the review of fertilization realization documents, it was concluded that the fertilization realization was appropriate based on the fertilizer recommendations set.</p> <p>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.</p> <p>Based on the results of field observations of fertilization at Batu Anam Estate, it is known that workers have implemented fertilization activities in accordance with company procedures.</p>	II	October	2009	HGFB	3,740	III	October	2009	Urea	39,533	III	October	2015	Urea	10,162	
II	October	2009	HGFB	3,740														
III	October	2009	Urea	39,533														
III	October	2015	Urea	10,162														
<p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p>																		
7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p>	<p>There are no changes related to the suitability map and land types in the company's operational area. Apart from that, there is no addition/expansion of land from the previous assessment. In general, the types of land displayed on a land map with a scale of 1:30,000 are as follows:</p> <p>Aek Tarum Estate</p> <table border="1" data-bbox="1131 1133 1971 1366"> <thead> <tr> <th>Soil Classification</th> <th>Slope (%)</th> </tr> </thead> <tbody> <tr> <td>Arenic Hapludults</td> <td>0 – 8</td> </tr> <tr> <td>Typic Hapluduts</td> <td>0 – 8</td> </tr> <tr> <td>Typic Hapluduts</td> <td>>30</td> </tr> <tr> <td>Typic Endoquepts</td> <td>0 - 8</td> </tr> </tbody> </table>	Soil Classification	Slope (%)	Arenic Hapludults	0 – 8	Typic Hapluduts	0 – 8	Typic Hapluduts	>30	Typic Endoquepts	0 - 8	Complied					
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Typic Endoquepts	0 - 8												
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on the results of field observations, currently there have been no replanting activities at either Aek Tarum Estate or Batu Anam Estate.	Complied										
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based on the results of field observations, currently there are no new planting activities at either Aek Tarum Estate or Batu Anam Estate.	Complied										
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.													
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	<p>There are no changes related to the suitability map and land types in the company's operational area. Apart from that, there is no addition/expansion of land from the previous assessment. In general, the types of land displayed on a land map with a scale of 1:30,000 are as follows:</p> <p>Aek Tarum Estate</p> <table border="1"> <tr> <td>Soil Classification</td> <td>Slope (%)</td> </tr> <tr> <td>Arenic Hapludults</td> <td>0 – 8</td> </tr> <tr> <td>Typic Hapludults</td> <td>0 – 8</td> </tr> <tr> <td>Typic Hapludults</td> <td>>30</td> </tr> </table>	Soil Classification	Slope (%)	Arenic Hapludults	0 – 8	Typic Hapludults	0 – 8	Typic Hapludults	>30	Complied		
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7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	<p>Company has an SOP for land clearing including land preparation which is stated in the SOPs as follows:</p> <ul style="list-style-type: none"> - New Planting Procedure (AA-APM-OP-1100.02-R3) - Establish and Maintenance Road and Bridge (AA-APM-OP-1100.03-R2) - Establish and Maintenance Drainage (AA-APM-OP-1100.04-R3) - Land and Water Conservation (AA-APM-OP-1100.05-R3) <p>These procedures contain technical guidance for soil conservation work in the context of land preparation before planting by considering: slope, soil type, and planting media.</p> <p>Based on a review of documents and field observation, company does not use fire/burning in land clearing activities. Land condition for planting is influenced by topography (flat or hilly which requires terraces) as well as the presence of low areas which require ridges (platforms).</p>	Complied														
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	The results of a semi-detailed land survey conducted by the company on 2012 which contains information related to soil types and slope levels in the company's operational area and serves as a guide for determining	Complied														

		the location of roads and infrastructure in the company's operational areas						
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.								
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	<p>Based on field observation and review document of Soil Survey Semi Detail on 2012 by Research & Development Asian Agri, here's the detail of soil classification on Batu Anam Estate & Aek Tarum Estate:</p> <table border="1"> <tr> <td>Soil Classification</td> </tr> <tr> <td>Typic Hapludults</td> </tr> <tr> <td>Typic Hapludults</td> </tr> <tr> <td>Typic Eutrudox</td> </tr> <tr> <td>Typic Endoquepts</td> </tr> </table> <p>Based on that document there's no land classified as peat land in the company's operational area.</p>	Soil Classification	Typic Hapludults	Typic Hapludults	Typic Eutrudox	Typic Endoquepts	Complied
Soil Classification								
Typic Hapludults								
Typic Hapludults								
Typic Eutrudox								
Typic Endoquepts								
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..	Not Applicable					
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).								
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..	Complied					
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..	Complied					
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	As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..	Complied					

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	<p>provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>		
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..</p>	<p>Complied</p>
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>As explained in indicators 7.7.1, there's no land classified as peat land in the company's operational area..</p>	<p>Complied</p>
<p>Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			

<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Based on the results of the 1.2 surveillance audit that has been conducted, there are no changes related to SOPs in source conservation and water quality.</p> <p>PT Gunung Melayu - Gunung Melayu II POM has also developed a procedure to maintain soil fertility and water quality as stated in SOP for maintaining riparian zone is under SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air", it is stated that at during land clearing area along the river shall be conserved.</p> <p>PT Gunung Melayu - Gunung Melayu II POM has prepared the document on protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones as in document "Praktek-praktek Mempertahankan Kualitas dan Ketersediaan Air Permukaan dan Air Tanah" – Water Sustainable".</p> <p>The company also has an environmental management and monitoring plan which includes a water management plan.</p> <p>Company also conduct water quality test on each semester. Water quality test performed by accredited laboratory PT. Atoms laboratorium Indonesia (KAN_LP-1576-ICN), analysis report verified:</p> <ul style="list-style-type: none"> - Analysis of mill rain trench water was carried out on 15 January 2023, the results of the analysis showed that all test parameters were still in accordance with PermenLH number 5 of 2014 concerning wastewater quality standards. - Water analysis of monitoring wells of residents, monitoring wells of land application, monitoring wells of land application was carried out on 15 January 2023, the results of the analysis showed that all test parameters were still in accordance with the quality standards required in Permenkes no 2 of 2023 concerning environmental health. - Analysis of mill housing borehole water was carried out on 15 January 2023, the results of the analysis showed that all test 	<p>Complied</p>
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		<p>parameters were still in accordance with the quality standards required by Permenkes No. 2 of 2023 concerning environmental health.</p> <ul style="list-style-type: none"> - Analysis of Pinggul Toba Hilir River water was carried out on 15 January 2023, the results of the analysis showed that all test parameters were still in accordance with the quality standards required in PP number 22 of 2021 concerning the implementation of environmental protection and management. - Analysis of the Upper Pinggul Toba River water was carried out on 15 January 2023, the results of the analysis showed that all test parameters were still in accordance with the quality standards required in PP number 22 of 2021 concerning the implementation of environmental protection and management. <p>Water management plan review conducted every 6 months as required by Environmental Impact Assessment. The water management review is sourced from the result of laboratory analysis for certain water sources (as required under EIA). The frequent report is 6 months to Department of Environment.</p> <p>PT Gunung Melayu did not limit the supply of clean water to the worker. Based on stakeholder interview, there was no report or complaint from community on pollution to water body from company operation.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Company also conducts water quality test on each semester. Water quality test performed by accredited laboratory PT. Atoms Laboratorium Indonesia (KAN_LP-1576-ICN), analysis report verified:</p> <ul style="list-style-type: none"> - Water analysis of monitoring wells of residents, monitoring wells of land application, monitoring wells of land application was carried out on 15 January 2023, the results of the analysis showed that all test parameters were still in accordance with the quality standards required in Permenkes no 2 of 2023 concerning environmental health. 	

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		<p>- Analysis of mill housing borehole water was carried out on 15 January 2023, the results of the analysis showed that all test parameters were still in accordance with the quality standards required by Permenkes No. 2 of 2023 concerning environmental health.</p> <p>PT Gunung Melayu did not limit the supply of clean water to the worker.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT Gunung Melayu has procedure for riparian management No.AA-APM-OP-1100.21-R2 dated 7 December 2015. In the document, the criteria for riparian area, lake, water source and conservation area explained. River riparian area sets at 50 meters both sides for river width <12 meters; and riparian area sets at 100 meters both sides for river width >12 meters.</p> <p>Based on field visit to Aek Tarum River, and Piasa River, there was no replanting within the buffer zone; no chemical treatment in the buffer zone, riparian area marked with signboard.</p> <p>The company has also made a plan for planting in the riverbank with woody plants that will be carried out in 2024, the company has shown a stock of woody plant seedlings in 2023 with the types of Mahogany Trees 1,332 trees, Roda Trees 999 trees, Sungkai Trees 95 trees and ohon Ketapang 50 trees.</p>	Complied
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>To manage liquid waste generated by the mill, the company has an WWTP pond that is in accordance with its environmental permit. Liquid waste generated from the mill is flowed to the cooling pond (WWTP) and then flowed to the Biogas Plant Area to extract methane gas, then the liquid waste from the Biogas Plant is flowed back to the WWTP pond (acidification pond) to reduce its BOD using anaerobic bacteria, after the BOD meets the requirements, then the liquid waste is flowed to the Land Application.</p> <p>The Company has also shown the Land Application Permit based on the Decree of the Regent of Asahan with number:</p>	Complied

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		<p>503/IPAL/DPMPSTSP/0040/XI/2020 on 11 November 2020 and valid for 5 years until 23 November 2025.</p> <p>The company has shown evidence of the results of the analysis of liquid waste flowing into the Land Application every month. From all analysis results (October 2022 - September 2023) that have been carried out, BOD and pH still meet the quality standards required in Kepmenlh number 28-29 of 2003 (BOD < 5,000 mg/L, pH 6-9).</p> <p>Analysis of liquid waste is carried out by a third party PT Atoms Laboratorium Indonesia which has been accredited by KAN with number LP-1576-IDN, the last test was carried out on 11 September 2023 with BOD results: 3,521.6 mg/L and pH 7.12.</p> <p>Other requirements in managing liquid waste carried out by land application are testing monitoring wells, and soil.</p> <ul style="list-style-type: none"> - The Company has conducted analysis of resident monitoring well water, land application monitoring well water and non-application land monitoring well water every 6 months, the last analysis for the first semester of 2023 on 15 January 2023, the analysis results show all test parameters are still in accordance with the quality standards required in Permenkes no 2 of 2023 concerning environmental health. - The company has conducted a land application soil analysis which is carried out every 1 year, the last analysis for 2023 was carried out on 29 March 2023. - The company has shown evidence of sending liquid waste reports every quarter to the Asahan Regency Environment and Forestry Service, the last reporting for the third quarter of 2023 was carried out on 8 November 2023. 	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	The Company has a permit to use surface water for industrial and domestic use based on the decision of the Minister of Public Works and	Complied

		<p>Housing, number: 1486/KTPS/M/2023 on 19 October 2023 and is valid for up to 5 years from the date of stipulation.</p> <p>The Company has also shown proof of payment of surface water tax/retribution every month, the last payment was made on 18 August 2023.</p> <p>Based on Mill Summary Report year 2023 the average water per tonne FFB processed reach 1.17 m³/ton FFB.</p>	
<p>Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			
7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented</p>	<p>Plan for reduce fossil fuel use and optimize renewable energy stipulated under "Rencana Management Lingkungan" 2023. Point 2 stipulates fossil fuel use efficiency improved from monitoring the actual fossil fuel used.</p> <p>The company has documented the use of biomass in the form of shells and fibre for boiler fuel as a substitute for diesel. The company recorded an efficiency of 280 litres of diesel usage/saving for every 1200 kW.</p>	Complied
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Gunung Melayu has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022-2023". Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB. The assessment of pollution activities was documented in "Mitigasi Gas Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p>	Complied

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		Report as per GHG calculator result displayed in annual public summary report.	
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).	There is no new development in the supply base of PT Gunung Melayu, as replanting completed in 2012. Not applicable.	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Gunung Melayu has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months. For GHG emission, calculated with RSPO Palm GHG version 4.1. For 2023 emission from estate operation and mill calculated and monitored, emission reduction achieved.	Complied
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	Unit of certification has replanted oil palm since 2008. Replanting procedure in "Prosedur Replanting No.SOP AA-APM-OP-1100.20-R8" dated 1 May 2019. Procedure stated company will implement zero burning through chipping and stacking with bucket-modified excavator. The replanting activities recorded: felling, chipping, cutting palm stomp, Ganoderma mitigation, Legume cover crop planting, holing, planting. At the time of audit 1.2, no new planting or replanting activities were being carried out.	Complied

7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>PT Gunung Melayu – Batu Anam Estate has implement various step to prevent land and forest fire:</p> <ul style="list-style-type: none"> - Daily patrol to check hotspot and fire as per fire-prone area mapping “Peta Area Rawan Kebakaran PT Gunung Melayu-Kebun Aek Tarum and Batu Anam”. Based on patrol record year 2023 no hotspot or fire incident. - Company implement fire danger rating as early warning system. Based on fire danger rating record year 2019, 2020, 2021, 2022 and 2023 in general the fire danger rating at low risk. - Fire fighting tools, equipment and infrastructure is in place as per “Daftar Peralatan Pemadam Kebakaran”, this includes portable pumps, suction hose, nozzle, water hose, sickle, fire overall, etc. - Evidence of community involvement in the prevention and suppression of land fires was carried out by providing fire fighting training on 12 and 13 September 2023 in conjunction with the implementation of Corporate Share Value (CSV) training with Gonting Mahala Village and Batu Anam Village. Which was attended by 140 people. <p>In addition, the company has also shown proof of receipt of fire prevention and suppression system reporting to the Asahan District Environment Office and the Asahan District Agriculture and Plantation Office on 3 August 2023.</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>During Create Share Value/CSV program, company is also communicating with surrounding community member/smallholder to raise awareness on risk of land and forest fire.</p> <p>Evidence of community involvement in the prevention and suppression of land fires was carried out by providing fire fighting training on 12 and 13 September 2023 in conjunction with the implementation of Corporate</p>	Complied

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		Share Valuae (CSV) training with Gonting Mahala Village and Batu Anam Village. Which was attended by 140 people.	
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:			
<p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	There is no new planting in PT Gunung Melayu - Batu Anam Estate and Aek Tarum Estate after November 2005 and/or November 2018.	Not Applicable
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	PT Gunung Melayu has conducted HCV identification by Forestry Faculty from "Fakultas Kehutanan Institut Pertanian Bogor" in 2014, reported "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Gunung Melayu Kebun Aek Tarum and Batu Anam Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia",	Complied

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		<p>issued by “Konsorsium Revisi HCV Toolkit Indonesia” dated 12 July 2008.</p> <p>The HCV identification team consist of: Team leader: Dr. Ir. Nyoto Santoso, MS (RSPO HCV Assessor and HCVRNI member); Environmental service expert: Ir. A. Faizal Siregar, Msi (RSPO HCV Assessor and HCVRNI member); Vegetation expert: Eko Adhiyanto, S.Hut (RSPO HCV Assessor and HCVRNI member); Wildlife expert: Sutopo S.Hut. (RSPO HCV Assessor and HCVRNI member); Social-economic-cultural expert: Rae Birumbo (RSPO HCV Assessor and HCVRNI member); GIS: Arif Prasetyo, S.Hut (RSPO HCV Assessor and HCVRNI member).</p> <p>The HCV identification carried out with field assessment and public stakeholder consultation with surrounding communities on 1-7 April and May 2013. The HCV Identification report has been peer reviewed by Mr. Rachmad Darmawan (RSPO HCV Assessor and HCVRN member) on January 2014.</p> <p>In the assessment, The total HCV identified in Batu Anam Estate was 12.29 Ha, consist of HCV 4.1 (10.79 Ha) and HCV 6 (1.5 Ha). Based on HCV Identification Report, 2014 shows in area of Batu Anam Estate, found 54 types of mammal, 42 types of bird, 4 types of reptile.</p> <p>During this audit ASA1.2 there is no change in the HCV assessment report and area.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>There is no new planting within certified area of PT Gunung Melayu after November 2005 and /or November 2018. Company carried out replanting first in 2008.</p>	
<p>7.12.3</p>	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into</p>	<p>HFCL is not applicable for Indonesia. Not applicable.</p>	<p>Not Applicable</p>

	consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.		
<p>PROCEDURAL NOTE for 7.12.3:</p> <p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>There is no new planting within certified area of PT Gunung Melayu after November 2005 and /or November 2018. Company has carried out replanting first in 2008.</p> <p>PT Gunung Melayu has conducted HCV identification by Forestry faculty from “Fakultas Kehutanan Institut Pertanian Bogor” in 2014, reported “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Gunung Melayu Kebun Aek Tarum and Batu Anam Provinsi Sumatera Utara”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia” dated 12 July 2008. This HCV identification mark the base of HCV management plan.</p> <p>Based on soil survey from Asian Agri Group Research and Development year 2012, there was no peat soil in Batu Anam Estate; no fragile soil in Batu Anam Estate.</p> <p>PT Gunung Melayu – Aek Tarum Estate and Batu Anam Estate has develop the Conservation Management Plan 2023. Evidence Continuous monitoring documentation and report regarding the status of RTE species and HCV presented in “Laporan Monitoring Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Gunung Melayu, Kebun Aek Tarum dan Kebun Batu Anam” Periode January – 2023”. Monitoring documentation such as: “Daftar Temuan Satwa liar di Areal kebun” contain information regarding result of wildlife and RTE species monitoring, “Tabel Monitoring Kerusakan Kawasan Lindung” contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition.</p>	Not Applicable

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		<p>Report of HCV management and monitoring including RTE species monitoring has been reported to BKSDA (Natural Resources Conservation Agency) Sumatera Utara on 21/08/2023 for report Batu Anam Estate and Aek Tarum Estate period semester I 2023 and Evaluation to the effectiveness of management and monitoring plan implementation reported each semester in Laporan Monitoring Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Gunung Melayu, Kebun Aek Tarum dan Kebun Batu Anam". Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>There is no new planting within certified area of PT Gunung Melayu after November 2018. Company carried out replanting first in 2008.</p> <p>PT Gunung Melayu has conducted HCV identification by Forestry faculty from "Fakultas Kehutanan Institut Pertanian Bogor" in 2014, reported "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Gunung Melayu Kebun Aek Tarum and Batu Anam Provinsi Sumatera Utara". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia" dated 12 July 2008.</p> <p>Based on soil survey from Asian Agri Group Research and Development year 2012, there was no peat soil in Batu Anam Estate; no fragile soil in Batu Anam Estate.</p> <p>According to HCV assessment result and based on interview with stakeholders from surrounding communities and government, there was no HCV in local communities land.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place.</p>	<p>Based on HCV identification report, no wildlife identified in management unit categorized as Appendix I and II based on CITES or IUCN Redlist.</p>	Complied

	<p>Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p>PT Gunung Melayu carried out socialization to worker and surrounding community related to HCV area, wildlife protection and prohibit hunting/poaching/killing of RTE species. Based on stakeholder consultation with surrounding village this was confirmed. Socialization has been conducted to workers through master morning in each division by field assistant. Socialization to surrounding community by stakeholder meeting. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>PT Gunung Melayu – Aek Tarum Estate and Batu Anam Estate has develop the Conservation Management Plan 2023. Evidence Continuous monitoring documentation and report regarding the status of RTE species and HCV presented in “Laporan Monitoring Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Gunung Melayu, Kebun Aek Tarum dan Kebun Batu Anam” Periode January – 2023”. Monitoring documentation such as: “Daftar Temuan Satwa liar di Areal kebun” contain information regarding result of wildlife and RTE species monitoring, “Tabel Monitoring Kerusakan Kawasan Lindung” contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition.</p> <p>Report of HCV management and monitoring including RTE species monitoring has been reported to BKSDA (Natural Resources</p>	
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		<p>Conservation Agency) Sumatera Utara on 21/08/2023 for report Batu Anam Estate and Aek Tarum Estate period semester I 2023 and Evaluation to the effectiveness of management and monitoring plan implementation reported each semester in Laporan Monitoring Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Gunung Melayu, Kebun Aek Tarum dan Kebun Batu Anam". Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan.</p>	
<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>PT Gunung Melayu – Aek Tarum Estate and Batu Anam Estate has develop the Conservation Management Plan 2023. Evidence Continuous monitoring documentation and report regarding the status of RTE species and HCV presented in "Laporan Monitoring Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Gunung Melayu, Kebun Aek Tarum dan Kebun Batu Anam" Periode January – 2023". Monitoring documentation such as: "Daftar Temuan Satwa liar di Areal kebun" contain information regarding result of wildlife and RTE species monitoring, "Tabel Monitoring Kerusakan Kawasan Lindung" contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition.</p> <p>Report of HCV management and monitoring including RTE species monitoring has been reported to BKSDA (Natural Resources Conservation Agency) Sumatera Utara on 21/08/2023 for report Batu Anam Estate and Aek Tarum Estate period semester I 2023 and Evaluation to the effectiveness of management and monitoring plan implementation reported each semester in Laporan Monitoring Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Gunung Melayu, Kebun Aek Tarum dan Kebun Batu Anam". Evaluation result and recommendation of management and monitoring contain in the report.</p>	<p>Complied</p>

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		This recommendation give the feedback and improvement to conservation management plan.	
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.	There is no new planting within certified area of PT Gunung Melayu after November 2005 and /or November 2018. Company carried out replanting first in 2008. HCV assessment has been conducted in the existing plantation since 2013/2014 according to explanation in indicator 7.12.2.a above.	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Gunung Melayu II Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2023 for Gunung Melayu II Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.15
PKO	0.00

Extraction	%
OER	22.39
KER	4.88

Production	t/yr
FFB Process	269,085
CPO Produced	60235
PKO Produced	0

Land Use	Ha
OP Planted Area	9,025.02
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	273.27
Total	9,298.29

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	89136.77	0.46	0.00	0.00	0.00	0.00	89136.77	0.46
CO ₂ Emission from fertilizer	8609.19	0.04	0.00	0.00	0.00	0.00	8609.19	0.04
NO ₂ Emission	7321.16	0.04	0.00	0.00	0.00	0.00	7321.16	0.04
Fuel Consumption	1682.66	0.01	0.00	0.00	0.00	0.00	1682.66	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-84489.83	-0.43	0.00	0.00	0.00	0.00	0.00	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	22295.95	0.11	0.00	0.00	8938.92	0.00	31198.87	0.11

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	3921.90	0.01
Fuel Consumption	106.86	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-0.58	0.00
Sales of PKS	-24105.40	-0.09
Sales of EFB	0.00	0.00
Total	-20077.21	-0.08

Summary of Kernel Crusher Emission and Credit (if applicable)

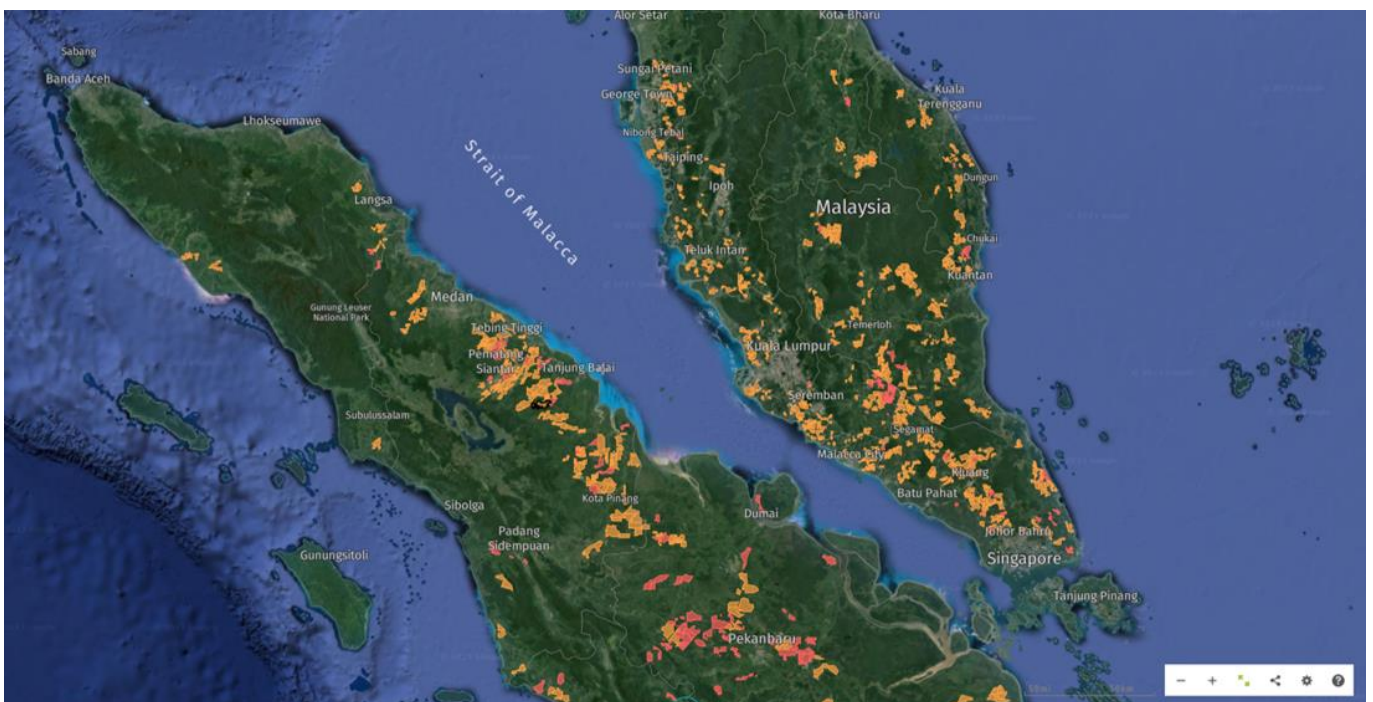
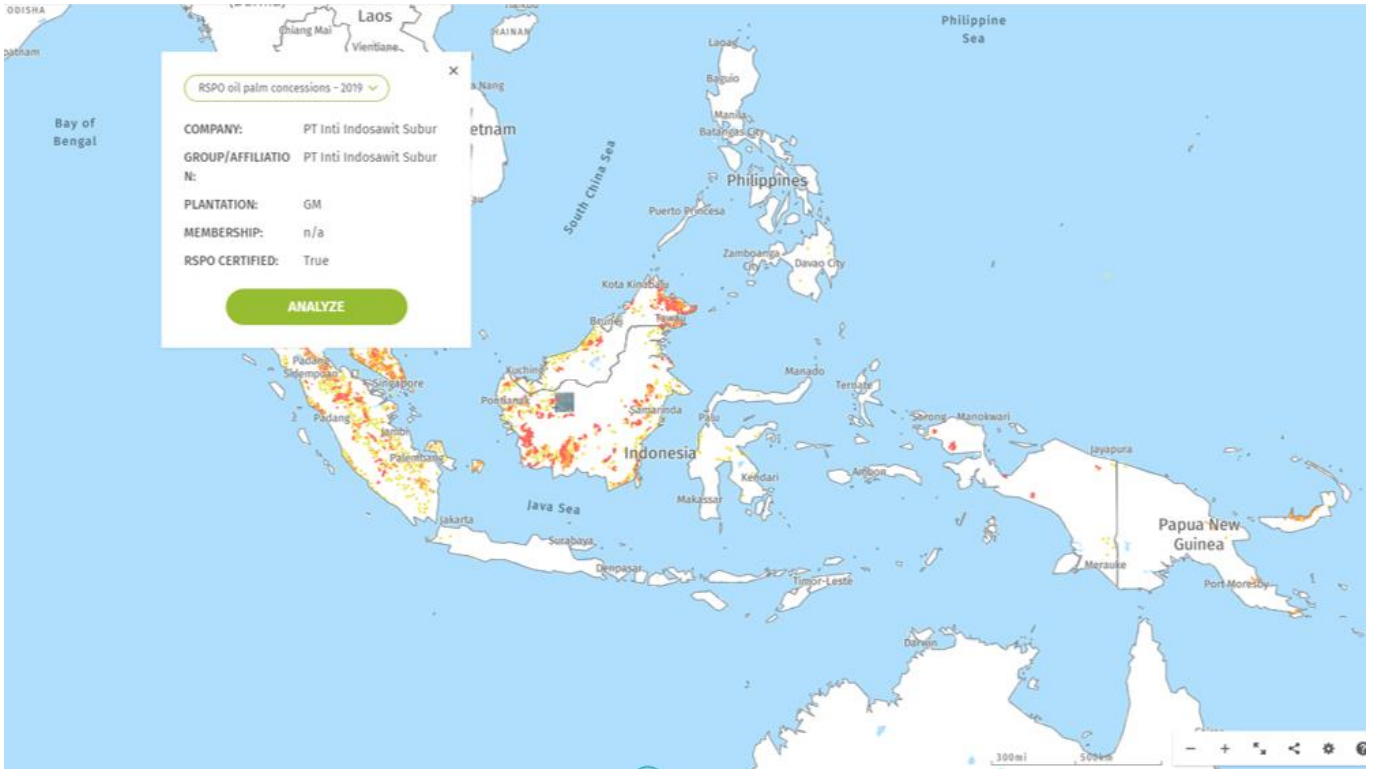
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

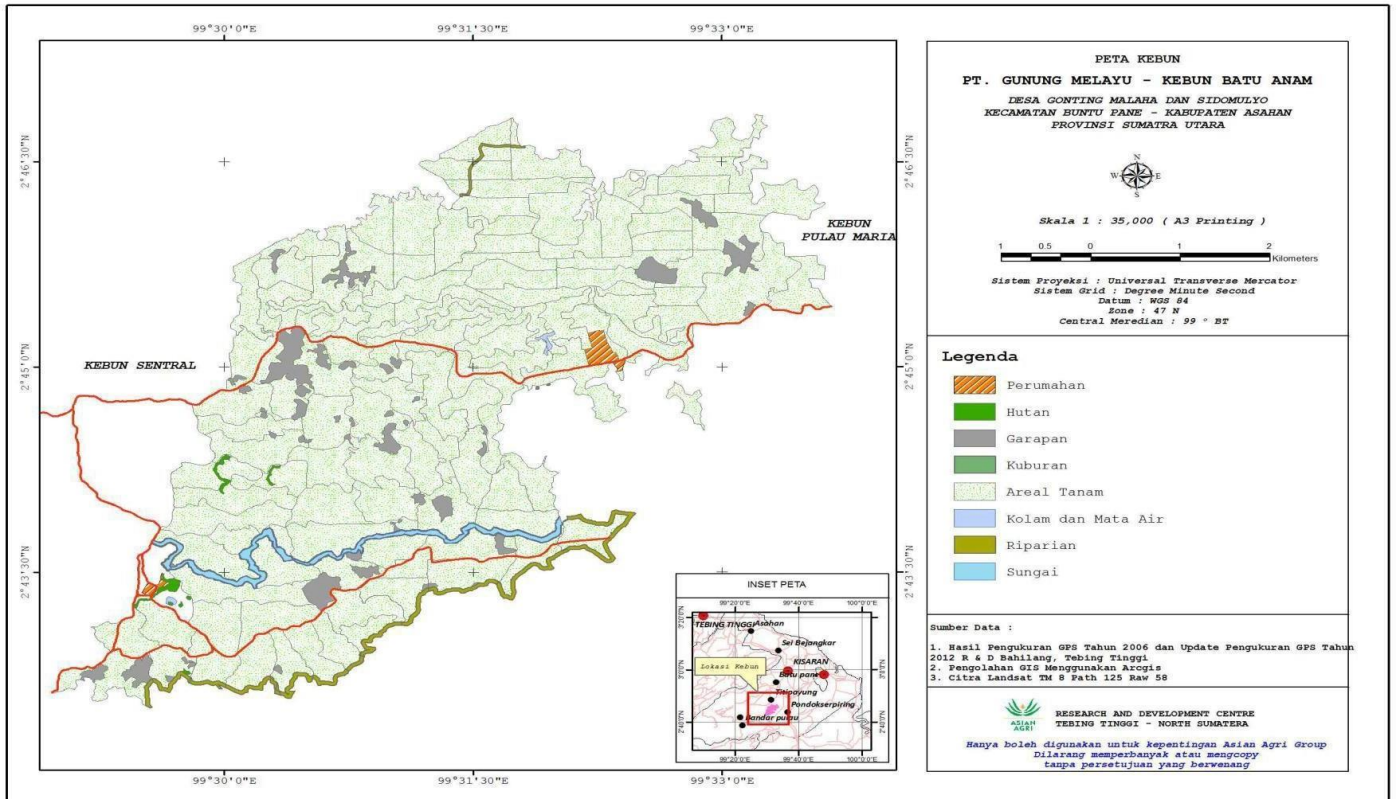
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	11.7
Divert to methane captured (energy generation) (%)	88.3

Appendix C: Location Map of Certification Unit and Supply bases

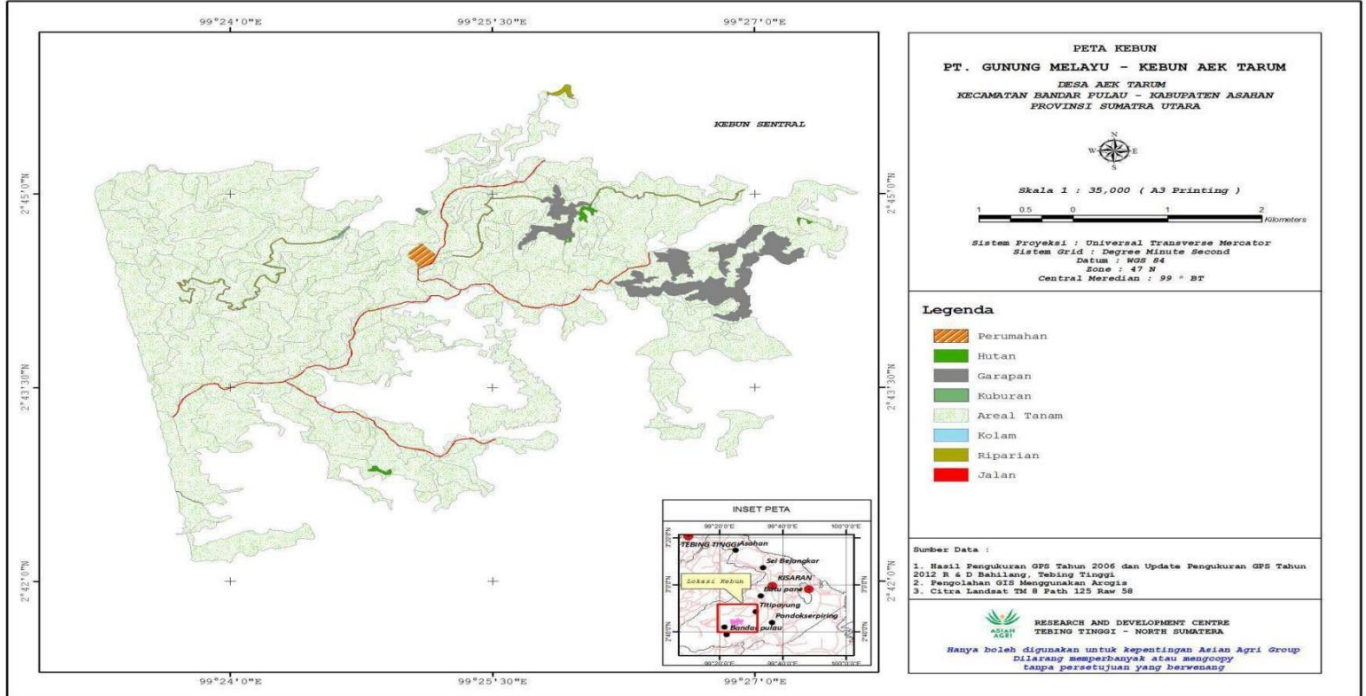


Appendix D: Estate Field Map

Batu Anam Estate



Aek Tarum Estate



Appendix E: List of Smallholder Registered and/or sampled

Not applicable.

Appendix F: List of Abbreviations

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