

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (3_1)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: SIPEF Group
Client Company / Parent Company Address: Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium
Certification Unit: Hargy Oil Palms Limited – Hargy POM, Barema POM, Navo POM Location of Certification Unit: Portion 15 & 633, Milinch of Ulawun, Fourmil of Talasea West New Britain Province, 4624 Papua New Guinea
Date of Final Report: 10/09/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SIPEF Group		
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7/12/2005
Address	Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Hargy Oil Palms Limited Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill		
Location / Address	Portion 15 & 633, Milinch of Ulawun, Fourmil of Talasea West New Britain Province, 4624, Papua New Guinea		
Website	www.sipef.com		
Management Representative	Mrs. Sophie Gett	E-mail	sgett@sipef.com
Telephone	+675 9831005/71001604 Ext.231	Facsimile	+675 9831191

2. Certification Information			
Certificate Number	RSPO 535739	Certificate Start Date	08/10/2023
Date of First Certification	09/04/2009	Certificate Expiry Date	07/10/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK) at Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill and 3 Supply Estates, namely Hargy Estate, Navo Estate and Pandi Estate including smallholder growers and marketing activities through SIPEF N.V.		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 3_1) <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"/> PNG & Solomon Islands National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	Hargy POM 45 MT/hr Barema POM 45 MT/hr Navo POM 60 MT/hr

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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
RSPO 633028	RSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn Bhd	22/10/2028
2023-7056	ISO 14001 Environment Management System	Sustainable Certification	08/09/2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Hargy Palm Oil Mill	Bialla, West New Britain Province, PNG	5° 18' 40.05" S	151° 00' 39.46" E
Barema Palm Oil Mill	30 km East of Bialla, West New Britain Province, PNG	5° 12' 40.25" S	151° 07' 51.10" E
Navo Palm Oil Mill	60 km East of Bialla, West New Britain Province, PNG	5° 05' 38.86" S	151° 13' 28.03" E
Hargy Estate	7 km East of Bialla, West New Britain Province, PNG	5° 17' 47.77" S	151° 03' 28.03" E
Navo Estate	33 km East of Barema POM, West New Britain Province, PNG	5° 05' 38.41" S	151° 13' 30.01" E
Pandi Estate	44 km East of Navo Estate, West New Britain Province, PNG	5° 00' 44.29" S	151° 25' 27.12" E
Smallholders (3,646 members)	Bialla, West New Britain, West New Britain Province, PNG	5° 18' 40.05" S	151° 00' 39.46" E
Note: <ul style="list-style-type: none"> - Hargy Estate consist of Hargy Plantation and Barema Plantation. - Navo Estate consist of Atata Plantation, Kiba Plantation and Ibana Plantation. - Pandi Estate consist of Bakada Plantation. 			

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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
Hargy Estate	4,413.46	1,872.76	528.15	6,814.37	64.77
Navo Estate	6,551.92	2,683.12	504.66	9,739.70	67.27
Pandi Estate	2,584.13	1,069.90	355.37	4,009.40	64.45
Subtotal	13,549.51	5,625.78	1,388.18	20,563.47	65.89
Smallholders	14,806.85	1,103.52	3,764.58	19,674.95	75.26
Total	28,356.36	6,729.30	5,152.76	40,238.42	70.47
Note: HCV area is based on final report of "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd, Papua New Guinea" dated 28 July 2023 by PT. Hijau Daun. After the Satisfactory feedback from HCVRN on 15 March 2024 (Central Section), 12 January 2024 (Southern Section), 8 January 2024 (Northern Section). Since the HCVRN Satisfactory feedback, HOPL conducted re-measurement to the planted area and infrastructure and other area, resulting slight difference in hectareage compared to last year's report.					

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Hargy Estate	392.80	1,745.89	2,274.77	-	4,413.46	-
Navo Estate	1,785.54	3,562.2	1,204.18	-	5,426.93	1,124.99
Pandi Estate	-	2,584.13	-	-	2,584.13	-
Subtotal	2,178.34	7,892.22	3,478.95	-	12,424.52	1,124.99
Smallholders	1,217.39	3,737.60	7,850.58	2,001.28	13,939.84	867.01
Total (ha)	3,395.73	11,629.82	11,329.53	2,001.28	26,364.36	1,992.00
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2023-Sept 2024)	Actual (Sept 2023-Jul 2024)		Forecast (Oct 2024-Sept 2025)
		Previous license period (Sep 2023 – Dec 2023)	Current license period (Jan 2024 – Jul 2024)	

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Hargy Estate	132,105	42,124	76,046	133,562
Navo Estate	164,883	44,229	63,627	125,917
Pandi Estate	78,762	29,422	45,852	76,597
Subtotal	375,750	115,775	185,525	336,076
Smallholders	231,195	77,372	122,382	266,218
Total	606,945	501,054		602,294

Note:

Previous audit conducted in September 2023, whilst this audit conducted in August 2024, therefore actual data is only until July 2024.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2023-Sept 2024)	Actual (Sept 2023-Jul 2024)		Forecast (Oct 2024-Sept 2025)
		Previous license period (Sep 2023 – Dec 2023)	Current license period (Jan 2024 – Jul 2024)	
Nil				
Total				

Note:

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

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2023-Sept 2024)	Actual (Sept 2023-Jul 2024)		Forecast (Oct 2024-Sept 2025)
		Previous license period (Sep 2023 – Dec 2023)	Current license period (Jan 2024 – Jul 2024)	
Nil				
Total				

Note:

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	Sep 2023	41,345	-	41,345
2	Oct 2023	52,990	-	52,990
3	Nov 2023	50,495	-	50,495

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4	Dec 2023	48,317	-	48,317
5	Jan 2024	51,683	-	51,683
6	Feb 2024	41,851	-	41,851
7	Mar 2024	41,358	-	41,358
8	Apr 2024	45,179	-	45,179
9	May 2024	51,317	-	51,317
10	Jun 2024	43,374	-	43,374
11	Jul 2024	33,145	-	33,145
TOTAL		501,054	-	501,054

Note:

Previous audit conducted in September 2023, whilst this audit conducted in August 2024, therefore actual data is only until July 2024.

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

Estimated last year (Oct 2023-Sept 2024)	Actual (Sept 2023-Jul 2024)		Forecast (Oct 2024-Sept 2025)
	Previous license period (Sep 2023 – Dec 2023)	Current license period (Jan 2024 – Jul 2024)	
Hargy POM			
FFB	FFB		FFB
159,495 mt	52,937 mt	92,274 mt	180,768 mt
	TOTAL	145,211 mt	
CPO (OER: 23.90 %)	CPO (OER: 22.75 %)		CPO (OER: 23.77 %)
38,119 mt	12,374 mt	20,672 mt	42,969 mt
	TOTAL	33,046 mt	
PK (KER: 5.03 %)	PK (KER: 4.84 %)		PK (KER: 5.00 %)
8,023 mt	2,606 mt	4,432 mt	9,038 mt
	TOTAL	7,038 mt	
Barema POM			
FFB	FFB		FFB
208,842 mt	69,596 mt	102,755mt	194,751 mt
	TOTAL	172,351 mt	
CPO (OER: 24.90 %)	CPO (OER: 24.14 %)		CPO (OER: 24.82 %)
52,002 mt	17,135 mt	24,464 mt	48,337 mt
	TOTAL	41,599 mt	
PK (KER: 5.00 %)	PK (KER: 5.07 %)		PK (KER: 5.00 %)

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10,442 mt	3,526 mt	5,206 mt	9,737 mt
	TOTAL	8,732 mt	
Navo POM			
FFB	FFB		FFB
238,608 mt	70,614 mt	112,878 mt	226,775 mt
	TOTAL	183,492 mt	
CPO (OER: 24.65 %)	CPO (OER: 24.09 %)		CPO (OER: 24.48 %)
58,817 mt	17,368 mt	26,831 mt	55,515 mt
	TOTAL	44,199 mt	
PK (KER: 5.15 %)	PK (KER: 5.22 %)		PK (KER: 5.00 %)
12,288 mt	3,700 mt	5,883 mt	11,339 mt
	TOTAL	9,583 mt	

Note:**Forecast of Hargy POM:**

Description	FFB	CPO	PK
Hargy Estate – Hargy Plantation	66,781	15,874	3,339
Smallholders	113,987	27,095	5,699
TOTAL	180,768	42,969	9,038

Forecast of Barema POM:

Description	FFB	CPO	PK
Hargy Estate – Barema Plantation	66,781	16,575	3,339
Smallholders	127,970	31,762	6,398
TOTAL	194,751	48,337	9,737

Forecast of Navo POM:

Description	FFB	CPO	PK
Navo Estate	114,720	28,084	5,736
Pandi Estate	76,597	18,751	3,830
Smallholders	35,458	8,680	1,773
TOTAL	226,775	55,515	11,339

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Sep 2023	10,049	2,103
2	Oct 2023	12,637	2,688
3	Nov 2023	12,270	2,572
4	Dec 2023	11,920	2,469
5	Jan 2024	11,847	2,591
6	Feb 2024	9,266	2,171
7	Mar 2024	9,387	1,979
8	Apr 2024	10,680	2,318
9	May 2024	12,501	2,637
10	Jun 2024	10,603	2,236
11	Jul 2024	7684	1589
TOTAL		118,844	25,353
Note:			

11. Summary of Actual Volume sold					
Current License period (Jan 2024 – Aug 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	83,774	-	-	-	83,774
PK (MT)	6,819	-	-	-	6,819
Credits	-	-	-	-	-
Previous License period (Sep 2023 – Dec 2023)					
CPO (MT)	8,575	-	-	-	8,575
PK (MT)	12,597	-	-	-	12,597
Credits	-	-	-	-	-
Note:					
Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Hargy Oil Palms - Kernel Crushing Plant	RSPO_PO1000002567	-	19,416

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2	Olenex Sarl	RSPO_PO1000004914	88,498	-
3	Cargill NV – Refined Oils Europe	RSPO_PO1000000031	3,851	-
TOTAL			92,349	19,416
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)
	Nil			
TOTAL				
Note:				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	Nil		
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
	Nil		
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	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

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CSPK	N/A	N/A		N/A	N/A		N/A	N/A	
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12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	N/A					
TOTAL						
Note: 1 mt = 1 credit						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPPO	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						
TOTAL							
Note:							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **5 – 16 August 2024**. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. PNG & Solomon Islands National Interpretation 2019 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.

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 (ASA3-1)	Year 3 (ASA3-2)	Year 4 (ASA3-3)	Year 5 (ASA3-4)
Hargy POM	X	X	X	X	X
Barema POM	X	X	X	X	X
Navo POM	X	X	X	X	X
Hargy Estate	X	X	X	X	X
Navo Estate	X	X	X	X	X
Pandi Estate	X	X	X	X	X
Smallholders (3646 smallholders)	X	X	X	X	X

Tentative Date of Next Visit: August 4, 2025 - August 15, 2025

Total Number of Mandays: 32 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Eko Purwanto	Team Leader	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, IPB University.</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. Over 11 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding</p>

		<p>Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p>Language proficiency: Fluent in English and understands Tok Pisin</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input 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>
Yudwi Wisnu Rahmanto (YW)	Team Member	<p>Education: Holds a Bachelor of Forestry with Silviculture, Faculty of Forestry, University of Gadjah Mada</p> <p>Work Experience: 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training Course, Endorsed RSPO Supply Chain Lead Auditor Training Course and Endorsed RSPO P&C Lead Auditor Refresher Course.</p> <p>Language proficiency: Fluent in English and understands Tok Pisin</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>
Imam Fakhrurozi (IF)	Team Member	<p>Education: Holds a Bachelor Degree majoring in Agriculture Technology, Gadjah Mada University.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETAR requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation</p> <p>Language proficiency: Fluent in English</p>

		Aspect covered in this audit: <input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Briyogi Shadiwa (BS)	Team Member	Education: Diploma Degree, Oil Palm Plantation, from Institut Pertanian Bogor – Bogor, Indonesia. Work Experience: 6 Years working experience in palm oil sector as agronomist and managing the sustainability. Qualified RSPO & ISPO auditor since 2018. Training Attended: RSPO P&C Lead Auditor Course on October 2018, RSPO ISH Training conducted by the RSPO Secretariat on March 2022, ISO 9001 Lead Auditor Course on March 2017, ISO 14001 Lead Auditor Course on Oct 2017, Social Accountability (SA 8000) Training on May 2018, OHS Expert Training (Ahli K3 Umum) on Jan 2016, and RSPO Refreshment Training on June 2023. Language proficiency: Fluent in Bahasa Indonesia and English Language proficiency: Fluent in English Aspect covered in this audit: <input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)

Accompanying Persons:

Name	Role
Cecilie Benjamin	Local translator Papua New Guinea
Emily Vavanga	Local translator Papua New Guinea

2.3 Assessment Plan

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

Date	Time	Subjects	EP	YW	IF	BS	CB, EV
Saturday, 03/08/2024	11.40-14.25	Flight Jakarta – Singapore	√	√	√	√	
	20.35-05.15	Flight Singapore – Port Moresby	√	√	√	√	
Sunday, 04/08/2024	08.40-09.55	Flight Port Moresby – Hoskins	√	√	√	√	
		Travelling Hoskins – Hargy Oil Palms Limited	√	√	√	√	

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Date	Time	Subjects	EP	YW	IF	BS	CB, EV
Monday 05/08/2024	08.00-08.30	Opening meeting • Auditee Presentation (Introduction of PIC, Profile of Certified Management Unit) • Auditor Team Presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	✓	✓	✓	✓	✓
	08.30-12.00	Audit to Hargy POM (RSPO P&C)				✓	✓
		Interview with stakeholder		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Hargy POM (RSPO P&C)				✓	
		Interview with stakeholder		✓			✓
	16.30-17.00	Verification/reporting		✓		✓	✓
Tuesday 06/08/2024		Closing meeting RSPO SCCS	✓		✓		✓
	08.00-12.00	Audit to Hargy POM (P&C and SCCS for POM)	✓		✓	✓	✓
		Interview with stakeholder		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Hargy POM (P&C and SCCS for POM)	✓		✓	✓	✓
		Interview with stakeholder		✓			✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Wednesday 07/08/2024	08.00-12.00	Field visit to Hargy Estate – Barema Plantation	✓		✓	✓	✓
		Field visit to Smallholder and stakeholder consultation (6 sample of smallholders)		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Hargy Estate – Barema Plantation	✓		✓	✓	✓
		Audit to Smallholder (continued)		✓			✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Thursday 08/08/2024	08.00-12.00	Audit to Barema POM	✓		✓	✓	✓
		Interview with stakeholder		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Field visit to Barema POM	✓		✓	✓	✓
		Interview with stakeholder		✓			✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Friday 09/08/2024	08.00-12.00	Field visit to Smallholder and stakeholder consultation (7 sample of smallholders for each auditor) total 28 smallholders.	✓	✓	✓	✓	✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Smallholder (continued)	✓	✓	✓	✓	✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Saturday 10/08/2024	08.00-12.00	Field visit to Smallholder and stakeholder consultation (6-7 sample of smallholders for each auditor) total 25 smallholders.	✓	✓	✓	✓	✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-17.00	Audit team document verification/report compiling	✓	✓	✓	✓	✓
Sunday 11/08/2024		Day Off	✓	✓	✓	✓	✓
	08.00-12.00	Audit to Navo POM	✓		✓	✓	✓

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Date	Time	Subjects	EP	YW	IF	BS	CB, EV
Monday 12/08/2024		Interview with stakeholder		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Field visit to Navo POM	✓		✓	✓	✓
		Interview with stakeholder		✓			✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Tuesday 13/08/2024	08.00-12.00	Field visit to Navo Estate – Kiba Plantation	✓		✓	✓	✓
		Field visit to Smallholder and stakeholder consultation (6 sample of smallholders)		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Navo Estate	✓		✓	✓	✓
		Audit to Smallholder (continued)		✓			✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Wednesday 14/08/2024	08.00-12.00	Field visit to Pandi Estate	✓		✓	✓	✓
		Field visit to Smallholder and stakeholder consultation (6 sample of smallholders)		✓			✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Pandi Estate – Bakada Plantation	✓		✓	✓	✓
		Audit to Smallholder (continued)		✓			✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Thursday 15/08/2024	08.00-12.00	Field visit to Independent Estate – Ivule Holding Limited	✓			✓	✓
		Field visit to Independent Estate - Babex		✓	✓		✓
	12.00-13.00	Break	✓	✓	✓	✓	✓
	13.00-16.30	Audit to Independent Estate – Ivule Holding Limited (continued)	✓			✓	✓
		Audit to Independent Estate – Babex (continued)		✓	✓		✓
	16.30-17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Friday 16/08/2024	11.00-12.00	Closing Meeting	✓	✓	✓	✓	✓
Saturday 17/08/2024		Travelling Hargy Oil Palms Limited – Hoskins	✓	✓	✓	✓	✓
	10.25-11.40	Flight Hoskins – Port Moresby	✓	✓	✓	✓	✓
	14.50-19.20	Flight Port Moresby – Singapore	✓	✓	✓	✓	
Sunday 18/08/2024	19.30-20.30	Flight Singapore – Jakarta	✓	✓	✓	✓	

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes, the timebound plan for the SIPEF Group includes all estates and mills. The data in the timebound plan has been verified against the membership information on the RSPO website.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	No. Some estate waiting for land title issuance. The latest RSPO Secretariat approval for estate and mill not yet certified obtained on 22 December 2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition. The latest acquisition for PT Agrical in Bengkulu Province came under PT Mukomuko Agro Sejahtera have undergone RSPO NPP process. The latest RSPO Secretariat approval for TBP obtained on 22 December 2022. There is no new acquisition since then.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company. The latest RSPO Secretariat approval for estate and mill not yet certified obtained on 22 December 2022.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No, there is no change of timebound plan since last assessment. The timebound plan is still relevant and consistent with ACOP 2023 reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	All lapses of implanting the original plan are justified based on the awaiting for the land title (Hak Guna Usaha/HGU) and/or awaiting for full estate development.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	There is no fundamental failure as all delays are justified as stated in TBP.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Previously prior to certification, a subsidiary of SIPEF Group namely PT Umbul Mas Wisesa and PT Toton Usaha Mandiri had liabilities. The compensation plan have been	Complied

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	approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>All the new development under the parent company SIPEF Group has undergone NPP and published in the RSPO website:</p> <p>PT Umbul Mas Wisesa (12 December 2014)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-group-pt-umbul-mas-wisesa/ <p>PT Agro Muara Rupit</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr/https://rspo.org/public-consultation/sipef-pt-agro-muara-rupit-2/ <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-agro-kati-lama-phase-ii/ii/ <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1/ <p>PT Bandar Sumatra Indonesia (PT BSI)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate/ <p>PT Timbang Deli Indonesia (18 December 2014 and 11 February 2018)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-group-pt-timbang-deli-indonesia/ • https://rspo.org/public-consultation/pt-timbang-deli-indonesia-sipef-group/ <p>PT Mukomuko Agro Sejahtera (Sei Teramang Estate - 26 January 2022 & Batu Kuda Estate – 1 March 2023)</p> <ul style="list-style-type: none"> • https://rspo.org/public-consultation/sipef-pt-mukomuko-agro-sejahtera-pt-mmas/ <p>PT Mukomuko Agro Sejahtera (Batu Kuda Estate)</p>	Complied

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	SIPEF Group - PT Mukomuko Agro Sejahtera Batu Kuda Estate (PT MMAS Batu Kuda) - Roundtable on Sustainable Palm Oil (RSPO)	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT Agro Kati Lama, date complaint submitted 22 January 2021. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>On 16 June 2022, The Complaints Panel has reviewed and deliberated on the Mediation Settlement Agreement between the parties and reached a decision to close the Complaint. The Complaint is now formally closed. The complaint tracker available on link https://rspo.my.site.com/Complaint/s/case/5000o000039f18kAAA/detail</p> <p>There is no case reported since then.</p> <p>Based on RaCP tracker in RSPO website updated 16 August 2024 as follows:</p> <ul style="list-style-type: none"> • MU's with potential liability: 5 • LUCA submitted (MU's): 5 • LUCA's review completed (MU's): 5 • Concept Note required (MU's): 5 • Concept Note submitted (MU's): 4 • Concept Note approved (MU's): 4 • Compensation Plan submitted (MU's): 4 • Compensation Plan endorsed (MU's): 4 • Remediation Plan required (MU's): 1 • Remediation Plan submitted (MU's): 1 • Remediation Plan approved (MU's): 1 	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Audit team made review on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT Agro Kati Lama. The case tracker available on link</p>	Complied

	https://askrspo.force.com/Complaints/case/5000o000039f8kAAA/detail Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. On 16 June 2022, Complaint Panel has reviewed and deliberated on the Mediation Settlement Agreement between parties and reach decision to close the Complaint. There is no case reported since then. Based on web search, audit team noted there was not active complaint related to labour dispute.	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Internal audit for PT Bandar Pinang Indonesia has been conducted on 4-5 October 2023. Report of internal audit completed on 7 October 2023 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 3.1, 3.7, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8, 6.1, 6.3, 6.7, 7.2 and 7.12. There were 1 Minor NC and 6 Observations issued by internal audit team. Internal audit for PT Citra Sawit Mandiri has been conducted on 9-10 October 2023. Report of internal audit completed on 12 October 2023 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 3.1, 3.7, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8, 6.1, 7.2 and 7.12. There were 2 Minor NC and 5 Observations issued by internal audit team. Positive assurance statement already justified within the Internal Audit Checklist.	Complied
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?	Previously prior to certification, PT Umbul Mas Wisesa and PT Toton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	No negative comment from stakeholders including from NGO for un-certified units of SIPEF Group.	Complied

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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.	All 100% smallholder under OPIC is certified under Hargy Oil Palms Limited's certification scope.	Complied

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Approved Time Bound Plan

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

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

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Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
					Audited by BSI in June 2024, waiting for certification decision.
PT Bandar Sumatra Indonesia	No mill	Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai, North Sumatra Indonesia	Bandar Pinang Estate	2025	Rubber plantation conversion. NPP submitted in July 2021.

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3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were no Critical; no Minor nonconformities and one (1) Opportunity For Improvement raised.

Non-conformity			
NCR Ref #	Nil	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>PNG & SI National Interpretation 2019 of the RSPO P&C 2018, indicator 3.8.16</p> <p>The company submits Shipping Announcements for CSPK in RSPO PalmTrace based on the volume specified in the CSPKO sales contract. Before finalizing CSPKO sales, the company converts the CSPKO volume back to CSPK, then makes the Shipping Announcement for CSPK based on that volume. As a result, the Shipping Announcement for CSPK must be delayed until the CSPKO contract is finalized.</p> <p>Point of consideration is to make Shipping Announcements for CSPK based on grouped deliveries or transfers to enhance traceability.</p>

Positive Findings	
PF #	Description
PF 1	Hargy Oil Palms Limited's HCV-HCS assessment report has received Satisfactory status from HCVRN on 15 March 2024 (Central Section), 12 January 2024 (Southern Section), 8 January 2024 (Northern Section).

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3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

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

Previous Audit Minor Non-conformity			
NCR Ref #	Nil	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Previous Audit Opportunity for Improvement	
OFI#	Description

OFI
1

OFI Statement:

PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil Indicator 6.2.4

Hargy Oil Palms Limited presented updated housing provision program and the 10 years new housing plan (2023-2033). Audit team verified the housing construction progress for 2022 and 2023 is on the track (to date October 2023).

Location	New Housing	Remarks
Area 6	16 DLQ ~ 32 units	Completed on 31 st May 2023
BMC	10 DLQ ~ 20 units	Completed on 31 st June 2023
NMC	17 DLQ ~ 34 units	Completed on 31 st July 2023
HMC	1 DLQ ~ 2 unit	
Total	44 DLQ ~ 88 units	

It is expected the management closely monitoring the employee housing development program implementation and the timeframe of its employee movement.

Verification / Follow-up actions:

During the ASA 3_1 audit in 2024, Hargy Oil Palm Limited (HOPL) provided documentation demonstrating the implementation of its employee housing development program for the year 2024.

Type	Prog	Act	Comp	Progress	Remakes
DLQ	66 units	68 units	2 units	66 units	
JS	14 units	16 units	0	10 units	
Ex	1 unit	9 units	5 units	3 units	5x Ex housing units carried forward from 2023
Others	10 units	0	0	0	Security housing at BP deferred due to design and budget review

HOPL has also provided the 2024 CAPEX (Capital Expenditure) plan, which includes the construction of housing, upgrades, replacement of burnt-down houses, and painting of rusted roof sheets. The building cost per housing unit is detailed in the document.

Based on the field visit and interviews with workers' families (housewives) in the compound areas at Barema Plantation, Kiba Plantation, Bakada Plantation, Navo Mill, and Barema Mill, the audit team found that housing facilities were provided, with several houses still in progress and expected to be completed in 2024.

OFI
2

OFI Statement:

PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil Indicator 7.3.2

Hargy Oil Palms Limited demonstrated commitment to waste disposal practices as per Environment Permit, Environmental Aspect Impact's Target-Program and Waste Management Plan. Waste disposal record verified for each waste pit on the landfills in Hargy Estate, Navo Estate, Pandi Estate.

Improved disposal record consistency from the operational unit for better disposal process integrity is expected.

Verification / Follow-up actions:

The company has maintained integrated records for waste management from each source. In the landfill records for the 2023/2024 period, all waste has been documented according to its source. Additionally, the records include information on the type of waste, the amount of waste, and details of the transporter.

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OFI 3	<p>OFI Statement:</p> <p>PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil Indicator 7.4.1</p> <p>OPIC, extension officer and smallholder carried out block inspections. Fertilizer application in smallholder blocks observed in sampled smallholder under Division I, II, and III.</p> <p>Encourage the smallholders to prepare the blocks (clean circle from weed, removed voluntary oil palm) prior to fertilizer application for optimized soil fertility.</p> <p>Verification / Follow-up actions:</p> <p>Based on field observation to the sample of smallholder during ASA3_1 audit, all smallholder block were well-maintained, with no presence of weeds or voluntary oil palms. Based on interview to the smallholder, obtained that the smallholder extension officer have been actively fulfilling their roles. These officers have consistently provided training and raised awareness, particularly in the areas of good agricultural practices and compliance with RSPO (Roundtable on Sustainable Palm Oil) requirements. This regular guidance has clearly had a positive impact on the smallholders, as evidenced by the well-kept conditions of their plots and their understanding of sustainable agricultural practices.</p>
OFI 4	<p>OFI Statement:</p> <p>PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil Indicator 7.12.7</p> <p>The company monitors the HCV-HCS through Buffer Zone Inspection Checklist. Sighted the Buffer Zone Inspection Checklist for Hagy Estate, Navo Estate, Pandi Estate period of January 2023-August 2023.</p> <p>Aligned monitoring checklist as per HCV-HCS Assessment Report (type of conservation values and the recommendations for management and monitoring plan) is expected.</p> <p>Verification / Follow-up actions:</p> <p>The HCV-HCS monitoring form includes key issues that need to be checked, such as hunting activity, evidence of fire or burning, tree cutting, gardening activities, observed RTE species, boundary markers, and HCV/HCS information boards. The HCV-HCS monitoring checklist implemented by the certification unit is aligned with the HCV-HCS assessment report. The inclusion of conservation value types or HCV numbers in the monitoring checklist form is currently noted.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1037572M17 – RSPO SCCS	Major	D.3.2	28/03/2014	08/04/2014 (closed)
1037572M18 – RSPO SCCS	Major	D.3.3	28/03/2014	08/04/2014 (closed)
1037572N4	Minor	4.7.2	28/03/2014	06/03/2015 (closed)
10375752N5	Minor	4.7.3	28/03/2014	06/03/2015 (closed)
10375752N10	Minor	4.7.5	28/03/2014	Escalated to Major NC
10375752N9	Minor	5.3.2	28/03/2014	06/03/2015 (closed)
10375752N13	Minor	5.6.2	28/03/2014	06/03/2015 (closed)

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10375752N15	Minor	6.5.3	28/03/2014	06/03/2015 (closed)
1161437M1	Major	4.7.5	06/03/2015	04/05/2015 (closed)
1161437M2	Major	5.6.1	06/03/2015	04/05/2015 (closed)
1161437N1	Minor	4.8.2	06/03/2015	20/02/2016 (closed)
1161437N2	Minor	5.2.4	06/03/2015	20/02/2016 (closed)
1295340M1	Major	2.2.1	20/02/2016	20/04/2016 (closed)
1295340M2	Major	4.7.3	20/02/2016	20/04/2016 (closed)
1295340M3	Major	6.3.2	20/02/2016	20/04/2016 (closed)
1295340M4 – RSPO SCCS	Major	D.4.1	20/02/2016	20/04/2016 (closed)
1295340N1	Minor	4.1.2	20/02/2016	01/08/2017 (closed)
1295340N2	Minor	4.7.5	20/02/2016	01/08/2017 (closed)
1664926-201807-M1	Major	6.5.2	10/08/2018	01/10/2018 (closed)
1664926-201807-M2	Major	4.7.3	10/08/2018	01/10/2018 (closed)
1664926-201807-M3- RSPO SCCS	Major	5.5	10/08/2018	01/10/2018 (closed)
1664926-201807-M4- RSPO SCCS	Major	5.11	10/08/2018	01/10/2018 (closed)
1992828-202012-M1	Critical	6.7.3	15/12/2020	23/02/2021 (closed)
1992828-202012-M2	Critical	7.2.6	15/12/2020	23/02/2021 (closed)
1992828-202012-M3	Critical	7.2.7	15/12/2020	23/02/2021 (closed)
1992828-202012-M4	Critical	7.10.1	15/12/2020	23/02/2021 (closed)
1992828-202012-N1	Minor	7.2.8	15/12/2020	Escalated to NC Major 2104903-202108-M4
1992828-202012-N2	Minor	7.3.2	15/12/2020	Escalated to NC Major 2104903-202108-M45
1992828-202012-N3	Minor	7.3.3	15/12/2020	07/12/2021 (closed)
2104903-202108-M1	Major	3.1.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M2	Major	3.6.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M3	Major	7.1.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M4	Major	7.2.8	15/09/2021	07/12/2021 (closed)
2104903-202108-M5	Major	7.3.2	15/09/2021	07/12/2021 (closed)
2104903-202108-N1	Minor	1.1.5	15/09/2021	20/08/2022 (closed)
2104903-202108-N2	Minor	3.2.2	15/09/2021	20/08/2022 (closed)
2104903-202108-N3	Minor	3.3.2	15/09/2021	20/08/2022 (closed)
2104903-202108-N4	Minor	3.7.2	15/09/2021	20/08/2022 (closed)

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2104903-202108-N5	Minor	4.3.1	15/09/2021	20/08/2022 (closed)
2104903-202108-N6	Minor	6.5.3	15/09/2021	20/08/2022 (closed)
2104903-202108-N7	Minor	7.12.7	15/09/2021	20/08/2022 (closed)

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 Hargy Oil Palms Limited 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)
Union	Worker union	Face to face
Governmental Department	<ul style="list-style-type: none"> - Conservation and Environmental Protection Agency (CEPA) - Department of Labor and Industrial Relation - Oil Palm Industry Corporation (OPIC) 	By phone and face to face
Communities	<ul style="list-style-type: none"> - Ewasse Community - Lamo Auru Conservation Association – landowner association - Kabaiya LSS Block womens representative - Ulamona village representative - Baikakea village representative 	Face to face
Internal	Social Improvement Committee - Community Engagement	Face to face
External	Alaba Lease-Lease Back Abulmosi Lease-Lease Back	Face to face

Stakeholders comment	
1	<p>Feedbacks: Hargy Worker union representative</p> <ul style="list-style-type: none"> - Worker union representative at Hargy have not vehicles to disseminate information to worker union members in operating unit (estates). - Hargy did not provide separated room/building for worker union to held the union meeting. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Based on the interview with worker union, Audit team obtain information that the worker union representative (Mr. JJ) submitted request verbally for Hargy to provide facilities to held union meeting such as vehicle and separated room. The union members (several Hargy employees) has been deducted PGK 2.00 per fortnight for union activities, but unfortunately the worker union cannot well managed its fund. <p>Based on information from the management, the worker union is formed independently and under supervisory of PNG Worker Union. HOPL worker union must first consult with the PNG Worker Union. Hargy Oil Palms Limited did not forced any activities of the worker union, but the facilities for union activities shall be provided by its organisation. Hargy will support the union activities by providing room for the meeting following Hargy procedure. Audit team accepted the explanation from management.</p>
2	<p>Feedbacks: Conservation and Environmental Protection Agency (CEPA)</p> <ul style="list-style-type: none"> - Hargy have been met the environmental regulations. - There is incident in the beginning of year 2024 that CPO truck slips and CPO spillage to Ama creek. This incident has been report to CEPA and immediate respond has been followed up by Hargy. <p>Audit Team verification and response:</p> <p>Audit team verified the incident report. Date accident: 17 Jan 2024. Prime Mover VP08 and PO12. CPO spillage to Ama creek and recovery conducted immediately. Investigation report made 10 Apr 2024 and approve by GM on 12 Jul 2024. Audit team accepted that the investigation report and the follow up action by HOPL.</p>
3	<p>Feedbacks: Department of Labor and Industrial Relation</p> <ul style="list-style-type: none"> - Minimum wage of PNG is PGK 3.50 per hour, but Hargy pay better than government regulations. - The updated PNG labor regulation is under review, especially for minimum wage rate. Because this regulation has been outdated. - There is no issues related industrial relation cases from Hargy submitted to DLIR for 2023 and 2024 (up to July). <p>Audit Team verification and response:</p> <p>Positive comments, no need to follow up</p>
4	<p>Feedbacks: Oil Palm Industry Corporation (OPIC)</p> <p>OPIC have collaboration program with Hargy particularly for smallholder extension activities. So far, the smallholder program is well managed and fully support for field activities by Hargy. No negative issues from smallholders.</p> <p>Audit Team verification and response:</p> <p>Positive comments, no need to follow up.</p>
5	<p>Feedbacks: Ewasse Community representative</p> <ul style="list-style-type: none"> - Good relationship with Hargy. - Have respect to Hargy for smallholder program both LSS and VOP, because this can increase the community welfare. - No land disputes between Hargy, VOP and LSS blocks within last five (5) years. Also, no issues on FFB selling from smallholders to Hargy. <p>Audit Team verification and response:</p> <p>Positive comments, no need to follow up</p>
6	<p>Feedbacks: Alaba Development Ltd. (LLB) – Mr. Nixon Volele</p> <ul style="list-style-type: none"> - FPIC process is implemented by Hargy prior to develop the plantations.

	<ul style="list-style-type: none"> - Alaba Development Ltd. bought the land from the state land and engage HOPL to develop the oil palm plantations. The MoU signed since 2009/2010 with partnership status is Lease-Lease Back. Since then, no issues in development. - Planned in 2025, Alaba LLB will review the agreement for increasing profit sharing. - In general, HOPL has provided many benefits to the communities around the plantations. <p>Audit Team verification and response: Positive comments, no need to follow up</p>
7	<p>Feedbacks: Lamo Auru Conservation Association Wish that Hargy can support the protection of conservation area (12,000 Ha) by supporting program and assist to Tourism Department for develop tourism in this area.</p> <p>Audit Team verification and response: Hargy team (sustainability team) will try to discuss with Lamo Auru landowner for tourism support. Audit team accepted the follow up action by HOPL management.</p>
8	<p>Feedbacks: Baikakea community representative</p> <ul style="list-style-type: none"> - As geographically, Baikakea village located closed to the seacoast while Hargy plantation is located above the village. During wet/rainy season the people have difficult access to clean water, because river/stream water is murky. Since that happen, no assistance or supporting for clean water access. Also, social services or consultation activities in this village is not well performed by HOPL. - Clean water access when rainy season, there is no assistance from Hargy. - Emergency vehicle assistance from the village to Bialla Health Center is not provided by HOPL. - HOPL only cares about the field day program for smallholders, less concerned about social services. <p>Audit Team verification and response: Has been verified under Indicator 4.3.1. Based on an interview with the Community Engagement Manager, these issues were captured during the Community Engagement meeting held on 28 May 2024 at Baikakea Village. The meeting addressed critical concerns, including water pollution, supply shortages, health impacts, and environmental issues. Hargy Oil Palms Limited (HOPL) will continue to support community needs, provided that the government fulfills its obligations to the communities. However, HOPL recognizes that it cannot address all community needs independently, as the company must align its efforts with government programs and responsibilities.</p> <p>Available Annual Work Plan 2024 of Community Engagement Section, that aims to build trust and improve stakeholder confidence by fostering collaboration, increasing community participation, addressing community concerns, and upholding sustainable practices in compliance with relevant regulatory policies and guidelines. Priority Areas are Education, Health, Youth and Other areas as identified. Audit team accepted respond and follow up action by HOPL management.</p>
9	<p>Feedbacks: Ulamona community representative</p> <ul style="list-style-type: none"> - There are no social activities for Ulamona residents, only field days. The issue is, when the community was affected by the eruption of Mount Ulawun in September 2023, they were evacuated to another place. However, there was no attention from Hargy to provide evacuation vehicles, instead the Chinese Company's highway contractor helped with the evacuation using their dump trucks. For 3 days there was no food supply, even HOPL had no role. - The impact of the eruption, residents left their fields until now there are no FFBs that can be harvested, so what is the solution from HOPL if the community does not get money from oil palm. - There is no access to clean water from HOPL, because several water flows/streams become mud paths and residents are threatened with not getting clean water. Several water flows have dried up. Then how is HOPL's attention to this. - There has never been any consultation from HOPL (its staff) who have dated and asked about the needs of residents. <p>Audit Team verification and response: Has been verified under Indicator 4.3.1, while Hargy prioritizing to evacuation their employees during eruption. The government have emergency evacuation vehicle, but not standby.</p>

	Hargy will support for communities needs as long as the government have met their obligation to the communities. Hargy cannot fulfilled all communities needs because the company have respect to government program.
10	<p>Feedbacks: LSS Kabaiya women representatives</p> <ul style="list-style-type: none"> - Previously a lot of women work as loose fruit picker with insufficient wage compare with decent living, but HOPL is provide additional soft skill training. - Since have field day and part of smallholder members who certified RSPO, women rights is getting more attention and the standard of living is increasingly in Kabaiya. - Even though they received additional training regarding soft skills, unfortunately there was no place to sell their products and marketing assistance, such as a place to sell woven products, bread/donuts, etc. <p>Audit Team verification and response: Positive comments for the additional training skill. The management respond that some comments should be part of local government provision such as market place at Kabaiya. Audit team accepted respond by HOPL management.</p>
11	<p>Feedbacks: Abulmosi (LLB) – Mr. Joachim Baliau</p> <ul style="list-style-type: none"> - FPIC process is implemented by Hargy prior to develop the plantations. - Abulmosi LLB bought the land from the state land and engage HOPL to develop the oil palm plantations covers 583 Ha planted and 807 is unplanted and reserved as buffer zone. Abulmosi area is part of Pandi Estate (Bakada Plantation). - The MoU signed since 2011 with partnership status is Lease-Lease Back. Since then, no issues in development. - Planned in 2025, Abulmosi LLB will review the agreement for increasing profit sharing. This aims to assist the community facilities. - In general, HOPL has provided many benefits to the communities around the plantations. <p>Audit Team verification and response: Positive comments, no need further follow up.</p>
12	<p>Social Improvement Committee – Mr. Wayne Bira</p> <ul style="list-style-type: none"> - The SIC is part of Community Engagement Division to develop social program for local communities regarding health, education, social issues, etc. - Formerly, SIC is within the Community Affairs department, due to Social Communities issues is more complex and must be managed differently, particularly during social engagement, therefore the Social Improvement Committee is established. - Scope of community engagement division is all communities located surrounding the plantations (HOPL), where there are only two persons/officer assigned to cover all communities. Any issues raises from communities, will manage by Community Engagement and program/work plan how to handle and manage the issues will discuss in the Social Improvement Committee. <p>Audit Team verification and response: Positive comments, no need further follow up.</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
Joachim Baliau (Abulmosi LLB)	current	1,390 Ha (as lease-lease back for Pandi Estate)	Yes	Yes	Compliance

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Previous land owner / user comment	
1	<p>Feedbacks:</p> <p>Abulmosi LLB – Joachim Baliau</p> <ul style="list-style-type: none">- FPIC process is implemented by Hargy prior to develop the plantations.- Abulmosi Oil Palm Estate Ltd. bought the land from the state land and engage HOPL to develop the oil palm plantations. The MoU signed since 21 February 2018 with partnership status is Lease-Lease Back. Since then, no issues in development.- In general, HOPL has provided many benefits to the communities around the plantations. <p>Audit Team verification and response:</p> <p>Positive comments, no need to follow up.</p>



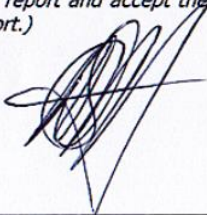
3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Hargy Oil Palms Limited has complied with the PNG & Solomon Islands National Interpretation 2019 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 Hargy Oil Palms Limited is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: Craig Gibsone
Company Name: On behalf BSI Services Malaysia Sdn Bhd	Company Name: Hargy Oil Palms Limited
Title: Lead Auditor	Title: General Manager HOPL
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: 26 August 2024	Date: 2 SEP 2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 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.			
1.1.1	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>Smallholder Requirement:</p> <p>Organization that is managing the smallholders shall hold relevant documents and make available to interested parties on request.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has established management documents specified in the RSPO P&C, which are made publicly available according to the Procedure for Dissemination of Company Information & Documents (Doc. No. PRO-SUS-SUS-002-04). This procedure outlines how the company's documentation is disseminated to both internal and external parties.</p> <p>Requests for information can be made verbally, during stakeholder or consultation meetings, or through written requests, phone calls, or emails. All requests are recorded in the Request for Information Register.</p> <p>The list of documents publicly available at the unit of certification includes land titles/user rights records, land acquisition and negotiation procedures, detailed complaints and grievances records, HCV reports, SEIA and EIA documents, company policies, public summary reports of certification assessments, and pollution prevention and reduction plans. Both company and smallholder documents are accessible upon request.</p> <p>Smallholder:</p> <p>All documents required RSPO for smallholders is available in notification board and disseminated during Field days.</p>	Complied
1.1.2	Documented Information is provided in English and accessible to relevant stakeholders. Explanatory information may be provided in writing or orally in Tok Pisin (PNG) or SI Pijin (Solomon Islands)	All documented information is available in both English and Tok Pisin (the local language). Hargy Oil Palms Limited has made the Freedom of Association Policy (No. POL-HRD-GEN-009-06, dated 6 June 2022) available	Complied

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	- Minor compliance -	<p>in Tok Pisin. During visits to the mills and estates sampled during this audit, records of information dissemination were found to be in place.</p> <p>Based on interview with stakeholders, smallholders and employees, confirmed that information on environmental, social and legal issues relevant to RSPO Criteria are adequately accessible and provided in English and Tok Pisin.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The Unit of Certification has established a procedure for responding to information requests, as outlined in the SOP for Dissemination of Company Information & Documents No. PRO-COM-SUS-002-03, which replaced the previous procedure No. PRO-SUS-SUS-002-04.</p> <p>Section 2 of the SOP stipulates that all requests received must be recorded in the "Request for Information Register." These records are maintained by the Unit of Certification and are centralized within the Community Affairs Department and the Sustainability Department.</p> <p>Additionally, each operating unit (Mill and Estate) maintains its own records of information requests and responses. The designated personnel responsible for accessing these documents are the Mill Manager or Estate Manager.</p> <p>For example: On 3 August 2024, a request for information was submitted by a representative of the workers' union regarding overtime allowances for mill workers.</p>	Complied
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>- Critical (Major) compliance -</p>	<p>There is no changes of consultation and communication procedure during this assessment.</p> <p>The Consultation and communication procedure are documented in procedure Communication (PRO-SUS-EMS-006-15). This procedure describes how to communicate both internally and with external interested</p>	Complied

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		<p>parties on issues of social and environmental management and performance. Responsible person or nominated management official to implementing this procedure are:</p> <ul style="list-style-type: none"> - General Manager - Smallholders Affairs Department - Department Managers - Sustainability Manager - Supervisors - All personnel <p>The latest dissemination regarding Consultation and communication procedures has been conducted, for example:</p> <ul style="list-style-type: none"> - On 11 June 2024, at Mataururu Village, attended by 69 stakeholders. - On 24 June 2024, at Tiauru Village, attended by 46 stakeholders. - On 13 May 2024, at Barema Village, attended by 52 stakeholders. - On 2 July 2024, at Baekakea Village, attended by 43 stakeholders. <p>Based on interview with stakeholders, they are aware how to make consultation and communication with the company.</p> <p>Otherwise, Hargy Oil Palms Limited have developed Communication Policy (POL-HRD-GEN-002-05, issued on 7 June 2019) which were accessible to all parties. All interested parties can access the Communication Policy through the link: https://www.sipef.com/sipef-papua-new-guinea/sustainability/policies/communication-policy/.</p> <p>The responsible section for community engagement is under and relevant stakeholders is Social Community Engagement Section. Nominated management official for Social Community Engagement is Mr. Wayne Bira.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>Unit of certification have list of contact and details stakeholders, including their nominated representatives and documented in HOPL List of Interested Parties (REG-SUS-GEN-001-13). The stakeholders divided into 14 types, i.a:</p> <ul style="list-style-type: none"> - National Government (15 institutions) 	Complied

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		<ul style="list-style-type: none"> - Provincial Government (6 institutions) - Local Level Government (4 institutions) - Oil Palm Growers (10 institutions) - Local Communities & Wards (24 stakeholders) - Incorporated Land Groups/ILG (9 stakeholders) - Landowners Associations (4 associations) - NGO's (3 stakeholders) - Industry (9 organizations) - Worker Associations (1 organization) - Contractors (46 contractors) - Other organizations (5 institutions) - Good Suppliers (26 enterprises) - Services suppliers (7 institutions) <p>Only one (1) organization is updated for this year, where under Goods suppliers.</p> <p>The list of stakeholders is completed with Name, contact persons, Contact means, HOPL Responsible Department/Section, Remark. Audit team tested the list of stakeholder and found up-to-date when calling the phone number of selected stakeholder and/or going for meeting to villages/community during stakeholder consultations.</p>	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.</p> <p>Smallholder Requirement:</p>	<p>There's no change of revision regarding to ethical conduct Policy from previous assessment. Hargy Oil Palms Limited (HPOL) has established Ethical Conduct Policy (POL-HRD-GEN-003- 05), issue No: 5, issued date: 6 June 2022 – the policy has signed by General Manager. The policy informs:</p> <ul style="list-style-type: none"> - All employees must conform strictly to the laws and regulations of Papua New Guinea as well as to accept standards of business ethics, both locally and overseas, including those set out in this code. - No Illegal gratification and Corrupt practice. 	Complied

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	<p>Organization that is managing the smallholders required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> - All executives must complete a declaration of conflict of interest form whether they are involved in other ventures or business partnership or not. <p>The organization had conducted socialization via early induction before sign the contract. For examples records:</p> <ul style="list-style-type: none"> - Induction Agreement records on 29 January 2024 with PT Jasa Aman Engineering on behalf of Sakris. - Induction Agreement records on 13 January 2024 with Palmiteco Engineering SDN BHD ion behalf of Sumarno. - Induction Agreement records on 23 July 2024 with ANUPI on behalf of Raymond V. - Induction Agreement records on 1 July 2024 with PNG Plant Hire on behalf of Pilimbopume. - Induction Agreement records on 4 March 2024 with Earthworks Mowing Services on Behalf of Robert Flesial. - Induction Agreement records on 19 February 2024 with Earthworks Mowing Services on Behalf of Robert Mr. Silva - Induction Agreement records on 25 June 2024 with Stabelnin (PNG) Ltd. on Behalf of Dickson. <p>The induction record has been signed by both parties. In that record, the contractor agreed and declared to comply with HOPL environmental and RSPO requirements (including policy of ethical conduct).</p> <p>In addition, the organization had conducted ethical policy induction for internal stakeholder, for examples:</p> <ul style="list-style-type: none"> - Ethical conduct policy induction on 1 May 2024 at Barema Oil Mill Engineering process attended by 16 personnel. - Ethical conduct policy induction on 8 April 2024 at Barema Oil Mill KCP and electrical department attended by 26 personnel. 	
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		<ul style="list-style-type: none"> - Ethical conduct policy induction on 9 April 2024 at Barema Oil Mill maintenance department attended by 13 personnel. - Ethical conduct policy induction on 16 July 2024 at Navo Oil Mill Engineering department attended by 25 personnel. - Ethical conduct policy induction on 12 July 2024 at Navo Oil Mill Engineering department attended by 25 personnel. - Ethical conduct policy induction on 19 June 2024 at Kiba Plantation attended by 8 personnel. - Ethical conduct policy induction on 18 June 2024 at Kiba Plantation Division 2 attended by 11 personnel. <p>Based on interview results with spraying, manuring and harvesting worker, they are already aware about ethical conduct policy such as integrity behaviour and corruption prohibited.</p> <p><u>Smallholders:</u> Scheme smallholders have had Policy Concerning Ethical Conduct that issued by OPIC since 19 July 2017. This policy containing: Basic Principles; Conflict of Interest; Illegal Gratification and Corrupt Practice; Gifts and Internal Controls.</p> <p>Based on interview with extension officer, the ethical conduct policy also re-disseminated during the field day, as presented at Smallholder Attendance Record, such as:</p> <ul style="list-style-type: none"> • Smallholder of Tiauru LSS: Field Day regarding RSPO Requirements including BMP, production, FFB inspection zone and security, on 7 February 2024, facilitate by HOPL-SHAAS, OPIC Staff, Police and Security. Attended by 59 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, child labour, ethical conduct policy, buffer zone, RTE species), importance of upkeep, importance of regular harvesting, importance of crop quality, importance of fertilizer, production figures, 	
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		<p>security awareness including prohibit use of fire on waste disposal and replanting.</p> <ul style="list-style-type: none"> • Mini Field Day – Management for oil palm farmers on 11 June 2024; located at Mataururu Block 10-1008 (OPRA BMP Block); facilitated by HOPL Smallholder extension and PNG OPRA; cover topics related to saving scheme, Fertiliser, pest and disease, ethical conduct policy, child labour, chemical requirement and safety uses, waste management, RTE species, buffer zone, grievance, new planting and replant, consequences of not compliant, transport-production, road and pick up schedule; Attended by 69 participants including from independent estate i.e Babex Estate. <p>Based on interview during field visit with sampled of smallholders, e.g.: Pupui Solagoga (No.050150, Uasilau LSS), Timothy Lume (No.460019, Walo VOP), Jonah Tony (No.010259, Tiauru LSS), and Goldie Willimon (No.770002, Ivule Independent Estate), obtain information that the smallholders have informed related to the ethical conduct policy.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>To monitor the implementation of ethical conduct policy, the organization conduct internal audit assessment. Here's the sample of record:</p> <ul style="list-style-type: none"> - Internal Audit Report of Sustainability Department for Hargy Oil Mill on 24 June 2024. - Internal Audit Report of Sustainability Department for Barema Oil Mill on 20 June 2024. - Internal Audit Report of Sustainability Department for Navo Mill on 18 June 2024. - Internal Audit Report of Sustainability Department for Kiba Estate on 21 February 2024. - Internal Audit Report of Sustainability Department for Pandi Estate on 18 June 2024. <p>All of the previous negative/non-conformities findings will be checked by the auditors for their consistency of improvement, for examples there's</p>	Complied

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		improvement evidences of repairing boundaries pegs. The internal audit methodology are documentation/records, site inspection and interview individual staff onsite.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>Smallholder Requirement:</p> <p>Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance.</p> <p>- Critical (Major) compliance -</p>	<p>The updated compliance with legal requirements are as follow:</p> <p>Hargy POM:</p> <ul style="list-style-type: none"> • "Certificate of Registration as a Factory – Mill Processing Plant No.17078 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – Machining Shop No.17079 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – Shed 1 & Shed 2 No.16384 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – Water Treatment Plant Plant No.17082 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – Electrical Workshop No.17083 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – CPO Pump House No.17086 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – Powerhouse No.17140 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration as a Factory – Overhead Crane No.17155 for Hargy Oil Palms Limited Hargy Mill, until 31 December 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13240, Registered No.PV.0954 (Sterilizer 1) in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1965", dated 13 November 2023 until 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13241, 	Complied

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		<p>Registered No.PV.0955 (Sterilizer 2) in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1965", dated 13 November 2023 until 13 November 2024.</p> <ul style="list-style-type: none"> • "Certificate of Registration of a Boiler Pressure Vessel No.13244, Registered No.PV.2675 (Back Pressure Vessel 1) in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1965", dated 13 November 2023 until 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.11324, Registered No.PV.4071 (Back Pressure Vessel 2) in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1965", dated 8 March 2023 until 8 March 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.11331, Registered No.B.1894 (Boiler 1) for PT. Atmindo Bidrum WT Boiler in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 8 March 2023 until 8 March 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.11332, Registered No.B.1896 (Boiler 2) for PT. Atmindo Bidrum WT Boiler in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 8 March 2023 until 8 March 2024. <p>---</p> <p>Barema POM</p> <p>The updated licenses in 2024 are:</p> <ul style="list-style-type: none"> • "Certificate of Registration as a Factory No.17137 – KCP Workshop for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", valid until 31 December 2024. Issued by Department of Labour and Industrial Relations. • "Certificate of Registration as a Factory – Mill Processing Plant No.17130 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969", valid until 31 December 2024. Issued by Department of Labour and Industrial Relations. • "Certificate of Registration as a Factory – Water Treatment Plant 	
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		<p>No.17135 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969”, valid until 31 December 2024. Issued by Department of Labour and Industrial Relations.</p> <ul style="list-style-type: none"> • “Certificate of Registration as a Factory – Boiler Plant House No.17136 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969”, valid until 31 December 2024. Issued by Department of Labour and Industrial Relations. • “Certificate of Registration as a Factory – Warehouse No.17132 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969”, valid until 31 December 2024. Issued by Department of Labour and Industrial Relations. • “Certificate of Registration as a Factory No.17133 – Mill Maintenance and Electrical Workshop for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, valid until 31 December 2024. Issued by Department of Labour and Industrial Relations. • “Certificate of Registration as a Factory No.17134 – Biogas Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, valid until 31 December 2024. Issued by Department of Labour and Industrial Relations. • “Certificate of Inspection of a Boiler Pressure Vessel No.13275, Registered No.PU.1335 for <u>Sterilizer2</u> in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Regulations 1965”, valid until 13 November 2024. Issued by Department of Labour and Industrial Relations. • “Certificate of Inspection of a Boiler Pressure Vessel No.13276, Registered No.PU.1336 for <u>Sterilizer3</u> in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Regulations 1965”, valid until 13 November 2024. Issued by Department of Labour and Industrial Relations. • “Certificate of Inspection of a Boiler Pressure Vessel No.13278, Registered No.PU.1353 for <u>Mech Drum Water Tube Boiler</u> in Hargy Oil 	
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		<p>Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Regulations 1965", valid until 13 November 2024. Issued by Department of Labour and Industrial Relations.</p> <ul style="list-style-type: none"> • "Certificate of Inspection of a Boiler Pressure Vessel No.13278, Registered No.PU.1338 for <u>Steam Separator1</u> in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Regulations 1965", valid until 13 November 2024. Issued by Department of Labour and Industrial Relations. • "Certificate of Inspection of a Boiler Pressure Vessel No.13283, Registered No.PU.1339 for <u>Steam Separator2</u> in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Regulations 1965", valid until 13 November 2024. Issued by Department of Labour and Industrial Relations. • "Certificate of Inspection of a Boiler Pressure Vessel No.13284, Registered No.PU.1337 for <u>Back Pressure Vessel</u> in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Regulations 1965", valid until 13 November 2024. Issued by Department of Labour and Industrial Relations. <p>The certificate registration of factory is updated in annual basis through the inspections.</p> <p>---</p> <p>In Navo POM, Environment Permit No. WD-L2B (104) to Hargy Oil Palms Limited, date of issue 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The environmental permit is still valid and applicable.</p> <p>The permit to carry out works at Ibana Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Bialla, West New Britain Province; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction.</p> <p>The updated machineries license as below:</p> <ul style="list-style-type: none"> • "Certificate of Registration as a Factory – Mill Processing Plant No.17118 for Hargy Oil Palms Limited Navo Mill, based on Industrial 	
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		<p>Safety, Health and Welfare Act 1961-1969", until 31 December 2024.</p> <ul style="list-style-type: none"> • "Certificate of Registration as a Factory – Metal Fabrication No.17122 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2024. • "Certificate of Registration as a Factory – Mill warehouse No.17123 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2024. • "Certificate of Registration as a Factory – Receiving Bay No.17120 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2024. • "Certificate of Registration as a Factory – Water Treatment Plant No.17121 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2024. • "Certificate of Registration as a Factory – Boiler Plant House No.17124 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13263, Registered No.PV.2123 for Pressure Vessel (Sterilizer 1) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 - 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13264, Registered No.PV.2124 for Pressure Vessel (Sterilizer 2) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 - 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13272, Registered No.B.3132 for PT Atmino Bidrum Boiler (Boiler 1) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 until 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13273, Registered No.B.3133 for PT Atmino Bidrum Boiler (Boiler 2) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 until 13 November 2024. 	
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		<ul style="list-style-type: none"> • "Certificate of Registration of a Boiler Pressure Vessel No.13269, Registered No.PV.1340 for Pressure Vessel (Horizontal Air Receiver) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 until 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13267, Registered No.PV.1338 for Steam Separator 1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 until 13 November 2024. • "Certificate of Registration of a Boiler Pressure Vessel No.13268, Registered No.PV.1339 for Steam Separator 2 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 13 November 2023 until 13 November 2024. <p>---</p> <p>Hargy POM: Nuweigh Weighbridge. Certificate of inspection #ICCC3090 dated 14 May 2024, model WB JAC320, capacity 60 tonnes, S/N: E26209-0212, valid until 25 May 2025. Other Mill machineries inspection have no scheduled for year 2024, the time period is once in two year. All the operating unit (Mill and Estate) has had List of PNG Applicable Legislations (REG-SUS-GEN-002-13) where all relevant legislation for Mill and Plantations operation is covered and listed, including the reviewing date. The latest issue No. 13 have been reviewed on 22 June 2024. In example:</p> <ul style="list-style-type: none"> - Investment Promotion Authority 1991 regarding registration of business name certificates and company registration, applicable to third party contractors have been amended on 29 May 2023. - Legislation of Industrial Safety, Health and Welfare Regulation 1965 regarding Inspections/Licenses issued by Department of Labour and Industrial Relations have been reviewed and No changes. 	
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		<p>The certificate holder has making review through Sustainability Department.</p> <p>Hargy Estate</p> <ul style="list-style-type: none"> - Legal requirements regarding land tittle of Hargy Estate has been complied as detailed in Indicator 4.4.1, in form of Agricultural Lease. - "License to Keep a Store Where Inflammable Liquids and/or Dangerous Goods May be Kept No.13066 for Hargy Oil Palms Limited Urumaili Goods Storage – Chemical Storage and Mixing Bay, based on Inflammable Liquids Act 1953-1968". - "License to Keep a Store Where Inflammable Liquids and/or Dangerous Goods May be Kept No.13067 for Hargy Oil Palms Limited Division I Goods Storage – ChemiacI AStorage & Mixing Bay, Fertilizer Store Shed, based on Inflammable Liquids Act 1953-1968". - "License to Keep a Store Where Inflammable Liquids and/or Dangerous Goods May be Kept No.13076 for Hargy Oil Palms Limited Urumaili/Kerakera/Makakiwa oil storage diesel tank cap. 3000 liters x 3, based on Inflammable Liquids Act 1953-1968" - Department of Labour and Industrial Relations Annual Inspection Plan 27 June – 2 July 2023 against Industrial Safety, Health and Welfare Act 1961, Industrial Safety, Health and Welfare Regulation 1965, Trade Licensing Act 1969-1970, Inflammable Liquids Act 1953-1968. <p>Navo Estate:</p> <ul style="list-style-type: none"> - Legal requirements regarding land tittle of Navo Estate has been complied as detailed in Indicator 4.4.1, in form of Agricultural Lease and Lease-Lease Back. - Environment Permit No. WD-L2(60) date of issue 11 January 2001, date of amendment 16 June 2006, date of expiry 31 December 2053 – for Hargy Oil Palms Limited to extract water from Ibana River within Portion 624, West New Britain Province. 	
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		<ul style="list-style-type: none"> - "Certificate of Registration as a Factory No.16446 – Power House for Hargy Oil Palms Limited Navo Estate, based on Industrial Safety, Health and Welfare Act 1961-1969". - "License to Keep a Store Where Inflammable Liquids And/Or Dangerous Goods May Be Kept – Overhead Storage in Compound (10,000 litres) No.13072 for Hargy Oil Palms Limited Navo Estate-Atata Plantation, based on Inflammable Liquids Act 1953-1968". <p>Pandi Estate:</p> <ul style="list-style-type: none"> - Legal requirements regarding land title of Navo Estate has been complied as detailed in Indicator 4.4.1, in form of Agricultural Lease and Lease-Lease Back. - Environment Permit No. WD-L2B (224) to Hargy Oil Palms Limited, date of issue 9 November 2009, expiry on 9 December 2034. The permit to carry out works at Portion 733, Milinch Ulawun, Fourmil Talasea, West New Britain Province; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction. - "Certificate of Registration as a Factory No.16443 for Power House in Pandi VWS based on Industrial Safety, Health and Welfare Act 1961-1969". - "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Delivered Goods Storage (chemical storage shed, mixing bay, fertilizer storage, lubricant storage, oxygen & acetylene storage), No.13058 for Hargy Oil Palms Limited Pandi Estate Bakada Plantation, based on Inflammable Liquids Act 1953-1968". - "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – overhead storage tank (fuel bowser: 30,000 litres diesel and drum storage petrol), No.13071 for Hargy Oil Palms Limited Pandi Estate Bakada Plantation, based on Inflammable Liquids Act 1953-1968". 	
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		<ul style="list-style-type: none"> - "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Pumps (3 Fuel Bowsers) No.13079 for Hargy Oil Palms Limited Pandi Estate Bakada Plantation, based on Inflammable Liquid Acts 1953-1968". <p>Smallholders:</p> <ul style="list-style-type: none"> - Smallholder No 04-0682: Statuary of Declaration Lamase Sagagol of Portion 682, in Malasi LSS Subdivision, Bialla, WNPB (Declared at Bialla. 5 June 2023 by Independent State of Papua New Guinea). Completed with Survey Map of portion 671-692 (Act. No. 15/203) - Smallholder No. 04-1192: Land Application for Portion 1192 at Sale Malasi Subdivision. Milinch/Banga Fourmil/Talasea – West Britain Province in 27 February 2017. Inspection report for Portion 1192 on 27 February 2017 with land area 6 hectares; Valuation report on 15 August 2017. Completed with Survey Map of Portions 1190-1196 & 1199 (Cat. No. 15.674). - Smallholder No. 04-0782: Agricultural Lease under Section 56; portion 782, Milich Banga, Fourmil Talasea with area 15.76 ha; referred to in state lease volume 81 Folio 250 on 4 April 2012 by Deputy Registrar of Titles. - Smallholder No. 390022: Memorandum of Agreement between Gamupa Oil Palm Evelopement Ltd and Cornellius Lai on 26 July 2018; Agricultural Lease Title Described as Volume 25, Folio 184, Portion 5, Milinch of Ulawun, Fourmil of Talasea in West New Britain. Gamupa Oil Plam Developmnet ltd constest to release 2 hectares of its oil palm esttae to Cornellius Lai. The Agreement expires on the 30 July 2028. - Smallholder No. 02-0708: Agricultural Lease under Section 56; portion 708, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 36 Folio 8800 on 22 March 1985 by Delegate of the Minister for Lands. - Smallholder No. 02-0697: Agricultural Lease under Section 56; portion 697, Milich Uluwan, Fourmil Talasea with area 7.42 ha for period of 99 	
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		<p>years; referred to in state lease volume 91 Folio 116 on 14 November 1984 by by Deputy Registrar of Titles.</p> <ul style="list-style-type: none"> - Smallholder No. 02-0781: Agricultural Lease under Section 56; portion 781, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 91 Folio 171 on 14 November 1984 by by Deputy Registrar of Titles. - Smallholder No 02-0746: Statuary of Declaration Peter Jimmy of Portion 746, in Wilelo LSS, Bialla, WNBP (Declared at Bialla. 18 August 2018 by Independent State of Papua New Guinea). Completed with Survey Map of portion 746-754 & 1109-1126 (Act. No. 15/383). - Smallholder No. 02-0748: Agricultural Lease under Section 56; portion 748, Milich Uluwan, Fourmil Talasea with area 6.51 ha for period of 99 years; referred to in state lease volume 89 Folio 228 on 18 September 1984 by by Deputy Registrar of Titles. - Smallholder No. 02-0718: Agricultural Lease under Section 56; portion 718, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 79 Folio 61 on 17 October 1983 by by Deputy Registrar of Titles. - Smallholder No. 33-1971: Land Application for Portion 1971 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNBP on 1 August 2016 to Department of Lands & Physical Planning; Inspection Report on 17 August 2016 with land area 6.7 ha; Valuation report on 12 August 2016; Survey of Map Portions 1960-1975 (Cat. No. 15/628). - Smallholder No. 33-1987: State Lease under section 87 of the land Act 1996 for a period 99 years from 13 January 2005; containing an area of 8.7200 hectares (Portion 1987) on registered survey plan catalogued no. 15/630. - Smallholder No. 33-1980: Land Application for Portion 1980 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNBP on 2 August 2022 to Department of Lands & Physical Planning; Inspection Report on 22 august 2022 with land area 7 ha; Valuation report on 12 August 2016; Survey of Map Portions 1976-1991 (Cat. No. 15/630). 	
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		<ul style="list-style-type: none"> - Smallholder No. 33-1981: Land Application for Portion 1981 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNBPN on 29 June 2012 to Department of Lands & Physical Planning; Inspection Report on 25 December 2011 with land area 11.25 ha; Valuation report on 5 December 2011; Survey of Map Portions 1976-1991 (Cat. No. 15/630). - Smallholder No. 33-2005: State Lease under section 49 of the land Act 1996 for a period 99 years from 25 March 1993; containing an area of 6.6 hectares (Portion 2005) on registered survey plan catalogued No. 15/628. - Smallholder No. 010-225: Agricultural Lease under section 56 of the land Act 1962 for a period 99 years from 17 November 1977, Milinch Nakanai, Fourmil Talasea; containing an area of 8.46 hectares (Portion 225) on registered survey plan catalogued no. 15/303. - Smallholder No 010-225: Statuary of Declaration Paul Gena of Portion 192, in Tiauru LSS Subdivision, Bialla, WNBPN (Declared at Bialla. 24 April 2020 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No. 010-243: Agricultural Lease under Section 56; portion 243, Milich Nakanai, Fourmil Talasea with area 8.62 ha for period of 99 years; referred to in state lease volume 67 Folio 51 on 31 August 1979 by Deputy Registrar of Titles. - Smallholder No 010-205: Statuary of Declaration Kenny Wingomi of Portion 205, in Tiauru LSS Subdivision, Bialla, WNBPN (Declared at Bialla. 5 May 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No 010-202: Statuary of Declaration Wasei Walaki of Portion 202, in Tiauru LSS Subdivision, Bialla, WNBPN (Declared at Bialla 8 July 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No 010-259: Statuary of Declaration Jonah Tony of Portion 259, in Tiauru LSS Subdivision, Bialla, WNBPN (Declared at Bialla 11 October 2021 by Independent State of Papua New Guinea). Completed 	
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		<p>with Survey Map of portion 253-270, 272-278, 295-300 & 303-306 (Act. No. 15/307).</p> <ul style="list-style-type: none"> - Smallholder No. 05-0189: Agricultural Lease under Section 56; portion 189, Milich Banga, Fourmil Talasea with area 6.4 ha for period of 99 years; referred to in state lease volume 2 Folio 1 on 25 November 1966 by Administrator of The Territory of Papua and New Guinea. - Smallholder No 05-193: Statuary of Declaration Kovulovo Melamuli of Portion 193, in Uasilau LSS Subdivision, Bialla, WNPB (Declared at Bialla, 5 May 2022 by Independent State of Papua New Guinea). Completed with Survey Map of portion 187-193 (Act. No. 15/24). - Smallholder No. 32-1109: Land Application for Portion 1109 Subdivision Milinch/Banga Fourmil/Talasea – WNPB on 30 November 2023 to Department of Lands & Physical Planning; Inspection Report on 30 November 2023 with land area 6.64 ha. - Smallholder No. 32-1164: Land Application for Portion 1164 Subdivision Milinch/Banga Fourmil/Talasea – WNPB on 29 May 2015 to Department of Lands & Physical Planning; Inspection Report on 29 May 2015 with land area 7.23 ha. - Smallholder No. 32-1164: Successful applicant for lease Notice under Section 75 & 76 of The Land Act No. 45 of 1996 for portion 1148 at Milinch Banga, Fourmil Talasea by Secretary for Lands and Physical Planning on 8 May 2017. Completed with Survey of Map Portions 1148-1158 & 1167 (Cat. No. 15/665). - Smallholder No. 32-1118: Document of meeting no. 1922 regarding to consideration of application for an agricultural lease by notice in the National Gazette of 11 November 1993 (Onike Tavisou, Portion 1118 with 6.63 ha). - Smallholder No. 32-1187: Land Application for Portion 1169 Subdivision Milinch/Banga Fourmil/Talasea – WNPB on 29 March 2021 to Department of Lands & Physical Planning; Inspection Report on 29 March 2021 with land area 5.32 ha; Valuation report on 29 March 2021; Survey of Map Portions 1968 & 1169 (Cat. No. 15/677). 	
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		<ul style="list-style-type: none"> - Smallholder No. 32-1114: Document of meeting no. 1922 regarding to consideration of application for an agricultural lease by notice in the National Gazette of 11 November 1993 (Krala Viobubu, Portion 1114 with 6.75 ha). - Smallholder No. 31-102: Agricultural Lease under Section 49; portion 1502, Milich Ulawun, Fourmil Talasea with area 6.77 ha for period of 99 years; referred to in state lease volume 4 Folio 30 on 25 July 1993 by Minister of Lands and Physical Planning. - Smallholder No 31-1523: Statuary of Declaration Aron Wafuka of Portion 1523, in Soi LSS Subdivision, Bialla, WNBP (Declared at Bialla, 6 August 2024 by Independent State of Papua New Guinea). Completed with Survey Map of portion 1519-1529 (Act. No. 15/582). - Smallholder No. 03-1399: Agricultural Lease under Section 56; portion 1399, Milich Ulawun, Fourmil Talasea with area 6.59 ha for period of 99 years; referred to in state lease volume 87 Folio 216 on 22 March 1985 by Minister of Lands and Physical Planning. - Smallholder No. 03-1359: Agricultural Lease under Section 56; portion 1359, Milich Ulawun, Fourmil Talasea with area 10.24 ha for period of 99 years; referred to in state lease volume 82 Folio 14 on 21 July 1984 by Minister of Lands and Physical Planning. - Smallholder No. 03-1371: Agricultural Lease under Section 56; portion 1371, Milich Ulawun, Fourmil Talasea with area 6.35 ha for period of 99 years; referred to in state lease volume 82 Folio 16 on 18 January 1984 by Minister of Lands and Physical Planning. - Smallholder No 03-1400: Statuary of Declaration Veronica Vulum of Portion 1400, in Barema LSS Subdivision, Talasea, WNBP (Declared at Bialla, 13 February 2015 by Independent State of Papua New Guinea). Completed with Survey Map of portion 1374-1400 (Act. No. 15/412). 	
2.1.2	The milling Company has a documented system for ensuring legal compliance in place. This system has a means to track changes to the law and also includes listing and evidence of legal due	Sustainability department is responsible for updating any changes of PNG legislation with collaborative information from legal department. All the updated legislations is documented in List of PNG Applicable Legislations (REG-SUS-GEN-002-13) dated 22 June 2024. The PNG Applicable	Complied

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	<p>diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>Smallholder Requirement:</p> <p>Organization that is managing the smallholders shall disseminate information on legal changes to smallholders.</p> <p>- Minor compliance -</p>	<p>Legislations comprise of 105 Legislations and PNG Code of Practices. The newest legislation was Dangerous Drug Act 1952; reviewed on 20 May 2022; commencement date on 13 January 2022. There is no updated legislation since then.</p>	
2.1.3	<p>For Company land, legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>For Smallholder land, boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General OR boundaries of Customary Land have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; AND there is no significant dispute over tenure.</p> <p>Smallholder allotment boundaries may be identified by traditional means provided that boundary locations are agree by all neighbouring parties that share common boundaries.</p> <p>Guidance: Significant disputes are those disputes currently before the Courts.</p> <p>Smallholders requirement:</p> <p>Smallholders, evidence of the "Right to use the land" will be demonstrated by compliance with the following:</p> <p>a) Land title or lease OR uncontested occupancy where</p> <ul style="list-style-type: none"> Boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and 	<p>Hargy Oil Palms Limited has demonstrated its commitment to monitoring and taking follow-up actions to ensure that the boundary pegs in all company estates are clearly demarcated and visibly maintained. As of August 2024, based on field observation, all boundary stones are clearly demarcated and visibly maintained. For example:</p> <ul style="list-style-type: none"> Boundary Stone No. Barema 223 at Barema Plantation – Hargy Estate, with coordinates 5° 11' 57.27" S and 151° 4' 9.98" E. Boundary Stone No. Barema 210 at Barema Plantation – Hargy Estate, with coordinates 5° 12' 17.26" S and 151° 4' 43.56" E. Boundary Stone No. Barema 279 at Barema Plantation – Hargy Estate, with coordinates 5° 10' 15.20" S and 151° 5' 55.77" E. Boundary Stone No. Kiba 265 at Kiba Plantation – Navo Estate, with coordinates 5° 8' 0.85" S and 151° 12' 5.70" E. Boundary Stone No. Abulmosi 155 at Bakada Plantation – Pandi Estate, with coordinates 5° 1' 53.07" S and 151° 24' 2.01" E. Boundary Stone No. Gamupa 33 at Bakada Plantation – Pandi Estate, with coordinates 5° 2' 55.33" S and 151° 25' 15.12" E. Boundary Stone No. Alangili 13 at Bakada Plantation – Pandi Estate, with coordinates 4° 58' 28.10" S and 151° 25' 31.76" E. <p>Smallholder:</p> <p>Smallholder within the scope is divided into two types, Land Settlement Scheme (LSS) and Village Oil Palms (VOP). For the LSS Blocks, boundary marks is pegs or stones, while VOP blocks boundary marks is by planting flower or other trees.</p>	Complied

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	<p>agreed between neighbours with common boundaries and other interested parties;</p> <ul style="list-style-type: none"> • There is no significant dispute over tenure; • Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries. <p>- Minor compliance -</p>	<p>All boundaries' marks of smallholders blocks is clearly demarcated and visibly maintained.</p> <p>Sample of smallholders' boundary pegs:</p> <ul style="list-style-type: none"> - Boundary Stone of smallholder Ieisu Mage (ID 050189) at Uasilau LSS, with coordinates 5° 33' 15.40" S and 150° 52' 58.49" E. - Boundary Stone of smallholder Kovulovo Melamuli (ID 050193) at Uasilau LSS, with coordinates 5° 33' 35.15" S and 150° 52' 44.70" E. - Boundary Stone of smallholder Timothy Lume (ID 460019) at Walo VOP, with coordinates 5° 31' 29.04" S and 150° 52' 37.91" E. - Boundary Stone of smallholder Ume Mulu (ID 460009) at Walo VOP, with coordinates 5° 31' 7.25" S and 150° 52' 47.62" E. - Boundary Stone of smallholder James Liu (ID 010243) at Tiauru LSS, with coordinates 5° 21' 53.49" S and 151° 1' 36.31" E. - Boundary Stone of smallholder Burnawae Tamata (ID 010225) at Tiauru LSS, with coordinates 5° 22' 5.37" S and 151° 2' 28.29" E. - Boundary Stone of smallholder Jonah Tony (ID 010259) at Tiauru LSS, with coordinates 5° 21' 54.08" S and 151° 2' 59.71" E. - Boundary Stone of smallholder Paul Gena (ID 010192) at Tiauru LSS, with coordinates 5° 21' 27.49" S and 151° 2' 42.91" E. - Boundary Stone of Independent Estate Ivule Holding Ltd (ID 770002) at Division I, with coordinates 5° 29' 54.57" S and 150° 59' 25.27" E. 	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
2.2.1	<p>A list of contracted parties is maintained. Contracted parties include parties with whom a formal documented contract is in place and Smallholders where the contract is implied through the Smallholder offering fruit for sale by placing it at the pick-up point and the Company accepting the Smallholders offer by collecting it. The price to be paid and other conditions of the transaction are</p>	<p>Unit of certification have list of contracted parties and updated when new contractor is engaged. Unit of Certification has "2024 Contractors Listings" for all HOPL operating sites.</p> <p>According to the list, there were 49 contracts maintained. The contract contains information of:</p> <ul style="list-style-type: none"> • Contracting Department, • Contract Owner 	Complied

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	<p>communicated by the Company. Each Smallholder pick-up is a separate transaction.</p> <p>Guidance: The Company docket issued when small-holder fruit is collected is evidence of the contract for that transaction.</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> • Status • Contract reference • Contractor • Commencement date • Expired date • Scope of works • Location of services to be rendered • Contractor representatives • Contact details • Contractor mailing detail • Contractor emailing address • Physical address. <p>Here are some samples of contractors who still have cooperation with the Company:</p> <ul style="list-style-type: none"> - Agreement No. HOPL-ENG-MGC/2022 with Marea Contractors Limited on 29 March 2022. - Contract of Service (No. HOPL2024-054: Grass Cutting Services) with Earthworks Mowing Services on 1 July 2024. - Contract of Service (No. HOPL2024-0824: CPKO & CPO Tank Cleaning Services) with Earthworks Mowing Services on 1 July 2024. - Contract of Services (No. HOPL2024-025: Navo Ramp Upgrade) with Ong Soon Fatt SDN, BHD on 1 January 2024. <p>The contract informs about right and obligation for both parties, from validity of contract, scope activities, worker qualification, and payment methods.</p>	
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by all parties to the contract.</p>	<p>All contractors had declaration signed before start the work in Contractor Induction Agreement (FOR-SUS-GEN-014-08). For examples:</p> <ul style="list-style-type: none"> - Contractor Induction Agreement record on 29 January 2024 with PT Jasa Aman Engineering on behalf of Sakris. 	Complied

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	<p>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <ul style="list-style-type: none"> - Minor compliance - 	<ul style="list-style-type: none"> - Contractor Induction Agreement record on 13 January 2024 with Palmiteco Engineering SDN BHD on behalf of Sumarno. - Induction Agreement records on 1 July 2024 with PNG Plant Hire on behalf of Pilimbopume. - Induction Agreement records on 4 March 2024 with Earthworks Mowing Services on Behalf of Robert Flesial. - Induction Agreement records on 19 February 2024 with Earthworks Mowing Services on Behalf of Robert Mr. Silva - Induction Agreement records on 25 June 2024 with Stabelnin (PNG) Ltd. on Behalf of Dickson. <p>The induction record has been signed by both parties. In that record, the contractor agreed and declared to comply with HOPL environmental and RSPO requirements.</p> <p>In addition, based on service agreement/contract record for examples:</p> <ul style="list-style-type: none"> - Agreement No. HOPL-ENG-MGC/2022 with Marea Contractors Limited on 29 March 2022, the agreement mentions about obligation for contractor regarding legal requirement on Point 14 (The contractor agree to meet minimum legal terms). - Contract of Service (No. HOPL2024-054: Grass Cutting Services) with Earthworks Mowing Services on 1 July 2024. The contract mention about obligation for contractor regarding legal requirement on Point 14 (The contractor agree to meet minimum legal terms). - Contract of Service (No. HOPL2024-0824: CPKO & CPO Tank Cleaning Services) with Earthworks Mowing Services on 1 July 2024. The contract mention about obligation for contractor regarding legal requirement on Point 14 (The contractor agree to meet minimum legal terms). - Contract of Services (No. HOPL2024-025: Navo Ramp Upgrade) with Ong Soon Fatt SDN, BHD on 1 January 2024. The contract mention 	
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		about obligation for contractor regarding legal requirement on Point 11 (Comply with the requirements of RSPO).	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>As mentioned in 2.2.2, the service agreement/contract record for examples:</p> <ul style="list-style-type: none"> - Agreement No. HOPL-ENG-MGC/2022 with Marea Contractors Limited on 29 March 2022 also mentioned about worker aspect, especially on Point 4 and 10 which informs: <ol style="list-style-type: none"> 1. Employees are to be 18 years or over and must be paid at or above the PNG minimum wage. 2. The contractors agree to meet minimum legal terms and conditions of the PNG legislation regarding employment. - Contract of Service (No. HOPL2024-054: Grass Cutting Services) with Earthworks Mowing Services on 1 July 2024 mentioned about worker aspect requirement, especially on Point 14 and 15 which informs: <ol style="list-style-type: none"> 1. The contractor is solely responsible for and shall comply with basic employment regulatory terms and conditions as imposed by the Department of Labor & Industrial Relations in relation to its employees pursuant to the employment and labour laws of Papua New Guinea. 2. All contractor agents, employees and representative must be 18 years and over and must be paid at over the required minimum wage as approved by the PNG minimum Wages Board from time to time. - Contract of Service (No. HOPL2024-082: CPKO & CPO Tank Cleaning Services) with Earthworks Mowing Services on 1 July 2024 mentioned about worker aspect requirement, especially on Point 15 and 16 which informs: <ol style="list-style-type: none"> 1. The contractor is solely responsible for and shall comply with basic employment regulatory terms and conditions as imposed by the Department of Labor & Industrial Relations in relation to its employees pursuant to the employment and labour laws of Papua New Guinea. 	Complied

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		<p>2. All contractor agents, employees and representative must be 18 years and over and must be paid at over the required minimum wage as approved by the PNG minimum Wages Board from time to time.</p> <p>- Contract of Services (No. HOPL2024-025: Navo Ramp Upgrade) with Ong Soon Fatt SDN, BHD on 1 January 2024 mentioned about worker aspect requirement, especially on Point 13 to 15 which informs:</p> <ol style="list-style-type: none"> 1. Contractor shall have valid workers insurance cover. 2. Contractor shall endeavour to comply with basic legal requirements concerning its employees under the employment Act 1978. 3. All contractor agents, employees and representative must be 18 years and over and must be paid at over the required minimum wage as approved by the PNG minimum wages board from time to time. <p>Based on field and site observation at Hargy Mill, Barema Mill, Navo Mill, Hargy Estate, Navo Estate and Pandi Estate, all workers is over 18 years old. No indication the company using child labour.</p>	
Criterion 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, the mill requires:</p> <p>Company plantations, this will be Division or Sub-division, for Smallholder fruit, this will be Smallholder name, Division or Sub-division.</p> <p>Proof of the ownership status or the right/claim to the land by the grower/smallholder.</p> <p>Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group.</p>	Hargy Mill, Barema Mill and Navo Mill only received FFB from company owned estate and scheme smallholder. No uncertified FFB received by those Palm Oil Mill.	Complied

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	- Critical (Major) compliance -																													
2.3.2	No fruit is to be indirectly sourced through third party traders.	Based on FFB receive records, no FFB indirectly sourced through third party traders or collectors.	Complied																											
Principle 3: Optimise productivity, efficiency, positive impacts and resilience																														
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																														
3.1.1	<p>(C) A business or management plan (minimum three years) is documented by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL had a ten-year business plan initiated, compiled and distributed from The CEO’s office. There is no change to the business plan during this assessment period. The document details among others the following data:</p> <ul style="list-style-type: none">• Annual crop from plantation estates and the smallholders.• Age profile, year planted & YPH (ranges from 17.59 – 30.06)• The distribution of crop to the 3 mills to ensure optimum capacity.• Targeted extraction ratios CPO Hargy Mill 23.96%; Navo Mill 24.50%; Barema Mill 25.00%; average 24.53%; and CPKO Hargy Mill 2.16%; Barema Mill 2.08%.• Production cost of both estates and mills.• Projected Profit/Loss statement. <p>The projected crop for a period of 2019 - 2029 was sighted and summarised below:</p> <table><tr><th>Source of FFB</th><th>Total FFB 2019 – 2029</th><th>% Contribution</th></tr><tr><td>Company Plantation</td><td>3,924,222</td><td>61.42</td></tr><tr><td>Growers</td><td>2,464,588</td><td>38.58</td></tr><tr><td>Total</td><td>6,388,811</td><td>100.00</td></tr></table> <table><tr><th>Mill</th><th>CPO-ER</th><th>Total CPO 2019 - 2029</th><th>CPKO-ER</th><th>Total CPKO 2019 - 2029</th></tr><tr><td>Hargy Mill</td><td>23.96</td><td>453,468</td><td>2.16</td><td>40,937</td></tr><tr><td>Navo Mill</td><td>24.50</td><td>628,675</td><td>-</td><td>-</td></tr></table>	Source of FFB	Total FFB 2019 – 2029	% Contribution	Company Plantation	3,924,222	61.42	Growers	2,464,588	38.58	Total	6,388,811	100.00	Mill	CPO-ER	Total CPO 2019 - 2029	CPKO-ER	Total CPKO 2019 - 2029	Hargy Mill	23.96	453,468	2.16	40,937	Navo Mill	24.50	628,675	-	-	Complied
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Navo Mill	24.50	628,675	-	-																										

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Barema Mill	25.00	482,554	2.08	93,506
Total	24.49	1,564,697	2.10	134,443

The breakdown of crop for the mill processing as shown above budgeted at 61.42% for plantation FFBs and 38.58% for Smallholder FFBs.

The cost of relating to RSPO is reflected under item environment, whilst safety is absorbed under item health. PPE is taken into item staff welfare. All other related figures in details are available in soft copy and maintained in The CEO's Office. It is treated with full confidentiality released on discretion of the management. In conclusion the financial plan for the organisation has been prepared in comprehensive and adequate to address the direction of the business for the next 10 years.

This is also made available as summarised below similar to the one prepared for the estates. The smallholders data is prepared through assistance given by OPIC and also the HOPL smallholders department. These are subjects discussed among others during the monthly extension meeting between the management and the smallholders.

Based on Business Plan Overview, the HOPL 2024 – 2025 targets are:

Description	Target	
	2024	2025
FFB		
• Company	376,917 Tons	376,777 Tons
• Smallholders	233,533 Tons	224,508 Tons
Total FFB	610,450 Tons	601,285 Tons
Extraction Rates		
• OER	24.55%	24.52%

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		<table><tr><td>• KER</td><td>5.00%</td><td>5.00%</td></tr><tr><td>• PKOER</td><td>2.03%</td><td>2.03%</td></tr><tr><td>FFA</td><td><3.5%</td><td><3.5%</td></tr><tr><td>Oil Loses</td><td><1.57%</td><td><1.57%</td></tr><tr><td>Oil Production</td><td></td><td></td></tr><tr><td>• CPO</td><td>149,837 Tons</td><td>147,410 Tons</td></tr><tr><td>• PK</td><td>30,522 Tons</td><td>30,064 Tons</td></tr><tr><td>• PKO</td><td>12,402 Tons</td><td>12,201 Tons</td></tr><tr><td>Planting</td><td></td><td></td></tr><tr><td>• New Planting</td><td>0</td><td>0</td></tr><tr><td>• Replant (HP)</td><td>525 Ha</td><td>566 Ha</td></tr><tr><td>• Replant (SH)</td><td>400 Ha</td><td>400 Ha</td></tr></table> <p>Those business plan overview also described the strengths, weaknesses, opportunities and threats ahead.</p>	• KER	5.00%	5.00%	• PKOER	2.03%	2.03%	FFA	<3.5%	<3.5%	Oil Loses	<1.57%	<1.57%	Oil Production			• CPO	149,837 Tons	147,410 Tons	• PK	30,522 Tons	30,064 Tons	• PKO	12,402 Tons	12,201 Tons	Planting			• New Planting	0	0	• Replant (HP)	525 Ha	566 Ha	• Replant (SH)	400 Ha	400 Ha							
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3.1.2	<p>The Milling Companies develop an annual replanting programme for Company plantations projected for a minimum of five years with yearly review.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders develop replanting program for smallholders.</p> <p>- Minor compliance -</p>	<p>The information of annual replanting program for the entire estates in the Hargy Palm Oil Limited (HOPL) is available. Below is the latest revision of replanting program, issued by General Manager of HOPL on 16 July 2022, based on HOPL 5 years Development & Replant 2023 - 2027. Contents of which were sighted and shown below; figures in hectares otherwise stated.</p> <p>Replanting Program:</p> <table><tr><th>Estate/ Plantation</th><th>2023</th><th>2024</th><th>2025</th><th>2026</th><th>2027</th></tr><tr><td>Hargy Estate / Hargy Plantation</td><td>-</td><td>235.19</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Hargy Estate / Barema Plantation</td><td>-</td><td>-</td><td>-</td><td>-</td><td>523.93</td></tr><tr><td>Navo Estate / Atata-Kiba Plantation</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Navo Estate / Ibana Plantation</td><td>534.63</td><td>290.41</td><td>566.85</td><td>602.48</td><td>-</td></tr><tr><td>Subtotal</td><td>534.63</td><td>525.60</td><td>566.85</td><td>602.48</td><td>523.93</td></tr><tr><td>Smallholders</td><td>400.00</td><td>400.00</td><td>400.00</td><td>400.00</td><td>400.00</td></tr></table>	Estate/ Plantation	2023	2024	2025	2026	2027	Hargy Estate / Hargy Plantation	-	235.19	-	-	-	Hargy Estate / Barema Plantation	-	-	-	-	523.93	Navo Estate / Atata-Kiba Plantation	-	-	-	-	-	Navo Estate / Ibana Plantation	534.63	290.41	566.85	602.48	-	Subtotal	534.63	525.60	566.85	602.48	523.93	Smallholders	400.00	400.00	400.00	400.00	400.00	Complied
Estate/ Plantation	2023	2024	2025	2026	2027																																								
Hargy Estate / Hargy Plantation	-	235.19	-	-	-																																								
Hargy Estate / Barema Plantation	-	-	-	-	523.93																																								
Navo Estate / Atata-Kiba Plantation	-	-	-	-	-																																								
Navo Estate / Ibana Plantation	534.63	290.41	566.85	602.48	-																																								
Subtotal	534.63	525.60	566.85	602.48	523.93																																								
Smallholders	400.00	400.00	400.00	400.00	400.00																																								

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			Combined	934.63	925.60	966.85	1,002.48	923.93	
			Replanting in Smallholders are managed incorporation with Oil Palm Industry Corporation (OPIC). During the field visit, there was some replanting activity in 2024. For example, 2 Ha in LSS Blocks No.01-0225 on behalf of Burnawae Tamata – Tiauru LSS that started in July 2024, and 28 Ha in Ivule Independent Estate (No.770002) that also start in July 2024.						
3.1.3	The Milling Company holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -		Available Procedure of Management Review (PRO-SUS-EMS-017-07) Issue no.7 dated 8 March 2021. The management review is conducted annually at planned intervals, to confirm that the standard implementation is suitable, adequate and effective for meeting the desired level performance and to identify and plan future improvement. Hargy Oil Palm Management conducted the management review annually. The last management review has been held on 20 February 2024 covering the issue related to the implementation of RSPO Principle and Criteria, RSPO Supply Chain Certification Standard and ISO 14001 performance in 2023. The management review attended by top management i.e General Manager, Personal Assistant to GM, Head of Department Plantation, Head of Department Engineering, Head of Department Vehicle Workshop, Head of Department of Construction, Head of Department Smallholders Affairs, Head of Department Stores, Head of Department HR, Head of Department Sustainability, and internal auditor. The record of management review covered: 1. Action/follow up from previous management review: a. Environment permit application follows up with CEPA on permit application lodged in 2022 and updated in 2023. b. There was no follow up from previous management review for RSPO P&C and Supply Chain. All item attended to and closed. 2. Changes to management system						Complied

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		<p>Revision of the RSPO P&C progressed in 2023 and a revision is still ongoing; there were no change to the requirements of RSPO Standard during 2023.</p> <p>3. Environmental objectives and targets/environmental performances. Environment performance is based on the environmental objectives; Zero deforestation, biodiversity conservation, effluent management, air quality management, pollution management, soil conservation, waste management and water management.</p> <p>4. Process performance and product conformity. By the end of 2023, only 29% of the CIP had been completed, 30% were in progress and 40% were pending. The CIP is planned for review so that any plans that are no longer feasible shall be removed and the CIP updated for 2024.</p> <p>5. Result of internal audits/status of preventive & corrective actions Total 140 NCs issued in whole department. 95.7% has been closed out.</p> <p>6. Customer feedback from interested parties. Communication with smallholders regarding the requirements of RSPO with regard to land use right and traceability of FFB. This is communicated through smallholder training and awareness.</p> <p>7. Adequacy of resources: ISO 14001, RSPO P&C and RSPO SCCS. Staff cross-training; to maintain business continuity in the department when required.</p> <p>8. Opportunities/recommendation for improvement: ISO 14001, RSPO P&C and RSPO SCCS.</p> <p>9. Continuing suitability & adequacy of the management & certification system.</p>	
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	HOPL has document of Action Plan for Continual Improvement in HOPL Continuous Improvement Plan (PLN-SUS-GEN-001-021, issue No.21, dated	Complied

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	<p>- Critical (Major) compliance -</p>	<p>6 June 2024). The document identifies planned actions that HOPL will take further improve its performance in the key area of:</p> <ul style="list-style-type: none"> - Minimizing the use of certain pesticides - Reducing negative and enhancing positive environmental impact. - Waste reduction. - Pollution and emission. - Social impacts. <p>HOPL commits to maintaining and reporting on progress implementing this improvement plan commencing January 2024 and reviewing annually. Timeframe for realising objective split into short term (1 to 2 years), medium term (3 to 8 years) and long term (greater than 8 years). The start date of this plan is in 2023. It endeavours to cover time span of 25 years as this is approximately the replant cycle of oil palm plantation and some environment improvements will only be implemented at the time of replanting. The review will not just review progress on previously identified activities but will identified and incorporate additional improvement activities that have risen because of need, technological, social, or environmental change or for other reasons.</p> <p>Implementation of continuous improvement plan can be seen in several document, such as Environment Performance report and Social Management/Improvement Plan.</p> <p>The Action Plan for Continual Improvement identifies the planned actions to further improve its performance in the key areas of:</p> <ul style="list-style-type: none"> • Water Extraction • Waste discharge • Smoke density monitoring • Buffer zone management • Conservation area management • Mangrove planting activity • Water management plan 	
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		<ul style="list-style-type: none"> • Waste management plan • Agrochemical management • Erosion control management plan • Social Impacts. <p>Further improvements and company compounds are planned and captured as part of the Continuous Improvement Plan for 2024. One area of priority is management of High Conservation Value and High Carbon Stock area identified within HOPL operational area. Improving water quality for domestic water and Palm Oil Mill Effluent is another key focus area.</p> <p>HOPL commits to maintaining and reporting on progress implementing this improvement plan commencing January 2024 and reviewing it annually. By following this plan, HOPL continually improve its performance.</p> <p>Audit team verified the progress implementation:</p> <ul style="list-style-type: none"> - All chemical sourced and used are as per the list of approved chemicals stipulated by CEPA. Material Safety Data Sheets (MSDS) also are supplied with the chemicals and provided to sites for use. All agrochemicals are securely stored on shelves in chemical sheds that are locked. All 20 L chemical containers, except Dimehypo are triple rinsed once empty and used back in the plantation for pre-mixing chemicals to the field. Once containers are damaged, they are triple rinsed, crushed and disposed at the landfill. - Safe working environment: Solar streetlight to minimize theft and vandalism during night; construction of Bailey bridges replacing existing steel pipe culvert over Sabalbala Creek; Boundary compound fencing, housing both junior and senior staffs close to VOP Settlement and risk of theft and other security issues. - Water quality and quantity: Relocated water supply piping to the landowners, keeping landowners away from company asset; 90,000 litres southern cross tank for Atata compound, improve water pressure and water access to all houses due to ongoing water shortage due to 	
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		<p>low water pressure; 1x standard underground bore pump water supply for Sabalbala compound, alternate water source during volcano as well; upgrade of industrial water treatment plant to 20 MT/hour, back up current 33 MT/hour demin plant to produce adequate water volume to supply the new 45 MT/hour steam boiler.</p> <ul style="list-style-type: none"> - Continuous Improvement and reporting: Virgin oil (high FFA) plant, to separate low FFA production; Navo ramp extension project 50-doors, reducing FFA and MOSH and MOAH compliance; Nursery perimeter fencing, keeping out employees trespassing from Ibana to Atata compound as to avoid theft and vandalism. <p>Implementation of above continuous improvement plan are reviewed during the annual management review meeting.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor Compliance -</p>	<p>Unit of certification has sent the RSPO Metric Template to CB's on 3 August 2024 which contain the summary data as follows:</p> <ul style="list-style-type: none"> • Economic indicators: Total production volume of FFB; all FFB are certified since all supply bases are certified under HOPL; Yield (land productivity); Total production volume of certified PO and PK; Total sales volume of certified PO and certified PK. • Social indicators: Demographic breakdown for workers/labour; Training for workers and smallholders; Inclusion of smallholders; Lost time injury frequency rate (LTIFR); Complaints and Grievances. • Environmental indicators: Pesticide use; Freshwater usage; Biodiversity. 	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders.</p>	<p>HOPL had a documented Manual and Standard Operating Procedure (SOP) are indexed according for the subjects and scope covered. Copies are available in the estates and mill audited. Therein is shown issue no and date of revision. All SOPs are issued by the Sustainability Department Manager. Format of SOP is standard through all the estates and mills. e.g.</p>	Complied

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- Critical (Major) compliance -	<table><tr><td>PRO</td><td>SUS</td><td>GEN</td><td>001</td><td>12</td><td>New Development Procedure</td></tr></table> <p>Based on updated List of Approved Documents (REG-COM-EMS-002-022), documented information for the whole operation of HOPL are divided into sections as follow, including samples of procedures:</p> <p>Manuals:</p> <ul style="list-style-type: none">• MAN-SUS-EMS-001-13; EMS Manual; Rev.13; dated 30 March 2022.• MAN-SUS-SCC-001-03; HOPL SCC Manual; Rev.3; dated 10 March 2021.• MAN-PLT-HAR-001-06; Harvesting Manual; Rev.6; dated 18 July 2022.• MAN-PLT-UPK-002-01; Oil Palm Inorganic Fertilizer Management Practices Manual; Rev.1; dated 31 March 2021.• MAN-HRD-GEN-001-02; HR Operations Manual; Rev.2; dated 1 June 2021. <p>General Procedures:</p> <ul style="list-style-type: none">• PRO-SUS-GEN-001-12; New Development Procedure; Rev.12; dated 19 September 2023.• PRO-SUS-GEN-003-10; Upkeep Management; Rev.10; dated 12 May 2021.• PRO-SUS-GEN-004-12; Pesticides Management; Rev.12; dated 12 May 2021.• PRO-SUS-GEN-005-12; Nursery Practices; Rev.12; dated 5 May 2024.• PRO-SUS-GEN-006-12; Crude Palm Oil Milling; Rev.12; dated 12 May 2021.• PRO-SUS-GEN-007-12; Palm Kernel Oil Milling Practices; Rev.12; dated 12 May 2021.• PRO-SUS-GEN-008-12; Waste Management Practice; Rev.12; dated 12 May 2021.• PRO-SUS-GEN-009-10; Compost Management; Rev.10; dated 12 May 2021.	PRO	SUS	GEN	001	12	New Development Procedure
PRO	SUS	GEN	001	12	New Development Procedure		

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		<ul style="list-style-type: none"> • PRO-SUS-GEN-010-11; Hydrocarbons Management; Rev.11; dated 12 May 2021. • PRO-SUS-GEN-011-13; Palm Oil Mill Effluent Management; Rev.13; dated 30 May 2022. • PRO-SUS-GEN-012-15; Shipping; Rev.15; dated 24 July 2024. • PRO-SUS-GEN-013-11; Transport; Rev.11; dated 12 May 2021. • PRO-SUS-GEN-014-11; Compound Management; Rev.11; dated 12 May 2021. • PRO-SUS-GEN-015-11; Central Stores; Rev.11; dated 12 May 2021. • PRO-SUS-GEN-016-10; Construction; Rev.10; dated 12 May 2021. • PRO-SUS-GEN-017-03; HOPL Planting Approval; Rev.3; dated 18 March 2021. • PRO-SUS-GEN-018-02; Conservation Areas SOP; Rev.2; dated 18 March 2021. <p>Sustainability Department - EMS Procedures:</p> <ul style="list-style-type: none"> • PRO-SUS-EMS-001-11; Environmental Aspects; Rev.11; dated 8 March 2021. • PRO-SUS-EMS-002-12; Compliance Obligation; Rev.12; dated 21 March 2022. • PRO-SUS-EMS-003-11; Environmental Objectives; Rev.11; dated 21 March 2022. • PRO-SUS-EMS-004-11; Organizational Roles, Responsibilities and Authorities; Rev.11; dated 21 March 2022. • PRO-SUS-EMS-005-11; Competence; Rev.11; dated 21 March 2022. • PRO-SUS-EMS-006-15; Communication; Rev.15; dated 21 March 2022. • PRO-SUS-EMS-007-15; Documentation; Rev.15; dated 16 June 2023. • PRO-SUS-EMS-008-12; Operational Planning and Control; Rev.12; dated 21 March 2022. • PRO-SUS-EMS-009-12; Purchasing; Rev.12; dated 21 March 2022. • PRO-SUS-EMS-010-12; Emergency Preparedness and Response; Rev.12; dated 21 March 2022. 	
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		<p>Sustainability Department - Sustainability:</p> <ul style="list-style-type: none"> • PRO-SUS-SUS-001-03; Mechanism to Check Consistent Implementation of Procedures; Rev.3; dated 8 March 2021. • PRO-SUS-SUS-002-04; Dissemination of Company Information & Documents; Rev.4; dated 25 March 2021. • PRO-SUS-SUS-003-03; Internal Control System SOP – SH Monitoring; Rev.3; dated 30 June 2022. • PRO-SUS-SUS-004-09; Grievance Mechanism; Rev.9; dated 30 August 2023. • PRO-SUS-SUS-005-01; RSPO Metric SOP; Rev.1; dated 27 June 2022. <p>Sustainability Department - Supply Chain Certification System:</p> <ul style="list-style-type: none"> • PRO-SUS-SCC-001-02; Receipt of Palm Kernel; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-002-03; Production of CPKO; Rev.3; dated 10 March 2021. • PRO-SUS-SCC-003-03; Production of Palm Kernel Expeller; Rev.3; dated 10 March 2021. • PRO-SUS-SCC-004-02; Non-Conformance; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-005-02; Outsourcing Activities; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-006-02; Sales and Goods Out; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-007-02; Receipts of Transaction; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-008-02; Training; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-009-02; Record Keeping; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-010-02; Conversion Factor; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-011-03; Claims; Rev.3; dated 10 March 2021. 	
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		<ul style="list-style-type: none"> • PRO-SUS-SCC-012-02; Complaints; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-013-02; Management Review; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-014-02; Production of CPO; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-015-02; Receive of Fresh Fruit Bunch (FFB) SOP; Rev.2; dated 10 March 2021. • PRO-SUS-SCC-016-03; Collection and Transport of Fresh Fruit Bunch (FFB); Rev.3; dated 1 June 2022. <p>Sustainability Department – Occupational Health and Safety:</p> <ul style="list-style-type: none"> • PRO-SUS-OHS-001-03; First Aid Handling; Rev.3; dated 26 March 2021. • PRO-SUS-OHS-002-02; Basic Operating Operators Guide for Garbage Truck; Rev.3; dated 26 March 2021. • PRO-SUS-OHS-003-06; PPE; Rev.5; dated 23 November 2021. <p>Sustainability Department – Emergency Response Procedures:</p> <ul style="list-style-type: none"> • ERP-SUS-GEN-001-11; Volcano Eruption Evacuation Response Plan; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-002-11; Flooding Rivers Evacuation Response Plan; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-003-11; Mills Factories Fire Evacuation Response Plan; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-004-11; Bialla Tank Farm Tanker Terminal Fire Emergency Standard Response Procedure; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-005-11; Bialla Tanker Terminal Oil Spill Standard Response (Involving People) Procedure; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-007-11; Medical Emergency; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-008-11; Motor Vehicle Accident; Rev.11; dated 13 July 2022. 	
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		<ul style="list-style-type: none"> • ERP-SUS-GEN-009-11; Fire Emergency Response Evacuation; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-010-11; Search and Rescue Response; Rev.11; dated 13 July 2022. • ERP-SUS-GEN-011-13; Emergency Response Plan; Rev.13; dated 12 July 2024. <p>And continues with the other procedures such as Sustainability Department – Safe Working Procedures; Engineering Department – Laboratory; Engineering Department – Process; Engineering Department – Biogas; Engineering Department – Maintenance; Engineering Department – Shipping; Engineering Department – General; Vehicle Workshop; Community Affairs Department – General; Community Affairs Department – Security; Community Affairs Department – Lands; Smallholders Affairs Department – Community Engagement; Smallholders Affairs Department – Smallholder Agriculture Advisory Services; Smallholders Affairs Department – Smallholder Transport; Human Resource Department – Health; Human Resource Department – General; Construction Department – Joinery; Plantation – General; Plantation – Ancillary; Finance Department – General; Finance Department – Smallholder Payroll; Safe Working Instruction/Procedures.</p> <p>Plantation – Upkeep.</p> <ul style="list-style-type: none"> • PRO-PLT-UPK-002-02; EFB Application; Rev.2; dated 24 March 2021. • PRO-PLT-UPK-003-04; Chemical Application; Rev.4; dated 3 January 2023. • PRO-PLT-UPK-004-04; Selective Weeding; Rev.4; dated 30 April 2023. • PRO-PLT-UPK-005-02; Chemical Shed; Rev.2; dated 24 March 2021. • PRO-PLT-UPK-006-03; Chemical Mixing; Rev.3; dated 24 March 2021. • PRO-PLT-UPK-007-02; Flow Rate Test; Rev.2; dated 24 March 2021. • PRO-PLT-UPK-008-02; Swath Width Test; Rev.2; dated 24 March 2021. 	
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		<ul style="list-style-type: none"> • PRO-PLT-UPK-009-02; Sprayer Calibration; Rev.2; dated 24 March 2021. • PRO-PLT-UPK-010-01; Ablation; Rev.1; dated 21 June 2022. • PRO-PLT-UPK-011-02; Manual Weeding; Rev.2; dated 3 January 2023. • PRO-PLT-UPK-012-01; Epiphyte Spraying; Rev.1; dated 29 July 2022. • PRO-PLT-UPK-013-01; Sanitation; Rev.1; dated 3 January 2023. • PRO-PLT-UPK-014-01; Pruning; Rev.1; dated 3 January 2023. • PRO-PLT-UPK-015-01; Mechanical Empty Fruit Bunch Application; Rev.1; dated 1 September 2023. • PRO-PLT-UPK-016-01; Replanting; Rev.1; dated 1 September 2023. • PRO-PLT-HAR-001-02; Harvesting; Rev.2; dated 24 March 2021. <p>Legal</p> <p>Smallholders Department – Smallholder Extension</p> <ul style="list-style-type: none"> • PRO-SHD-SHA-001-02; TTI and Palm Poisoning SOP; Rev.2; dated 8 March 2023. • PRO-SHD-SHA-002-03; Smallholders Chemicals Use and Storage Procedure; Rev.3; dated 8 March 2023. • PRO-SHD-SHA-003-03; Mobile Card Contract SOP; Rev.3; dated 8 March 2023. • PRO-SHD-SHA-004-03; Seedling Request & Delivery Management SOP; Rev.3; dated 8 March 2023. • PRO-SHD-SHA-005-03; Chemical Request & Issuance SOP; Rev.2; dated 8 March 2023. • PRO-SHD-SHA-006-02; Management of Block Registration and Maintenance in LSHM; Rev.2; dated 8 March 2023. • PRO-SHD-SHA-007-03; Fertilizer SOP; Rev.3; dated 8 March 2023. • PRO-SHD-SHA-008-03; Growers Tools Request & Issuance SOP; Rev.3; dated 8 March 2023. • PRO-SHD-SHA-009-02; Smallholders Payslip Distribution SOP; Rev.2; dated 8 March 2023. 	
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		<p>Smallholders Department – Smallholder Transport</p> <ul style="list-style-type: none"> • PRO-SHD-SHT-001-05; Daily Transport Operation SOP; Rev.5; dated 10 February 2023. • PRO-SHD-SHT-002-04; Suspended Block Management SOP; Rev.4; dated 8 March 2023. • PRO-SHD-SHT-003-03; Procedure for Loose Fruit Picker by Contractor; Rev.3; dated 10 February 2023. • PRO-SHD-SHT-004-03; SOP Warning Devices Application for SH Market Place; Rev.3; dated 10 February 2023. • PRO-SHD-SHT-005-04; Smallholders VC Truck Calibration SOP; Rev.4; dated 5 May 2023. • PRO-SHD-SHT-006-04; LSHM Block Setup SOP; Rev.4; dated 8 March 2023. • PRO-SHD-SHT-007-02; SH Transport High Variance SOP; Rev.2; dated 8 March 2023. <p>All procedures are in English and in certain specific areas being translated to local language Tok Pisin. All the procedures reviewed annually and updated/revised if needed. All the SOP's document is available in respective unit or in softcopy.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p> <p>- Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures is in place from the lowest level of supervisory to the highest level like by The General Manager and external parties. On the Head office level, the following among others is made:</p> <ul style="list-style-type: none"> • Regular evaluation of all procedures will be made annually 2 times/year audit by the Compliance Department, Workplace inspection by RSPO representative on monthly basis. • Chief Engineer visits to the mills. • Head of Plantation field inspection. • General Manager or Consultant Inspection. <p>Palm Oil Mill:</p>	Complied

		<p>The Mill Manager inspects the mill on a daily basis. The Engineers, Supervisors monitors the entire production performance and product quality. This is made through the mill rounds and supervisions. The checklist forms sighted during the audit are sterilizer safety operation checklist, press station checklist. The product/lab data sheet is checked hourly by shift superintendent to ensure conformity to quality standard of all process parameters. Monthly figures are analyzed/recommended for improved performance. Chief Engineer does regular visits to all the 3 mills and with a report being established.</p> <p>Technically there is no specific document, but the Chief Engineering always reported the visit issue/daily monitoring issue through the Whatsapp group to be followed up by the Mill Manager and his team. Available Chief Engineering report dated 23 July 2024, in Hargy POM concerning about Replacing Sterilizer No. 1; Replace furnace wall tubes on boiler 2; Hargy Main Shipment Wharf Repair Work. In Barema POM concerning about High FFA (Technical Oil) Plant. In Navo POM concerning about New Boiler & Turbine and EFB press & Chipper; FFB Ramp extension project; Kiba Compound High Voltage Reticulation.</p> <p>Plantation: The record of mechanism to check the implementation of procedures can be seen in Data Collection Form, HOPL completed by Division Manager. The record consists of Block number; FFB tons; number bunches; total mandays; round length; palm census data; fertiliser input; pesticides application.</p> <p>There was a consultants visit report prepared by Palm Oil Consulting Ltd – Philippines during his visit on 2 – 12 May 2023. The consultant reports about Four-month crop forecast (BBC); main line transport system; bunch oil content; immature fertilizer application; pruning; EFB application; sterile/unmaintained palms; frond collapse; ablation, etiolation; best and</p>	
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		<p>worst block; dura fruit contamination; seed supply; OPRA and Parthenocarp. All the recommendation have been followed up by the Hargy Oil Palms Limited.</p> <p>During this audit, auditor also noted the monthly report of Workplace Inspection Form for Plantation Compounds and Operations (FOR-PLT-PFF-025-05). Areas that inspected was health and safety, general housekeeping (compound), environmental, documentation and operational requirements (harvesting and upkeep). Record seen: Kiba Plantation Division 2 on 26 June 2024. Inspected by Leslie Ima, Cyril Thompson and Nelsong Karange. Bakada Plantation – Pandi Estate on 29 July 2024. Inspected by Mathew Malie.</p> <p>The Head of Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p> <ul style="list-style-type: none">• Sections inspected immature, mature, new development.• Action points to be taken before next visit and completion date.• Harvesters productivity / standards• Upkeep standard / Pest & Diseases• RSPO related requirement• Documentation compliance. <p>Available HOD Plantation visit report by email dated 25 July 2024. Report regarding cleanliness of fleets; maintenance of triple interceptor; harvesting; spraying and fertilizer application.</p> <p>There are also available RSPO Internal Audit as record to check consistent implementation of procedures:</p> <ul style="list-style-type: none">• Internal audit report Navo Estate – Kiba Plantation and Compound: Audit Record Kiba PLNT:3-2024 dated 19 June 2024. Conducted by Vali Ani and Florence Jicki. Found no major and 4 minor non-conformity;	
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		<p>regarding boundary pegs; illegal expansion on company houses; training records; sprayers annual medical check. Corrective action has been actively addressed by Kiba Plantation management.</p> <ul style="list-style-type: none"> • Internal audit report Navo Estate – Kiba Plantation and Compound: Audit Record Kiba PLNT:2-2024 dated 24 April 2024. Conducted by Stephanie Silik and Fidelis Hiamagi. Found 1 major and 1 minor non-conformity; regarding employee pay grade and overall clothes for sprayers. Corrective action has been actively addressed by Kiba Plantation management. • Internal audit report of Pandi Estate – Bakada Plantation: #BAKADA PLNT:3-2024 dated 18 June 2024. Conducted by Fidelis Hiamangi, Stephanie Silik, Florence Jicki, Vali Ani and Douglas Morris. Found no major non-conformity and 4 minor non-conformities, regarding open pay queries; HOPL Policies awareness records; unsafe workplace; chemical mixer is not trained and no record of PPE issuance. • Internal audit report Barema POM: Audit Record BPOM:3-2024 dated 20 June 2024. Conducted by Stephanie Silik and Fidelis Hiamangi. Found 1 major and 1 minor nonconformance; regarding malfunction of waterline to boiler ash storage area, and organizational chart and emergency response contact. Corrective action has been actively addressed by the unit. • Internal audit report: Navo POM: 3-2024 dated 18 June 2024. Conducted by Douglas Morris, Vali Ani and Florence Jicki. Found no major and 1 minor nonconformance regarding fire hydrant hose cabinet. Corrective action has been actively addressed by the unit. <p>Smallholders:</p> <ul style="list-style-type: none"> • Internal audit report of #SMALL_HOLDERS#2-2024 dated 23 April 2024; Audit location: Gilo IE, Soi, Kabaya, Tianepou, and Galelolo VOP and LSS; Conducted by Stephanie Silik, Fidelis Hiamangi, Vali Ani Florence Jicki; Found 2 minor findings regarding spraying activity and 	
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		<p>payment records. All the findings have been rectified by the Smallholders Department before the external audit.</p> <ul style="list-style-type: none"> • Internal audit report of #SMALL_HOLDERS#3-2024 dated 25 – 26 June 2024; Audit location: Smallholders Department; Conducted by Stephanie Silik, Florence Jicki, Douglas Morris and Fidelis Hiamangi; Found 3 major non-conformity and 3 minor non-conformity regarding TTI, chemical mixing bay, no toilet, fire extinguisher, medical surveillance. All the findings have been rectified by the Smallholders Department before the external audit. <p>HOPL by its Smallholders Affairs has conducted field day and training to maintain knowledge of smallholders of sustainable production and best agriculture practices. Available records of field day facilitated by HOPL – PNGOPRA, e.g.</p> <ul style="list-style-type: none"> • Lalopo Office Station on 29 August 2023. Refreshment training facilitated by smallholder extension staff regarding Production and BMP. Attended by 19 participants. Solomon Pagege and Ieisou Mage as a smallholders sampled in this assessment were listed. • Uasilau Sec-2, Wainamasile (Walo VOP) on 18 April 2024. Training covered topic related to the CLUA arrangement facilitated by HOPL smallholder extension staff and OPIC officer. Attended by 30 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. • Walo Community Ground on 28 May 2024. Training covered topic related to the RSPO awareness, transport arrangement, crop quality and harvesting. Facilitated by HOPL smallholder extension staff. Attended by 27 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. • Uasilau Sec-3B on 11 July 2024. Training covered topic related to the BMP, facilitated by HOPL smallholder extension staff. Attended by 28 participants including the smallholders sampled on this assessment. 	
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		<ul style="list-style-type: none"> • Smallholder of Tiauru LSS Section 1, 2 & 3: RSPO Requirements awareness on 4 March 2024, facilitate by HOPL-SHAAS and Sustainability Department. Attended by 33 participants. The topic is regarding RSPO requirements, including ethical conduct policy, child labour, protective equipment, use of chemicals, waste management, RTE species, buffer zone, new planting or replanting (including that fire cannot be used for replanting land preparation), consequences of not complying with RSPO criteria, and crop quality. • Smallholder of Tiauru LSS: Field Day regarding RSPO Requirements including BMP, production, FFB inspection zone and security, on 7 February 2024, facilitate by HOPL-SHAAS, OPIC Staff, Police and Security. Attended by 59 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, child labour, ethical conduct policy, buffer zone, RTE species), importance of upkeep, importance of regular harvesting, importance of crop quality, importance of fertilizer, production figures, security awareness including prohibit use of fire on waste disposal and replanting. • Mini Field Day – Management for oil palm farmers on 11 June 2024; located at Mataururu Block 10-1008 (OPRA BMP Block); facilitated by HOPL Smallholder extension and PNG OPRA; cover topics related to saving scheme, Fertiliser, pest and disease, ethical conduct policy, child labour, chemical requirement and safety uses, waste management, RTE species, buffer zone, grievance, new planting and replant, consequences of not compliant, transport-production, road and pick up schedule; Attended by 69 participants including from independent estate i.e Babex Estate. 	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Palm Oil Mill:</p> <p>The Mill Manager overseeing the daily operations of the mill, ensuring that all aspects of the milling process are functioning efficiently. Every day, the Mill Manager conducts thorough inspections of the mill, paying close attention to the equipment, processes, and overall workflow. Supporting</p>	Complied

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		<p>the Mill Manager in these daily inspections are the Engineers and Supervisors, who are tasked with closely monitoring the mill's entire production performance and product quality. These Staffs are responsible for conducting regular mill rounds, where they assess the operational status of machinery, evaluate production processes, and supervise the workforce to ensure that all activities are carried out in accordance with established procedures and work instructions.</p> <p>During these inspections, various checklist forms are used to document and verify the safety and performance of specific areas within the mill. For example, the sterilizer safety operation checklist is used to ensure that the sterilization process is operating correctly and without any safety hazards. Similarly, the press station checklist is used to monitor the functioning of the press station, ensuring that it operates meets the required standards for product quality and efficiency. In addition to these checklists, the product and laboratory data sheets are checked on an hourly basis by the shift superintendent. This regular monitoring is for ensuring that all process parameters conform to the established quality standards. On a monthly basis, the mill's performance data is analyzed to identify trends, assess the effectiveness of current processes, and recommend improvements. The findings from these analyses are used to make informed decisions about process optimization, equipment maintenance, and workforce training.</p> <p>Available Daily Production Figure and Weekly Mill Summary Report, that described FFB milled, Mill throughput, CPO produced, PK Produced, CPO and PK dispatched, OER, KER, FFA, available hours, milling hours, CPO and PK production losses.</p> <p>Furthermore, the Chief Engineer plays a vital role in maintaining the overall performance of all three mills within the operation. The Chief Engineer conducts regular visits to each mill, carrying out inspections. These visits are followed by detailed reports that document the findings and provide recommendations for any necessary improvements.</p>	
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		<p>Technically there is no specific document, but the Chief Engineering always reported the visit issue/daily monitoring issue through the Whatsapp group to be followed up by the Mill Manager and his team. Available Chief Engineering report dated 23 July 2024, in Hargy POM concerning about Replacing Sterilizer No. 1; Replace furnace wall tubes on boiler 2; Hargy Main Shipment Wharf Repair Work. In Barema POM concerning about High FFA (Technical Oil) Plant. In Navo POM concerning about New Boiler & Turbine and EFB press & Chipper; FFB Ramp extension project; Kiba Compound High Voltage Reticulation.</p> <p>In Navo POM, there was a record of Chief Engineering visit on 3 June 2024. The issue focused on milling operation; machinery cleaning up program; control the use of water and washing; fix all leakage; install all drive unit trays; complete the sterilizer piping. All the issue has been actively addressed by Navo POM management. All the issue and correction by the mill's team shared via WhatsApp Group to make it quickly informed.</p> <p>Plantation: There was a consultants visit report prepared by Palm Oil Consulting Ltd – Philippines during his visit on 2 – 12 May 2023. The consultant reports about Four-month crop forecast (BBC); main line transport system; bunch oil content; immature fertilizer application; pruning; EFB application; sterile/unmaintained palms; frond collapse; ablation, etiolation; best and worst block; dura fruit contamination; seed supply; OPRA and Parthenocarp. All the recommendation have been followed up by the Hargy Oil Palms Limited.</p> <p>During this audit, auditor also noted the monthly report of Workplace Inspection Form for Plantation Compounds and Operations (FOR-PLT-PFF-025-05). Areas that inspected was health and safety, general housekeeping (compound), environmental, documentation and operational requirements</p>	
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		<p>(harvesting and upkeep). Record seen: Kiba Plantation Division 2 on 26 June 2024. Inspected by Leslie Ima, Cyril Thompson and Nelsong Karange. Bakada Plantation – Pandi Estate on 29 July 2024. Inspected by Mathew Malie.</p> <p>The Head of Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p> <ul style="list-style-type: none"> • Sections inspected immature, mature, new development. • Action points to be taken before next visit and completion date. • Harvesters productivity / standards • Upkeep standard / Pest & Diseases • RSPO related requirement • Documentation compliance. <p>Available HOD Plantation visit report by email dated 25 July 2024. Report regarding cleanliness of fleets; maintenance of triple interceptor; harvesting; spraying and fertilizer application.</p> <p>Smallholders:</p> <ul style="list-style-type: none"> • Internal audit report of #SMALL_HOLDERS#2-2024 dated 23 April 2024; Audit location: Gilo IE, Soi, Kabaya, Tianepou, and Galelolo VOP and LSS; Conducted by Stephanie Silik, Fidelis Hiamangi, Vali Ani Florence Jicki; Found 2 minor findings regarding spraying activity and payment records. All the findings have been rectified by the Smallholders Department before the external audit. • Internal audit report of #SMALL_HOLDERS#3-2024 dated 25 – 26 June 2024; Audit location: Smallholders Department; Conducted by Stephanie Silik, Florence Jicki, Douglas Morris and Fidelis Hiamangi; Found 3 major non-conformity and 3 minor non-conformity regarding TTI, chemical mixing bay, no toilet, fire extinguisher, medical 	
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		surveillance. All the findings have been rectified by the Smallholders Department before the external audit.	
Criterion 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.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p> <p>Guidance: SEIA will be undertaken where:</p> <p>a) It is required by law; or</p> <p>b) The certified operation meets any of these thresholds:</p> <ol style="list-style-type: none"> 1. Land conversion exceeding 500 hectares; 2. Additional water withdrawal exceeding 500,000 cubic meters per year for irrigation or processing; or 3. Additional industrial wastewater discharge exceeding 10,000 cubic meters per year. <p>The SEIA may be comprised of separate documents being a Social Impact Assessment and an Environmental Impact Assessment provided there is collaboration in the production of the documents to ensure coordination.</p> <p>- Critical (Major) compliance -</p>	<p>Regarding to SEIA, the company has several documents which developed with participatory of relevant stakeholders. Here's the document for environment and social impact assessment:</p> <ul style="list-style-type: none"> - "Hargy Oil Palms Limited Update of the 2009 Social Impact Assessment and A Social Management Plan – November 2013". The study conducted by Roland Allbrook Consulting, November 2013. This study covers an area of 26,000 Ha: 12,540 Ha directly under Hargy and 13,565 Ha under smallholders. The area interviewed: Sulu village, Gomu village, Bageta village, Painave village, Noau village, Gigipuna village and Kiava village, Wilelo LSS. - "Hargy Oil Palms Limited Bialla West New Britain Province Social and Environment Impact Assessment Report – August 2007". The study carried out by Mr. Narua Lovai, Imeana Ecosystem Services. - "Barema Oil Palm Estate Social and Environmental Impact Assessment Report – August 2007". The study carried out by Narua Lovai, Imeana Ecosystem Services. The area of study covers area of 2,500 Ha in Barema area. Consultation with local villages along Barema River. - "Social Environment Impact Report of Hargy Oil Palms Ltd" by PT Hijau Daun on 25 March 2023. <p>The main heading for social management plan are:</p> <ul style="list-style-type: none"> - Accessibility to gardens, firewood, clean water and dependence on market. - Reduce family disputes, domestic violence, and sexual harassment. - Reduce substance and drug abuse intake. - Make all communities safe and harmonious. - Education and literacy program for all 	Complied

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		<ul style="list-style-type: none"> - Promote healthy lifestyle habits. - Spiritual wellbeing for all. <p>The latest SEIA document was created by involving many related parties, especially those who have an impact on the organization's operations, for example: Lily Ambu (SOI LSS), Stephen (Sovula VOP), Jmmy Wells (Nantabu VOP), Nickson Gilo (Matililiu VOP), James Lloh (Bubu VOP), and Clan leader of Ulamona.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.</p> <p>Smallholder requirements:</p> <p>Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p> <ul style="list-style-type: none"> - Minor Compliance - 	<p>As described in indicators 3.4.1, the company already had SEIA documents. The SEIA document also informed management and monitoring plan for environmental and social aspect. Here's the following detail:</p> <p>Environment Aspect</p> <p>The latest environmental management and monitoring plans informed in "Environmental Management Plan of Hargy Oil Palms Limited" which develop in October 2022. The overall objective of organizations plan is to:</p> <ul style="list-style-type: none"> - Identify the environmental impacts associated with the operation of company business activities. - Describe the existing control measures for mitigation of environmental protection does not meet required standards. - Define the improvement plans for situations where environmental protection does not meet required standards. - Define the programme for monitoring and reporting of information on environmental impacts and the performance of the mitigation measures. <p>The environmental management and monitoring plan is in accordance with the relevant PNG Environmental Legislations, regulations, code of practice and recognized world industry best management practice and standards, such as:</p> <ul style="list-style-type: none"> - Water contamination - Biodiversity protection 	Complied

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		<ul style="list-style-type: none"> - Air Quality/temp/visual amenity - Soil contamination - POME Monitoring <p>The organization has the latest update for the environmental aspect on 29 May 2023 which revise about specific monitoring program based on latest Environmental Permit Performance Evaluation, such as EHS inspections period and internal & external POME testing.</p> <p>Social Aspect The latest social management plan is contained is contained in the "Social Management/Improvement Plan – update July 2023". The management plan covers all units in Hargy Palm Oil Ltd. Where the document contains a social monitoring and management plans, for example:</p> <ul style="list-style-type: none"> - Problems with effluent from mills and community engagement - Protection of sacred and heritage sites in Kiba village - Provision of health clinic in company compound - Establishing an effective communication strategy especially regarding expansion. - Prohibit child labour (subject to traditional family activities on VOP and LSS blocks) - Examine the current grievance system and efficacy and reach. - Gender equity and social inclusion – concentrated around Sabalbala. <p>The program plan has been developed with relevant stakeholder (surrounding communities and internal workers) as describe on environmental document and Social Impact assessment.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Smallholder requirements:</p>	<p>The company has implemented environmental and social management and monitoring plans, namely:</p> <p>Environmental Aspect The implementation of environmental program informed in "Hargy Oil Palms Limited Annual Environment Performance Reports 2023". The</p>	Complied

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	<p>Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.</p> <p>- Critical (Major) compliance -</p>	<p>reports issued in accordance with section 65 and 66 of the environmental Act 2000. The report has been submitted to relevant agencies on 14 June 2024.</p> <p>The report includes all details of environmental performance:</p> <ul style="list-style-type: none"> - Water Extraction - Water Quality Monitoring - Palm Oil Mill Effluent Monitoring - Smoke Density Monitoring - Energy Usage - Solid Waste - Buffer Zone Management - Conservation Area Management - Mangrove Planting Activity - Water Management Plant - Waste Management Plant - Agrochemical Management - Erosion Control Management Plan <p>For HCV, HCS and buffer zone, the company conducted routine monitoring for each month in "HCV/HCS inspection zone" form. For examples:</p> <ul style="list-style-type: none"> - HCV/HCS inspection record at Division One of Kiba Plantation on 25 July 2024 (Block 12F26). - HCV/HCS inspection record at Division Two of Kiba Plantation on 23 July (Block 22B18). - HCV/HCS inspection record at Bakada Plantation on 30 July (11C12, 11C11 and 11C10). <p>The form of the monitoring consist of issues needs to be checked, such as: hunting activity, evidence of fire & burning, cutting trees, gardening activities, RTE species observed, boundary pegs and HCV/HCS information board.</p>	
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		<p>All the information gathered from the monitoring record will be followed by officer. For examples, the officer conducted awareness socialization for surrounding communities regarding the HCV/HCS area at Kabaya Section 4 on 17 July 2024 and at Sabalabala Village on 4 August 2024.</p> <p>Social Aspect The latest social management plan has been implemented and has been informed in "Social Management/Improvement Plan Update June 2024". Here's the record of implantation:</p> <ul style="list-style-type: none"> - Provided 13 clinics across HOPL. - Conducted awareness regarding to PPE. - Financial literacy training. - Slasher Assistance at SIO Community Field (Adventist Church of Kabaya) in May 2024. - Slasher Assistance at OPIC area at Barema Community in June 2024. - Slasher Assistance at Vilelo Primary School on March 2024. - Establish an emergency response team made up of senior management. - Housing inspection and compound census. <p>The certificate holder reviews social impact management at least once every year as for evaluating social impact management in line with existing social developments, so that companies can adapt social impact management programs to the current situation. The social management plan involved relevant stakeholder issue to be basis for plan, for examples gathering issue on Kiba Village.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.	During ASA3_1 in the year 2024, no changes were made to the employment procedures since the last audit. Hargy Oil Palms Limited (HOPL) has developed Human Resource Operations Manual (Doc. No. MAN-HRD-GEN-001-02, Issue No. 2 dated 1 June 2021) to outline the recruitment,	Complied

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	- Minor Compliance -	<p>selection, hiring, promotion, retirement, and termination. Based on interview with sample of workers in Mills and Estates, employment procedure has been disseminated clearly through the employment contract.</p> <p>The employment contracts have included the clauses of Position; Grade/Level; Remuneration (fortnightly basis); Designation/Start Date; Place of Recruitment; Working Hours; Working hour (7am-4.30pm, Fri 7am- 2.30pm, Sat 7am-12pm); Overtime; Annual Leave (11 working days); Sick Leave (6 days/annum); Superannuation (6% employee, 8.4% employer) in accordance with PNG Superannuation Act; Probation Period (6 months); Medical Clearance; Maternity Leave (12 weeks and full pay after 12 months working) – refer to employee handbook for other conditions of maternity leave; Housing; Medical Treatment: worker and declared dependants receive medical treatment at no cost to the limit of the services available at HOPL clinics; Salary Review; Company Policy & RSPO; Transfer; Confidentiality of Information; and Termination of this Agreement.</p> <p>HOPL has also prepared the Guide to Plantation Labour Recruitment and Onboarding. The document is provided the guide a step-by-step process for the recruitment process of Plantation Labour.</p> <p>Record of implementation the procedure provided in indicator 3.5.2.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures are implemented, and records are maintained to demonstrate that workers are employed or promoted based on capabilities and skills. Based on employment documents that have been reviewed, it can be concluded that all employment procedure is implemented properly, in there is no indication of discrimination in recruitment processes. The promotions are conducted based on performance evaluation.</p> <p>Implementation records of employment procedures – verified during ASA 3_1, such as:</p>	Complied

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		<p><u>Recruitment Process:</u></p> <ul style="list-style-type: none"> • Letter of Interest for Job Vacancy – title: Plantation Account Officer, dated April 2024. The position is under Field Department and reporting to the Estate Manager. • Employee Induction Checklist, title: Plantation Account Officer April 2024, namely Ms Helen Kitombi • Staff Employment Form, title: Plantation Account Officer April 2024, namely Ms Helen Kitombi • Employment Offer dated 21 May 2024, title: Plantation Account Officer April 2024, namely Ms Helen Kitombi, grade 9, level 6. Date of appointment: mutual agreed commencement dated, location in Gorokoa – EHP. The anticipated dated to start on 17 June 2024. <p><u>Promotion:</u> Staff Order – General, dated 9 July 2024, name Mr. Charles Wai (employee ID: 08405), position: HEF TM in VWS Navo to nightshift supervisor. Current grade is 5–8 @K12.45 and new grade is 10-1 @K16.45. the document has been issued by HOD of VWS and HOD of HR. The probation period of six month forms the effective date of promotion.</p> <p><u>Resignation:</u> Resignation acceptance letter, dated 15 July 2024, name: Mr. Karl Torang (employee ID: 4338), the position is supervisor – central store. Current grade is 10.1. the reason is resigned of own accord. The document was signed by HOD CS and HOD HR, that signed by employee and witness.</p> <p><u>Dismissal:</u> Dismissal Notice dated 29 June 2024, name Moses Peka (employee ID: 08456) Reason for dismissal is unsuccessful probation. The document was signed by HOD HR and HR Operation managers, that signed by employee and witness.</p>	
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Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>Smallholder requirements:</p> <p>Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>As subsidiary of SIPEF, Hargy Oil Palms Limited (HPOL) recognized that a safe and healthy workplace is the most important element, through prepared the document of:</p> <p>1. <u>The Policy</u> – there was no change for the policy. The Policy on Occupational Health and Safety was established, signed by General Manager of Hargy Oil Palms Limited, issue No.7, dated 6 June 2022. The policy has mentioned that HOPL committed to provide a safe working environment for all employee and other stakeholders. The policy has been communicated to all employees and made available to other stakeholders.</p> <p>The dissemination of the policy has been conducted through pamphlet in notification board located in housing complex, Estate/Plantation Office, and workplaces. Moreover, the dissemination has been conducted through annual dissemination/training.</p> <p>Record verification during ASA 3_1, such as:</p> <ul style="list-style-type: none"> • In Hargy POM – the record of training dated 19 February 2024. The topics is RSPO/HOPL Policy – OHS Policy, that was attended by 26 workers. • In Barema Plantation - the record of refreshment training regarding the Occupational Health and Safety policy dated 9 July 2024 – location at Muster Point of Barema Plantation, that was attended by 63 workers. • In Barema POM – the record of refreshment training regarding OHS policy, the protection of reproductive right policy and family violence policy, dated 19 July 2024 attended by 20 workers of Engineering and Maintenance, dated 23 July 2024 attended by 15 workers of Engineering – KCP, and dated 17 July 2024 attended by 6 workers of Engineering – Maintenance. 	Complied

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		<ul style="list-style-type: none"> • In Navo POM - the record of training dated 16 July 2024. The topic regarding refreshment of Occupational Health and Safety Policy, attended by 50 workers of Engineering Shift A. • Navo Estate - Kiba Plantation - training attendance dated 2 July 2024. The topic regarding the Occupational Health and Safety Policy, attended by 13 workers of FFB loader, 12 workers of Upkeep, 8 workers of Compound upkeep, 20 workers of harvester, 13 workers of Lost Fruit Collector. • Navo Estate - Kiba Plantation – training attendance dated 4 July 2024. The topic regarding Occupational Health and Safety policy, attended by 25 workers. • Pandi Estate - Bakada Plantation – training attendance. The topic regarding the Company Policy including policy to Occupational Health and Safety Policy. Dated 18 February 2024 attended by 9 workers, dated 22 April 2024, attended by 25 workers, dated 10 June 2024 attended by 19 workers, dated 17 June 2024 attended by 12 workers, dated 5 July 2024 attended by 24 workers, dated 29 July 2024 attended by 9 workers. <p>2. <u>The OHS Plan</u> years 2024 has been established – as documented on PLN-COM-OHS-001-12, The program consisted of:</p> <ul style="list-style-type: none"> • Mechanism to implements the OHS trough prepared the HIRADC, JAS, Hazard report, Near Miss Report and OHS Training • Providing the PPE • Mechanism to discuss the OHS. • Medical services (first aid) • Medical care and accident insurance • Incident and Accident Investigation and Lost time by Accident (LTA). <p>3. <u>Hazard and Risk Assessment</u> (REG-ESD-OHS-001-12) has been conducted updated for 2024 for all activity in Mills, Estates/Plantations. The risk assessment for plantation has been included activities for</p>	
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		<p>smallholders, such as harvesting, wheeling, and spraying, boiler station, press station, welding of metal activities.</p> <p>4. <u>OHS Procedures</u> – there was no changes for the procedures since last audit, such as:</p> <ul style="list-style-type: none"> • SOP of Personal Protective Equipment (SOP No. PRO-SUS-OHS-003-06) • SOP of Chemical Weeding (PRO-PLT-UPK-006-03) • SOP for First Aid Handling (PRO-SUS-OHS-001-003) • SOP for Basic Operating Operator's Guide for Garbage Truck (SOP-SIS-OHS-002-02) 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited (HPOL) has demonstrated the effectiveness of its OHS Plan through monthly monitoring of Environmental, Health & Safety risks, conducted by a dedicated EHS Officer of each unit.</p> <p>Document verified, such as:</p> <ul style="list-style-type: none"> • Hargy POM: According to the minutes of the RSPO meeting held on 9 July 2024, in the Shipping/Safety Office, the meeting agendas included: reviewing OHS performance for June 2024, discussing PPE and uniforms, reviewing accident reports, training reports for OHS, and inspection reports. • Navo Estate - Kiba Plantation: The minutes of the RSPO meeting dated 25 July 2024, included the following agendas: EHS Inspection Report, review of OHS performance for June 2024, review of the health report, internal audit report review, and other business issues. The meeting was attended by the RSPO team and Kiba Plantation Management. • Pandi Estate - Bakada Plantation: The minutes of the RSPO meeting dated 29 July 2024, included: a review of the previous meeting's plans and recommendations, EHS Inspection Report, review of OHS performance for June 2024, review of the health report, internal audit report review, and other business issues. The meeting was attended by the RSPO team and Bakada Plantation Management. The record was 	Complied

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		<p>prepared by RSPO representative, Mr. Ananias Kawasa.</p> <ul style="list-style-type: none"> Noise Monitoring Report - Hargy POM: Reported on 30 June 2024, the allowable noise level is 75 dB based on the PNG Oil Palm Environment Code of Practices 2013 for all mill stations. Sample noise levels were recorded as follows: Engine Room Station (102.4 dB), Sterilizer Station (84.6 dB), Kernel Mill (101.2 dB), and Boiler Station (104.4 dB). Earplugs and earmuffs are issued as needed to reduce noise hazards for all station workers. Fire Extinguisher Register - Hargy POM: Last updated in July 2024, a total of 54 fire extinguishers were distributed to processing stations in the POM, including the Boiler Station, Demin Plants, Mill Laboratory, Oil Room, Maintenance, and Powerhouse Station. Sample of inspection report verified, e.g.: <ul style="list-style-type: none"> Hargy POM: The OHS inspection report, as per "Hazard Report – FOR-SUS-OHS-001-04," dated February 2024, identified a hazard where the stormwater drain cover on the access road junction leading to Hargy Mill and central stores was not properly seated due to eroding cement. This posed a traffic hazard and risk of accidents involving moving vehicles, endangering drivers, passengers, bystanders, and company property. Action Taken: A traffic safety cone was installed to mitigate the risk. Kiba Plantation: The "Plantation EHS Monthly Inspection Checklist – FOR-SUS-GEN-006-08," dated 25 July 2024, covered Divisions 1 & 2 in Kiba Plantation. The inspection areas included genset condition, fuel storage and issues, amenities and office, driveway and car park, first aid kits, PPE, pesticides management, spraying team, fertilizer store, landfill, housing/compound, water sources, clinics, and roads. All areas inspected in July 2024 were reported as satisfactory. Bakada Plantation: The EHS Monthly Inspection Checklist – FOR-SUS-GEN-006-08, dated 29 July 2024, covered Divisions Alaba, Abulmesi, Alangily, Magalona, and Gamupa. The inspection was 	
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		<p>conducted by Ananias Kawasa (RSPO Officer). The areas inspected included genset condition, fuel storage and issues, amenities and office, driveway and car park, first aid kits, PPE, pesticides management, spraying team, fertilizer store, landfill, housing/compound, water sources, clinics, and roads. All areas inspected in July 2024 were reported as satisfactory.</p> <ul style="list-style-type: none"> - Bakada Plantation: The Daily Sprayers Checklist, dated 14 August 2024, was reported as satisfactory. • Sample of emergency response drill report in 2024, such as: <ul style="list-style-type: none"> - Hargy POM: The Emergency Drill Review Form – FOR-SUS-OHS-010-03, documented a shipment oil spill drill (Scenario 9.3) conducted 30 minutes from the Whiskey Base Fledge Pipeline. The drill was attended by 8 participants. - Kiba Plantation: The Emergency Drill Review Form – FOR-SUS-OHS-010-03, dated 16 June 2024, documented a volcano eruption drill (Type 7.0) attended by 151 workers. The evaluation and action plan were provided in the review form. - Kiba Plantation: The Emergency Drill Review Form – FOR-SUS-OHS-010-03, dated 26 July 2024, documented a fire emergency drill attended by 29 workers. The evaluation and action plan were provided in the review form. - Bakada Plantation: The Emergency Drill Review Form – FOR-SUS-OHS-010-03, dated 28 July 2024, documented a volcano eruption drill (Type 7.0) attended by 240 workers. The evaluation and action plan were provided in the review form. - Bakada Plantation: Refresher training on safety, risk assessment, and PPE was conducted on 17 April 2024, attended by 9 workers, and on 25 May 2024, attended by 23 workers. 	
Criterion 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to those who will be affected by the	Hargy Oil Palms Limited (HOPL) has prepared a training program outlined in the document titled "The Courses Calendar Year 2024." All workers	Complied

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	<p>programme, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>Smallholder requirements:</p> <p>Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks.</p> <p>- Major Compliance -</p>	<p>involved in operations have been adequately trained in safe working practices. The training program includes a monthly calendar detailing the date, training topics, targeted audiences, facilitators, duration, and venue.</p> <p>Hargy Oil Palms Limited (HOPL) has also developed a training plan for 2024, coordinated by the sustainability department. The training plan includes the following courses:</p> <ul style="list-style-type: none"> - HOPL Community Policy Socialization - HOPL Ethical Conduct Policy Socialization - RSPO SCCS 2020 Training - RSPO Rules on Market Communication and Claims Training - HOPL HCV Management Plan - HOPL Plantation Cadet Inductions - RSPO SH Requirements - Legal Compliance Obligations - Training on Mill SOPs and Manuals - First Aid Training <p>The training plan is designed for supervisors and key personnel whose duties directly relate to certification standards, such as Lab Analysts, Prime Mover Drivers, Sustainability Officers, Safety Officers, and Clerks.</p> <p>The training program targets workers, smallholders, independent estates, and contractors. It covers various topics, including best practices, safety, environmental management, financial literacy, customer service, and company policies.</p> <p>Based on the document review, Hargy Oil Palms Limited (HOPL) has demonstrated that training records are well-maintained. These records include minutes from each training session, training evaluation records, and individual training records.</p>	
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		<p>Based on interviews with workers, it was confirmed that they are knowledgeable about RSPO requirements, including best management practices, health and safety, environmental protection, social responsibility, and worker welfare. Additionally, they recognize that the company has effectively implemented these requirements.</p> <p>Based on interviews with smallholders, they reported that Hargy's Smallholders or Sustainability Staff regularly visit them to monitor the implementation of best practices and safety measures.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling</p> <p>Smallholder requirements: Smallholder training records are maintained. - Minor Compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) has demonstrated that training records are meticulously maintained. The documentation includes minutes from each training session and individual training records.</p> <p>Data Verified – Training Records for 2024:</p> <ul style="list-style-type: none"> - Hargy POM: Emergency Drill Review Form – FOR-SUS-OHS-010-03, detailing a shipment oil spill drill (Scenario 9.3) conducted 30 minutes from the Whiskey Base Fledge Pipeline. The drill was attended by 8 participants. - Hargy POM: Boiler training license renewal, including confined space training, dated 19 April 2024. The training was facilitated by Mr. Wayne Sareo (Safety Officer). - Hargy POM: Training on Mill loading/dispatch bay operations, dated 5 March 2024, facilitated by Mr. Jeffrey Penias, attended by 11 workers. - Navo Estate - Kiba Plantation: OHS training, dated 22 June 2024, attended by 91 workers. - Navo Estate - Kiba Plantation: Fertilizer application training, dated 22 March 2024, attended by 22 workers. - Navo Estate - Kiba Plantation: Chemical handling and pesticide application training, dated 12 January 2024, attended by 9 sprayers. - General Training: Refresher training on safety, risk assessment, and PPE, conducted on 17 April 2024, and attended by 9 workers, with a follow-up session on 25 May 2024, attended by 23 workers. 	Complied

		<ul style="list-style-type: none"> - Kiba Plantation: Emergency Drill Review Form – FOR-SUS-OHS-010-03, detailing a fire emergency drill, dated 26 July 2024, attended by 29 workers. The evaluation and action plan are included in the review form. - Pandi Estate - Bakada Plantation: Emergency Drill Review Form – FOR-SUS-OHS-010-03, detailing a volcano eruption drill (Type 7.0), dated 28 July 2024, attended by 240 workers. The evaluation and action plan are included in the review form. <p>Smallholder Training Program – Sample Records of Training in 2024:</p> <ul style="list-style-type: none"> - Mataururu (OPRA BMP Block): Smallholder Attendance Record, dated 11 June 2024. Theme: Mini Field Day – Management for Oil Palm Farmers, attended by 69 smallholders. Example: Mr. Peter June (Block Number: 101091), Babex Estate (Independent Estate, No: 770010). - Tiaruru (Block #01-0194): Smallholder Attendance Record, dated 24 June 2024. Theme: Mini Field Day – Herbicide Spraying, attended by 46 smallholders. Examples: Mr. Issack Apiasare (Block Number: 01-209), Mr. David Walaki (Block Number: 01-202), Mr. Noel Tamata (Block Number: 01-225), Mr. Cliff Ren (Block Number: 01-205), Mrs. Essy Ludwick (Block Number: 01-192). - Barema 1-4: Smallholder Attendance Record, dated 13 May 2024. Theme: Mini Field Day – FFB Price Calculation, attended by 52 smallholders. Examples: Mr. Charlie Vitikut (Block Number: 03-1271), Mr. Peter Walter (Block Number: 03-1309), Mr. Tom Lus (Block Number: 03-1320). - Baekakea Village: Smallholder Attendance Record, dated 2 July 2024. Theme: Mini Field Day – RSPO and FFB Formula Refresher, attended by 43 smallholders. Examples: Mr. John Mou (Block Number: 09-0932), Mr. Ben Masori – Baekakea United Church (Block Number: 09-0943), Mr. Joshua Sobi (Block Number: 0947). 	
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The organization has been conducted supply chain training regularly. Some of the training record has been verified i.e:</p> <ul style="list-style-type: none"> In Hargy POM: Record of Training of RSPO SCC Refreshment Training, on 22 April 2024 in HPOM, attended by 7 personnel; on 19 July 2024 in HPOM, attended by 4 personnel; on 26 May 2024 in Hargy Mill Office, attended by all specific personnel for each mill (Navo, Hargy and Barema). In Barema POM: Record of Training of RSPO SCC 2020 & RSPO Rules on Market Communication and Claims, on 24 and 25 July 2024 in Barema POM, that was attended by 14 participants on 24 July and 10 participants on 25 July. Training attended by Weighbridge Operators, lab sampler, Lab analyst, cadet engineer, KCP operators, Plant Fitter and others. In Navo POM: RSPO Supply Chain Refresher Training on 9 June 2024, location in Navo Mill Conference Room that was attended by 9 participants. Sample name on behalf of Raphael Waie (Lab Analyst) and Benjamin Dau (Weighbridge Operator). 	Complied								
<p>Criterion 3.8: Supply chain requirement for mills</p> <p>(note: all supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>											
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing 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 since the previous assessment. Hargy Oil Palms Limited is implementing Module D for CPO Mills: Identity Preserved. Hargy Palm Oil Mills consist of 3 certified palm oil mills: Hargy POM, Barema POM and Navo POM. Each palm oil mill only receiving certified FFB from company owned plantation: Hargy Plantation, Navo Plantation and Pandi Plantation; as well as from certified smallholders.</p> <table border="1"> <thead> <tr> <th></th><th colspan="3">Mill Name</th></tr> </thead> <tbody> <tr> <td></td><td>Hargy Mill</td><td>Barema Mill</td><td>Navo Mill</td></tr> </tbody> </table>		Mill Name				Hargy Mill	Barema Mill	Navo Mill	Complied
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		Suppliers Name	Hargy Division 1 – Makakiwa	Barema Plantation	Navo Division Ibana 1		
			Hargy Division 2 – Urumaili	Navo Division Ibana 1	Navo Division Ibana 2		
			Hargy Division 3 – Kerakera	Navo Division Ibana 2	Pandi Estate - Division Abulmosi		
				Pandi Division Abulmosi	Pandi Estate - Division Alaba		
			Hargy Division – Barema 1	Pandi Division Alaba	Pandi Estate - Division Alangily		
				Pandi Division Alangily	Pandi Estate - Division Gamupa		
				Pandi Division Gamupa	Pandi Estate - Division Magalona		
				Pandi Division Magalona	Navo Division Sena		
			Hargy Division – Barema 2	Navo Division Sena	Navo Division Vamakuma		
				Navo Division Vamakuma	Navo Division Atata 1 (Remaling)		
				Navo Division Atata 1 (Remaling	Navo Division Kiba 1		

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			<div> <div>Cenaka Division – Smallholders</div> <ul style="list-style-type: none"> Kulabe Matililiu </div>	<div> <div>Navo Division Kiba 1</div> <div>Navo Division Kiba 2</div> <div>Maututu – Independent Estate</div> <div>Meramera – Independent Estate</div> <div>HOPL Smallholders</div> </div>	<div> <div>Navo Division Kiba 2</div> <div>Maututu – Independent Estate</div> <div>Meramera – Independent Estate</div> <div>HOPL Smallholders</div> </div>		
			<p><i>*Note: some of the supply bases in Barema and Navo Mill is same where the own estate, independent estate or smallholders can send the FFB to Barema or Navo Mill.</i></p> <p>Verification of volumes and sources of certified FFB entering the palm oil mills catered by transport fleet. The transport fleet is organized to certain FFB pick up scheduled. Referring to HOPL procedure Collection and Transport of FFB No.PRO-COM-SCC-016 section 2.1: "Within company estates, as the FFB/LF is harvested it is placed at designated locations called "marketplaces". The nominated recorder takes the bunch count and records it on the Rollover form. A scissors tractor with trailer then picks up the FFB/loose fruit from the marketplace and as they do the pickup the driver records the number of bunches of FFB in the FFB collection docket based on the information on the rollover form. The FFB collection docket shows the plantation name, division, field and block where FFB/loose fruit is from and the bunch count. This docket also indicates the supply chain certification model (Identity Preserved) used, by means of either a "IP" stamp on the docket or "IP" pre-printed on the docket. The</p>				

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		Latitude/Longitude of this location can be determined from GIS records as required.																																																							
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	HOPL implement Identity Preserved. This indicator is not applicable.	Not Applicable																																																						
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated annual tonnage for certified FFB processed, CPO and PK production are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases (company-owned plantation and associated smallholders).</p> <p>2024:</p> <table border="1"> <thead> <tr> <th rowspan="2">Projected Item</th><th colspan="3">Palm Oil Mill Name</th></tr> <tr> <th>Hargy POM</th><th>Barema POM</th><th>Navo POM</th></tr> </thead> <tbody> <tr> <td>FFB</td><td>155,924</td><td>212,626</td><td>241,896</td></tr> <tr> <td>CPO</td><td>37,266</td><td>52,944</td><td>59,627</td></tr> <tr> <td>OER</td><td>23.90</td><td>24.90</td><td>24.65</td></tr> <tr> <td>PK</td><td>7,769</td><td>10,631</td><td>12,094</td></tr> <tr> <td>KER</td><td>5.00</td><td>5.00</td><td>5.00</td></tr> </tbody> </table> <p>2025:</p> <table border="1"> <thead> <tr> <th rowspan="2">Projected Item</th><th colspan="3">Palm Oil Mill Name</th></tr> <tr> <th>Hargy POM</th><th>Barema POM</th><th>Navo POM</th></tr> </thead> <tbody> <tr> <td>FFB</td><td>173,432</td><td>197,934</td><td>229,917</td></tr> <tr> <td>CPO</td><td>41,450</td><td>49,286</td><td>56,675</td></tr> <tr> <td>OER</td><td>23.90</td><td>24.90</td><td>24.65</td></tr> <tr> <td>PK</td><td>8,671</td><td>9,896</td><td>11,495</td></tr> <tr> <td>KER</td><td>5.00</td><td>5.00</td><td>5.00</td></tr> </tbody> </table>	Projected Item	Palm Oil Mill Name			Hargy POM	Barema POM	Navo POM	FFB	155,924	212,626	241,896	CPO	37,266	52,944	59,627	OER	23.90	24.90	24.65	PK	7,769	10,631	12,094	KER	5.00	5.00	5.00	Projected Item	Palm Oil Mill Name			Hargy POM	Barema POM	Navo POM	FFB	173,432	197,934	229,917	CPO	41,450	49,286	56,675	OER	23.90	24.90	24.65	PK	8,671	9,896	11,495	KER	5.00	5.00	5.00	Complied
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		The estimated for CPO and PK production from Hargy POM, Barema POM and Navo POM is recorded under the public summary report and the RSPO certificate for Hargy Oil Palms Limited. The actual CPO and PK production were verified during each subsequent annual surveillance assessment visit to ensure that certified mill only deliver the allowed tonnage for the year. BSI Group as certification body has submitting estimated of FFB received, CPO and PK produced to RSPO Public Summary Report and the RSPO PalmTrace system.	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005. All mills has meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. The PalmTrace ID of each mill are:</p> <ul style="list-style-type: none"> • Hargy POM PalmTrace ID: RSPO_PO10000 00053. • Barema POM PalmTrace ID: RSPO_PO10000 01655. • Navo POM PalmTrace ID: RSPO_PO10000 00105. 	Complied
3.8.5	<p>Documented procedures</p> <p>a. The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>b. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>c. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>d. Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable</p>	<p>As of ASA 3_1 in 2024, there have been no changes to the documented procedures. Hargy Oil Palms Limited (HOPL) has prepared a Supply Chain Manual under MAN-COM-SCC-001-03, titled "RSPO Supply Chain Certification Manual," dated 10 March 2021. The document, on page 4, states that the General Manager of HOPL has overall responsibility and authority for implementing the RSPO Supply Chain Certification and ensuring compliance with applicable requirements. This includes informing clients of any termination or suspension within three business days from the date of termination or suspension.</p> <p>Hargy Oil Palms Limited (HOPL) has also defined Standard Operating Procedures (SOPs) to ensure the implementation of all elements of the RSPO Supply Chain Certification Standards in Hargy's Palm Oil Mills. The procedures were updated on 10 March 2021, and include:</p>	Complied

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	<p>requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>e. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> - PRO-SUS-SCC-016-03: Receipt of Fresh Fruit Bunch – Collection of FFB/Loose Fruit in Company Estate/Smallholders Block by Company Truck or Contractor, updated 1 June 2022. - PRO-SUS-SCC-015-02: Receipt of Fresh Fruit Bunch SOP, updated 10 March 2021. - PRO-SUS-SCC-014-02: Production of Crude Palm Oil, updated 10 March 2021. - PRO-SUS-SCC-004-02: Non-Conformance, updated 10 March 2021. - PRO-SUS-SCC-005-02: Outsourcing Activities, updated 10 March 2021. - PRO-SUS-SCC-006-02: Sales and Goods Out, updated 10 March 2021. - PRO-SUS-SCC-007-02: Receipt of Transaction, updated 10 March 2021. - PRO-SUS-SCC-008-02: Training, updated 10 March 2021. - PRO-SUS-SCC-009-02: Record Keeping, updated 10 March 2021. - PRO-SUS-SCC-010-02: Conversion Factor, updated 10 March 2021. - PRO-SUS-SCC-011-03: Claims, updated 10 March 2021. - PRO-SUS-SCC-012-02: Complaints, updated 10 March 2021. - PRO-SUS-SCC-013-02: Management Review, updated 10 March 2021. <p>Hargy Mill, Barema Mill, and Navo Mill have complete and up-to-date records and reports demonstrating compliance with the supply chain model requirements. This includes comprehensive documentation of training records, operational procedures, and other relevant compliance data. These records provide evidence that all mills are adhering to the established standards and practices required for maintaining the RSPO Supply Chain Certification.</p> <p>Hargy Oil Palms Limited has conducted refresher training on these procedures, covering the RSPO Supply Chain Certification, including standards and systems (Supply Chain Models). According to records, the trainers also demonstrated traceability at every step of the chain. A critical topic in the training was compliance with legal requirements and its impact on RSPO-certified supply bases. The trainer emphasized the importance of</p>	
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		<p>avoiding the production of uncertified oil and ensuring that FFB from uncertified blocks/plots is not accepted.</p> <p>Data Verified During ASA 3.1:</p> <ul style="list-style-type: none"> - RSPO Supply Chain Certifications Training: Held on 22 April 2024 in Hargy POM (2-hour duration), facilitated by Wayne Sareno and attended by 7 personnel. - RSPO Supply Chain Certifications Training: Held on 19 July 2024 in Hargy POM (1-hour duration), facilitated by Wayne Sareno and attended by 4 personnel. - RSPO Supply Chain Certifications Training: Held on 26 May 2024 in Hargy POM Office (2-hour duration), facilitated by Fidelis H. and attended by specific personnel from each mill (Navo, Hargy, and Barema). - In Barema POM: Record of Training of RSPO SCC 2020 & RSPO Rules on Market Communication and Claims, on 24 and 25 July 2024 in Barema POM, that was attended by 14 participants on 24 July 2024 and 10 participants on 25 July 2024. Training attended by Weighbridge Operators, lab sampler, Lab analyst, cadet engineer, KCP operators, Plant Fitter and others. - In Navo POM: RSPO Supply Chain Refresher Training on 9 June 2024, location in Navo Mill Conference Room that was attended by 9 participants. Sample name on behalf of Raphael Waie (Lab Analyst) and Benjamin Dau (Weighbridge Operator). <p>During the field visit and interviews with selected personnel in charge at each station (e.g., weighbridge operator, dispatch operator, tanker driver, and loading master at Hargy Mill/KCP), it was confirmed that they could describe and demonstrate the procedures for receiving certified FFB/PK/PKO from other mills/KCPs, managing the product, record keeping, and the loading process onto ships.</p>	
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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> <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. <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>Hargy Oil Palms Limited (HOPL) has established a written procedure for conducting internal audits under No. PRO-SUS-EMS-016-12, dated 8 March 2021. This procedure outlines the process for conducting annual internal audits to verify that HOPL:</p> <ul style="list-style-type: none"> - Conforms to the requirements of the RSPO Supply Chain Certification Standard and the RSPO Market Communication and Claims Documents. - Effectively implements and maintains these standard requirements within its organization. <p>Nonconformities identified during internal audits result in corrective action requests. The results of these audits, along with all actions taken to address nonconformities, are available to the certification body upon request. The outcomes of internal audits are reviewed by top management during the annual management review. The Compliance Department conducts these internal audits for Hargy POM, Navo POM, and Barema POM.</p> <p>Internal audits are conducted comprehensively, integrating ISO 14001, RSPO P&C, and RSPO SCCS standards. Non-conformances and observations identified during these audits are addressed through corrective actions. In 2023, internal audits were carried out across all operational sites according to the 2023 internal audit plan. A total of 140 non-conformances were identified across all units, with 134 of these being closed, resulting in a 95.7% closure rate for the year. Internal audits are a key mechanism for monitoring the effective implementation of standard requirements. Mill managers are responsible for taking corrective actions to address any non-conformities identified at their sites or to resolve outstanding issues from previous audits.</p> <p>As stated in the "Sustainability – Internal Audit Program 2024," the organization plans to conduct Supply Chain internal assessments twice a year. The most recent internal audit took place on 22–23 April 2024, led by Fidelis Hiamangi, who attended RSPO SCCS training by BMTrada in March</p>	Complied
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		<p>2021. The audit scope included Hargy POM, Navo POM, and Barema POM (including KCP plant and Bulking stations). The objectives of this audit were to:</p> <ul style="list-style-type: none">- Ensure conformity with all requirements of the RSPO SCCS 2020, RSPO Rules on Market Communications and Claims 2022, and other applicable requirements.- Provide management with information on audit results for consideration and review.- Offer opportunities for continuous improvement. <p>Based on the latest record review, no non-conformities were identified. All RSPO Supply Chain standards, including RSPO rules on market communication and claims, and other requirements established by the organization, have been effectively implemented and maintained.</p> <p>Hargy Oil Palms Limited's management conducts an annual review for all mill units (including KCP). The latest management review occurred on 20 February 2024. The review focused on the progress and achievements of 2023 and was attended by representatives from all departments, including General Management, VWS, Construction, Smallholder Affairs, HR, Sustainability, Internal Audit, and Security.</p> <p>The agenda for the management review included:</p> <ul style="list-style-type: none">- Actions and follow-up from previous management reviews.- Changes to the management systems.- Environmental objectives and targets, including environmental performance.- Process performance and product conformity.- Results of internal audits, status of preventive and corrective actions.- Customer feedback from interested parties.- Adequacy of resources for ISO 14001, RSPO P&C, and RSPO SCCS.	
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		<ul style="list-style-type: none"> - Opportunities and recommendations for improvement in ISO 14001, RSPO P&C, and RSPO SCCS. - Continuing suitability and adequacy of the management and certification systems. 	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>Hargy Oil Palms Limited established RSPO Supply Chain Certification Manual (No.MAN-SUS-SCC-001-03 dated 10 March 2021). Other document related to the purchasing and goods in is SOP Receipt of Fresh Fruit Bunch (FFB) No.PRO-SUS-SCC-015-02 dated 10 March 2021. There are no change to the procedures since previous assessment. The procedure stated:</p> <ul style="list-style-type: none"> • All FFB/LF from the company plantations and smallholders within the unit of certification are received by each mill through the weighbridge. • On arrival, the weighbridge clerks check the documentation accompanying the FFB brought in to verify it comes from the certified supply base (company or smallholder). If, for any reason, a smallholder within the certified supply base has been suspended for compliance reasons, their identity is provided to the weighbridge operator on a list of suspended smallholders. The Weighbridge operator checks that none of the documentation is for FFB from a suspended smallholder on that list. If it is, the FFB is not accepted. • The weighbridge operator further verifies that relevant documentation has the 'IP' notation. • Should FFB be brought in not signifying the supply chain module (IP) then the FFB is to be deemed uncertified material and is to be rejected after investigation to identify the source and determine the reason for IP to be omitted from the documentation. If the reason is a clerical error, the PK may be accepted after receipt of corrected documentation. • Under no circumstances will any FFB that does not meet IP requirements be processed in a Hargy Mill. <p>Hargy Oil Palms Limited also have a mechanism in place for handling non-conforming oil palm products and/or documents under Non-Conformance</p>	Complied

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		<p>Procedure (No.PRO-SUS-SCC-004-02 dated 10 March 2021). Up to this assessment, there is no case of no-conforming document or material entering the Mill.</p> <p>Sample of FFB receiving at Hargy POM:</p> <ul style="list-style-type: none"> • FFB IP Collection Docket No.450076 date 15 June 2024 from Hargy Plantation, Makakiwa (Division 1), Block 02B06, Truck Number VH36; Skip Bin No. C0100; Driver M. Joe. Total bunches 85. • FFB Receiving Slip Hargy POM No. FFB24008144W date 15 June 2024; from Hargy Plantation, Makakiwa (Division 1), Block 02B0; 85 Bunches; Vehicle VH36; Product FFBIP RSPO 535739. Nett Weight 2.18 MT. • FFB IP Collection Docket No.498503 date 7 May 2024 from Hargy Plantation, Urumaili (Division 2), Block 17H06, Truck Number VH05; Skip Bin No. 13; Driver Joshua Jonah. Total bunches 550. • FFB Receiving Slip Hargy POM No. FFB24005935W date 7 May 2024; from Hargy Plantation, Urumaili (Division 2), Block 17H06; 550 Bunches; Vehicle VH05; Product FFBIP RSPO 535739. Nett Weight 7.42 MT. • FFB Receiving Slip Hargy POM No. FFB24008295W date 20 June 2024; from Cenaka Division (Farm Gate); Vehicle VC30; Product FFBIP RSPO 535739. Nett Weight 14.42 MT. <p>Sample of FFB receiving at Barema POM:</p> <ul style="list-style-type: none"> • FFB IP Collection Docket No. 424834 dated 31 July 2024 from Barema Plantation, Division 2, Block 07C25 (587 bunches) and 07B25 (173 bunches), Truck Number VH31; Skip Bin No. SOK140; Driver Name Wilson Piniau. Total 760 bunches. • FFB Receiving Slip Barema POM No. BOMFFB/2407-00059 dated 31 July 2024; from Barema Plantation, Block 07B25 (173 bunches) and 07C25 (587 bunches); Vehicle Number VH31; FFBIP RSPO535739; Net weight 13.04 MT. 	
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		<ul style="list-style-type: none"> FFB Receiving Slip Barema POM No. BOMFFB/2407-00005 date 29 July 2024; from HOPL Smallholders SHMED002, Vehicle Number VC23; FFBIP RSPO535739; Net weight 17.00 MT. <p>Sample of FFB receiving at Navo POM:</p> <ul style="list-style-type: none"> FFB IP Collection Docket No. 447645 dated 31 July 2024; from Navo Estate – Kiba Plantation Division 2, Block 22B19R (1,339 bunches) and 22E18R (963 bunches), total 2,327 bunches. FFB Receiving Slip Navo POM No. NOMFFB/2407-00139 dated 31 July 2024; Navo Estate – Kiba Plantation Division 2, Block 22B19 and 22E18; 2,327 Bunches; Nett Weight 5.14 MT; Vehicle VH55; Product FFBIP RSPO 535739. FFB IP Collection Docket No. 416039 dated 31 July 2024; from Pandi Estate – Bakada Plantation, Gamupa Division, Block 14A06 (328 bunches), 14B06 (260 bunches), and 14B05 (267 bunches), total 855 bunches. FFB Receiving Slip Navo POM No. NOMFFB/2407-00144 dated 31 July 2024; Pandi Estate – Bakada Plantation, Gamupa Division, Block 14A06, 14B06 and 14B05; 855 Bunches; Nett Weight 14.70 MT; Vehicle VH45; Product FFBIP RSPO 535739. FFB Receiving Slip Navo POM No. NOMFFB2408-00390 dated 12 August 2024; Smallholder Division 3; Nett Weight 14.84 MT; Vehicle VC28; Product FFBIP RSPO 535739. <p>Dispatch slip for CPO cartage from Barema to Hargy POM, Navo POM to Hargy POM and PK cartage from Navo POM to Barema POM:</p> <ul style="list-style-type: none"> CSPO Dispatch from Barema POM to Hargy POM: Despatch Slip No. CPOIP24000655W dated 1 June 2024; Destination Hargy POM; Nett weigh 33.52 MT; Product CPO IP RSPO 535739; Vehicle VP05. CSPO Dispatch from Navo POM to Hargy POM: Despatch Slip No. CPOIP24000662W dated 31 May 2024; Destination Hargy POM; Nett weigh 30.68 MT; Product CPO IP RSPO 535739; Vehicle VP14. Weighbridge ticket No.PKIP24000174W; dated 28 March 2024; Supplier: Navo POM; Receiver: Barema POM/KCP; Vehicle: VH39; Driver: Earl 	
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		<p>Melchior; Product: PK IP; Certificate number: RSPO 535739; Nett weight: 15.68 MT; time at 12.50.</p> <ul style="list-style-type: none"> • Weighbridge ticket No.PKIP24000291W; dated 31 May 2024; Supplier: Navo POM; Receiver: Barema POM/KCP; Vehicle: VH41; Driver: Aiyo Moses; Product: PK IP; Certificate number: RSPO 535739; Nett weight: 15.80 MT; time at 10.41. 	
3.8.8	<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"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>Hargy Oil Palms Limited has established RSPO Supply Chain Certification Manual (No.MAN-COM-SCC-001-03 dated 10 March 2021) and Procedure of Sales and Goods Out (No.PRO-SUS-SCC-006-02 dated 10 March 2021). The documents explain that record of final tonnage shipped was recorded in the FOSFA Combined Weight Certificate & Loading Report. Shipping documents such as Contract documents, Sales advice and FOSFA Combined Weight & Loading Report include the information. There is no change to the procedure.</p> <p>Hargy POM Shipping Announcement for Sales of CPO:</p> <ul style="list-style-type: none"> • PalmTrace transaction No. TR-232aa0a0-2d70 confirmed date 6 June 2024: Contract No. PHO-11622. Product: Crude Sustainable Palm Oil/SG. Quantity: 500 MT. Seller: Hargy Oil Palms Mill; End Buyer: Olenex Sarl. Bill of Lading No. LIM032406, dated 1 June 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A One Business Center LA, Piece 3 CH-1180 Rollest, Sitzerland. Tanker: MT Theresa Lima. Voyage: V03/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 500 MT, RSPO Certificate No. RSPO535739. Volume 500 MT. Reference to Contract No. PHO-11622 SG. • PalmTrace transaction No. TR-a2c87f10-c94c confirmed date 23 May 2024: Contract No. PHO-11701. Product: Crude Sustainable Palm Oil/SG. Quantity: 494.45 MT. Seller: Hargy Oil Palms Mill. End Buyer: Olenex Sarl. Tanker Bill of Lading No. AQU022425, dated 3 May 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New 	Complied

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		<p>Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Aquila. Voyage: V02/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 494.45 MT, RSPO Certificate No. RSPO535739. Volume 500 MT. Reference to Contract No. PHO-11701 SG.</p> <ul style="list-style-type: none"> • PalmTrace transaction No. TR-462def7c-4fb5 confirmed date 14 May 2024: Contract No. PHO-11743. Product: Crude Sustainable Palm Oil/SG. Quantity: 800.78 MT. Seller: Hargy Oil Palms Mill. End Buyer: Olenex Sarl. Tanker Bill of Lading No. DRA022422, dated 5 April 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Draco. Voyage: V02/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 800.78 MT, RSPO Certificate No. RSPO535739. Volume 800 MT. Reference to Contract No. PHO-11743 SG. <p>Barema POM Shipping Announcement for Sales of CPO:</p> <ul style="list-style-type: none"> • PalmTrace transaction No. TR-6c8eb891-1204 confirmed date 18 December 2023: Contract No. PHO-11582. Product: Crude Sustainable Palm Oil/SG. Quantity: 980 MT. Seller: SIPEF – Barema POM. End Buyer: Olenex Sarl. Tanker Bill of Lading No. VEL042332, dated 16 October 2023. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Vela. Voyage: V04/23. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 980 MT, RSPO Certificate No. RSPO535739. Volume 980 MT. Reference to Contract No. PHO-11582 SG. <p>Navo POM Shipping Announcement for Sales of CPO:</p>	
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		<ul style="list-style-type: none"> • PalmTrace transaction No. TR-bf4e81f1-42cb confirmed date 15 July 2024: Contract No. PHO-11700. Product: Crude Sustainable Palm Oil/SG. Quantity: 500 MT. Seller: Navo Palm Oil Mill - SIPEF. End Buyer: Olenex Sarl. Tanker Bill of Lading No. LIM032420, dated 1 June 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Theresa Lima. Voyage: V03/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 500 MT, RSPO Certificate No. RSPO535739. Volume 500 MT. Reference to Contract No. PHO-11700 SG. <p>Dispatch slip for CPO cartage from Barema to Hargy POM, Navo POM to Hargy POM and PK cartage from Navo POM to Barema POM:</p> <ul style="list-style-type: none"> • CSPO Dispatch from Barema POM to Hargy POM: Despatch Slip No. CPOIP24000655W dated 1 June 2024; Destination Hargy POM; Nett weigh 33.52 MT; Product CPO IP RSPO 535739; Vehicle VP05. • CSPO Dispatch from Navo POM to Hargy POM: Despatch Slip No. CPOIP24000662W dated 31 May 2024; Destination Hargy POM; Nett weigh 30.68 MT; Product CPO IP RSPO 535739; Vehicle VP14. • Weighbridge ticket No.PKIP24000174W; dated 28 March 2024; Supplier: Navo POM; Receiver: Barema POM/KCP; Vehicle: VH39; Driver: Earl Melchior; Product: PK IP; Certificate number: RSPO 535739; Nett weight: 15.68 MT; time at 12.50. • Weighbridge ticket No.PKIP24000291W; dated 31 May 2024; Supplier: Navo POM; Receiver: Barema POM/KCP; Vehicle: VH41; Driver: Aiyo Moses; Product: PK IP; Certificate number: RSPO 535739; Nett weight: 15.80 MT; time at 10.41. <p>All information needed by RSPO such as name and address of buyer, seller, shipment date, RSPO certificate number, supply chain model, shipper</p>	
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		information and unique number has been completed as written in the especially in PalmTrace transaction report and tanker bill of lading.	
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>Hargy Oil Palms Limited (HOPL) outsources activities for the transport of Fresh Fruit Bunches (FFB). During transport, the company holds legal ownership of the FFB. In this ASA 3_1, HOPL provided evidence of agreements or contracts governing the outsourced processes with each contractor, ensuring that these agreements are signed and enforceable.</p> <p>Sample of contract verified:</p> <ul style="list-style-type: none"> - Contract No. HOPL2024-0057: Agreement for FFB cartage delivery between HOPL and Kijomhal Transport (IPA #6-2139890), valid from 1 July 2024 to 30 June 2025. The contractor uses an Isuzu NPR series dump crane truck (white) with MVIL Registration RAU 879 to collect loose fruit. - Contract No. HOPL2024-059: Agreement for FFB cartage delivery between HOPL and Earthworks Mowing Services (IPA #6-2111185), valid from 1 July 2024 to 30 June 2025. The contractor uses an Isuzu NPR series dump crane truck (white) with MVIL Registration RAW 992 to collect loose fruit. - Contract No. HOPL2024-060: Agreement for FFB cartage delivery between HOPL and Unandu Transport Services (IPA #6-119416635), valid from 1 July 2024 to 30 June 2025. The contractor uses a Hyundai (silver) series dump truck (white) with MVIL Registration LCA 253 to collect loose fruit. - Contract No. HOPL2024-063: Agreement for FFB cartage delivery between HOPL and Arrjan Limited (IPA #6-119416635), valid from 1 July 2024 to 30 June 2025. The contractor uses a Hyundai Mighty series dump truck (white) with MVIL Registration HAX 087 and a Hino Duto truck with MVIL registration BGR 287 to collect loose fruit. <p>According to Section 25 of the agreements, contractors are required to adhere to RSPO Principles and Criteria during the contract's duration:</p>	Complied

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		<ul style="list-style-type: none">- Implement RSPO Supply Chain Certification Standards, including all relevant principles and criteria.- Provide access to accredited certification bodies to conduct regular audits and investigations into business operations, systems, and company information when necessary.- Refrain from using forced labor or trafficked labor under any circumstances during the contract's performance.- Failure to comply with clauses 25.1, 25.2, and 25.3 will result in termination of the contract.																																				
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>During the ASA 3_1 audit, Hargy Oil Palms Limited (HOPL) provided updated names and contact details for all contractors involved in the physical handling of RSPO-certified oil palm products.</p> <p>Sample observed:</p> <table><tr><th>Contractor</th><th>Contact Person</th><th>Address</th><th>Mail</th><th>Contact number</th></tr><tr><td>Abulmosi Oil Palm Estate (6-118226356)</td><td>Joachim Baliau</td><td>Noau village, Nakanai, WNB</td><td>Box 192, Bialla, WNB</td><td>7312 7601</td></tr><tr><td>Sena Oil Palm Estate</td><td>Greg Malai</td><td>Ulamona, WNB</td><td>Box 58, Bialla, WNB</td><td>7121 8993</td></tr><tr><td>Endy Estate Limited (1-47929)</td><td>Senis Awe</td><td>Bialla, WNB</td><td>Box 129, Bialla, WNB</td><td>7978 4842</td></tr><tr><td>Liwale Nane Oil Palm Ltd (1-118464389)</td><td>Simon Dariako</td><td>Bialla, WNB</td><td>Box 78, Bialla, WNB</td><td>7189 4718</td></tr><tr><td>Alaba Development Corporation Ltd (1-19878)</td><td>Nixon Volele</td><td>Bialla, WNB</td><td>Box 172, Bialla, WNB</td><td>7286 8866</td></tr><tr><td>Unandu Transport Services</td><td>Stanley Malken</td><td>Bialla, WNB</td><td>PO Box 13, Bialla, WNB</td><td>7454 7413</td></tr></table>	Contractor	Contact Person	Address	Mail	Contact number	Abulmosi Oil Palm Estate (6-118226356)	Joachim Baliau	Noau village, Nakanai, WNB	Box 192, Bialla, WNB	7312 7601	Sena Oil Palm Estate	Greg Malai	Ulamona, WNB	Box 58, Bialla, WNB	7121 8993	Endy Estate Limited (1-47929)	Senis Awe	Bialla, WNB	Box 129, Bialla, WNB	7978 4842	Liwale Nane Oil Palm Ltd (1-118464389)	Simon Dariako	Bialla, WNB	Box 78, Bialla, WNB	7189 4718	Alaba Development Corporation Ltd (1-19878)	Nixon Volele	Bialla, WNB	Box 172, Bialla, WNB	7286 8866	Unandu Transport Services	Stanley Malken	Bialla, WNB	PO Box 13, Bialla, WNB	7454 7413	Complied
Contractor	Contact Person	Address	Mail	Contact number																																		
Abulmosi Oil Palm Estate (6-118226356)	Joachim Baliau	Noau village, Nakanai, WNB	Box 192, Bialla, WNB	7312 7601																																		
Sena Oil Palm Estate	Greg Malai	Ulamona, WNB	Box 58, Bialla, WNB	7121 8993																																		
Endy Estate Limited (1-47929)	Senis Awe	Bialla, WNB	Box 129, Bialla, WNB	7978 4842																																		
Liwale Nane Oil Palm Ltd (1-118464389)	Simon Dariako	Bialla, WNB	Box 78, Bialla, WNB	7189 4718																																		
Alaba Development Corporation Ltd (1-19878)	Nixon Volele	Bialla, WNB	Box 172, Bialla, WNB	7286 8866																																		
Unandu Transport Services	Stanley Malken	Bialla, WNB	PO Box 13, Bialla, WNB	7454 7413																																		

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		<div>Earthworks Mowing Services (6-211185)</div> <div>Kijomhal Transport (1-104463)</div> <div>Saltamana Oil Palm Estate Limited</div> <div>WNB Solar Distributors</div> <div>Pepea Transport Services</div> <div>Arrjan Limited .</div>	<div>Geoffrey Sirinjui</div> <div>Allan Zairere</div> <div>Chris Lagisa</div> <div>Andrew Tegete</div> <div>Waba Balele</div> <div>Jacqueline Adeg</div>	<div>Barema, WNB</div> <div>Bialla, WNB</div> <div>Saltamana, WNB</div> <div>Bialla, WNB</div> <div>Bialla, WNB</div> <div>Bialla, WNB</div>	<div>Box 141, Bialla, WNB</div> <div>Box 98, Bialla, WNB</div> <div>Box 243, Bialla, WNB</div> <div>Box 166, Bialla, WNB</div> <div>Box 898, Vision City, NCD</div> <div>.Box 1889, Waterfront, NCD</div>	<div>7176 7060</div> <div>7344 4345</div> <div>7019 0328</div> <div>7134 2663/7858 3238</div> <div>7148 6869/7859 4995</div> <div>7723 6002</div>	
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.	Hargy Oil Palms Limited informed BSI of the new contractor used for FFB transport from smallholder blocks to HOPL's palm oil mills. During this ASA 3_1, there is no new contractor that used for the physical handling of RSPO certified oil palm products.					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>Hargy POM, Barema POM and Navo POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. The organization has implemented RSPO Supply Chain Certification Standard based on RSPO Supply Chain Certification Manual (MAN-SUS-SCC-001-03 Issue no.3 dated 10 March 2021; SOP SCCS Internal Audit (FOR-SUS-SUS-001-03 dated 25 March 2021). Hargy Oil Palms Limited can demonstrate that all record and report are maintained accuracy, completeness and up-to-date. Sample seen:</p> <ul style="list-style-type: none"> Daily Production Figure of Hargy POM for 31 July 2024 mentioned that FFB Stock B/F was 115.28 Tons; FFB received was 704.54 Tons; FFB processed was 587.78 Tons; stock C/F was 232.03 Tons; FFB processed 					Complied

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	<p>iv. For Mass Balance Module, the mill:</p> <ol style="list-style-type: none"> 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. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 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>year to date was 93,691.70 Tons. CPO IP Stock B/F is 4,356.29 Tons; Received year to date 53,106.72 Tons; Despatched year to date 84,674.72 Tons; Produced year to date 20,982.71 Tons; Stock C/F 4,761.87 Tons. PK IP Stock B/F 162.06 Ton; Received is 0 Tons; Despatched 0 Tons; Produced year to date 4,515.94 Tons; Stock C/F was 183.52 Tons. Mill Throughput month to date was 45.80 ton/hour; year to date was 45.46 ton/hour. OER: today 21.36%; month to date 22.01%; year to date 22.39%; KER: today 6.32%; month to date 5.00%; year to date 4.82%.</p> <ul style="list-style-type: none"> Daily Production Figure of Barema POM for 31 July 2024, mentioned that FFB Stock B/F was 714.72 Tons; FFB received was 340.64 Tons; FFB processed was 959.36 Tons; stock C/F was 96.00 Tons; FFB processed year to date was 103,618.18 Tons. CPO IP Stock B/F was 1,545.57 Tons; Received 0 Tons; Despatched year to date is 24,998.60 Tons; Produced year to date is 24,669.58 Tons; Stock C/F is 1,751.03 Tons. PK IP Stock B/F is 127.12 Ton; Received year to date is 5,930.72 Tons; Despatched 0 Tons; Produced year to date is 5,254.92 Tons; Stock C/F was 77.55 Tons. Mill Throughput month to date was 46.07 ton/hour; year to date was 45.18 ton/hour. OER: today 21.42%; month to date 23.58%; year to date 23.81%; KER: today 5.09%; month to date 5.07%; year to date 5.07%. Daily Production Figure of Navo POM for 31 July 2024, mentioned that FFB Stock B/F was 136.05 Tons; FFB received was 503.54 Tons; FFB processed was 0 Tons; stock C/F 639.59 Tons; FFB processed year to date was 113,687.69 Tons. CPO IP Stock B/F was 2,026.42 Tons; Received 0 Tons; Despatched year to date was 28,108.06 Tons; Produced year to date was 27,069.96 Tons; Stock C/F was 1,746.42 Tons. PK IP Stock B/F was 133.03 Ton; Received is 0 Tons; Despatched year to date was 5,938.10 Tons; Produced year to date was 5,937.99 Tons; Stock C/F was 102.39 Tons. Mill Throughput month to date was 58.74 ton/hour; year to date was 53.70 ton/hour. OER: month to date 	
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		<p>is 24.16%; year to date is 23.81%; KER: month to date is 4.54%; year to date is 5.22%.</p> <p>HOPL RSPO Supply Chain Certification Manual (No.MAN-COM-SCC-001-03 dated 10 March 2021), Section 5.9.2 (Record Keeping) stated retention times for all records and reports is a minimum of two (2) years and complies with legal and regulatory requirements. The records confirm the certified status of raw materials or products held in stock.</p> <p>Based on record review in Hargy POM, Barema POM and Navo POM: FFB delivery docket, weighbridge ticket, CPO dispatch slip, PK dispatch slip, daily production report from 2022 can be retrieved.</p> <p>HOPL uses Identity Preserved Module for the Palm Oil Mill, as evidence above, the mills have record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The OER and KER are applied to provide reliable estimate of amount of certified CPO and PK from each palm oil mills. CPOER and PKER are monitored and documented in Daily Production Figure.</p> <p>The extraction rate can be seen in a daily basis on Mill's Daily Production Figure. Sample seen:</p> <ul style="list-style-type: none"> Hargy Mill (31 July 2024): OER: today 21.36%; month to date 22.01%; year to date 22.39% KER: today 6.32%; month to date 5.00%; year to date 4.82% Barema Mill (31 July 2024): OER: today 21.42%; month to date 23.58%; year to date 23.81%; KER: today 5.09%; month to date 5.07%; year to date 5.07%. Navo Mill (31 July 2024): OER: month to date 24.16%; year to date 23.81%; KER: month to date 4.54%; year to date is 5.22%. 	Complied

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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	HOPL Mills have updated CPO and PK extraction in daily basis to ensure accuracy against actual performance.	Complied
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>The procedure for production recording as in PRO-SUS-SCC-009-02, Record Keeping dated 10 March 2021 - has rules out a record keeping for RSPO certified FFB CPO and PK.</p> <p>There is no change in processing, all FFB sources are certified. There are no non-certified FFB sources coming to Hargy POM, Barema POM or Navo POM. All records are provided and traceable such as Daily Production Report for Hargy POM, Barema POM and Navo POM as well as Quarterly Balance Report.</p> <p>Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM and downgrading certified CPO "IP" into "SG" in Bulking Station due to mixing certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL.</p>	Complied
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>Hargy Oil Palms Limited have registered all of their POM into RSPO PalmTrace. Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005. All mills has meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. The PalmTrace ID of each mill are:</p> <ul style="list-style-type: none"> • Hargy POM PalmTrace ID: RSPO_PO10000 00053. • Barema POM PalmTrace ID: RSPO_PO10000 01655. • Navo POM PalmTrace ID: RSPO_PO10000 00105. <p>Hargy POM Shipping Announcement for Sales of CPO:</p> <ul style="list-style-type: none"> • PalmTrace transaction No. TR-232aa0a0-2d70 confirmed date 6 June 2024: Contract No. PHO-11622. Product: Crude Sustainable Palm Oil/SG. Quantity: 500 MT. Seller: Hargy Oil Palms Mill; End Buyer: 	OFI

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		<p>Olenex Sarl. Bill of Lading No. LIM032406, dated 1 June 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A One Business Center LA, Piece 3 CH-1180 Rollest, Sitzerland. Tanker: MT Theresa Lima. Voyage: V03/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 500 MT, RSPO Certificate No. RSPO535739. Volume 500 MT. Reference to Contract No. PHO-11622 SG.</p> <ul style="list-style-type: none"> • PalmTrace transaction No. TR-a2c87f10-c94c confirmed date 23 May 2024: Contract No. PHO-11701. Product: Crude Sustainable Palm Oil/SG. Quantity: 494.45 MT. Seller: Hargy Oil Palms Mill. End Buyer: Olenex Sarl. Tanker Bill of Lading No. AQU022425, dated 3 May 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Aquila. Voyage: V02/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 494.45 MT, RSPO Certificate No. RSPO535739. Volume 500 MT. Reference to Contract No. PHO-11701 SG. • PalmTrace transaction No. TR-462def7c-4fb5 confirmed date 14 May 2024: Contract No. PHO-11743. Product: Crude Sustainable Palm Oil/SG. Quantity: 800.78 MT. Seller: Hargy Oil Palms Mill. End Buyer: Olenex Sarl. Tanker Bill of Lading No. DRA022422, dated 5 April 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Draco. Voyage: V02/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 800.78 MT, RSPO Certificate No. RSPO535739. Volume 800 MT. Reference to Contract No. PHO-11743 SG. <p>Barema POM Shipping Announcement for Sales of CPO:</p>	
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		<ul style="list-style-type: none"> PalmTrace transaction No. TR-6c8eb891-1204 confirmed date 18 December 2023: Contract No. PHO-11582. Product: Crude Sustainable Palm Oil/SG. Quantity: 980 MT. Seller: SIPEF – Barema POM. End Buyer: Olenex Sarl. Tanker Bill of Lading No. VEL042332, dated 16 October 2023. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Vela. Voyage: V04/23. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 980 MT, RSPO Certificate No. RSPO535739. Volume 980 MT. Reference to Contract No. PHO-11582 SG. <p>Navo POM Shipping Announcement for Sales of CPO:</p> <ul style="list-style-type: none"> PalmTrace transaction No. TR-bf4e81f1-42cb confirmed date 15 July 2024: Contract No. PHO-11700. Product: Crude Sustainable Palm Oil/SG. Quantity: 500 MT. Seller: Navo Palm Oil Mill - SIPEF. End Buyer: Olenex Sarl. Tanker Bill of Lading No. LIM032420, dated 1 June 2024. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex Sarl, A. One Business Center La Piece 3 CH-1180 Rolle Switzerland. Tanker: MT Theresa Lima. Voyage: V03/24. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG 500 MT, RSPO Certificate No. RSPO535739. Volume 500 MT. Reference to Contract No. PHO-11700 SG. <p>There is no "remove" implemented, because all RSPO certified quota sold and registered into RSPO PalmTrace.</p> <p><i>Opportunities for Improvement:</i> The company submits Shipping Announcements for CSPK in RSPO PalmTrace based on the volume specified in the CSPKO sales contract. Before finalizing CSPKO sales, the company converts the CSPKO volume</p>	
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		back to CSPK, then makes the Shipping Announcement for CSPK based on that volume. As a result, the Shipping Announcement for CSPK must be delayed until the CSPKO contract is finalized. Point of consideration is to make Shipping Announcements for CSPK based on grouped deliveries or transfers to enhance traceability.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	The mechanism for claims is stated in Hargy Oil Palms Limited RSPO Supply Chain Certification Manual (No.MAN-SUS-SCC-001-03 dated 10 March 2021). The unit of certification only stated RSPO IP/SG and certificate number only in documents such as Daily Production Figure, Weighbridge Card, Sales Contract, and Tanker Bill of Lading. Hargy Oil Palms Limited has aware and comply with the RSPO Rules on Market Communication and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	<p>Hargy Oil Palms Limited (HOPL) is a subsidiary company of SIPEF Group, which is a registered RSPO member No.1-0021-05-000-00, since 7 December 2005. The corporate communication is available in the SIPEF Group website: https://www.sipef.com/</p> <p>SIPEF Group is producing and selling palm products, such as crude palm oil, palm kernels and crude palm kernel oil, as well as natural rubber, tea in bulk, green bananas, flowers and foliage. SIPEF Group, is highlighting its commitment to the principles of RSPO – therefore making an "non-product related" claim.</p>	Complied
4.2	<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 SIPEF Group website:</p> <ul style="list-style-type: none"> • Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. • Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. • State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape 	Complied

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		<p>approach to new oil palm developments, guided by the methodology endorsed by the RSPO".</p> <ul style="list-style-type: none"> State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. <ul style="list-style-type: none"> Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website, letter head or sales documents. 	
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.	No, SIPEF Group did not display RSPO corporate logo in any of documentation.	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.	No, SIPEF Group did not shows any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products. The statement is clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF's own products.	Complied
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." 	No, SIPEF Group did not display made statements that highlight their RSPO certification status and product-related claims in their corporate communication tools.	Complied

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	<ul style="list-style-type: none"> • “We are RSPO certified. Ask us for our RSPO certified products.” 		
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>	Hargy Oil Palms Limited is a subsidiary of RSPO registered member, SIPEF Group with Membership No. 1-0021-05-000-00. Therefore, this indicator is not applicable.	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,	Hargy Oil Palms Limited did not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied

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	websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	Hargy Oil Palms Limited did not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	Hargy Oil Palms Limited did not display product-specific communications such as RSPO label.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Hargy Oil Palms Limited did not use any trademark or label to highlight the presence of RSPO certified sustainable palm oil products.	Complied
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. 	Hargy Oil Palms Limited is certified under the RSPO P&C standard. 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-	Hargy Oil Palms Limited is certified under the RSPO P&C standard. Not applicable.	Not Applicable

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	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		
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.	Hargy Oil Palms Limited does not made off-pack claims in their shipping documents, websites, emails, annual report.	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.	Hargy Oil Palms Limited stating the supply chain model and certificate number in their sales documents such as contract, delivery order, weighbridge ticket.	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 	Hargy Oil Palms Limited is not a distributor or wholesaler.	Complied

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	<p>products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation.</p> <ul style="list-style-type: none"> • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	Complied
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>	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	Complied
	<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)* 	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	Complied

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	*Add RSPO TM Licence Number below or next to the claim.		
	C) For Partially Certified Products: <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* *Add RSPO TM Licence Number below or next to the claim.	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	Complied
	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* *Add RSPO TM Licence Number below or next to the claim.	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	Hargy Oil Palms Limited delivered their product in bulk and does not made on-pack claims on their product.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	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.	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims and/or RSPO label on their product.	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.	Hargy Oil Palms Limited delivered their product in bulk and does not make on-pack claims on their product.	Complied
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	Hargy Oil Palms Limited is certified for production of RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product. Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM. Due to mixing of	Complied

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		certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL, therefore all certified CPO are downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).	
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	Hargy Oil Palms Limited is certified for production of RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product.	Complied
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org <ul style="list-style-type: none"> • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 	Hargy Oil Palms Limited does not made storytelling in their shipping documents, websites, emails, annual report.	Complied
Product-Specific Communications Labelling			

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	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	Hargy Oil Palms Limited does not use RSPO Label in their shipping documents, websites, emails, annual report.	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including Prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has developed a Policy on Human Rights (Doc. No. POL-HRD-GEN-005-05, Issue No. 5, dated 6 June 2022), approved by the General Manager of HOPL. The company recognizes that human rights are universal and apply to all individuals without distinction. They support the implementation of the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.</p> <p>Hargy Oil Palms Ltd prohibits retaliation against Human Rights Defenders (HRD) and complainants, including any form of intimidation or harassment by HOPL employees and contracted services. Contractors and their employees providing services to the company have signed the Contractor Induction Agreement and Employee Induction Agreement, acknowledging compliance with RSPO and legal requirements.</p> <p>The dissemination of the policy has been conducted through pamphlets posted on notification boards located in housing complexes, estate/plantation offices, and workplaces. Additionally, the policy has been communicated through annual dissemination and training sessions.</p> <p>Record verification during ASA 3_1:</p>	Complied

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		<ul style="list-style-type: none"> - Hargy POM: Training attendance record dated 19 February 2024, covering the topic of RSPO/HOPL Policy—Respect for Human Rights, attended by 26 workers. - Hargy POM: Training attendance records regarding the company's policies on human rights, including the prohibition of retaliation, dated 20 April 2024 (attended by 11 workers) and 24 April 2024 (attended by 9 workers). The training was facilitated by Mr. Wayne Sareo. - Barema Plantation: Refreshment awareness training on respecting human rights, conducted in May 2024 and attended by 62 workers. - Barema POM: Refreshment training on respecting human rights, with records dated 19 July 2024 (20 workers for Engineering and Maintenance), 23 July 2024 (15 workers for Engineering—KCP), and 17 July 2024 (6 workers for Engineering Upkeep). - Barema POM: Basic principles of the Human Rights policy were covered in refreshment training sessions on 1 May 2024 (16 workers for Engineering—Process Shift B), 30 April 2024 (14 workers for Engineering—Process Shift A), and 6 March 2024 (24 workers for Maintenance Attendant). - Navo POM: Training attendance record dated 16 July 2024, on the topic of the refreshment policy respecting human rights, attended by 50 workers from Engineering Shift A. - Kiba Plantation: Training attendance record dated 2 July 2024, covering the Human Rights policy, attended by 13 workers from FFB loader, 12 workers from Upkeep, 8 workers from Compound Upkeep, 20 workers from Harvesting, and 13 workers from Lost Fruit Collection. - Bakada Plantation: Training attendance records on company policies, including human rights, non-discrimination, equal opportunity, protection of children, minimum age, "No Child Labour," prevention of harassment and violence, and protection of reproductive rights. Sessions were held on 18 February 2024 (9 workers), 22 April 2024 (25 workers), 10 June 2024 (19 workers), 17 June 2024 (12 workers), 5 July 2024 (24 workers), and 29 July 2024 (9 workers). 	
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		Based on interviews conducted during ASA 3_1 with a sample of workers from Palm Oil Mills (Hargy POM, Barema POM, and Navo POM), Estates (Hargy Estate - Barema Plantation, Navo Estate - Kiba Plantation, and Pandi Estate - Bakada Plantation), and smallholders, including independent estates (Babex Oil Palm Estate and Ivule Holding Limited), workers demonstrated a strong understanding of these policies and confirmed their participation in refreshment training sessions throughout 2024.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	During ASA 3_1, the audit team conducted interviews with relevant stakeholders, including representatives from Lamo Auru Conservation Associations (a local NGO), the Community Engagement Manager, the Department of Labour & Industrial Relations PNG, CEPA (Conservation, Environment, and Protection Authority), a women's representative, and several workers sampled from Palm Oil Mills (Hargy POM, Barema POM, and Navo POM), Estates (Hargy Estate - Barema Plantation, Navo Estate - Kiba Plantation, and Pandi Estate - Bakada Plantation), and independent estates (Babex Oil Palm Estate and Ivule Holding Limited). These stakeholders confirmed that HOPL has never instigated violence or engaged in any form of harassment, including the use of mercenaries or paramilitaries in its operations.	Complied
Criterion 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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	Hargy Oil Palm Limited (HOPL) has established a Grievance Mechanism procedure, as outlined in the Hargy Oil Palms Limited Grievance Policy (POL-HRD-GEN-010-05, dated 7 June 2019) and the Grievance Mechanism SOP (PRO-SUS-SUS-004-09, Issue No. 0, dated 30 August 2023). This mechanism was developed to mitigate risks related to company employees, provide external stakeholders with an effective channel for expressing concerns and seeking resolutions, and promote a constructive and mutually beneficial relationship between the company and all relevant stakeholders.	Complied

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		These policies are designed to safeguard the anonymity of complainants, Human Rights Defenders (HRDs), community spokespersons, and whistle-blowers upon request. They aim to protect these individuals from any form of retaliation, intimidation, or reprisal, ensuring they can raise concerns or report issues without fear of adverse consequences. The policies establish robust mechanisms to maintain confidentiality and promote a safe environment for all parties involved, thereby fostering trust and encouraging the reporting of grievances and misconduct.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	<p>The Grievance Mechanism SOP (PRO-SUS-SUS-004-09, Issued No. 9, dated 30 August 2023) was developed to mitigate risks from company employees, provide external stakeholders with an effective avenue for expressing concerns and seeking remedies, and promote a constructive relationship with all relevant stakeholders and the company.</p> <p>The Community Affairs Manager serves as the primary interface between HOPL and external stakeholders raising grievances. The Security Department and Human Resources Department act as the primary contacts for company employees concerning grievances related to social safety, security, and employment. The Business Development Officer is responsible for centralized reporting and managing the Grievance Tracking Database, ensuring that all grievances are directed to the relevant departments. The goal is to respond to and provide feedback on 100% of grievances within 7 days, directly engaging with the individuals who raised the grievances.</p> <p>Grievances can be received through:</p> <ul style="list-style-type: none"> - Requests, Complaints, Grievances, and Disputes Register Form for company employees. - Written letters or verbal reports registered in the Requests, Complaints, Grievances, and Disputes Register Form for external stakeholders and contractors. - For illiterate parties, the unit of certification ensures awareness by explaining the procedure in the local language (Tok Pisin). 	Complied

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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>- Minor compliance -</p>	<p>Grievances received by the unit of certification are handled according to their nature. For grievances from internal employees concerning work performance and salary, the HR Department addresses them directly. Complaints related to welfare are directed to the Welfare Office.</p> <p>Grievance records are logged in the Welfare Office Logbook, capturing issues raised by workers and staff at HOPL. All grievance records are maintained by the Sustainability Department. Sample records during ASA 3_1 include:</p> <ul style="list-style-type: none"> - Hargy Mill: An internal complaint recorded in the Complaints, Grievances, and Disputes Register Form (FOR-SUS-GEN-013-04) dated 15 May 2024, concerning Ms. D*** G***. The grievance was responded to on 22 May 2024, with the response prepared by the General Manager. - Barema Plantation: An internal complaint recorded in the Complaints, Grievances, and Disputes Register Form (FOR-SUS-GEN-013-04) dated 5 May 2024, regarding an allegation of sexual harassment. The HR Department followed up on the complaint. - Navo Mill: An internal complaint recorded in the Complaints, Grievances, and Disputes Register Form (FOR-SUS-GEN-013-04) dated 15 September 2023, from the Engineering department. The nature of the complaint was a request for transport assistance for shopping and better housing accommodation. The complaint was received by the RSPO Officer and followed up by the Head of HR Department on 20 September 2023. The response indicated that CAPEX funding had been allocated in 2023 to address these issues. 	Complied
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>As per the Grievance Mechanism outlined in indicator 4.2.2, complainants have the option to access independent legal and technical advice of their choice, select individuals or groups to support them, and opt for a third-party mediator if desired.</p>	Complied

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	<p>- Minor compliance -</p>	<p>Grievances are recorded in the Welfare Office Logbook, capturing issues raised by workers and staff at HOPL. All grievance records are maintained by the Sustainability Department. Sample records during ASA 3_1 include:</p> <ul style="list-style-type: none"> - Hargy Mill: An internal complaint recorded in the Complaints, Grievances, and Disputes Register Form (FOR-SUS-GEN-013-04), dated 15 May 2024, concerning Ms. D*** G***. The grievance was responded to on 22 May 2024, with the response prepared by the General Manager. - Barema Plantation: An internal complaint recorded in the Complaints, Grievances, and Disputes Register Form (FOR-SUS-GEN-013-04), dated 5 May 2024, regarding an allegation of sexual harassment. The HR Department followed up on the complaint. - Navo Mill: An internal complaint recorded in the Complaints, Grievances, and Disputes Register Form (FOR-SUS-GEN-013-04), dated 15 September 2023, from the Engineering department. The nature of the complaint was a request for transport assistance for shopping and better housing accommodation. The complaint was received by the RSPO Officer and followed up by the Head of HR Department on 20 September 2023. The response indicated that CAPEX funding had been allocated in 2023 to address these issues. <p>Based on interviews conducted during ASA 3_1 with sample of workers from Palm Oil Mills (Hargy POM, Barema POM, and Navo POM), Estates (Hargy Estate - Barema Plantation, Navo Estate - Kiba Plantation, and Pandi Estate - Bakada Plantation), and smallholders (Babex Oil Palm Estate and Ivule Holding Limited), as well as relevant stakeholders including the PNG OPIC Project Manager, Ewase Community, Community Engagement Manager, and Women Representative, it was evident that there is a strong understanding among the complainants regarding their options for accessing independent legal and technical advice, choosing support individuals or groups, and selecting third-party mediators.</p>	
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Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>Smallholder requirements:</p> <p>Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained.</p> <p>- Minor compliance -</p>	<p>The Unit of Certification has established a community development program called the Community Engagement Plan 2024, which is based on the results of consultations with local communities. Evidence of this commitment includes the following records:</p> <ul style="list-style-type: none"> - A schedule for consultation meetings in June 2024, dated 29 May 2024. - Stakeholder consultation and analysis meetings with local communities: <ul style="list-style-type: none"> o 9 April 2024 at Bialla District Office: Attended by the School Inspector of Bialla, the District Education Officer, and the Community Engagement Officer. The consultation focused on early childhood registration for the Ibane Compound, Sabalbala Compound, Barema Plantation Compound, and Barema Mill Compound. Conclusion: The Community Engagement Officer commended the education officials for making time to provide updates on Early Childhood school registration. o 28 May 2024 at Baikakea Village: Attended by 81 participants (villagers). The meeting addressed critical issues such as water pollution, supply shortages, health impacts, and environmental concerns. - A Community Engagement Stakeholder Awareness Report for May 2024. <p>Previously, stakeholder engagement was managed under the Lands and Community Engagement section within the Community Affairs Department and then moved to the Smallholders Affairs Department. Recently, the Community Engagement (CE) and Lands sections were separated into two sections that now report directly to the General Manager's office.</p> <p>Stakeholder analysis and awareness activities were conducted between April and May 2024 in various areas, with further analyses planned for late May and June 2024. The CE team will continue to roll out the awareness</p>	Complied

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		<p>program and ensure that all communities are informed about the company's intentions and any changes.</p> <p>Based on interviews with representatives from Baikakea and Ula Mona villages, some issues were raised:</p> <ul style="list-style-type: none"> - Baikakea Village (Community Representative): <ul style="list-style-type: none"> o The village is located near the seacoast, while the Hargy Plantation is situated above the village. During the rainy season, access to clean water is challenging due to murky river/stream water. The village has not received assistance or support for clean water access. o There has been no assistance from HOPL for emergency vehicle services from the village to Bialla Health Center. o HOPL appears to focus more on smallholder programs like Field Day, with less concern for social services. - Ula Mona Village (Chairman of Ula Mona Church): <ul style="list-style-type: none"> o No social activities have been conducted for Ula Mona residents, only Field Days. After the Mount Ula wun eruption in September 2023, which led to community evacuation, HOPL did not provide evacuation vehicles. Instead, a Chinese company's highway contractor assisted with dump trucks. For three days, there was no food supply, and HOPL did not play a role in the evacuation. o The eruption impacted residents' fields, leaving them unable to harvest FFBs. There has been no solution offered by HOPL regarding the community's loss of income. o Several water flows/streams have dried up or become muddy, threatening residents' access to clean water. HOPL has not addressed this issue. o There has been no consultation from HOPL to ask about the residents' needs. <p>Based on an interview with the Community Engagement Manager, these issues were captured during the Community Engagement meeting held on</p>	
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		<p>28 May 2024 at Baikakea Village. The meeting addressed critical concerns, including water pollution, supply shortages, health impacts, and environmental issues. Regarding the evacuation during the volcanic eruption, HOPL prioritized evacuating its employees. Although the government provided emergency evacuation vehicles, they were not stationed at the location. HOPL will continue to support community needs, provided that the government has fulfilled its obligations to the communities. However, Hargy cannot meet all community needs, as the company must respect the government's programs and responsibilities.</p> <p>Community Engagement Section – Annual Work Plan 2024: The plan aims to build trust and improve stakeholder confidence by fostering collaboration, increasing community participation, addressing community concerns, and upholding sustainable practices in compliance with relevant regulatory policies and guidelines.</p> <p>Priority Areas:</p> <ul style="list-style-type: none">- Education: Conduct baseline surveys for schools within the HOPL catchment, collect student enrollment data, and carry out school surveys (Jan-Mar).- Health: Conduct baseline surveys within the HOPL catchment (Apr-Jun).- Youth: Survey the challenges faced by youths in the communities within the HOPL catchment (Jul-Sep).- Other areas as identified. <p>Community Engagement Social & Improvement Management Plan – 2024, dated 6 July 2024: This plan aligns with past and current activities administered by the CE team. Recommendations from the SEIA (2023) report were incorporated to improve the quality of life for HOPL stakeholders and employees.</p>	
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		<p>Stakeholder Mapping Includes: HOPL smallholder farmers (VOP & LSS), ILGs, LLBs, independent estate owners, local business owners, HOPL employees, OPIC, OPRA, WNBH Health Authority, WNBH Education Department, NGOs, NBPOL, contractors, financial institutions, government sectors, other private entities, donors, and SIPEF.</p> <p>Strategic Planning:</p> <ul style="list-style-type: none"> - Objectives: Focus on compounds, lawlessness, water, decent living wages, health, education, socioeconomic development, and climate change. - Alignment: To HOPL business goals, RSPO P&C, and the 2030 Sustainable Development Goals. <p>Program Development:</p> <ul style="list-style-type: none"> - Educational initiatives - Healthcare programs - Economic development - Environmental stewardship <p>Implementation:</p> <ul style="list-style-type: none"> - Local partnerships - Employee involvement - Resource allocation <p>Communication and Transparency:</p> <ul style="list-style-type: none"> - Regular updates - Feedback mechanisms <p>Monitoring and Evaluation: Key Performance Indicators (KPIs) will be determined for each program.</p>	
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		<p>In 2022, the Social Improvement Committee (SIC) carried out a child census for children aged 5-10 in all compounds (Kiba, Navo Mill, Atata, Sena, Ibana, Vamakuma, and Bakada).</p> <p>On 2 February 2024: The Community Engagement team sent a letter to the Elementary Coordinator requesting registration of newly established early childhood schools:</p> <ul style="list-style-type: none"> - Bakada Early Childhood (Bakada Estate) – 250 children, 2 teachers - Kiba Early Childhood (Navo Estate) – 150 children, 2 teachers - Ibana/Sena Early Childhood (Navo Estate) – 300 children, 3 teachers - Vamakuma Early Childhood (Navo Estate) – 95 children, 1 teacher <p>On 22 March 2024: A letter was sent to the Elementary Coordinator requesting registration of newly established early childhood and Pakisi Community School:</p> <ul style="list-style-type: none"> - Barema Plantation Early Childhood (Barema Plantation) – 202 children, 3 teachers - Barema Mill Early Childhood (Barema Plantation) – 168 children, 1 teacher - Pakisi Community School (Barema VOP) – 150 children, 2 teachers <p>On 6 August 2024: Meeting with Vilelo Section 6 Youth, attended by 31 youths. Agenda included forming a youth group, appointing executives, opening accounts, registering members, and defining working areas (e.g., roadside upkeep, cemetery upkeep, building a grandstand, and meeting house).</p>	
Criterion 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 Consent (FPIC) process where such documents have been issued by the appropriate Government	Currently, there's no expansion of scope from previous assessment. All main estate still using same land title, no change information regarding to legal ownership. Here's the detail of each estate and smallholder (sampled growers):	Complied

	<p>agency. For Customary land where such documents are not available, evidence of ownership will be demonstrated as follows:</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Hargy Estate Hargy Estate covering Hargy Plantation and Barema Plantation, comprises of land title and Lease-Lease Back:</p> <ul style="list-style-type: none"> - Portion 9: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 25 March 1977 for 95 years, Portion 9, Milinch Ulawun, Fourmil Talasea, area of 2,967 Ha, West New Britain Province. Land title completed with map scale 1:50,000 Survey Plan Catalogue No.15/289. - Portion 1081: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 9 October 1976 for 99 years (valid until 8 October 2075), Milinch Ulawun, Fourmil Talasea, area of 128.08 Ha, West New Britain Province. Land title completed with map scale 1:12,500 Survey Plan File No.76/1548. - Portion 2044: Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 20 June 2014 for 99 years (valid until 23 June 2113), Milinch Ulawun, Fourmil Talasea, area of 18.372 Ha, West New Britain Province. Land title completed with map scale 1:7,500 Survey Plan Catalogue No.15/811. - Portion 2046: Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 5 April 2007 for 99 years (valid until 6 April 2106), Milinch Ulawun, Fourmil Talasea, area of 321.6770 Ha, West New Britain Province. Land title completed with map scale 1:12,000 Survey Plan Catalogue No.15/805. - Portion 2038 (Barema Plantation): Agricultural Lease under Section 102, to Hargy Oil Palms Limited, dated 1 August 2002 for 99 years (valid until 30 July 2101), Milinch Ulawun, Fourmil Talasea, area of 2,900 Ha, West New Britain Province. Land title completed with map scale 1:20,000 Survey Plan Catalogue No.15/733. - Portion 1431 (Barema Plantation): Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 23 Oct 1980 for 99 years (valid until 22 Oct 2079), Milinch Ulawun, Fourmil Talasea, area of 6.79 Ha, West 	
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		<p>New Britain Province. Land title completed with map scale 1:50,000 Survey Plan Catalogue No.15/540.</p> <ul style="list-style-type: none"> - Hargy Beach Front, Portion 1045: State Lease Hargy Oil Palms Limited Portion 1045, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.72 Ha, Survey Plan Catalogue 17/140; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1046: State Lease Hargy Oil Palms Limited Portion 1046, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.24 Ha, Survey Plan Catalogue 17/150; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1047: State Lease Hargy Oil Palms Limited Portion 1047, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.50 Ha, Survey Plan Catalogue 17/144; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1048: State Lease Hargy Oil Palms Limited Portion 1048, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.426 Ha, Survey Plan Catalogue 17/147; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1049: State Lease Hargy Oil Palms Limited Portion 1049, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.56 Ha, Survey Plan Catalogue 17/143; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1050: State Lease Hargy Oil Palms Limited Portion 1050, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.42 Ha, Survey Plan Catalogue 17/148; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1051: State Lease Hargy Oil Palms Limited Portion 1051, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/145; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1052: State Lease Hargy Oil Palms Limited Portion 1052, Milinch Ulawun, Fourmil Talasea, West New Britain 	
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		<p>Province for area 0.1 Ha, Survey Plan Catalogue 17/145; dated 5 April 2007 for 99 years.</p> <ul style="list-style-type: none"> - Hargy Beach Front, Portion 1053: State Lease Hargy Oil Palms Limited Portion 1053, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/141; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1054: State Lease Hargy Oil Palms Limited Portion 1054, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/146; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1055: State Lease Hargy Oil Palms Limited Portion 1055, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/149; dated 5 April 2007 for 99 years. - Portion 6: Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 21 February 2018 for 99 years (valid until 20 February 2117), Milinch Ulawun, Fourmil Talasea, area of 35.00 Ha, West New Britain Province. Survey Plan Catalogue No.15/936. - Portion 7: Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 21 February 2018 for 99 years (valid until 20 February 2117), Milinch Ulawun, Fourmil Talasea, area of 65.00 Ha, West New Britain Province. Survey Plan Catalogue No.15/935. - Portion 1494: Special Purpose Lease under Section 63, to Hargy Oil Palms Limited, dated 30 October 1991 for 99 years, Milinch Ulawun, Fourmil Talasea, area of 170.00 Ha, West New Britain Province. <p>Navo Estate Navo Estate covering Atata Plantation, Kiba Plantation and Ibana Plantation comprises of land title and Lease-Lease Back:</p> <ul style="list-style-type: none"> - Portion 624: Agricultural Lease under Section 49, to Hargy Oil Palms Limited, dated 7 July 1983 for 99 years, Milinch Ulawun, Fourmil Talasea, area of 6,460.00 Ha, West New Britain Province. Land title 	
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		<p>completed with map scale 1:60,000 Survey Plan Catalogue No.19366/0624.</p> <ul style="list-style-type: none"> - LLB: Agriculture Sub-Lease Agreement, dated 1 November 2022; Landlord: Soi Welfare Ltd. State Lease Soi Welfare Ltd; Portion 2040, Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 27 November 2020 for 99 years (valid until 26 November 2119), Milinch Ulawun, Fourmil Talasea, area of 26.00 Ha, West New Britain Province. Land title completed with map scale 1:15,000 Survey Plan Catalogue No.15/790. - LLB: Agriculture Sub-Lease Agreement, dated 26 August 2011; Landlord: Vamukuma Land Group Inc. State Lease Vamukuma Land Group Inc.; Portion 2062c, Agricultural Lease under Land Act 1996, to Hargy Oil Palms Limited, dated 13 August 2010 for 99 years (valid until 12 August 2109), Native Land Dealing (NLD) 6709, Milinch Ulawun, Fourmil Talasea, area of 731 Ha, West New Britain Province. Land title completed with map scale 1:15,000 Survey Plan Catalogue No.15/910. Currently, LLB Vamukuma become Vamukuma Incorporated Land Group (ILG) as per certificate of registration ILG No: 795, dated 15 April 2019. - LLB: Agriculture Sub-Lease Agreement or MoU between HOPL and Remailing ILG, dated 25 July 2018; Landlord: Remailing Land Group Inc. for area 1,830 Ha (planted). State Lease Remailing Land Group Inc.; Portion 2091c, Agricultural Lease under Land Group Act 2009. Remailing Incorporated Land Group (ILG) as per certificate of registration ILG No: 796, dated 14 July 2017. Completed with Map Scale 1:12,000. - LLB: Agriculture Sub-Lease Agreement or MoU between HOPL and Abunava ILG, dated 11 April 2013; Landlord: Abunava Clan or Abunava ILG Inc. for area 1,181 Ha (Portion 2076: 315 Ha, Portion 2077: 184 Ha (currently renewal portion to become portion 2115c with total 87.8 Ha and portion 2116c with total area is 96 Ha), Portion 2078: 682 Ha (currently renewal portion to become portion 2108c with total 318 Ha). 	
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		<p>Portion 2076 (315 Ha) is now lease to Saltamana Estate (independent Est.). Actual managed due to changes portion to be 594 Ha (include portion 2113c (93 Ha). State Lease Abunava Land Group Inc.; Portion 2113c, 2114c, 2115c, 2116c Agricultural Lease under Land Group Act 2009. Abunava Incorporated Land Group (ILG) as per certificate of registration ILG No: 340, dated 21 April 2016. Completed with Map Scale 1:10,000.</p> <ul style="list-style-type: none"> - LLB: Agriculture Sub-Lease Agreement or MoU between HOPL and Abunava ILG, dated 24 July 2018; Landlord: Abunava Land Group Inc. for area 93.00 Ha (planted), map scale 1:20,000. Portion 2125c: 97.90 Ha. <p>Pandi Estate Pandi Estate Covering Alangili Plantation, Gamupa Plantation, Alaba Plantation, Abulmosi Plantation and Magalona Plantation, comprises of land title and Lease-Lease Back:</p> <ul style="list-style-type: none"> - Portion 3: Agricultural State Lease under Section 87, to Hargy Oil Palms Limited, dated 21 February 2018 for 99 years, Milinch Ulawun, Fourmil Talasea, area of 146.00 Ha, West New Britain Province. Land title completed with map scale 1:7,500 Survey Plan Catalogue No.15/946. - LLB: Agriculture Sub-Lease Agreement, dated 5 February 2019; Landlord: Sulvuse Estate Ltd. (Alangili Plantation) State Lease Sulvuse Estate Ltd.; Portion 1, State Lease under Section 87, to Hargy Oil Palms Limited, dated 21 February 2018 for 99 years (valid until 20 February 2117), Milinch Ulawun, Fourmil Talasea, area of 383.00 Ha, East New Britain Province. Land title completed with map scale 1:10,000 Survey Plan Catalogue No.15/979. Where 291 Ha planted, 92 Ha buffer zone - LLB: Agriculture Sub-Lease Agreement, dated 9 April 2019; Landlord: Gamupa Oil Palm Development Ltd. State Lease Gamupa Oil Palm Ltd.; Portion 13, Agricultural Lease under Section 87, to Hargy Oil Palms Limited, dated 21 February 2018 for 99 years (valid until 20 February 2117), Milinch Ulawun, Fourmil Talasea, area of 614 Ha, East New 	
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		<p>Britain Province. Land title completed with map scale 1:7,500 Survey Plan Catalogue No.15/1010.</p> <ul style="list-style-type: none"> - LLB: Agriculture Sub-Lease Agreement or MoU between HOPL and Abulmosi Oil Palm Estate Ltd., dated 7 February 2019; Landlord: Abulmosi Oil Palm Estate Ltd. for area 1,390 Ha. State Lease Abulmosi Oil Palm Estate Ltd.; Portion 8, Agricultural State Lease under Section 87, to Hargy Oil Palms Limited, dated 21 February 2018 for 99 years (valid until 20 February 2117), Milinch Ulawun, Fourmil Talasea, area of 1,390 Ha, East New Britain Province. Completed with Map Scale 1:10,000. But as per MoU, only 583 Ha planted by oil palm and 807 Ha reserved. - LLB: Agriculture Sub-Lease Agreement or MoU between HOPL and Magalona Estate Ltd., dated 23 August 2022; Landlord: Magalona Estate Ltd. for area 348 Ha (managed by HOPL is 343 Ha). State Lease Magalona Estate Ltd.; Portion 2071, Agricultural State Lease under Section 87, to Hargy Oil Palms Limited, dated 21 Nov 2020 for 99 years (valid until 20 February 2119), Milinch Ulawun, Fourmil Talasea, area of 348 Ha, West New Britain Province. Completed with Map Scale 1:10,000 but only 343 Ha managed by HOPL. - LLB: Agriculture Sub-Lease Agreement or MoU between HOPL and Alaba Development Corporation Ltd., dated 5 September 2011; Landlord: Alaba Development Corporation Ltd. for area 1,906.40 Ha (managed by HOPL is 1,133.40 Ha). State Lease Alaba Development Corporation Ltd.; Portion 2061, Agricultural State Lease under Section 87, to Hargy Oil Palms Limited, dated 13 November 2008 for 99 years (valid until 13 Nov 2107), Milinch Ulawun, Fourmil Talasea, area of 1,906.40 Ha, West New Britain Province. Completed with Map Scale 1:12,500 but only 1,133.40 Ha managed by HOPL under portion 2072 (renew). - Hargy Mill/Workshop, Portion 15 & Portion 633: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 2 February 1978 for 99 years, Portion 633 & 1044 consolidated, Milinch Ulawun, Fourmil 	
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		<p>Talasea, area of 16.99 Ha, West New Britain Province. Land title completed with map scale 1:7500 Survey Plan Catalogue No.15/282 & 15/341.</p> <p>Talutu Estate (Independent Estate) Currently, based on latest assessment evidence, the Company shows the latest information related to the legal progress of the property it owns, where:</p> <ul style="list-style-type: none"> - A letter sent to national lands and physical planning by an association which wanted to Sub-divide the portion which already got a survey plan of through a registered surveyor. - There's a document for the acquisition of portion 1250 Milinch of Banga Fourmils of Talasesa. - Land Application Docs. Division of Lands & Physical Planning Letter for Land Application for Portion 1250, Millinch Banga, Fourmil Talasea WNB, dated 4 November 2021. Consist of documents such as: Land Application Form (signed on 21 July 2021); Land Application Receipt No: R00001331531, dated 22 July 2021 (PGK 500); Inspection Report dated 4 November 2021; Unimproved Value Assessment: State Agriculture Lease issued from Division of Lands & Physical Planning, dated 28 August 2023. The allotment has a land area of 1,190 Ha as per registered survey catalogue no 15/1118. Current improvements including mature oil palm trees occupies approximately 250 Ha. - National Gazette of PNG No. G772J dated 17 December 2021. <p>Alaba Estate (Independent Estate) There are documents related to legality:</p> <ul style="list-style-type: none"> - Certificate of Incorporation Alaba Development Corporation Limited 1-19878, dated 29 May 2018. - State Lease under Section 87 of the Land Act 1996 for Agriculture Purposes to Alaba Development Corporation Limited, dated 13 November 2008 for 99 years, Portion 2061, Milinch Ulawun, Fourmil 	
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		<p>Talasea, area of 1,906.40 Ha, West New Britain Province. Land title completed with map in which the portion divided into portion 2072 and 2082. Now the independent estate works on portion 2082 of 764.9 Ha.</p> <ul style="list-style-type: none"> - Survey Plan Portion 2016, Catalogue 15/866 dated 18 October 2006. <p>Ivule Estate (Independent Estate) Therea are document related to legality:</p> <ul style="list-style-type: none"> - Certificate of Incorporation Ivule Holding Limited 1-88034, dated 19 April 2013. - Land Application equipped with Agricultural Lease No. G793 – 30th December 2021 with Land Available for leasing are Portion 1234 (99.7 ha – Milinch of Banga Fourmil Talasea – West New Britain Province), Portion 794 (28.6 ha 99.7 ha – Milinch of Banga Fourmil Talasea – West New Britain Province) and Portion 1242 (44.3 ha 99.7 ha – Milinch of Banga Fourmil Talasea – West New Britain Province). Competed with survey of portions map 794, 1242 & 1243 (Cat.No. 15/1004). - Inspection Report for Portions 1242, 1243 & 794, Miliinch of Banga, Fourmil of Talasea, West New Britain Province on 1 February 2019 by Provincial Alienated Lands Officer. <p>Smallholder Sampled</p> <ul style="list-style-type: none"> - Smallholder No 04-0682: Statuary of Declaration Lamase Sagagol of Portion 682, in Malasi LSS Subdivision, Bialla, WNBPN (Declaraded at Bialla. 5 June 2023 by Independent State of Papua New Guinea). Completed with Survey Map of portion 671-692 (Act. No. 15/203) - Smallholder No. 04-1192: Land Application for Portion 1192 at Sale Malasi Subdivision. Milinch/Banga Fourmil/Talasea – West Britain Province in 27 February 2017. Inspection report for Portion 1192 on 27 February 2017 wih land area 6 hectares; Valuation report on 15 August 2017. Completed with Survey Map of Portions 1190-1196 & 1199 (Cat. No. 15.674). 	
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		<ul style="list-style-type: none"> - Smallholder No. 04-0782: Agricultural Lease under Section 56; portion 782, Milich Banga, Fourmil Talasea with area 15.76 ha; referred to in state lease volume 81 Folio 250 on 4 April 2012 by Deputy Registrar of Titles. - Smallholder No. 390022: Memorandum of Agreement between Gamupa Oil Palm Evelopment Ltd and Cornellius Lai on 26 July 2018; Agricultural Lease Title Described as Volume 25, Folio 184, Portion 5, Milinch of Uluwan, Fourmil of Talasea in West New Britain. Gamupa Oil Plam Developmnet ltd conset to release 2 hectares of its oil palm esttae to Cornellius Lai. The Agreement expires on the 30 July 2028. - Smallholder No. 02-0708: Agricultural Lease under Section 56; portion 708, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 36 Folio 8800 on 22 March 1985 by Delegate of the Minister for Lands. - Smallholder No. 02-0697: Agricultural Lease under Section 56; portion 697, Milich Uluwan, Fourmil Talasea with area 7.42 ha for period of 99 years; referred to in state lease volume 91 Folio 116 on 14 November 1984 by by Deputy Registrar of Titles. - Smallholder No. 02-0781: Agricultural Lease under Section 56; portion 781, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 91 Folio 171 on 14 November 1984 by by Deputy Registrar of Titles. - Smallholder No 02-0746: Statuary of Declaration Peter Jimmy of Portion 746, in Wilelo LSS, Bialla, WNB (Declared at Bialla. 18 August 2018 by Independent State of Papua New Guinea). Completed with Survey Map of portion 746-754 & 1109-1126 (Act. No. 15/383). - Smallholder No. 02-0748: Agricultural Lease under Section 56; portion 748, Milich Uluwan, Fourmil Talasea with area 6.51 ha for period of 99 years; referred to in state lease volume 89 Folio 228 on 18 September 1984 by by Deputy Registrar of Titles. - Smallholder No. 02-0718: Agricultural Lease under Section 56; portion 718, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 	
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		<p>years; referred to in state lease volume 79 Folio 61 on 17 October 1983 by by Deputy Registrar of Titles.</p> <ul style="list-style-type: none"> - Smallholder No. 33-1971: Land Application for Portion 1971 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNPB on 1 August 2016 to Department of Lands & Physical Planning; Inspection Report on 17 August 2016 with land area 6.7 ha; Valuation report on 12 August 2016; Survey of Map Portions 1960-1975 (Cat. No. 15/628). - Smallholder No. 33-1987: State Lease under section 87 of the land Act 1996 for a period 99 years from 13 January 2005; containing an area of 8.7200 hectares (Portion 1987) on registered survey plan catalogued no. 15/630. - Smallholder No. 33-1980: Land Application for Portion 1980 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNPB on 2 August 2022 to Department of Lands & Physical Planning; Inspection Report on 22 august 2022 with land area 7 ha; Valuation report on 12 August 2016; Survey of Map Portions 1976-1991 (Cat. No. 15/630). - Smallholder No. 33-1981: Land Application for Portion 1981 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNPB on 29 June 2012 to Department of Lands & Physical Planning; Inspection Report on 25 December 2011 with land area 11.25 ha; Valuation report on 5 December 2011; Survey of Map Portions 1976-1991 (Cat. No. 15/630). - Smallholder No. 33-2005: State Lease under section 49 of the land Act 1996 for a period 99 years from 25 March 1993; containing an area of 6.6 hectares (Portion 2005) on registered survey plan catalogued No. 15/628. - Smallholder No. 010-225: Agricultural Lease under section 56 of the land Act 1962 for a period 99 years from 17 November 1977, Milinch Nakanai, Fourmil Talasea; containing an area of 8.46 hectares (Portion 225) on registered survey plan catalogued no. 15/303. - Smallholder No 010-225: Statuary of Declaration Paul Gena of Portion 192, in Tiauru LSS Subdivision, Bialla, WNPB (Declared at Bialla. 24 	
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		<p>April 2020 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304).</p> <ul style="list-style-type: none"> - Smallholder No. 010-243: Agricultural Lease under Section 56; portion 243, Milich Nakanai, Fourmil Talasea with area 8.62 ha for period of 99 years; referred to in state lease volume 67 Folio 51 on 31 August 1979 by Deputy Registrar of Titles. - Smallholder No 010-205: Statuary of Declaration Kenny Wingomi of Portion 205, in Tiauru LSS Subdivision, Bialla, WNPB (Declared at Bialla. 5 May 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No 010-202: Statuary of Declaration Wasei Walaki of Portion 202, in Tiauru LSS Subdivision, Bialla, WNPB (Declared at Bialla 8 July 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No 010-259: Statuary of Declaration Jonah Tony of Portion 259, in Tiauru LSS Subdivision, Bialla, WNPB (Declared at Bialla 11 October 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 253-270, 272-278, 295-300 & 303-306 (Act. No. 15/307). - Smallholder No. 05-0189: Agricultural Lease under Section 56; portion 189, Milich Banga, Fourmil Talasea with area 6.4 ha for period of 99 years; referred to in state lease volume 2 Folio 1 on 25 November 1966 by Administrator of The Territory of Papua and New Guinea. - Smallholder No 05-193: Statuary of Declaration Kovulovo Melamuli of Portion 193, in Uasilau LSS Subdivision, Bialla, WNPB (Declared at Bialla, 5 May 2022 by Independent State of Papua New Guinea). Completed with Survey Map of portion 187-193 (Act. No. 15/24). - Smallholder No. 32-1109: Land Application for Portion 1109 Subdivision Milinch/Banga Fourmil/Talasea – WNPB on 30 November 2023 to Department of Lands & Physical Planning; Inspection Report on 30 November 2023 with land area 6.64 ha. 	
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		<ul style="list-style-type: none"> - Smallholder No. 32-1164: Land Application for Portion 1164 Subdivision Milinch/Banga Fourmil/Talasea – WNBP on 29 May 2015 to Department of Lands & Physical Planning; Inspection Report on 29 May 2015 with land area 7.23 ha. - Smallholder No. 32-1164: Successful applicant for lease Notice under Section 75 & 76 of The Land Act No. 45 of 1996 for portion 1148 at Milinch Banga, Fourmil Talasea by Secretary for Lands and Physical Planning on 8 May 2017. Completed with Survey of Map Portions 1148-1158 & 1167 (Cat. No. 15/665). - Smallholder No. 32-1118: Document of meeting no. 1922 regarding to consideration of application for an agricultural lease by notice in the National Gazette of 11 November 1993 (Onike Tavisou, Portion 1118 with 6.63 ha). - Smallholder No. 32-1187: Land Application for Portion 1169 Subdivision Milinch/Banga Fourmil/Talasea – WNBP on 29 March 2021 to Department of Lands & Physical Planning; Inspection Report on 29 March 2021 with land area 5.32 ha; Valuation report on 29 March 2021; Survey of Map Portions 1168 & 1169 (Cat. No. 15/677). - Smallholder No. 32-1114: Document of meeting no. 1922 regarding to consideration of application for an agricultural lease by notice in the National Gazette of 11 November 1993 (Krala Viobubu, Portion 1114 with 6.75 ha). - Smallholder No. 31-102: Agricultural Lease under Section 49; portion 1502, Milich Ulawun, Fourmil Talasea with area 6.77 ha for period of 99 years; referred to in state lease volume 4 Folio 30 on 25 July 1993 by Minister of Lands and Physical Planning. - Smallholder No 31-1523: Statuary of Declaration Aron Wafuka of Portion 1523, in Soi LSS Subdivision, Bialla, WNBP (Declared at Bialla, 6 August 2024 by Independent State of Papua New Guinea). Completed with Survey Map of portion 1519-1529 (Act. No. 15/582). - Smallholder No. 03-1399: Agricultural Lease under Section 56; portion 1399, Milich Ulawun, Fourmil Talasea with area 6.59 ha for period of 	
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		<p>99 years; referred to in state lease volume 87 Folio 216 on 22 March 1985 by Minister of Lands and Physical Planning.</p> <ul style="list-style-type: none"> - Smallholder No. 03-1359: Agricultural Lease under Section 56; portion 1359, Milich Ulawun, Fourmil Talasea with area 10.24 ha for period of 99 years; referred to in state lease volume 82 Folio 14 on 21 July 1984 by Minister of Lands and Physical Planning. - Smallholder No. 03-1371: Agricultural Lease under Section 56; portion 1371, Milich Ulawun, Fourmil Talasea with area 6.35 ha for period of 99 years; referred to in state lease volume 82 Folio 16 on 18 January 1984 by Minister of Lands and Physical Planning. - Smallholder No 03-1400: Statuary of Declaration Veronica Vulum of Portion 1400, in Barema LSS Subdivision, Talasea, WNBP (Declared at Bialla, 13 February 2015 by Independent State of Papua New Guinea). Completed with Survey Map of portion 1374-1400 (Act. No. 15/412). 	
	<p>4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a land-owning group through custom in order to have access to land.</p>	<p>Here's the detail information about smallholder land title (customary land):</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement No. 16-0113 for the Roboam Tomarum to use the land known as Komo and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 30 years. (signed in 16 April 2018 by Clan Leader). - Clan Land Usage Agreement No. 1616-107 for the Alista B. to use the land known as Bolo and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 25 years. (signed in 15 April 2018 by Clan Leader). - Clan Land Usage Agreement No. 1616-40 for the Dainah Tavuvu to use the land known as Kaokao and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 25 years. (signed in 15 April 2018 by Clan Leader). - Clan Land Usage Agreement No. 16-1670 for the Nancy Vilau to use the land known as Pua and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 30 years. (signed in 16 April 2018 by Clan Leader). 	

		<ul style="list-style-type: none"> - Clan Land Usage Agreement No. 0808-13 for the Mesak Bubu to use the land known as Yuvule and which has been allocate the Village Oil Palm Block of the Sulu for the period of 25 years. (signed in 12 June 2017 by Clan Leader). - Clan Land Usage Agreement No. 440045 for the Kalole Maoko to use the land known as Madudua/Nantabu and which has been allocate the Village Oil Palm Block of the Nantabu for the period of 25 years. (signed in 11 July 2018 by Clan Leader). - Clan Land Usage Agreement No. 070711 for the Gerard Niu to use the land known as Madudua and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed in 31 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 070719 for the Kaveu Paulu to use the land known as North Ulamona and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed in 31 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 070727 for the Rebon Malila to use the land known as North Ulamona and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed in 31 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 070747 for the Michael Diaavaa to use the land known as North Madudua and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed in 18 November 2022 by Clan Leader). - Clan Land Usage Agreement for the Babex Oil Palm Estate (770010E) to use the land known as Morosiroso and which has been allocate the Village Oil Palm Block of the Mataururu for the period of 25 years. (signed in 29 May 2017 by Clan Leader). Certificate of Registration of Business Name Babex Estate 6-96012 on 11 February 2011. - Clan Land Usage Agreement No. 460009 for the Ume Mulu to use the land known as Solamuli and which has been allocate the Village Oil 	
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		<p>Palm Block of the Walo for the period of 25 years. (signed in 17 November 2016 by Clan Leader).</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement No. 460019 for the Timothy Lume to use the land known as Solamuli and which has been allocate the Village Oil Palm Block of the Walo for the period of 25 years. (signed in 28 November 2016 by Clan Leader). - Clan Land Usage Agreement No. 460031 for the Tanisou Povei to use the land known as Solamuli and which has been allocate the Village Oil Palm Block of the Walo for the period of 25 years. (signed in 14 November 2016 by Clan Leader). - Clan Land Usage Agreement No. 060602 for the Nobert Bokia to use the land known as Gigipuna and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 25 years. (signed in 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 060674 for the Felix Guldia to use the land known as Tangere and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 10 years. (signed in 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 060653 for the Raymond Vulele to use the land known as Rapolinkovu and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 20 years. (signed in 1 January 2018 by Clan Leader). - Clan Land Usage Agreement No. 060651 for the Carol Lome to use the land known as Tangere and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 16 years. (signed in 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 060609 for the Benedict Mangau to use the land known as Gigipuna and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 25 years. (signed in 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 090063 for the Wesley Tomare to use the land known as Lakiso and which has been allocate the Village Oil 	
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		<p>Palm Block of the Baikakea for the period of 20 years. (signed in 14 April 2015 by Clan Leader).</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement No. 141424 for the Tommy Batari to use the land known as Kumo and which has been allocate the Village Oil Palm Block of the Pakisi for the period of 25 years. (signed in 25 October 2022 by Clan Leader). - Clan Land Usage Agreement No. 141423 for the Rudolf Batari to use the land known as Kumo and which has been allocate the Village Oil Palm Block of the Pakisi for the period of 25 years. (signed in 1 April 2016 by Clan Leader). - Clan Land Usage Agreement No. 141401 for the Thomas Misa to use the land known as Kumo and which has been allocate the Village Oil Palm Block of the Pakisi for the period of 25 years. (signed in 1 April 2016 by Clan Leader). - Clan Land Usage Agreement No. 131336 for the Timothy Babo to use the land known as Mule Kautu and which has been allocate the Village Oil Palm Block of the Apupul for the period of 20 years. (signed in 14 June 2017 by Clan Leader). - Clan Land Usage Agreement No. 090944 for the John Vulolo to use the land known as Bala and which has been allocate the Village Oil Palm Block of the Baikakeka for the period of 10 years. (signed in 21 September 2016 by Clan Leader). - Clan Land Usage Agreement No. 090943 for the United Church to use the land known as Kekie and which has been allocate the Village Oil Palm Block of the Baikakeka for the period of 17 years. (signed in 18 September 2015 by Clan Leader). - Clan Land Usage Agreement No. 090932 for the John Mou to use the land known as Kavalo and which has been allocate the Village Oil Palm Block of the Baikakeka for the period of 18 years. (signed in 21 September 2016 by Clan Leader). - Clan Land Usage Agreement No. 17122 for the Berry Lume to use the land known as Papaha and which has been allocate the Village Oil Palm 	
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		Block of the Matililiu for the period of 21 years. (signed in 25 February 2017 by Clan Leader).	
		All the document kept by the smallholder, and copies are available at SHAAS Office.	
	4.4.1(b) For Solomon Islands, Customary Land may be recorded in accordance with the Customary Lands Record Act 1994 (as amended). This act provides for the Recording officer appointed by the National Records to determine the Customary Owners, the survey the land with maps to be held at the Central and other Land Record offices. Other mechanisms to manage Customary Land may be applied. Companies must be able to demonstrate that where they have leased customary land, they have negotiated with the recognised owners of the land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.	Not Applicable. This scope of certification is in Papua New Guinea.	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Based on the results of interviews with stakeholders, they admitted that there was no coercion from any party in the process of signing the agreement with the Company. Consciously and freely, smallholders can make decisions whether they still want to sell FFB to the Company or not. This is in line with the results of interviews with smallholders in Noau Village, Kaiamu Village, Apupul Village and Tiauru Village.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making - Minor compliance -	All legal documents are available at the office and signed by all parties involved including Clan Leaders, Witnesses, Block Holders and OPIC officers.	Complied

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4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken - Minor compliance -		Complied
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. - Minor compliance -	<p>Hargy Oil Palms Limited (HOPL) has fully developed its leasehold land, acquired either from predecessors or through purchase and title transfer. No further expansion of HOPL-owned land is planned. The development of the Bialla project includes contributions from smallholders and sub-leasing of customary land through the Lease-Lease Back (LLB) program, in collaboration with Incorporated Land Groups (ILGs) and incorporated companies holding state leases. The LLBs involve land that belongs to clans, necessitating the maintenance of Free, Prior, and Informed Consent (FPIC) requirements. To manage the registration of clan lands, HOPL has established a Land Negotiation Procedure. This procedure provides guidance to clans, ensuring that clan members discuss their user rights, communal benefits, and reach a consensus to incorporate land groups (ILGs).</p> <p>Communication with Landowners: Hargy Oil Palms Limited has demonstrated stakeholder communication with Alaba Development Corporation Ltd. and Abulmosi Oil Plam Estate Ltd., led by Mr. Greg Malai (ILG Chairman) on 14 April 2015. The discussions covered ILG registration, the Lease-Lease Back process, agricultural sub-leases, RSPO requirements, the Memorandum of Understanding (MoU), economic benefits, buffer zone establishment, environmental controls, and other agreements. This process was documented in the "Stakeholders Communication Record Form" and was attended by 15 clan members, 2 mediators, 3 ILG representatives, and 2 Hargy officers.</p> <p>Based on interview with chairman of Abulmosi LLB, confirmed that FPIC process is implemented by HOPL prior to develop the plantations. Abulmosi</p>	Complied

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		LLB bought the land from the state land and engage HOPL to develop the oil palm plantations covers 583 Ha planted and 807 is unplanted and reserved as buffer zone. The MoU signed since 2011 with partnership status is Lease-Lease Back (LLB). Since then, no issues in development or operations.	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>The company has a map with an appropriate scale for each plantation with scale of 1: 18,000 which contains the boundaries of location of the company operational area including facilities and HCV/HCS area.</p> <p>From the results of field observations, the actual conditions visited by the auditor are in accordance with the descriptions on the map displayed.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and the English language, including assessments of impacts, proposed benefit sharing, and legal arrangements. Explanatory documentation may be provided in Tok Pisin in PNG or Solomon Pijin in the Solomon Islands and verbal presentation may be made in those languages.</p> <p>- Minor compliance -</p>	All land agreement and ownership documents in the certification scope are available in English and local languages. Smallholder member samples admitted that there were no problems with the use of language in the documents or records they owned.	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	Based on the results of interviews with stakeholders including smallholder members, they admitted to being involved in all land acquisition processes including cooperation with the Company. They also admitted to being able to involve third parties (legal) in assisting with any disputes that may occur.	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement.</p> <p>- Minor compliance -</p>	The certificate holder has shown evidence of FPIC that has been implemented during the process of using the land owned, where for example in the acceptance of TBS from smallholders, there is no coercion from the Company. All CLUA owned have also been agreed upon by all parties, such as Clan leaders, witnesses, and government representatives.	Complied

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		<p>The company has also shown proof of payment for land loans related to LLB within the scope of certification as a form of FPIC agreement with landowners, here are some of the latest payment records that have been made:</p> <ul style="list-style-type: none"> - Land Rental Payment to Abulmosi Land Group Incorporate Ltd. (account No. 3311007713058) on 5 January 2024 (Record Ref. No. 0501362956000001). - Land Rental Payment to Alaba Development (account No. 3311013989239) on 5 January 2024 (Record ref. No. 0501362956000001). 	
Criterion 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. - Critical (Major) compliance -	<p>There is no land expansion activity during this audit (scope of certification is the same as previous assessment). The information regarding to legal rights has been described on 4.4.1.</p>	Complied
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, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	<p>Currently there is no new planting in Hargy Oil Palms Limited within last 12 months. All land titles and copy of CLUA for smallholders VOP are maintained and available in place. In the beginning of plantation development by Hargy Oil Palms Limited, FPIC process was implemented to affected parties.</p> <p>It is also known that previously the compensation (land rental) process was carried out directly to the landowner such as Alaba Development Corporation Ltd. & Abulmosi Oil Plam Estate Ltd., and until now there have been no problems related to the land compensation process.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' 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</p>	<p>Based on the results of interviews with stakeholders, they admitted that there was no coercion from any party in the process of signing the agreement with the Company. Consciously and freely, smallholders can make decisions whether they still want to sell FFB to the Company or not.</p>	Complied

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	<p>certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>This is in line with the results of interviews with smallholders in Noau Village, Kaiaumu Village, Apupul Village and Tiauru Village.</p> <p>All legal documents are available at the office and signed by all parties involved including Clan Leaders, Witnesses, Block Holders and OPIC officers.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>As a result of interviews with representatives of local communities and smallholder sampled members, they do not experience any restrictions regarding access to water and food in the company's operational areas, except for conservation areas where there is a prohibition on destroying or hunting protected animals.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>As explained on 3.4.1 and 3.4.2, companies can show evidence of social impact assessment documentation with FPIC approach that has been carried out by involving various key parties, such as representatives of village head, government agencies and the community around the company.</p>	Complied
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator</p> <p>- Minor compliance -</p>	<p>As explained in indicators 4.5.2, based on the results of interviews with community representatives and government agency, there were no negative issues related to land title in the company area. The land title is in form of Agricultural Lease and Agriculture Sub-Lease Agreement (Lease-Lease Back).</p>	Complied
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>There is no land expansion activity during this audit (scope of certification is the same as previous assessment).</p> <p>In addition, certificate holder has not currently carried out new planting activities beyond 2018. Based on field observation on Hargy Estate, Navo</p>	Complied

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		Estate, Pandi Estate and Smallholder sampled, only replanting activities has been conducted (no new planting).	
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1. - Critical (Major) compliance -	<p>As informed in indicators 4.5.7, there is no land expansion activity during this audit (scope of certification is same as previous assessment).</p> <p>In addition, certificate holder has not currently carried out new planting activities beyond 2018. Based on field observation on Hargy Estate, Navo Estate, Pandi Estate and Smallholder sampled, only replanting activities has been conducted (no new planting).</p>	Complied
Criterion 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.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	<p>Currently, there's no change of the procedure form previous assessment. The certificate holder have "A Guide to Acquiring Land For Oil Palm Development" (PRO-LAN-GEN-002-04, dated 29 March 2023) which informs:</p> <ul style="list-style-type: none"> - FPIC involving consultative meetings, negotiations & continuous awareness are the major tools that organization use in obtaining access to customary land. - The use of any form of mercenaries or paramilitary force to acquire customary land or any other form of undue influence including use of bribes to acquire alienated land is prohibited. - The national government through its agencies the department of lands and physical planning and SEPA, the Environmental Authority, are involve in processing relevant statutory documents and approvals. - The two common forms of land holding system in PNG is by Customary Ownership dan the State. Customary land can only be acquired under provisions as allowed for under the land groups incorporation (amendment) Act, 2009 and the land Registration (Amendment) Act, 2009, legally enforceable as of March, 2012. 	Complied

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		<ul style="list-style-type: none"> - No Outright purchase of customary land s entered into but an Agriculture Sub Lease is sought from the landowners after they have secured a Customary Land Title over their land. - Alienated land is acquired through the normal process of making applications to the state Land Board. 	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair 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. Distribution of monies within families is determined by the families.</p> <p>Guidance: Where possible, Companies shall set up banking arrangements with the ILGs to provide for monies to be paid directly into members' bank accounts at the agreed percentages to avoid the possibility of theft or diversion of funds.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>As informed in 4.6.1, there are several mechanisms related to mutually agreed procedure for each type of land title:</p> <ul style="list-style-type: none"> - Alienated land. The acquisition of alienated land occurs either by agreement or compulsory process (under section 151 of the land act which is referred to as state leases). This form of acquisition can take place in many manners, such as purchase of leasehold land either granted or registered lease or Purchase of freehold lease. - Customary Land The process of acquisition is divided into three main categories under Division 3 or section 10 to 16 of Land Act 1996. - Incorporated Land Group The process refers to The Land Groups Incorporation (Amendment) Act, 2009. A clan must firstly register as a land group (ILG) before they apply to register clan land. Only clans with certified copies of Incorporated Land Group Certificates will proceed to register customary land as clearly stipulated in The Land Registration (Amendment) Act, 2009. The ILG is assisted by HOPL Lands Department in preparing application. 	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Certificate holder shows evidence that it provides opportunities for smallholders with female gender to be able to work together as smallholders in sustainable FFB production. Here are some examples:</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement (CLUA) No. 1616-40 for the Dainah Tavuvu to use the land known as Kaokao and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 25 years. (signed in 15 April 2018 by Clan Leader). 	Complied

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		- Clan Land Usage Agreement (CLUA) No. 16-1670 for the Nancy Vilau to use the land known as Pua and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 30 years. (signed in 16 April 2018 by Clan Leader).	
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 publicly available to them provided that the right to privacy and confidentiality is respected.. - Minor compliance -	Regarding the implementation of the FPIC process, according to the explanation in indicator 4.4.2, all land agreement has been given to land holders. The company has also shown proof of payment for land loans related to LLB within the scope of certification, here are some of the latest payment records that have been made: - Land Rental Payment to Abulmosi Land Group Incorporate Ltd. (account No. 3311007713058) on 5 January 2024 (Record Ref. No. 0501362956000001). - Land Rental Payment to Alaba Development (account No. 3311013989239) on 5 January 2024 (Record ref. No. 0501362956000001).	Complied
Criterion 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.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Related to mutually agreed procedure for identifying people has been informed in "A Guide to Acquiring Land For Oil Palm Development" (PRO-LAN-GEN-002-04, dated 29 March 2023). All the mechanism of the compensation refers to government regulations: - Land groups incorporation (amendment) Act, 2009 - The land Registration (Amendment) Act, 2009 Legally enforceable as of March, 2012 - Land Act, 1996.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	As informed in 4.6.2, there are calculating and distributing fair compensation for each type of land title procedure in "A Guide to Acquiring Land For Oil Palm Development" (PRO-LAN-GEN-002-04, dated 29 March 2023):	Complied

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	- Critical (Major) compliance -	<ul style="list-style-type: none"> - Alienated land. The acquisition of alienated land occurs either by agreement or compulsory process (under section 151 of the land act which is referred to as state leases). This form of acquisition can take place in many manner, such as purchase of leasehold land either granted or registered lease or Purchase of freehold lease. - Customary Land The process of acquisition is divided into three main categories under Division 3 or section 10 to 16 of Land Act 1996. - Incorporated Land Group The process refers to The Land Groups Incorporation (Amendment) Act, 2009. A clan must firstly register as a land group (ILG) before they apply to register clan land. Only clans with certified copies of Incorporated Land Group Certificates will proceed to register customary land as clearly stipulated in The Land Registration (Amendment) Act, 2009. The ILG is assisted by HOPL Lands Department in preparing application. 	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Based on document have "A Guide to Acquiring Land For Oil Palm Development" (PRO-LAN-GEN-002-04, dated 29 March 2023), there are direct benefit to landowner, as follows:</p> <ul style="list-style-type: none"> - Rental payments – paid @ K75/planted hectare and K20/unplanted (buffer). - FFB royalties – paid monthly i.e. 10% of total kina value of monthly production. - Improved housing for workforce. - Medical services and law & order if need to be addresses by the company depending on the viability project. - Skill development within rural population. <p>As informed by government agency and smallholder sampled members, they got a benefit from company such as road maintenance on block and loan for fertilizer and chemical herbicide.</p>	Complied

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Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	<p>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.</p> <p>Guidance: In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution.</p> <p>- Minor compliance -</p>	<p>The certificate holder already had grievance mechanism regarding to resolve conflicts in "Grievance Mechanism" (PRO-SUS-SUS-004-09), dated 30 August 2023. The mechanism include:</p> <ul style="list-style-type: none"> - A Mechanism for receiving, investigating, and responding to grievances I understandable, transparent, confidential, culturally appropriate, and timely manner. - An easily accessible and efficient grievance procedure for affected employees, company contractors and relevant stakeholders. - Management of grievances and how it is reported effectively. - Improvement of the organization social improvement through the analysis of complaints. <p>Document and records relating to grievances registered in the grievance tracking database will be kept for a minimum of 10 years after the resolutions of the grievance. The organization will monitor progress of the respective grievance and keep the person raising the grievance informed of its status and at the same time keeping grievance coordinator informed. If required, further actions may be taken to address the grievance and may even lead to referring the matter to court or police.</p>	Complied
4.8.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>As informed in indicator 4.8.1, the procedure has acceptable conflict resolution process. Document and records relating to grievances registered in the grievance tracking database will be kept for a minimum of 10 years after the resolutions of the grievance. The organization will monitor progress of the respective grievance and keep the person raising the grievance informed of its status and at the same time keeping grievance coordinator informed. If required, further actions may be taken to address the grievance and may even lead to referring the matter to court or police.</p> <p>The grievance policy (2022) informs that company committed:</p>	Complied

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		<ul style="list-style-type: none"> - To address all concerns and grievances in a prompt manner to reach a swift resolution. - To behave in an impartial and fair manner, respectful of the positions and sensitivities of the people expressing their concerns or grievances. - Complainants have the right to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. 	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	Based on explanation from relevant stakeholders, there are no issues related to land acquisition. This information is in line with field observation on Hargy Estate, Navo Estate, Pandi Estate and sampled smallholder.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on explanation from relevant stakeholders, there are no issues related to land acquisition. This information is in line with field observation on Barema Estate, Navo Estate, Pandi Estate and sampled smallholder.	Complied
Principle 5: Support smallholder inclusion			
Criterion 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 paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	<p>The FFB prices are publicly displayed. Current and previous FFB prices are posted on the information board located in front of the Smallholder Office, near the Weighbridge.</p> <p>Sample verification of FFB prices during ASA 3_1 includes:</p> <ul style="list-style-type: none"> - January 2024: PGK 429.90 (Mill gate price); PGK 366.79 (Farm gate price). - February 2024: PGK 435.51 (Mill gate price); PGK 370.82 (Farm gate price). 	Complied

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		<ul style="list-style-type: none"> - March 2024: PGK 490.29 (Mill gate price); PGK 383.06 (Farm gate price). - April 2024: PGK 445.55 (Mill gate price); PGK 426.51 (Farm gate price). - May 2024: PGK 495.89 (Mill gate price); PGK 431.38 (Farm gate price). - June 2024: PGK 462.09 (Mill gate price); PGK 397.48 (Farm gate price). - July 2024: PGK 477.32 (Mill gate price); PGK 413.10 (Farm gate price). 	
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>FFB prices are displayed on the information board at the Smallholder Office, near the Mill Weighbridge. Both current and previous FFB prices are accessible to everyone.</p> <p>During ASA 3_1, the FFB pricing calculation was demonstrated to smallholders during field day events. Sample records of training sessions in 2024 include:</p> <ul style="list-style-type: none"> - Barema 1-4 Field Day: Held on 13 May 2024, themed "Mini Field Day – FFB Price Calculation," attended by 52 smallholders. Examples include: Mr. Charlie Vitikut (Block Number: 03-1271); Mr. Peter Walter (Block Number: 03-1309); Mr. Vincent Pbjilken (Block Number: 03-1300); Mr. Tom Lus (Block Number: 03-1320). - Baekakea Village Field Day: Held on 2 July 2024, themed "Mini Field Day – RSPO and FFB Formula Refresher," attended by 43 smallholders. Examples include: Mr. John Mn (Block Number: 09-0932); Mr. Ben Masori (Block Number: 09-0943); Mr. Joshua Sobi (Block Number: 09-0947). 	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews conducted during ASA 3_1 with smallholders, including Independent Estates such as Babex Oil Palm Estate and Ivule Holding Limited, it was confirmed that fair pricing is calculated as a portion of the international CPO price, minus costs and premium pricing. This pricing structure also applies to RSPO-certified sustainable palm oil and is shared with smallholders at K15 per MT FFB.</p> <p>FFB price calculation considers several factors, including:</p> <ul style="list-style-type: none"> - World Marketplace Prices: CPO and PKO prices in USD. 	Complied

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		<ul style="list-style-type: none"> - Net CPO & PKO Prices: Prices in USD after subtracting costs for freight and insurance. - Extraction Rate: Percentage of CPO & PKO extracted from 1 tonne of FFB. - CPO & PKO Value: USD value from 1 MT FFB, calculated by multiplying the CPO & PKO price by the Oil Extraction Rate (OER). - Total Oil Product Value: Total USD value of palm products in 1 tonne of FFB. - Exchange Rate: Conversion rate from USD to PNG Kina (PGK). - Total Value in PGK: Total value of palm products in 1 tonne of FFB converted to PGK. - Revenue Distribution: 57% of the value is paid out to growers, while 43% is retained by the company to cover production costs (milling). - Mill Gate Price: Price in PGK for FFB that is self-delivered. - Cost of Transport: Costs associated with transporting FFB. - Farm Gate Price: Price in PGK for FFB picked up by the company. 	
5.1.4	<p>(C) Evidence is available that all parties within the Unit of Certification, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the basis on which their fruit is sold to the Companies. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. To assist this, Companies include financial literacy information in their extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palm Limited actively involves all parties, including women, in the decision-making process. During ASA 3_1, the auditor team conducted field observations and interviews with the Women Representative, Lamo Auru Conservation Associations (a local NGO), and female smallholders. It was confirmed that women have been involved in decision-making processes. Dissemination efforts included providing information on FFB pricing, calculations, payment terms, and deductions.</p> <p>Sample records of training and engagement activities in 2024 are as follows:</p> <ul style="list-style-type: none"> - Mataururu 101008 (OPRA BMP Block): On 11 June 2024, a Mini Field Day focused on FFB price calculation was attended by 69 smallholders. Notable attendees included Mr. Peter June (block number: 101091) and Babex Estate (Independent Estate, No: 770010). - Tiaruru (Block #01-0194): On 24 June 2024, a Mini Field Day covering herbicide spraying and FFB price calculation was attended by 46 	Complied

		<p>smallholders. Notable attendees included Mr. Issack Apiasare (block number: 209), Mr. David Walaki (block number: 202), Mr. Noel Tamata (block number: 225), Mr. Cliff Ren (block number: 205), and Mrs. Essy Ludwick (block number: 192).</p> <ul style="list-style-type: none"> - Barema 1-4: On 13 May 2024, a Mini Field Day focused on FFB price calculation was attended by 52 smallholders. Notable attendees included Mr. Charlie Vitikut (block number: 03-1271), Mr. Peter Walter (block number: 03-1309), Mr. Vincent Patiken (block number: 03-1300), and Mr. Tom Lus (block number: 03-1320). - Baekakea Village: On 2 July 2024, a Mini Field Day on RSPO and FFB formula refresher was attended by 43 smallholders. Notable attendees included Mr. John Mou (block number: 0932), Mr. Ben Masori (block number: 090927/43), and Mr. Joshua Sobi (block number: 0947). 	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>Smallholder requirements:</p> <p>Smallholders must be able to verbally explain that they understand and observe their obligations and the obligations of the Company to whom they are selling their fruit.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>During ASA 3_1, the auditor team interviewed a sample of smallholders, who provided detailed explanations of the items on their payment slips. These items include: Tonnage; Levies (e.g., OPRA, OPIC, sexava/pest); Farmgate price (if the company collects the FFB from the farm); Mill gate price (if the smallholder delivers the FFB to the mill); Loans; Net pay. The smallholders also confirmed their understanding that FFB should be sold only to Hargy's Mills and not to unauthorized mills or FFB transporters. They reported that the documentation system is effective in terms of transparency and detail.</p> <p>Based on a review of weighing slips and payment slips, it can be concluded that Hargy Oil Palm Limited and OPIC extension officers have provided clear explanations regarding FFB quality, FFB pricing, calculations, payment terms, and deductions.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>Guidance: Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when</p>	<p>During ASA 3_1, Hargy Oil Palm Limited (HOPL) demonstrated that the agreed payment schedule is fortnightly. The payment receipts include detailed variables such as: Tonnage; Levies (e.g., OPRA, OPIC, sexava/pest); Farmgate price (if the company collects the FFB from the farm); Mill gate price (if the smallholder delivers the FFB to the mill); Loans;</p>	Complied

	<p>weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Net pay. Based on interview, smallholders are aware regarding these variables. FFB prices are determined based on the calculation of the average bunch weight when weighed at the verified mill weighbridge. FFB is also weighed at the point of pick-up for comparison. The total FFB price is then calculated considering the Mill Gate Price (the price in PGK for FFB that is self-delivered) or the Farm Gate Price (the price in PGK for FFB picked up by the company).</p> <p>The smallholders have confirmed their understanding that FFB should only be sold to Hargy's Mills and not to unauthorized mills or FFB transporters. They also reported that the documentation system is effective in terms of transparency and detail, and that payments are made on time every fortnight.</p>	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail.</p> <p>- Minor compliance -</p>	<p>Weighbridges used for determining payments to smallholders are verified by the Independent Consumer and Competition Commission (ICCC). All Hargy's smallholder FFB truck weighing scales have been calibrated regularly. An issue of high variance was recorded (-450 kg), prompting a recalibration of the faulty scale, which was then tested and confirmed to be accurate.</p> <p>Sample of weighbridge calibration records:</p> <ul style="list-style-type: none"> - Hargy POM: Certificate of Inspection No. ICCC 3090, dated 14 May 2024. Scale Type: Weighbridge, Model: JAC 320 NUWEIGH, Capacity: 60 tonnes, Serial Number: E26209-0212; Graduation Interval: 20 kg. The result complies with Maximum Permissible Error (MPE) and is valid until the next inspection on 14 May 2025. The inspection was conducted by the Independent Consumer and Competition Commission under the Trade Measurement Act. - Barema POM: Weighbridge Certificate of Inspection No. ICCC 3091, dated 14 May 2024. Scale Type: Rinstrum Weighbridge, Model: R 420, Capacity: 60 tonnes, Serial Number: 3356199. The next inspection is due on 14 May 2025. The certificate was issued by the Independent 	Complied

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		<p>Consumer and Competition Commission under the Trade Measurement Act.</p> <ul style="list-style-type: none"> - Navo POM: Weighbridge Certificate of Inspection No. ICC3 3092, dated 13 May 2024. Scale Type: Avery Weigh Tronix Weighbridge, Model: E1110, Capacity: 60 tonnes, Serial Number: 114850293. The next inspection is due on 13 May 2025. The certificate was issued by the Independent Consumer and Competition Commission under the Trade Measurement Act. 	
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>As of ASA 3_1, there are no independent smallholders surrounding the company. All smallholders in PNG are associated smallholders. The Internal Control System for associated smallholders is conducted by Hargy Oil Palm Limited (HOPL) in cooperation with the Oil Palm Industry Corporation (OPIC).</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palm Limited (HOPL) has implemented the Grievance Mechanism SOP (PRO-SUS-SUS-004-09), issued as No. 9, dated 30 August 2023. This SOP was developed to mitigate risks from company employees, provide external stakeholders with an effective avenue for expressing concerns and achieving remedies, and foster a constructive relationship with all relevant stakeholders and the company. Section 5 of the Performance Indicator specifies that the target is to provide feedback on 100% of grievances within 7 days, directly addressing the person raising the grievance. The company maintains a Grievances Logbook for this purpose.</p> <p>The Community Affairs Manager serves as the primary interface between HOPL and external stakeholders raising grievances. The Security Department and Human Resources Department are the main points of contact for grievances related to social safety, security, and employee matters. The Business Development Officer manages centralized reporting through the Grievance Tracking Database and ensures that all grievances are channelled to the relevant departments. The target is to respond and</p>	Complied

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		<p>provide feedback on 100% of grievances within 7 days, directly engaging with the person raising the grievance.</p> <p>Mechanisms to receive grievances include:</p> <ul style="list-style-type: none"> - Requests, Complaints, Grievances, and Disputes Register Form for company employees. - Form of letter or verbal submission to register in the Requests, Complaints, Grievances, and Disputes Register Form for external stakeholders and contractors. - For illiterate parties, the procedure is explained in Tok Pisin to ensure understanding. <p>Records of reports and information requests from smallholders indicate that grievances have been resolved in a timely manner.</p>	
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>Up to ASA 3_1, Hargy Oil Palm Limited (HOPL) has conducted regular consultation and communication meetings with interested smallholders within the unit of certification, including women. These consultations and communications are performed during field days, where HOPL representatives visit villages or smallholder areas to assess their needs for support in improving their livelihoods and their interest in RSPO certification.</p> <p>Auditor team consulted with the Oil Palm Industry Corporation (OPIC) Project Manager. Currently, OPIC is working to improve the structure and function of the organization. OPIC collaborates with relevant ministries to maximize its functions, extending beyond smallholder organizations' outreach.</p> <p>Planned improvements include encouraging the government to increase intervention in smallholder issues, such as accelerating the issuance of new</p>	Complied

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		<p>land titles or changes in ownership; providing free subsidies for replanting costs, seeds, and fertilizer; regulating the FFB price mechanism to maximize smallholder profits; and increasing the capacity of OPIC and its staff to better empower smallholders.</p> <p>HOPL, through its Smallholders Affairs division, has conducted field days to maintain smallholders' knowledge of sustainable production and best agricultural practices. Sample records of training conducted in 2024 include:</p> <ul style="list-style-type: none"> - Smallholder Attendance Record, location in Mataururu 101008 (OPRA BMP Block), dated 11 June 2024: Theme: Mini Field Day – Management for Oil Palm Farmers, attended by 69 smallholders. Example: Mr. Peter June (block number: 101091), Babex Estate (Independent estate, No: 770010). - Smallholder Attendance Record, location in Tiauru (Block #01-0194), dated 24 June 2024: Theme: Mini Field Day – Herbicide Spraying, attended by 46 smallholders. Example: Mr. Issack Apiasare (block number: 01-209), Mr. David Walaki (block number: 01-202), Mr. Noel Tamata (block number: 01-225), Mr. Cliff Ren (block number: 01-205), Mrs. Essy Ludwick (block number: 01-192). - Smallholder Attendance Record, location in Barema 1-4, dated 13 May 2024: Theme: Mini Field Day – FFB Price Calculation, attended by 52 smallholders. Example: Mr. Charlie Vitikut (block number: 03-1271), Mr. Peter Walter (block number: 03-1309), Mr. Vincent Patiken (block number: 03-1300), Mr. Tom Lus (block number: 03-1320). - Smallholder Attendance Record, location in Baekakea Village, dated 2 July 2024: Theme: Mini Field Day – RSPO and FFB Formula Refresher, attended by 43 smallholders. Example: Mr. John Mou (block number: 09-0932), Mr. Ben Masori (block number: 09-0943), Mr. Joshua Sobi (block number: 09-0947). 	
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5.2.2	<p>The Company and Government Extension Service provide extension services to support the development and implementation of livelihood improvement programmes, including capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard).</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO is currently developing a separate standard for Independent Smallholders to be referred to as the "RSPO Independent Smallholder Standard". A National Interpretation for PNG&SI will be developed after the standard is ratified.</p> <p>- Minor compliance -</p>	<p>HOPL and OPIC provide extension services through the Smallholder Agricultural Advisory Services (SHAAS) to support the development and implementation of livelihood improvement programmes, including capacity building. Through SHAAS, Extension Officers provide smallholder growers with knowledge on best agricultural practices to enhance productivity, quality, organizational and managerial competencies, and specific elements of RSPO certification. SHAAS Extension Officers are responsible for overseeing the provision of all necessary documentation and conducting physical checks during the process. Sample training records from 2024 include:</p> <ul style="list-style-type: none"> - Smallholder Attendance Record, location in Mataururu 101008 (OPRA BMP Block), dated 11 June 2024: Theme: Mini Field Day – Management for Oil Palm Farmers, attended by 69 smallholders. Example: Mr. Peter June (block number: 101091), Babex Estate (Independent estate, No: 770010). - Smallholder Attendance Record, location in Tiauru (Block #01-0194), dated 24 June 2024: Theme: Mini Field Day – Herbicide Spraying, attended by 46 smallholders. Example: Mr. Issack Apiasare (block number: 01-209), Mr. David Walaki (block number: 01-202), Mr. Noel Tamata (block number: 01-225), Mr. Cliff Ren (block number: 01-205), Mrs. Essy Ludwick (block number: 01-192). - Smallholder Attendance Record, location in Barema 1-4, dated 13 May 2024: Theme: Mini Field Day – FFB Price Calculation, attended by 52 smallholders. Example: Mr. Charlie Vitikut (block number: 03-1271), Mr. Peter Walter (block number: 03-1309), Mr. Vincent Patiken (block number: 03-1300), Mr. Tom Lus (block number: 03-1320). - Smallholder Attendance Record, location in Baekakea Village, dated 2 July 2024: Theme: Mini Field Day – RSPO and FFB Formula Refresher, attended by 43 smallholders. Example: Mr. John Mou (block number: 09-0932), Mr. Ben Masori (block number: 09-0943), Mr. Joshua Sobi (block number: 09-0947). 	Complied
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5.2.3	<p>Where applicable, the Company and Government Extension Service provide extension services to Smallholders to enhance their understanding of the legal requirements for FFB production to maintain RSPO certification.</p> <p>- Minor compliance -</p>	<p>HOPL and OPIC assist smallholder in obtaining legal ownership of the land.</p> <p>Data verified during ASA 3_1, such as:</p> <ul style="list-style-type: none"> Independent Estate - Ivule Holding Limited: <ul style="list-style-type: none"> Certificate of Incorporation Ivule Holding Limited 1-88034, dated 19 April 2013. Land Application equipped with Agricultural Lease No. G793 – 30th December 2021 with Land Available for leasing are Portion 1234 (99.7 ha – Milinch of Banga Fourmil Talasea – West New Britain Province), Portion 794 (28.6 ha 99.7 ha – Milinch of Banga Fourmil Talasea – West New Britain Province) and Portion 1242 (44.3 ha 99.7 ha – Milinch of Banga Fourmil Talasea – West New Britain Province). Competed with survey of portions map 794, 1242 & 1243 (Cat.No. 15/1004). Inspection Report for Portions 1242, 1243 & 794, Miliinch of Banga, Fourmil of Talasea, West New Britain Province on 1 February 2019 by Provincial Alienated Lands Officer. <u>VOP - Detail information in term of smallholder land title (customary land):</u> <ul style="list-style-type: none"> Clan Land Usage Agreement No. 16-0113 for the Roboam Tomarum to use the land known as Komo and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 30 years. (signed on 16 April 2018 by Clan Leader). Clan Land Usage Agreement No. 1616-107 for the Alista B. to use the land known as Bolo and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 25 years. (signed on 15 April 2018 by Clan Leader). Clan Land Usage Agreement No. 1616-40 for the Dainah Tavuvu to use the land known as Kaokao and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 25 years. (signed on 15 April 2018 by Clan Leader). 	Complied
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		<ul style="list-style-type: none"> - Clan Land Usage Agreement No. 16-1670 for the Nancy Vilau to use the land known as Pua and which has been allocate the Village Oil Palm Block of the Kaimau for the period of 30 years. (signed on 16 April 2018 by Clan Leader). - Clan Land Usage Agreement No. 0808-13 for the Mesak Bubu to use the land known as Yuvule and which has been allocate the Village Oil Palm Block of the Sulu for the period of 25 years. (signed on 12 June 2017 by Clan Leader). - Clan Land Usage Agreement No. 440045 for the Kalole Maoko to use the land known as Madudua/Nantabu and which has been allocate the Village Oil Palm Block of the Nantabu for the period of 25 years. (signed on 11 July 2018 by Clan Leader). - Clan Land Usage Agreement No. 070711 for the Gerard Niu to use the land known as Madudua and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed on 31 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 070719 for the Kaveu Paulu to use the land known as North Ulamona and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed on 31 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 070727 for the Rebon Malila to use the land known as North Ulamona and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed on 31 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 070747 for the Michael Diaavaa to use the land known as North Madudua and which has been allocate the Village Oil Palm Block of the Noau for the period of 25 years. (signed on 18 November 2022 by Clan Leader). - Clan Land Usage Agreement for the Babex Oil Palm Estate (770010E) to use the land known as Morosirosi and which has been allocate the Village Oil Palm Block of the Mataururu for the period of 25 years. (signed on 29 May 2017 by Clan Leader). Certificate 	
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		<p>of Registration of Business Name Babex Estate 6-96012 on 11 February 2011.</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement No. 460009 for the Ume Mulu to use the land known as Solamuli and which has been allocate the Village Oil Palm Block of the Walo for the period of 25 years. (signed on 17 November 2016 by Clan Leader). - Clan Land Usage Agreement No. 460019 for the Timothy Lume to use the land known as Solamuli and which has been allocate the Village Oil Palm Block of the Walo for the period of 25 years. (signed on 28 November 2016 by Clan Leader). - Clan Land Usage Agreement No. 460031 for the Tanisou Povei to use the land known as Solamuli and which has been allocate the Village Oil Palm Block of the Walo for the period of 25 years. (signed on 14 November 2016 by Clan Leader). - Clan Land Usage Agreement No. 060602 for the Nobert Bokia to use the land known as Gigipuna and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 25 years. (signed on 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 060674 for the Felix Guldia to use the land known as Tangere and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 10 years. (signed on 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 060653 for the Raymond Vulele to use the land known as Rapolinkovu and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 20 years. (signed on 1 January 2018 by Clan Leader). - Clan Land Usage Agreement No. 060651 for the Carol Lome to use the land known as Tangere and which has been allocate the Village Oil Palm Block of the Gigipuna for the period of 16 years. (signed on 2 August 2016 by Clan Leader). - Clan Land Usage Agreement No. 060609 for the Benedict Mangau to use the land known as Gigipuna and which has been allocate the 	
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		<p>Village Oil Palm Block of the Gigipuna for the period of 25 years. (signed on 2 August 2016 by Clan Leader).</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement No. 090063 for the Wesley Tomare to use the land known as Lakiso and which has been allocate the Village Oil Palm Block of the Baikakea for the period of 20 years. (signed on 14 April 2015 by Clan Leader). - Clan Land Usage Agreement No. 141424 for the Tommy Batari to use the land known as Kumo and which has been allocate the Village Oil Palm Block of the Pakisi for the period of 25 years. (signed on 25 October 2022 by Clan Leader). - Clan Land Usage Agreement No. 141423 for the Rudolf Batari to use the land known as Kumo and which has been allocate the Village Oil Palm Block of the Pakisi for the period of 25 years. (signed on 1 April 2016 by Clan Leader). - Clan Land Usage Agreement No. 141401 for the Thomas Misa to use the land known as Kumo and which has been allocate the Village Oil Palm Block of the Pakisi for the period of 25 years. (signed on 1 April 2016 by Clan Leader). - Clan Land Usage Agreement No. 131336 for the Timothy Babo to use the land known as Mule Kautu and which has been allocate the Village Oil Palm Block of the Apupul for the period of 20 years. (signed on 14 June 2017 by Clan Leader). - Clan Land Usage Agreement No. 090944 for the John Vulolo to use the land known as Bala and which has been allocate the Village Oil Palm Block of the Baikakeka for the period of 10 years. (signed on 21 September 2016 by Clan Leader). - Clan Land Usage Agreement No. 090943 for the United Church to use the land known as Kekie and which has been allocate the Village Oil Palm Block of the Baikakeka for the period of 17 years. (signed on 18 September 2015 by Clan Leader). - Clan Land Usage Agreement No. 090932 for the John Mou to use the land known as Kavalo and which has been allocate the Village 	
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		<p>Oil Palm Block of the Baikakeka for the period of 18 years. (signed on 21 September 2016 by Clan Leader).</p> <ul style="list-style-type: none"> - Clan Land Usage Agreement No. 17122 for the Berry Lume to use the land known as Papaha and which has been allocate the Village Oil Palm Block of the Matililiu for the period of 21 years. (signed on 25 February 2017 by Clan Leader). <ul style="list-style-type: none"> • <u>LSS - Detail information in term of smallholder sample:</u> <ul style="list-style-type: none"> - Smallholder No 04-0682: Statuary of Declaration Lamase Sagagol of Portion 682, in Malasi LSS Subdivision, Bialla, WNPB (Declared at Bialla. 5 June 2023 by Independent State of Papua New Guinea). Completed with Survey Map of portion 671-692 (Act. No. 15/203) - Smallholder No. 04-1192: Land Application for Portion 1192 at Sale Malasi Subdivision. Milinch/Banga Fourmil/Talasea – West Britain Province in 27 February 2017. Inspection report for Portion 1192 on 27 February 2017 with land area 6 hectares; Valuation report on 15 August 2017. Completed with Survey Map of Portions 1190-1196 & 1199 (Cat. No. 15.674). - Smallholder No. 04-0782: Agricultural Lease under Section 56; portion 782, Milich Banga, Fourmil Talasea with area 15.76 ha; referred to in state lease volume 81 Folio 250 on 4 April 2012 by Deputy Registrar of Titles. - Smallholder No. 390022: Memorandum of Agreement between Gamupa Oil Palm Evelopment Ltd and Cornelli Lai on 26 July 2018; Agricultural Lease Title Described as Volume 25, Folio 184, Portion 5, Milinch of Ulawun, Fourmil of Talasea in West New Britain. Gamupa Oil Plam Developmnet Ltd conset to release 2 hectares of its oil palm esttae to Cornelli Lai. The Agreement expires on the 30 July 2028. - Smallholder No. 02-0708: Agricultural Lease under Section 56; portion 708, Milich Uluwan, Fourmil Talasea with area 6.56 ha for 	
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		<p>period of 99 years; referred to in state lease volume 36 Folio 8800 on 22 March 1985 by Delegate of the Minister for Lands.</p> <ul style="list-style-type: none"> - Smallholder No. 02-0697: Agricultural Lease under Section 56; portion 697, Milich Uluwan, Fourmil Talasea with area 7.42 ha for period of 99 years; referred to in state lease volume 91 Folio 116 on 14 November 1984 by by Deputy Registrar of Titles. - Smallholder No. 02-0781: Agricultural Lease under Section 56; portion 781, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 91 Folio 171 on 14 November 1984 by by Deputy Registrar of Titles. - Smallholder No 02-0746: Statuary of Declaration Peter Jimmy of Portion 746, in Wilelo LSS, Bialla, WNBP (Declared at Bialla. 18 August 2018 by Independent State of Papua New Guinea). Completed with Survey Map of portion 746-754 & 1109-1126 (Act. No. 15/383). - Smallholder No. 02-0748: Agricultural Lease under Section 56; portion 748, Milich Uluwan, Fourmil Talasea with area 6.51 ha for period of 99 years; referred to in state lease volume 89 Folio 228 on 18 September 1984 by by Deputy Registrar of Titles. - Smallholder No. 02-0718: Agricultural Lease under Section 56; portion 718, Milich Uluwan, Fourmil Talasea with area 6.56 ha for period of 99 years; referred to in state lease volume 79 Folio 61 on 17 October 1983 by by Deputy Registrar of Titles. - Smallholder No. 33-1971: Land Application for Portion 1971 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNBP on 1 August 2016 to Department of Lands & Physical Planning; Inspection Report on 17 August 2016 with land area 6.7 ha; Valuation report on 12 August 2016; Survey of Map Portions 1960-1975 (Cat. No. 15/628). - Smallholder No. 33-1987: State Lease under section 87 of the land Act 1996 for a period 99 years from 13 January 2005; containing 	
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		<p>an area of 8.7200 hectares (Portion 1987) on registered survey plan catalogued no. 15/630.</p> <ul style="list-style-type: none"> - Smallholder No. 33-1980: Land Application for Portion 1980 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNB on 2 August 2022 to Department of Lands & Physical Planning; Inspection Report on 22 August 2022 with land area 7 ha; Valuation report on 12 August 2016; Survey of Map Portions 1976-1991 (Cat. No. 15/630). - Smallholder No. 33-1981: Land Application for Portion 1981 Kabaiya Subdivision Milinch/Ulawun Fourmil/Talasea – WNB on 29 June 2012 to Department of Lands & Physical Planning; Inspection Report on 25 December 2011 with land area 11.25 ha; Valuation report on 5 December 2011; Survey of Map Portions 1976-1991 (Cat. No. 15/630). - Smallholder No. 33-2005: State Lease under section 49 of the land Act 1996 for a period 99 years from 25 March 1993; containing an area of 6.6 hectares (Portion 2005) on registered survey plan catalogued No. 15/628. - Smallholder No. 010-225: Agricultural Lease under section 56 of the land Act 1962 for a period 99 years from 17 November 1977, Milinch Nakanai, Fourmil Talasea; containing an area of 8.46 hectares (Portion 225) on registered survey plan catalogued no. 15/303. - Smallholder No 010-225: Statuary of Declaration Paul Gena of Portion 192, in Tiauru LSS Subdivision, Bialla, WNB (Declared at Bialla. 24 April 2020 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No. 010-243: Agricultural Lease under Section 56; portion 243, Milich Nakanai, Fourmil Talasea with area 8.62 ha for period of 99 years; referred to in state lease volume 67 Folio 51 on 31 August 1979 by Deputy Registrar of Titles. 	
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		<ul style="list-style-type: none"> - Smallholder No 010-205: Statuary of Declaration Kenny Wingomi of Portion 205, in Tiauru LSS Subdivision, Bialla, WNBP (Declared at Bialla. 5 May 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No 010-202: Statuary of Declaration Wasei Walaki of Portion 202, in Tiauru LSS Subdivision, Bialla, WNBP (Declared at Bialla 8 July 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 188,191-224 & 400 (Act. No. 15/304). - Smallholder No 010-259: Statuary of Declaration Jonah Tony of Portion 259, in Tiauru LSS Subdivision, Bialla, WNBP (Declared at Bialla 11 October 2021 by Independent State of Papua New Guinea). Completed with Survey Map of portion 253-270, 272-278, 295-300 & 303-306 (Act. No. 15/307). - Smallholder No. 05-0189: Agricultural Lease under Section 56; portion 189, Milich Banga, Fourmil Talasea with area 6.4 ha for period of 99 years; referred to in state lease volume 2 Folio 1 on 25 November 1966 by Administrator of The Territory of Papua and New Guinea. - Smallholder No 05-193: Statuary of Declaration Kovulovo Melamuli of Portion 193, in Uasilau LSS Subdivision, Bialla, WNBP (Declared at Bialla, 5 May 2022 by Independent State of Papua New Guinea). Completed with Survey Map of portion 187-193 (Act. No. 15/24). - Smallholder No. 32-1109: Land Application for Portion 1109 Subdivision Milinch/Banga Fourmil/Talasea – WNBP on 30 November 2023 to Department of Lands & Physical Planning; Inspection Report on 30 November 2023 with land area 6.64 ha. - Smallholder No. 32-1164: Land Application for Portion 1164 Subdivision Milinch/Banga Fourmil/Talasea – WNBP on 29 May 2015 to Department of Lands & Physical Planning; Inspection Report on 29 May 2015 with land area 7.23 ha. 	
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		<ul style="list-style-type: none"> - Smallholder No. 32-1164: Successful applicant for lease Notice under Section 75 & 76 of The Land Act No. 45 of 1996 for portion 1148 at Milinch Banga, Fourmil Talasea by Secretary for Lands and Physical Planning on 8 May 2017. Completed with Survey of Map Portions 1148-1158 & 1167 (Cat. No. 15/665). - Smallholder No. 32-1118: Document of meeting no. 1922 regarding to consideration of application for an agricultural lease by notice in the National Gazette of 11 November 1993 (Onike Tavisou, Portion 1118 with 6.63 ha). - Smallholder No. 32-1187: Land Application for Portion 1169 Subdivision Milinch/Banga Fourmil/Talasea – WNB on 29 March 2021 to Department of Lands & Physical Planning; Inspection Report on 29 March 2021 with land area 5.32 ha; Valuation report on 29 March 2021; Survey of Map Portions 1168 & 1169 (Cat. No. 15/677). - Smallholder No. 32-1114: Document of meeting no. 1922 regarding to consideration of application for an agricultural lease by notice in the National Gazette of 11 November 1993 (Krala Viobubu, Portion 1114 with 6.75 ha). - Smallholder No. 31-102: Agricultural Lease under Section 49; portion 1502, Milich Ulawun, Fourmil Talasea with area 6.77 ha for period of 99 years; referred to in state lease volume 4 Folio 30 on 25 July 1993 by Minister of Lands and Physical Planning. - Smallholder No 31-1523: Statuary of Declaration Aron Wafuka of Portion 1523, in Soi LSS Subdivision, Bialla, WNB (Declared at Bialla, 6 August 2024 by Independent State of Papua New Guinea). Completed with Survey Map of portion 1519-1529 (Act. No. 15/582). - Smallholder No. 03-1399: Agricultural Lease under Section 56; portion 1399, Milich Ulawun, Fourmil Talasea with area 6.59 ha for period of 99 years; referred to in state lease volume 87 Folio 216 on 22 March 1985 by Minister of Lands and Physical Planning. 	
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		<ul style="list-style-type: none"> - Smallholder No. 03-1359: Agricultural Lease under Section 56; portion 1359, Milich Ulawun, Fourmil Talasea with area 10.24 ha for period of 99 years; referred to in state lease volume 82 Folio 14 on 21 July 1984 by Minister of Lands and Physical Planning. - Smallholder No. 03-1371: Agricultural Lease under Section 56; portion 1371, Milich Ulawun, Fourmil Talasea with area 6.35 ha for period of 99 years; referred to in state lease volume 82 Folio 16 on 18 January 1984 by Minister of Lands and Physical Planning. - Smallholder No 03-1400: Statuary of Declaration Veronica Vulum of Portion 1400, in Barema LSS Subdivision, Talasea, WNBP (Declared at Bialla, 13 February 2015 by Independent State of Papua New Guinea). Completed with Survey Map of portion 1374-1400 (Act. No. 15/412). <p>All this process was assisted by HOPL and OPIC.</p>	
5.2.4	<p>(C) Evidence exists that pesticide handling training is available from the Company and/or Government Extension Service for Smallholders within the Unit of Certification. This may be verified by interview with the Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL provides pesticide handling training for smallholders.</p> <p>Sample record of training realization year 2024, such as:</p> <ul style="list-style-type: none"> • Smallholder Attendance Record, location in Mataururu 101008 (OPRA BMP Block), dated 11 June 2024, theme: Mini Field Day – Management for oil palm farmer, including handling of pesticides, that was attended by 69 smallholders. Example: Mr Peter June (block number: 101091), Babex Estate (Independent estate, No: 770010), • Smallholder Attendance Record, location in Tiauru (Block #01-0194), dated 24 June 2024, theme: Mini Field Day – herbicide spraying, that was attended by 46 smallholders. Example: Mr. Issack Apiasare (block number: 01-209), Mr. David Walaki (block number: 01-202), Mr. Noel Tamata (block number 01-225), Mr. Cliff Ren (block number: 01-205), Mrs. Essy Ludnik (block number: 01-192) • Smallholder Attendance Record, location in Barema 1-4, dated 13 May 2024, theme: Mini Field Day – FFB Price Calculation and handling of pesticides, that was attended by 52 smallholders. Example: Mr. Charlie 	Complied

		<p>Vitikut (block number: 03-1271), Mr Peter Walter (block number: 03-1309), Mr Vincent Patiken (block number 03-1300), Mr Tom Lus (block number 03-1320).</p> <ul style="list-style-type: none"> • Smallholder Attendance Record, location in Baekakea Village, dated 2 July 2024, theme: Mini Field Day – RSPO and FFB formula refresher, FFB Price Calculation and handling of pesticides, that was attended by 43 smallholders. Example: Mr. John Mou (block number: 09-0932), Mr. Ben Masori (block number: 09-0943), Mr. Joshua Sobi (block number 09-0947). <p>The auditor team has verified a sample of these certificates to confirm that the training has been successfully completed by the participating smallholders, e.g.:</p> <ul style="list-style-type: none"> • Smallholder on behalf of Noel Tamata (son of the owner Burnawae Tamata, portion 01-0225 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Uasilau LSS Subdivision of Bialla District, West New Britain Province, on 24 June 2024; valid for 3 years. • Smallholder on behalf of Paul Gana (owner of portion 01-0192 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 19 June 2023; valid for 3 years. • Smallholder on behalf of Jonah Tony (owner of portion 01-0259 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 24 July 2024; valid for 3 years. • Based on site verification at Chemical Shed of smallholder namely Noel Tamata and Jonah Tony. The chemical shed is used to keep all chemicals material, including spraying tools. An interview with the respective smallholder (certified sprayer), clearly that he understands how the correct handling, storage, application and disposal requirements. 	
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5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The progress of smallholder support is reviewed annually during the Local Program Committee (LPC) meetings, organized by Hargy Oil Palms Limited, OPIC, and PNG-OPRA.</p> <p>The last meeting was held on Field Day, for example:</p> <ul style="list-style-type: none"> • Location in Mataururu 101008 (OPRA BMP Block), dated 11 June 2024, theme: Mini Field Day, that was attended by 69 smallholders. • Location in Tiauru (Block #01-0194), dated 24 June 2024, theme: Mini Field Day, that was attended by 46 smallholders. • Location in Barema 1-4, dated 13 May 2024, theme: Mini Field Day, that was attended by 52 smallholders. • Location in Baekakea Village, dated 2 July 2024, theme: Mini Field Day, that was attended by 43 smallholders. 	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) has established a non-discrimination and equal opportunity policy under the Equal Employment Opportunity Policy (Doc. No. POL-HRD-GEN-008-06, Issue No. 6, dated 6 June 2022).</p> <p>The policy affirms HOPL's commitment to:</p> <ul style="list-style-type: none"> - Maintaining a non-discriminatory workplace in compliance with relevant anti-discrimination and equal employment laws and regulations in the countries where it operates. This policy encompasses, but is not limited to, discrimination based on ethnic or national origin, caste, gender, gender identity, sexual orientation, religion, disability, age, union membership, and political affiliations. Recruitment is based solely on merit, with qualifications and experience considered for open positions. - Ensuring that promotions and sanctions are handled based on the same principles of non-discrimination. Employment is contingent upon medical fitness, and all employees receive salaries in accordance with legal requirements. Promotions are determined by performance. 	Complied

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		<p>The policy has been disseminated through pamphlets posted on notice boards located in housing complexes, estate/plantation offices, and workplaces. Additionally, it is communicated through annual training sessions.</p> <p>Record verification during ASA 3_1 includes:</p> <ul style="list-style-type: none"> - In Hargy POM – A record of training attendance dated 19 February 2024. The topics covered included RSPO/HOPL Policy, OHS Policy, and the non-discrimination and equal opportunity policy, attended by 26 workers. - In Barema Plantation – A record of refresher training on the equal employment policy, grievance policy, and freedom of association policy dated 9 July 2024, held at the Muster Point in Barema Plantation, attended by 63 workers. - In Barema POM – Records of refresher training on the non-discrimination and equal opportunity policy: 19 July 2024, attended by 20 workers in Engineering and Maintenance; 23 July 2024, attended by 15 workers in Engineering – KCP; and 17 July 2024, attended by 6 workers in Engineering Upkeep. - In Navo POM – A record of training attendance dated 16 May 2024 on the non-discrimination and equal opportunity policy, attended by 25 workers. - In Kiba Plantation – A record of training attendance dated 2 July 2024 on the Human Rights Policy, attended by 13 workers from FFB loading, 12 workers from Upkeep, 8 workers from Compound Upkeep, 20 workers from harvesting, and 13 workers from Lost Fruit Collection. - In Kiba Plantation – A record of training attendance dated 4 July 2024 on the non-discrimination and equal opportunity policy, attended by 25 workers. - In Bakada Plantation – Various records of training attendance on company policies, including the non-discrimination and equal 	
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		<p>opportunity policy, policies on human rights, child protection, prevention of sexual and other forms of harassment and violence, and reproductive rights. These sessions were held on 18 February 2024, attended by 9 workers; 22 April 2024, attended by 25 workers; 10 June 2024, attended by 19 workers; 17 June 2024, attended by 12 workers; 5 July 2024, attended by 24 workers; and 29 July 2024, attended by 9 workers.</p> <p>Smallholders: Associated smallholders have adhered to the non-discrimination and equal opportunity policy issued by OPIC since 19 July 2017. According to an interview with an extension officer, this policy is also re-disseminated during field days, as evidenced in the Smallholder Attendance Records.</p> <p>Based on interviews conducted during ASA 3_1 samples of workers at Palm Oil Mills (Hargy POM, Barema POM, and Navo POM), Estates (Barema Plantation, Kiba Plantation, and Bakada Plantation), and smallholder samples, including Independent Estates (Babex Oil Palm Estate and Ivule Holding Limited), all demonstrated a good understanding of these policies and confirmed attendance at refresher training sessions in 2024.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 3_1, Hargy Oil Palm Limited (HOPL) demonstrated evidence of its commitment to inclusivity among workers, groups, including local communities, and women. Based on information collected during interviews with a sample of workers, there were no migrant workers employed in HOPL's operations. Additionally, no evidence of job assignment-related discrimination was found within the unit of certification. Therefore, there is no indication that discrimination is practiced within the operations of this certificate holder.</p> <p>HOPL has also provided updated demographic information of its employees, with the latest update completed in August 2024.</p>	Complied

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Citizen	Local WNP		Non-Local (other)	
	Male	Female	Male	Female
Expat	-	-	16	5
Autonomous Region of Bougainville	-	-	57	13
East New Britain	-	-	836	325
East Sepik	-	-	517	170
Eastern Highlands	-	-	314	89
Enga	-	-	35	7
Gulf	-	-	45	2
Hela	-	-	57	22
Jiwaka	-	-	65	14
Madang	-	-	164	27
Manus	-	-	21	8
Milne Bay	-	-	27	10
Morobe	-	-	525	103
National Capital District	-	-	23	7
New Ireland	-	-	26	15
Oro Province	-	-	20	8
Sandaun (West Sepik)	-	-	53	13
Simbu (Chimbu)	-	-	90	21
Southern Highlands	-	-	228	57
Western Fly	-	-	8	1
Western Highlands	-	-	33	7
West New Britain	686	196	3,160	924
Total Headcount	4,966			

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6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>During ASA 3_1, Hargy Oil Plantation (HOPL) has demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities.</p> <p>Implementation record of employment procedures verified during ASA 3_1, such as:</p> <p>Recruitment Process:</p> <ul style="list-style-type: none"> - Letter of Interest for Job Vacancy – Title: Plantation Account Officer, dated April 2024. The position is within the Field Department, reporting to the Estate Manager. - Employee Induction Checklist – Title: Plantation Account Officer, April 2024, for Ms. Helen Kitombi. - Staff Employment Form – Title: Plantation Account Officer, April 2024, for Ms. Helen Kitombi. - Employment Offer dated 21 May 2024 – Title: Plantation Account Officer, April 2024, for Ms. Helen Kitombi, Grade 9, Level 6. Date of appointment: Mutually agreed commencement date. Location: Goroka – EHP. The anticipated start date is 17 June 2024. <p>Promotion:</p> <p>Staff Order – General, dated 9 July 2024, for Mr. Charles Wai (Employee ID: 08405), Position: HEF TM in VWS Navo, promoted to Nightshift Supervisor. Current grade: 5-8 @K12.45; New grade: 10-1 @K16.45. The document was issued by the Heads of VWS and HR. The promotion includes a probation period of six months from the effective date.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing is conducted without any discrimination and is performed upon request by female workers. The testing typically takes place at the clinic located within each compound.</p> <p>During ASA 3_1, HOPL also provided the Antenatal Register Book for 2024, prepared by the Department of Health, to ensure that routine antimalarial treatments, iron tablets, and deworming medications are administered,</p>	Complied

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		along with physical examinations (covering current pregnancy and general health conditions).																																			
6.1.5	<p>(C) A Social Issues Committee (SOC) is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 3_1, Hargy Oil Palms Limited (HOPL) have appointed persons for Social Issue/Improvement Committee – updated in 2024, consisted of:</p> <table><tr><th>Department</th><th>Officer/Department Representative</th></tr><tr><td>HR Administration</td><td>Darren Stott – Gender Committee Ex-Officio</td></tr><tr><td>HR Welfare</td><td>Edward Philip – Welfare Officer</td></tr><tr><td>HR Health</td><td>Ethel Kumei - HSE</td></tr><tr><td>Internal Audit</td><td>Barry Bayang – Internal Auditor</td></tr><tr><td>Finance & IT</td><td>Derrick Gett – Senior System Administrator</td></tr><tr><td>ESD</td><td>Stephanie Silik – Sustainability Officer.</td></tr><tr><td>Engineering</td><td>Leila Lepakot – Lab/Shipping Superintendent</td></tr><tr><td>Construction</td><td>Abraham Boavagi – Construction</td></tr><tr><td>Security</td><td>Greg Kali – Security Superintendent</td></tr><tr><td>Plantation</td><td>Kenny Marks – Field Supervisor</td></tr><tr><td>GM Administration</td><td>Judith Kasimani – Executive Secretary</td></tr><tr><td>Vehicle Workshop</td><td>Frederick Kira – VWS Operational Manager</td></tr><tr><td>Community Engagement Manager</td><td>Margueritte Masing</td></tr><tr><td>Community Engagemnet Officer</td><td>Mayne Bira</td></tr><tr><td>Store Department</td><td>Evalini Jiribil</td></tr><tr><td>HR Training</td><td>Evelyn Maya</td></tr></table>	Department	Officer/Department Representative	HR Administration	Darren Stott – Gender Committee Ex-Officio	HR Welfare	Edward Philip – Welfare Officer	HR Health	Ethel Kumei - HSE	Internal Audit	Barry Bayang – Internal Auditor	Finance & IT	Derrick Gett – Senior System Administrator	ESD	Stephanie Silik – Sustainability Officer.	Engineering	Leila Lepakot – Lab/Shipping Superintendent	Construction	Abraham Boavagi – Construction	Security	Greg Kali – Security Superintendent	Plantation	Kenny Marks – Field Supervisor	GM Administration	Judith Kasimani – Executive Secretary	Vehicle Workshop	Frederick Kira – VWS Operational Manager	Community Engagement Manager	Margueritte Masing	Community Engagemnet Officer	Mayne Bira	Store Department	Evalini Jiribil	HR Training	Evelyn Maya	Complied
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6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>During ASA 3_1, the audit team reviewed the pay slips for both male and female workers and found that all employees are paid the minimum basic rate of K3.55 per hour. The rate may be adjusted higher depending on the</p>	Complied																																		

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		<p>job scope and position. There is no evidence of pay discrimination based on gender.</p> <p>Pay slips verified during ASA 3_1 include:</p> <ul style="list-style-type: none"> - Female employee, R*** H***** (ID: 02038 – Kiba Plantation), dated 2 June 2024. Total hours: 88 (rate K7.81), Gross K865.00, MIBANK loan deduction K171.85, Net salary K693.15. - Female employee, J***** (ID: 07732 – Navo Estate), dated 14 July 2024. Total hours: 88 (rate K3.55), Gross K312.40, MIBANK loan deduction K18.74, Net salary K293.65. - Female employee, B*** (ID: 13750 – Navo Estate), dated 5 May 2024. Total hours: 88 (rate K7.14), Gross K628.32, MIBANK loan deduction K107.70, Net salary K520.60. 	
Criterion 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) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in the English language and verbally explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has implemented an Employee Handbook, revised in January 2015, which clearly outlines the terms and conditions of employment. The handbook covers essential topics such as hours of work, overtime, annual leave, sick leave, housing, utilities (electricity and water), promotion procedures, loans and advances, probation periods, and maternity leave.</p> <p>According to an interview with the Worker Union, the Employee Handbook has been effectively disseminated to all workers. Interviews with a sample of workers confirmed that they are well-informed about applicable labour laws, union rights, and collective agreements, as well as the documentation related to pay and working conditions. Additionally, pay slips are provided in compliance with labour laws and collective agreements, ensuring transparency and adherence to established standards.</p>	Complied
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,</p>	<p>Based on the document review, the employment contract at HOPL comprehensively outlines the essential elements of employment. After the contract is signed, the company retains a copy in the HR Office, where it is</p>	Complied

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	<p>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, including work done by family members.</p> <p>Family members who work must be employed to ensure that they have access to those benefits. Notwithstanding that, young children may assist their parents on Smallholder blocks provided it does not interfere with their schooling, their physical and emotional development and they are under the direct supervision of their parents.</p> <p>- Critical (Major) compliance -</p>	<p>accessible to the employee upon request. This practice is particularly practical given the large number of employees, the absence of secure storage facilities within employee housing, the need for confidentiality, and the high turnover rate, especially among lower-grade positions. This approach mitigates the risks associated with these factors while ensuring that employees can access their contract details when needed.</p> <p>A sample of employee details and conditions reviewed includes:</p> <ul style="list-style-type: none"> - Employee: Mr. Benny Imaka Job Title: Harvester Date: 8 August 2024 Grade/Level: 1/1 Clauses Covered: Position, Grade/Level, Remuneration, Designation/Start Dates, Place of Recruitment, Working Hours, Working Schedule, Overtime, Annual Leave, Superannuation, Probationary Period, Maternity Leave, Housing, Medical Treatment, Termination of the Agreement. - Employee: Mr. Anton Bega Job Title: Harvester Date: 8 August 2024 Grade/Level: 1/1 Clauses Covered: Position, Grade/Level, Remuneration, Designation/Start Dates, Place of Recruitment, Working Hours, Working Schedule, Overtime, Annual Leave, Superannuation, Probationary Period, Maternity Leave, Housing, Medical Treatment, Termination of the Agreement. 	
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 legal compliance with employment regulations at HOPL has been thoroughly verified through a comprehensive review of payment slips, interviews with workers, the Worker Union, and relevant Governmental Agencies. This verification process confirmed that working hours, overtime,</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>and hourly rates are fully compliant with both legal regulations and the stipulations outlined in the Employee Handbook.</p> <p>Furthermore, the review of payment slips and interviews with a sample of workers revealed no issues related to payments. Workers consistently reported receiving their correct wages and overtime pay, with no discrepancies or concerns raised during the verification process. This reflects HOPL's adherence to fair labor practices and its commitment to maintaining transparent and lawful payment procedures.</p>																							
6.2.4	<p>(C) The Company 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. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. Smallholders may live in houses of traditional materials or other accommodation of their choosing.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) has ensured the provision of adequate housing, sanitation facilities, water supplies, medical services, educational resources, and welfare amenities for its employees and their families. These facilities are regularly maintained and monitored to meet the required standards, contributing to the overall well-being and quality of life within the plantation communities.</p> <p>The updated data during the ASA 3.1-year 2024 audit includes: Barema Plantation: The second quarter census summary for 2024 reflects the following:</p> <table><tr><th>Building</th><th>Total</th></tr><tr><td>General labor houses</td><td>208 units</td></tr><tr><td>Junior staff</td><td>16 units</td></tr><tr><td>Executive staff</td><td>4 units</td></tr><tr><td>Plantation office</td><td>1 unit</td></tr><tr><td>Car yard – small holders office/construction/security/genset/chemical</td><td>1 unit</td></tr><tr><td>Tower</td><td>1 unit</td></tr><tr><td>Clinic</td><td>1 unit</td></tr><tr><td>Canteen</td><td>1 unit</td></tr><tr><td>Fertilizer shad</td><td>1 unit</td></tr><tr><td>Guard house</td><td>1 unit</td></tr></table>	Building	Total	General labor houses	208 units	Junior staff	16 units	Executive staff	4 units	Plantation office	1 unit	Car yard – small holders office/construction/security/genset/chemical	1 unit	Tower	1 unit	Clinic	1 unit	Canteen	1 unit	Fertilizer shad	1 unit	Guard house	1 unit	Complied
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			Elementary classroom	2 units					
			Grandstand building	1 unit					
			During the ASA 3_1, Hargy Oil Palm Limited (HOPL) has provided comprehensive documentation demonstrating the implementation and monitoring of its Employee Housing Development Program for the year 2024. This program is designed to ensure that all employees are provided with safe, comfortable, and well-maintained housing facilities that meet the company's standards and regulatory requirements.						
			Type	Prog	Act		Comp	Progress	Remakes
			DLQ	66 units	68 units		2 units	66 units	
			JS	14 units	16 units		0	10 units	
			Ex	1 unit	9 units		5 units	3 units	5x Ex housing units carried forward from 2023
			Others	10 units	0		0	0	Security housing at BP deferred due to design and budget review
			Hargy Oil Palm Limited (HOPL) has also presented the Capital Expenditure (CAPEX) report for the year 2024, which outlines significant investments in employee housing. The report details the allocation of funds towards the construction of new housing units, upgrades to existing homes, replacement of houses that were damaged or destroyed by fire, and the painting of rusting roof sheets. The cost per housing unit is thoroughly						

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		<p>explained in the document, demonstrating HOPL's commitment to providing and maintaining high-quality living conditions for its employees.</p> <p>During field visits and interviews with workers' families, specifically housewives residing in the compound areas of Barema Plantation, Kiba Plantation, Bakada Plantation, Navo Mill, and Barema Mill, the audit team observed that housing facilities were indeed provided for every worker and their family. The facilities were found to be in good condition, meeting the basic needs of the occupants. Families expressed satisfaction with the living arrangements, highlighting the adequacy of space, safety, and amenities such as water supply, sanitation, and electricity.</p> <p>This CAPEX report and the positive feedback from workers' families during site visits underscore HOPL's ongoing efforts to enhance employee welfare through substantial investments in housing infrastructure.</p>	
6.2.5	<p>The unit of certification being the mill and Company operated plantations makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) provides canteens in each compound as part of its initiative to create business opportunities for the local community. These canteens are managed by the local community members under a rental agreement with the company, fostering economic empowerment within the area. In addition, HOPL has allocated gardening fields within each housing compound, allowing residents to cultivate crops for their own use.</p> <p>During ASA 3_1, field observations were conducted at several locations, including Barema Plantation Compound (on 7 August 2024), Barema POM (on 8 August 2024), Navo POM (on 12 August 2024), and Kiba Plantation (on 13 August 2024). These visits revealed that HOPL provides comprehensive amenities for its workers and their families, including well-maintained housing, sanitation facilities, water supply, and electricity (with solar power systems in Independent Estates). Additionally, gardening areas are available for planting staple foods, and clinics and sports courts are accessible to residents.</p>	Complied

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		<p>Whilst educational amenities are not directly provided within the compounds, workers' families utilize public or government schools located in the vicinity of the plantations. These efforts by HOPL demonstrate commitment to supporting the well-being and quality of life of its employees and the surrounding communities.</p>																																	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks¹. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage.</p> <p>Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards</p>	<p>During ASA 3_1, Hargy Oil Palms Limited (HOPL) established the annual prevailing wage calculation, which includes all in-kind benefits provided to workers. These in-kind benefits for local workers encompass housing, electricity and water, education, healthcare, transport, food, and sports and recreation facilities.</p> <p>The most recent prevailing wage calculation is documented in the "Hargy Oil Palms – Minimum Wage Exemption Calculation 2024," which includes detailed breakdowns of these benefits.</p> <table border="1"> <thead> <tr> <th>In kind benefits</th><th>Per hours (PGK)</th><th>Per F/N (PGK)</th><th>Per Anum (PGK)</th></tr> </thead> <tbody> <tr> <td>Housing</td><td>1.13</td><td>99.48</td><td>2586.49</td></tr> <tr> <td>Electricity & water</td><td>0.35</td><td>30.92</td><td>804.03</td></tr> <tr> <td>Health Care and Welfare</td><td>1.54</td><td>135.66</td><td>3527.17</td></tr> <tr> <td>Total cost in-kind benefits per employee</td><td>3.02</td><td>266.07</td><td>6917.69</td></tr> <tr> <td>Average take home salary per employee</td><td>3.55</td><td>312.07</td><td>8113.87</td></tr> <tr> <td>Total salary + in kind benefits</td><td>6.57</td><td>578.14</td><td>15031.56</td></tr> <tr> <td>National Minimum Wage</td><td>3.50</td><td>308.00</td><td>8008.00</td></tr> </tbody> </table> <p>Hargy Oil Palms Limited (HOPL) has also presented the "Letter on Annual Pay Increase 2024," effective from 8 April 2024, signed by the General Manager. The letter indicates that there is a wage increase for all grades in</p>	In kind benefits	Per hours (PGK)	Per F/N (PGK)	Per Anum (PGK)	Housing	1.13	99.48	2586.49	Electricity & water	0.35	30.92	804.03	Health Care and Welfare	1.54	135.66	3527.17	Total cost in-kind benefits per employee	3.02	266.07	6917.69	Average take home salary per employee	3.55	312.07	8113.87	Total salary + in kind benefits	6.57	578.14	15031.56	National Minimum Wage	3.50	308.00	8008.00	Complied
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	<p>the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>	<p>2024. The new minimum wage will be K3.55 per hour, reflecting a 4% increase from 2023. The increased wages will be included in employee salaries as of 26 April 2024.</p>	
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>During ASA 3_1, the auditor team interviewed HR Department and Smallholder Department, obtained information that permanent, full-time employment is used for all core work. Specifically:</p> <ul style="list-style-type: none"> - Estates/Plantations: All core work, such as harvesting and main station operations, is conducted by full-time workers. Temporary workers are employed only for tasks that are temporary or seasonal in nature. There are no casual workers employed in the Mills or Estates. - Smallholders: Most smallholders cultivate their blocks with the help of their families. For those who employ harvesters, it is considered a temporary job since harvesting typically occurs only twice a month. Additionally, some of the harvesting can also be done by the smallholders themselves or by their family members. 	Complied
<p>Criterion 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>			

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6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 3_1, Hargy Oil Palm Limited (HOPL) demonstrated its commitment to freedom of association and the right to collective bargaining through its published statement in the Freedom of Association Policy No. POL-HRD-GEN-009-04, issued on 7 June 2021, Issue No. 4. This policy is available in both English and Tok Pisin, recognizing employees' rights to freely associate and engage in collective bargaining.</p> <p>The policy has been disseminated through pamphlets displayed on notice boards located in housing complexes, estate/plantation offices, and workplaces. Additionally, it is covered in annual training sessions. Record verification during ASA 3_1 includes:</p> <ul style="list-style-type: none"> - Hargy POM: Training attendance record dated 19 February 2024, covering RSPO/HOPL Company policies, attended by 26 workers. - Barema Plantation: Refresher awareness training on sexual harassment policy, reproductive rights, and breastfeeding held on 13 May 2024, attended by 62 workers. - Barema POM: Records of refresher training on company policies (including child labour, equal opportunity, freedom of association, and grievance policy): <ul style="list-style-type: none"> o 12 July 2024: 31 workers in Engineering – Maintenance o 10 July 2024: 21 workers in Engineering – Processing Shift A o 8 July 2024: 6 workers in Engineering – Upkeep o 10 July 2024: 13 workers in Engineering – QC Laboratory - Kiba Plantation: Training attendance record dated 15 May 2024, covering company policies, attended by 49 workers. - Bakada Plantation: Records of training on various company policies, including respect for human rights, non-discrimination, equal opportunity, child protection, minimum age, "No child labour" policy, harassment prevention, and reproductive protection: <ul style="list-style-type: none"> o 18 February 2024: 9 workers o 22 April 2024: 25 workers o 10 June 2024: 19 workers 	Complied
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		<ul style="list-style-type: none"> ○ 17 June 2024: 12 workers ○ 5 July 2024: 24 workers ○ 29 July 2024: 9 workers <p>Based on interviews with workers at the mills, estates/plantations, and smallholders, it is concluded that the company has consistently disseminated its policies on freedom of association and the right to collective bargaining.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>Hargy Oil Palm Limited (HOPL) has conducted a meeting between the company and the workers' union representatives. The most recent meeting took place on 19 July 2024 at the Hargy Oil Palm Office. The agenda included discussing the progress of the workers' union general secretary. It appears that the union executive has not been communicating effectively with the HOPL workers' union representatives and has been attempting to contact the workers' union executive in Kimbe without receiving any feedback. The issues related to progress will be addressed in subsequent meetings.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on an interview with the workers' union representative, Mr. John Jeffrey (chairman of the Workers' Union), conducted on 5 August 2024, it was confirmed that Hargy Oil Palm Limited (HOPL) does not interfere with the formation or operation of registered unions, labour organizations, associations, or other freely elected representatives for all workers.</p> <p>Union members are aware that a deduction of PGK 2.00 per fortnight is made for union membership, and they have agreed to this arrangement. The union chairman, visits the workplace to collect information from members and ensures that they understand the function of the workers' union at the company. As of 2024, HOPL employees who are union members report a high level of satisfaction with the company.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			

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6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) has established and documented a comprehensive policy for the protection of children, including a prohibition on child labor, as outlined in the Policy on Child Labor (Doc. No. POL-HRD-GEN-007-06, Issue No. 6, dated 7 June 2021). Additionally, HOPL has developed a Human Resource Operations Manual (Doc. No. MAN-HRD-GEN-001-01, Issue No. 1, dated 10 January 2021), which includes an age verification process as part of recruitment. This process aligns with the company's Child Labor Policy. For example, based on staff employment forms, age verification methods include birth certificates, clinic books, national identity cards, or other means such as professional curriculum vitae or best facial judgment.</p> <p>Contract documents clearly state that contractors must adhere to legal employment requirements, including the prohibition of child labor. Interviews with contractors confirmed that they understand and comply with the company's policy against employing children.</p> <p>The Child Labor Policy is communicated through Hargy's website and notice boards at operational sites. Additionally, the policy is reinforced through regular refresher training sessions.</p> <p>Record verification during ASA 3_1 included the following:</p> <ul style="list-style-type: none"> - Hargy POM: Training on company policies, including the protection of children, was held on 20 April 2024 with 11 workers attending, and again on 24 April 2024 with 9 workers attending. The facilitator was Mr. Wayne Sareo. - Barema Plantation: A refresher training session on the protection of children was held on 9 July 2024 at the Muster Point in Barema Plantation, attended by 63 workers. - Barema POM: Several refresher training sessions on the protection of children were conducted: 	Complied
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		<ul style="list-style-type: none"> ○ 1 May 2024 for Engineering – Process Shift B, attended by 16 workers. ○ 30 April 2024 for Engineering – Process Shift A, attended by 14 workers. ○ 6 March 2024 for Maintenance Attendants, attended by 24 workers. - Navo POM: A training session on the protection of children was held on 16 July 2024 for Engineering Shift A, attended by 50 workers. - Kiba Plantation: <ul style="list-style-type: none"> ○ 2 July 2024: Training on the Human Rights Policy attended by 13 FFB loaders, 12 upkeep workers, 8 compound upkeep workers, 20 harvesters, and 13 loose fruit collectors. ○ 4 July 2024: Training on the protection of children attended by 25 workers. - Bakada Plantation: Various training sessions on company policies, including human rights, non-discrimination, equal opportunity, and child protection, were held on: <ul style="list-style-type: none"> ○ 18 February 2024, attended by 9 workers. ○ 22 April 2024, attended by 25 workers. ○ 10 June 2024, attended by 19 workers. ○ 17 June 2024, attended by 12 workers. ○ 5 July 2024, attended by 24 workers. ○ 29 July 2024, attended by 9 workers. <p>During ASA 3_1, the auditor team reviewed the Employee Master Listing updated in August 2024. The data showed the youngest workers across various locations:</p> <ul style="list-style-type: none"> - Barema Plantation: Mr. Ally Membuta (Wheeler), born on 22 March 2004, 20 years old. - Navo POM: Mr. Charlse Taumosi (Attendant in Sterilizer Station), born on 1 June 2002, 21 years old, first employed on 23 January 2023. 	
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		<ul style="list-style-type: none"> - Kiba Plantation: Mr. Bega Patrick (ID: 83248, Harvester), born on 28 August 2002, 22 years old. - Bakada Plantation: Mr. Hevendah Logi (ID: 65186, Loose Fruit Collector), born on 10 November 2005, 19 years old. <p>Smallholders: Associated smallholders have followed the Policy for the Protection of Children, including Prohibition of Child Labor and Remediation, issued by OPIC since 19 July 2017. According to an interview with an extension officer and the smallholder, this policy is also re-disseminated during field days.</p> <p>Sample records of training sessions conducted in 2024 include:</p> <ul style="list-style-type: none"> - Mataururu (Block 101008 - OPRA BMP Block): Mini Field Day on 11 June 2024, covering oil palm management and child protection, attended by 69 smallholders. - Tiauru (Block #01-0194): Mini Field Day on 24 June 2024, focusing on herbicide spraying and child protection, attended by 46 smallholders. - Barema 1_4: Mini Field Day on 13 May 2024, focusing on FFB Price Calculation and child protection, attended by 52 smallholders. - Baekakea Village: Mini Field Day on 2 July 2024, covering RSPO and FFB formula refresher and child protection, attended by 43 smallholders. 	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure which must be carried out by clinic or supervisory staff to be applied where other documentary evidence of date of birth is not available.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) ensures strict adherence to the minimum age requirement for employment in accordance with government regulations. The HR Department provided a comprehensive list of workers in Mills and Estates/Plantations, detailing their dates of birth and dates of joining the company. This documentation confirms that all employees were at least 18 years old at the time of their hiring.</p> <p>For individuals whose dates of birth could not be verified through official documents, the officer in charge employs their best judgment to assess age. If there is any doubt regarding a worker's age during the verification</p>	Complied

		<p>process, employment is refused. Additionally, contractors, smallholders, and other parties performing work for the company are informed of this age verification policy. A review of service agreements and contracts with contractors confirmed that all employees must be 18 years of age or older. Field observations during the audit revealed no instances of child labor.</p> <p>During ASA 3_1, the auditor team reviewed the Employee Master Listing updated in August 2024, which confirmed that all workers are over 18 years old. During field observation and interview with workers, confirmed that there is no worker below 18 years old. This thorough verification process underscores HOPL's commitment to maintaining a compliant and responsible workforce.</p>	
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. Normally the minimum age for employment by the Company is 18 year however in certain circumstances such as school work experience, persons as young as 16 years may be employed. These persons are classified as Young Persons.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews with a sample of workers at the Mills and Estates, Hargy Oil Palms Limited (HOPL) strictly follows its policy prohibiting the employment of individuals under 18 years old. This policy and related employment requirements are communicated through notification boards and reinforced by supervisors through regular awareness sessions at each site. Field observations confirmed that no instances of child labor were found.</p> <p>During ASA 3_1, the auditor team reviewed the Employee Master Listing updated in August 2024, which confirmed that all workers are over 18 years old. During field observation and interview with workers, confirmed that there is no worker below 18 years old. This thorough verification process underscores HOPL's commitment to maintaining a compliant and responsible workforce.</p>	Complied
6.4.4	<p>The Company demonstrates communication about its "no child labour" policy and the negative effects of child labour through notices at workers' housing compounds and Smallholder field days. It promotes child protection to supervisors and other key</p>	<p>The dissemination of the "No Child Labour" policy has been carried out through pamphlets posted on notification boards located in housing complexes, Estate/Plantation offices, and workplaces. Additionally, the policy has been communicated through annual training sessions. Interviews with workers in the Mills and Estates/Plantations, as well as with</p>	Complied

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	<p>staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>smallholders, confirm that the company regularly disseminates the policy on freedom of association and the right to collective bargaining.</p> <p>The policy is also communicated through Hargy's website and notice boards at their operating sites, with further reinforcement provided through refresher training sessions.</p> <p>Record verification during ASA 3_1 included the following:</p> <ul style="list-style-type: none"> - Hargy POM: Training on company policies, including the protection of children, was held on 20 April 2024 with 11 workers attending, and again on 24 April 2024 with 9 workers attending. The facilitator was Mr. Wayne Sareo. - Barema Plantation: A refresher training session on the protection of children was held on 9 July 2024 at the Muster Point in Barema Plantation, attended by 63 workers. - Barema POM: Several refresher training sessions on the protection of children were conducted: <ul style="list-style-type: none"> o 1 May 2024 for Engineering – Process Shift B, attended by 16 workers. o 30 April 2024 for Engineering – Process Shift A, attended by 14 workers. o 6 March 2024 for Maintenance Attendants, attended by 24 workers. - Navo POM: A training session on the protection of children was held on 16 July 2024 for Engineering Shift A, attended by 50 workers. - Kiba Plantation: <ul style="list-style-type: none"> o 2 July 2024: Training on the Human Rights Policy attended by 13 FFB loaders, 12 upkeep workers, 8 compound upkeep workers, 20 harvesters, and 13 loose fruit collectors. o 4 July 2024: Training on the protection of children attended by 25 workers. 	
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		<ul style="list-style-type: none"> - Bakada Plantation: Various training sessions on company policies, including human rights, non-discrimination, equal opportunity, and child protection, were held on: <ul style="list-style-type: none"> o 18 February 2024, attended by 9 workers. o 22 April 2024, attended by 25 workers. o 10 June 2024, attended by 19 workers. o 17 June 2024, attended by 12 workers. o 5 July 2024, attended by 24 workers. o 29 July 2024, attended by 9 workers. <p><u>Smallholders:</u> Associated smallholders have followed the Policy for the Protection of Children, including Prohibition of Child Labor and Remediation, issued by OPIC since 19 July 2017. According to an interview with an extension officer and the smallholder, this policy is also re-disseminated during field days.</p> <p>Sample records of training sessions conducted in 2024 include:</p> <ul style="list-style-type: none"> - Mataururu (Block 101008 - OPRA BMP Block): Mini Field Day on 11 June 2024, covering oil palm management and child protection, attended by 69 smallholders. - Tiauru (Block #01-0194): Mini Field Day on 24 June 2024, focusing on herbicide spraying and child protection, attended by 46 smallholders. - Barema 1_4: Mini Field Day on 13 May 2024, focusing on FFB Price Calculation and child protection, attended by 52 smallholders. - Baekakea Village: Mini Field Day on 2 July 2024, covering RSPO and FFB formula refresher and child protection, attended by 43 smallholders. <p>Based on interviews with smallholders, they are aware of the "No Child Labour" policy. Field observations confirm that no children are working or present in the smallholder areas.</p>	
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Criterion 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 forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements:</p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>The Sexual Harassment Policy (Doc. No. POL-HRD-GEN-011-08, Issue No. 8, dated 6 June 2022) outlines the company's commitment to maintaining a harmonious and productive work environment for all employees. The policy defines sexual harassment as including physical contact, verbal comments, jokes, propositions, display of offensive material, or other inappropriate behaviors. It recognizes that the workplace must be free from sexual harassment, applying equally to all genders.</p> <p>The policy has been disseminated through pamphlets posted on notice boards located in housing complexes, Estate/Plantation Offices, and workplaces. Additionally, the policy is communicated through annual training sessions and other dissemination efforts.</p> <p>Record verification during ASA 3_1 includes the following:</p> <ul style="list-style-type: none"> - Hargy POM: Training attendance records dated 19 February 2024 show that 26 workers participated in training on the RSPO/HOPL Policy, specifically the Sexual Harassment Policy. - Hargy POM: Records of training sessions on the company's policies, including the policy to respect human rights and prevent sexual harassment, were held on 20 April 2024, attended by 11 workers, and on 24 April 2024, attended by 9 workers. The training was facilitated by Mr. Wayne Sareo. - Barema Plantation: A record of a refresher training on the Sexual Harassment Policy, held on 9 July 2024 at the Muster Point in Barema Plantation, shows that 63 workers attended. - Barema Plantation: A refresher awareness training covering the Sexual Harassment Policy, reproductive rights, and breastfeeding was conducted on 13 May 2024, with 62 workers in attendance. 	Complied

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		<ul style="list-style-type: none"> - Barema POM: Records of refresher training on the OHS policy, the Protection of Reproductive Rights Policy, and the Family Violence Policy show the following attendance: <ul style="list-style-type: none"> o 19 July 2024: 20 workers from Engineering and Maintenance. o 23 July 2024: 15 workers from Engineering – KCP. o 17 July 2024: 6 workers from Engineering Upkeep. - Navo POM: Training attendance records dated 16 May 2024 indicate that 25 workers attended a refresher session on the Sexual Harassment Policy. - Kiba Plantation: On 2 July 2024, training on the Sexual Harassment Policy was attended by 66 workers, including 13 FFB loaders, 12 Upkeep workers, 8 Compound Upkeep workers, 20 harvesters, and 13 Lost Fruit Collectors. - Bakada Plantation: Training attendance records for sessions covering various company policies—including respect for human rights, non-discrimination, equal opportunity, protection of children, minimum age requirements, "No Child Labour," and prevention of sexual harassment and violence—show the following attendance: <ul style="list-style-type: none"> o 18 February 2024: 9 workers. o 22 April 2024: 25 workers. o 10 June 2024: 19 workers. o 17 June 2024: 12 workers. o 5 July 2024: 24 workers. o 29 July 2024: 9 workers. <p>Based on interview with workers, they are aware about company's policy to prevent sexual and all other forms of harassment and violence.</p> <p><u>Smallholder:</u> Sample Training Records for 2024:</p>	
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		<ul style="list-style-type: none"> - Smallholder Attendance Record, Mataururu 101008 (OPRA BMP Block), 11 June 2024: Theme: Mini Field Day – Management for Oil Palm Farmers & Sexual Harassment Policy. Attendance: 69 smallholders. - Smallholder Attendance Record, Tiauru (Block #01-0194), 24 June 2024: Theme: Mini Field Day – Herbicide Spraying & Sexual Harassment Policy. Attendance: 46 smallholders. - Smallholder Attendance Record, Barema 1-4, on 13 May 2024: Theme: Mini Field Day – FFB Price Calculation & Sexual Harassment Policy. Attendance: 52 smallholders. - Smallholder Attendance Record, Baekakea Village, 2 July 2024: Theme: Mini Field Day – RSPO and FFB Formula Refresher & Sexual Harassment Policy. Attendance: 43 smallholders. <p>Based on interview with smallholders, that can verbally explained the policy to prevent sexual and all other forms of harassment and violence.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements:</p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>The policy to protect reproductive rights, particularly for women, has been disseminated through pamphlets posted on notice boards in housing complexes, estate/plantation offices, and workplaces. Additionally, this policy has been communicated through annual training sessions.</p> <p>Record verification during ASA 3_1 includes the following:</p> <ul style="list-style-type: none"> - Hargy POM: Training attendance records dated 19 February 2024 show that 26 workers participated in training on the RSPO/HOPL Policy, including policy to protect the reproductive rights. - Hargy POM: Records of training sessions on the company's policies, including policy to protect the reproductive rights, were held on 20 April 2024, attended by 11 workers, and on 24 April 2024, attended by 9 workers. The training was facilitated by Mr. Wayne Sareo. - Barema Plantation: A record of a refresher training on the Sexual Harassment Policy including policy to protect the reproductive rights, held on 9 July 2024 at the Muster Point in Barema Plantation, shows that 63 workers attended. 	Complied

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		<ul style="list-style-type: none"> - Barema Plantation: A refresher awareness training covering the Sexual Harassment Policy, reproductive rights, and breastfeeding was conducted on 13 May 2024, with 62 workers in attendance. - Barema POM: Records of refresher training on the OHS policy, the Protection of Reproductive Rights Policy, and the Family Violence Policy show the following attendance: <ul style="list-style-type: none"> o 19 July 2024: 20 workers from Engineering and Maintenance. o 23 July 2024: 15 workers from Engineering – KCP. o 17 July 2024: 6 workers from Engineering Upkeep. - Navo POM: Training attendance records dated 16 May 2024 indicate that 25 workers attended a refresher session on the Sexual Harassment Policy including policy to protect the reproductive rights. - Kiba Plantation: On 2 July 2024, training on the Sexual Harassment including policy to protect the reproductive rights was attended by 66 workers, including 13 FFB loaders, 12 Upkeep workers, 8 Compound Upkeep workers, 20 harvesters, and 13 Lost Fruit Collectors. - Bakada Plantation: Training attendance records for sessions covering various company policies—including policy to protect the reproductive rights, respect for human rights, non-discrimination, equal opportunity, protection of children, minimum age requirements, "No Child Labour," and prevention of sexual harassment and violence—show the following attendance: <ul style="list-style-type: none"> o 18 February 2024: 9 workers. o 22 April 2024: 25 workers. o 10 June 2024: 19 workers. o 17 June 2024: 12 workers. o 5 July 2024: 24 workers. o 29 July 2024: 9 workers. <p>Based on interview with workers, they are aware about company's policy to protect the reproductive rights.</p>	
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		<p><u>Smallholder:</u> Sample Training Records for 2024:</p> <ul style="list-style-type: none"> - Smallholder Attendance Record, Mataururu 101008 (OPRA BMP Block), 11 June 2024: Theme: Mini Field Day – Management for Oil Palm Farmers, Sexual Harassment Policy, including policy to protect the reproductive rights. Attendance: 69 smallholders. - Smallholder Attendance Record, Tiauru (Block #01-0194), 24 June 2024: Theme: Mini Field Day – Herbicide Spraying & Sexual Harassment Policy including policy to protect the reproductive rights. Attendance: 46 smallholders. - Smallholder Attendance Record, Barema 1-4, on 13 May 2024: Theme: Mini Field Day – FFB Price Calculation, Sexual Harassment Policy including policy to protect the reproductive rights. Attendance: 52 smallholders. - Smallholder Attendance Record, Baekakea Village, 2 July 2024: Theme: Mini Field Day – RSPO and FFB Formula Refresher, Sexual Harassment Policy including policy to protect the reproductive rights. Attendance: 43 smallholders. <p>Based on interview with smallholders, that can verbally explained the policy to protect reproductive rights of women called "<i>noken paitim meri</i>".</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies.</p> <p>- Minor compliance -</p>	<p>Hargy Oil Palm Limited (HOPL) has established a specific policy regarding workplace breastfeeding, outlined in the Workplace Breastfeeding Policy (POL-HRD-GEN-012-02, dated 6 June 2022). This policy supports new mothers' right to breastfeed during work hours, permitting them to do so twice a day, at 10 a.m. and 2 p.m.</p> <p>During ASA 3.1 for the year 2024, the auditor team interviewed a sample of female workers at Barema Plantation Compound, Navo Mill Compound, and Bakada Plantation Compound. The workers confirmed that the management assesses the needs of new mothers, allowing them to breastfeed three times a day, with the scheduled times being 10 a.m. and</p>	Complied

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		2 p.m. Additionally, information from the company clinic nurse indicated that new mothers receive comprehensive care, including pre- and post-natal treatment, immunization, and monthly baby care.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Awareness of the Grievance Policy has been disseminated to all levels of the workforce. The policy has been communicated through pamphlets posted on notice boards in housing complexes, Estate/Plantation Offices, and workplaces. Additionally, it has been covered in annual training sessions.</p> <p>Record verification during ASA 3_1, such as:</p> <ul style="list-style-type: none"> - Hargy POM: Training attendance records dated 19 February 2024 show that 26 workers participated in training on the RSPO/HOPL Policy, including grievance mechanism, which respects anonymity and protects complainants. - Hargy POM: Records of training sessions on the company's policies, including grievance mechanism, which respects anonymity and protects complainants, were held on 20 April 2024, attended by 11 workers, and on 24 April 2024, attended by 9 workers. The training was facilitated by Mr. Wayne Sareo. - Barema Plantation: A record of a refresher training on the company's policies, including grievance mechanism, which respects anonymity and protects complainants, held on 9 July 2024 at the Muster Point in Barema Plantation, shows that 63 workers attended. - Barema Plantation: A refresher awareness training covering the company's policies, including grievance mechanism, which respects anonymity and protects complainants was conducted on 13 May 2024, with 62 workers in attendance. - Barema POM: Records of refresher training on the company's policies, including grievance mechanism, which respects anonymity and protects complainants show the following attendance: <ul style="list-style-type: none"> o 19 July 2024: 20 workers from Engineering and Maintenance. o 23 July 2024: 15 workers from Engineering – KCP. 	Complied

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		<ul style="list-style-type: none"> ○ 17 July 2024: 6 workers from Engineering Upkeep. - Navo POM: Training attendance records dated 16 May 2024 indicate that 25 workers attended a refresher session on the company's policies, including grievance mechanism, which respects anonymity and protects complainants. - Kiba Plantation: On 2 July 2024, training on the company's policies, including grievance mechanism, which respects anonymity and protects complainants was attended by 66 workers, including 13 FFB loaders, 12 Upkeep workers, 8 Compound Upkeep workers, 20 harvesters, and 13 Lost Fruit Collectors. - Bakada Plantation: Training attendance records for sessions covering various company policies, including grievance mechanism, which respects anonymity and protects complainants show the following attendance: <ul style="list-style-type: none"> ○ 18 February 2024: 9 workers. ○ 22 April 2024: 25 workers. ○ 10 June 2024: 19 workers. ○ 17 June 2024: 12 workers. ○ 5 July 2024: 24 workers. ○ 29 July 2024: 9 workers. <p>The grievance mechanism is open to all local communities, workers, and contractor personnel. All grievances received will be forwarded to and managed by the General Manager's Secretary and the Human Resource Manager. The grievances will be distributed to the relevant departments for resolution. To ensure anonymity and confidentiality, complainants can choose to send emails to grievances@hargy.com.png. This email address is directed to HR Manager Mr. Darren Scott and the General Manager's Secretary Ms. Nishal. All policies and procedures follow the grievance mechanism established by the certification unit.</p>	
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		Based on interview with workers, they are aware about grievance mechanism, which respects anonymity and protects complainants.	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and following are prohibited:</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 <p>Note: where a Company has advanced money to an employee as a loan, this is to be regarded as a debt to the Company by the employee and a documented arrangement for repayment is to be established that is acceptable to both parties.</p> <p>Smallholder requirements:</p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the review of the Employee Handbook, the company's anti-forced or trafficked labor policies, and interviews with workers and stakeholders (including the PNG Department of Labor and Industrial Relations), it can be concluded that the company upholds its anti-forced or trafficked labor policies. All work is voluntary and governed by employment contracts, which are signed by both parties, with workers retaining a copy.</p> <p>There are no incidents documented in the company's procedures or contracts that imply retention of identity documents, recruitment fees, contract substitution, involuntary overtime, penalties for termination, or debt bondage.</p> <p>The audit confirmed that Hargy Oil Palm Limited (HOPL) provides awareness training on policies against forced or trafficked labor, child labor, and equal employment opportunities.</p> <p>During ASA 3.1 for the year 2024, the audit team interviewed sampled workers at Kiba Plantation, Barema Plantation, Bakada Plantation, Hargy POM, Barema POM, and Navo POM. The team received information indicating that no recruitment fees are charged, no debt bondage is practiced, no payments are withheld (as demonstrated by payslips), no contract substitution occurs, no prohibitions on resignation are enforced, and no retention of identity documents takes place.</p> <p>Smallholders: Associated smallholders have been provided with the Policy Against Forced or Trafficked Labour, Child Labour Policy, and Equal Employment Opportunity Policy issued by OPIC since 19 July 2017.</p>	Complied

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		Based on interviews with smallholders, these policies are also re-disseminated during field days. The smallholders can verbally explain the anti-forced or trafficked labor policy. They understand that practices such as deducting payments, withholding payments, debt bondage, or prohibiting workers from resigning or moving to other jobs are unacceptable and are not practiced. Additionally, interviews with workers in independent estates revealed that no recruitment fees are charged, no debt bondage occurs, no payments are withheld (as demonstrated by payslips), no contract substitutions are made, and there are no prohibitions on resigning imposed by estate owners.	
6.6.2	(C) Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as “casual” workers. A specific labour policy and procedures for casual workers are established and implemented. - Critical (Major) compliance -	<p>Hargy Oil Palms Limited has developed an Employee Handbook, revised in January 2015, which outlines the company’s commitment to maintaining a non-discriminatory workplace. The handbook also covers employee housing provisions, training opportunities, and adherence to the directives of the PNG Employment Act 1978. According to the Act, employment contracts are legally binding agreements between the company and the employee and cannot be altered without the consent of both parties. All employees are issued a contract of employment before beginning work.</p> <p>Based on field observations, interviews with employees at the Mills and Estates, and discussions with the HR Department, it can be concluded that there are no temporary or migrant workers employed including during periods of high demand.</p>	Complied
Criterion 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>Hargy Oil Palms Limited (HOPL) has designated responsible individuals at each unit for monitoring HSE performance. These appointees are:</p> <ul style="list-style-type: none"> - Barema Plantation: Mr. Alferd Mani (RSPO/OHS Officer), appointed based on the Employee Duty Statement dated September 2023. He reports to the Barema Plantation Manager. 	Complied

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	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - Barema POM: Mr. Thomas Tade (Mill Safety Officer – RSPO Representative), appointed based on the Employee Duty Statement dated 30 July 2023. - Kiba Plantation: Mr. Noel Pegety (HSE Officer – RSPO Representative), appointed based on the Employee Duty Statement dated 6 August 2024. <p>These officers are responsible for coordinating site programs and activities related to the implementation and maintenance of RSPO, the Environmental Management System (EMS), and Occupational Health & Safety (OHS). Their main duties include:</p> <ul style="list-style-type: none"> - Ensuring compliance with RSPO (including OHS) and EMS at their specific sites, including compounds. - Documenting, investigating, and mitigating safety, social, and environmental issues. - Coordinating timely responses to non-conformances, corrective and preventive actions, and other inspection outcomes. - Ensuring RSPO meetings, training, and related activities are carried out as required. - Conducting site inductions for new employees. <p>Regular meetings are held to address OHS and welfare concerns. Examples include:</p> <ul style="list-style-type: none"> - Hargy POM: Minutes from the RSPO meeting dated 9 July 2024, held in the Shipping/Safety Office, included agendas such as a review of OHS performance for June 2024, PPE/uniform issues, accident reports, training reports for OHS, and inspection report reviews. - Kiba Plantation: Minutes from the RSPO meeting dated 25 July 2024 covered the EHS Inspection Report, review of OHS performance for June 2024, health report reviews, internal audit results, and other business issues. The meeting was attended by the RSPO team and Kiba Plantation Management. 	
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		<ul style="list-style-type: none"> - Bakada Plantation: Minutes from the RSPO meeting dated 29 July 2024 included reviews of previous meeting plans and recommendations, EHS Inspection Reports, OHS performance for June 2024, health report reviews, internal audit results, and other business issues. The meeting was attended by the RSPO team and Bakada Plantation Management, and the record was prepared by RSPO representative Mr. Ananias Kawasa. 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>During ASA 3_1, Hargy Oil Palms Limited (HOPL) demonstrated its accident and emergency procedures as outlined in the Emergency Response Plan (No. ERO-SUS-GEN-011-12). The plan includes:</p> <ul style="list-style-type: none"> - Volcano Eruption Evacuation Response Plan (No. ERP-ESD-GEN-001-09) - Flooding Rivers Evacuation ERP (No. ERP-ESD-GEN-002-09) - Mill Factories Fires Evacuation (No. ERP-ESD-GEN-003-09) - Bialla Tank Farm and Tanker Terminal Fire (No. ERP-ESD-GEN-004-09) - Bialla Tanker Terminal Oil Spill (No. ERP-ESD-GEN-005-09) - Motor Vehicle Accident (No. ERP-ESD-GEN-008-09) - Fire Emergency Response (No. ERP-ESD-GEN-009-09) - Medical Emergency (No. ERP-ESD-GEN-007-09) - Search and Rescue Response (No. ERP-ESD-GEN-010-09) <p>These procedures are available in both English and Tok Pisin.</p> <p>Sample emergency response drill reports for the year 2024 include:</p> <ul style="list-style-type: none"> - Hargy POM: Emergency Drill Review Form – FOR-SUS-OHS-010-03, drill type: oil spill (scenario 9.3), location: 30 minutes from Whiskey Base Fledge Pipeline. The drill was attended by 8 participants. - Kiba Plantation: Emergency Drill Review Form – FOR-SUS-OHS-010-03, dated 16 June 2024, volcano eruption drill (type: 7.0), attended by 151 workers. Evaluation and action plan details are provided in the review form. 	Complied

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		<ul style="list-style-type: none"> - Kiba Plantation: Emergency Drill Review Form – FOR-SUS-OHS-010-03, dated 26 July 2024, fire emergency drill, attended by 29 workers. Evaluation and action plan details are provided in the review form. - Bakada Plantation: Emergency Drill Review Form – FOR-SUS-OHS-010-03, dated 28 July 2024, volcano eruption drill (type: 7.0), attended by 240 workers. Evaluation and action plan details are provided in the review form. - Refreshment Training: Safety, risk assessment, and PPE training held on 17 April 2024 (9 workers attended) and 25 May 2024 (23 workers attended). <p>Hargy Oil Palms Limited (HOPL), including its smallholders, demonstrated incident and accident reporting as per the Summary Report OHS Monthly KPI Rates for 2023-2024. The summary results are:</p> <ul style="list-style-type: none"> o Lost Time Injury Frequency Rate (LTIFR): 32 o Total Recordable Injury Frequency Rate (TRIFR): 59.59 o Lost Workdays Rate (LWDR): 68.52 o Severity Rate (SR): 2.17. 	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited (HOPL) has established a Personal Protective Equipment (PPE) Standard Operating Procedure (SOP) (No. PRO-SUS-OHS-003-06) and Risk Assessment for the year 2024. Both documents state that PPE is provided to workers at no cost.</p> <p>The PPE Matrix for 2024 outlines regular PPE provision, particularly for high-risk workplaces such as chemical storage, pesticide application, mill machinery, and harvesting. Examples of PPE provision records for 2024 include:</p> <ul style="list-style-type: none"> - Barema Plantation: PPE Issue Sheet dated 2 July 2024 for new items including gum boots, hand gloves, cap, and towel, provided to a new employee. 	Complied

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		<ul style="list-style-type: none"> - Kiba Plantation: PPE Issue and Record Sheet dated 24 July 2024 for Mr. Steven Melos (ID number: 28074), a chemical mixing operator, including overall, gum boots, hand gloves, and cap. - Kiba Plantation: PPE Issue and Record Sheet dated 4 January 2024 for Mr. Martin Kitepu (ID number: 20765), a harvester, including gum boots, grass knife, and hand gloves. - Bakada Plantation: PPE Issue and Record Sheet dated 5 February 2024 for Mr. Norman (ID number: 64606), a harvester, including gum boots. <p>HSE Officers regularly conduct inspections to ensure all workers are using PPE as required by the Risk Assessment results. Sample inspection reports include:</p> <ul style="list-style-type: none"> - Noise Monitoring at Hargy POM: Report dated 30 June 2024. The allowable noise level is 75 dB based on the PNG Oil Palm Environment Code of Practices 2013. Sample results are as follows: Engine Room Station (102.4 dB), Sterilizer Station (84.6 dB), Kernel Mill (101.2 dB), and Boiler Station (104.4 dB). Ear plugs and earmuffs are issued as needed to mitigate noise hazards. - Fire Extinguisher Register at Hargy POM: Last updated in July 2024, showing a total of 54 fire extinguishers distributed across processing stations including Boiler Station, Demin Plants, Mill Laboratory, Oil Room, Maintenance, and Powerhouse Station. - Inspection Reports: <ul style="list-style-type: none"> o Hargy POM: OHS inspection report, Hazard Report – FOR-SUS-OHS-001-04, dated 13 February 2024. Hazard: The stormwater drain cover at the access road junction leading to Hargy Mill and central stores was improperly seated due to erosion, posing a traffic hazard. Action: Traffic safety cones installed. o Kiba Plantation: Plantation EHS Monthly Inspection Checklist – FOR-SUS-GEN-006-08, dated 25 July 2024. The inspection covered aspects including genset condition, fuel storage, amenities, 	
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		<p>carpark, first aid kits, PPE, pesticide management, and more. All areas were reported as satisfactory.</p> <ul style="list-style-type: none"> ○ Bakada Plantation: EHS Monthly Inspection Checklist – FOR-SUS-GEN-006-08, dated 29 July 2024, covering Alaba, Abulmosi, Alangily, Magalona, and Gamupa divisions. The inspection, conducted by Anias Kawasa (RSPO Officer), included similar aspects as the Kiba Plantation inspection, with all areas reported as satisfactory. ○ Bakada Plantation: Daily Sprayers Checklist dated 14 August 2024. The report indicated satisfactory conditions. <p>Sanitation facilities and PPE storage for pesticide/fertilizer applicators are provided on the plantation. PPE and working tools are washed and stored in designated places and are prohibited from being kept in workers' houses.</p> <p>Based on interviews with workers, PPE is provided and exchanged regularly or as needed if damaged, at no cost to the employees.</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all employees. Each mill and plantation has a clinic to handle health issues and accidents. If the unit's clinic cannot manage the incident, patients are referred to the central clinic at Hargy POM. All workers are local and covered under the Workers Compensation Act 1978.</p> <p>Each site has a company doctor: for Navo POM and Estate, the clinic and doctor are located at Atata Plantation Compound; for Pandi Estate, the clinic is at the Bakada Plantation office complex. HOPL also has three ambulances stationed at Hargy Estate, Pandi Estate, and Navo Estate.</p> <p>During ASA 3_1, HOPL maintains a contract for medical, health, and workers' compensation insurance with MARSH & McLENNAN COMPANIES as the agent. The monthly premium payments have been documented, and the insurance coverage is valid from 2023 to 2024.</p>	Complied

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		<p>Details of the insurance are as follows:</p> <ul style="list-style-type: none"> - Workers Compensation (Excluding Workers Emergency Transportation and Hospitalization Abroad - WETHA) Extension: Policy number W0015566. Insurer: QBE Insurance (PNG) Ltd – 100%. This policy covers the insured's legal liability to workers under the Workers Compensation Act 1978 (as amended). - National Managers Medical (Marsh Medicare): Policy number HOPL 31121617. Insurer: Capital Life Insurance Company Limited – 100%. Scope: (1) Medical & Hospital Benefits, which cover eligible reimbursement of medical expenses following sickness or hospitalization of nominated employees and their declared dependents, including natural parents. (2) Personal Accident (Death by Accident), which covers loss of life resulting from accidental causes (as defined), 24 hours a day, 7 days a week. 																																																	
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>During ASA 3.1-year 2024, Hargy Oil Palms Limited (HOPL) presented the Incident/Accident Report as outlined in the Summary Report OHS Monthly KPI Rates for the period from August 2023 to June 2024. Examples include:</p> <table border="1"> <thead> <tr> <th>Month</th><th>LTI Case</th><th>Number of workers</th><th>Workdays lost</th></tr> </thead> <tbody> <tr><td>August 2023</td><td>30</td><td>4,999</td><td>63</td></tr> <tr><td>September 2023</td><td>24</td><td>4,997</td><td>51</td></tr> <tr><td>October 2023</td><td>35</td><td>4,927</td><td>88</td></tr> <tr><td>November 2023</td><td>25</td><td>4,926</td><td>56</td></tr> <tr><td>December 2023</td><td>22</td><td>5,014</td><td>54</td></tr> <tr><td>January 2024</td><td>25</td><td>5,034</td><td>60</td></tr> <tr><td>February 2024</td><td>37</td><td>5,140</td><td>91</td></tr> <tr><td>March 2024</td><td>32</td><td>5,371</td><td>70</td></tr> <tr><td>April 2024</td><td>22</td><td>5,163</td><td>56</td></tr> <tr><td>May 2024</td><td>29</td><td>5,149</td><td>63</td></tr> <tr><td>June 2024</td><td>9</td><td>5,070</td><td>30</td></tr> </tbody> </table>	Month	LTI Case	Number of workers	Workdays lost	August 2023	30	4,999	63	September 2023	24	4,997	51	October 2023	35	4,927	88	November 2023	25	4,926	56	December 2023	22	5,014	54	January 2024	25	5,034	60	February 2024	37	5,140	91	March 2024	32	5,371	70	April 2024	22	5,163	56	May 2024	29	5,149	63	June 2024	9	5,070	30	Complied
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		<p>Based on the summary, the result of:</p> <ul style="list-style-type: none"> • Lost Time Injury Frequency Rate (LTIFR): 32 • Total Recordable Injury Frequency Rate (TRIFR): 59.59 • Lost Workdays Rate (LWDR): 68.52 • Severity Rate (SR): 2.17. 	
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>Smallholder requirements:</p> <p>Organization managing the smallholders to manage IPM program for smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL Integrated Pest Management Plan is available in document No.PLN-SUS-SUS-001-07; Rev.7 dated 29 July 2022, therein includes Methods of Reducing Pesticides use, justification of agrochemical use, integrated pest management plan safety with chemicals, describes:</p> <ol style="list-style-type: none"> 1. Pest survey & monitoring. 2. Safety and effective use of pesticides. 3. Insect control. 4. Weed control. 5. Disease control. <p>Methods of reducing pesticides usage: More prudent use of pesticides, key components:</p> <ol style="list-style-type: none"> 1. Applying pesticides as needed, rather than on a fixed schedule. 2. Avoidance of persistent pesticides and those that bio-accumulate. 3. Decreased use of chemical spraying and increased efficiency of spray equipment. 4. Use of buffers near waterways to reduce possible contamination of non-target sectors of the ecosystem. 5. Sparing use. 6. Use of pesticides in combination with other control methods namely mechanical, biological, and cultural controls. 	Complied

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		<p>Available record of Integrated Pest Management Meeting dated 17 May 2024, that was attended by agrochemical supplier, PNG OPRA and HOPL representatives. The meeting discussed pest situation update as follow:</p> <ol style="list-style-type: none"> 1. Pest situation update in HOPL Plantation is under control. 2. The current pest of importance is CLM (coconut leaf miner). Sexvae infestation in the plantation is not prominent, however there is spread of <i>S. Decoratus</i> into new areas in late 2023 at Hargy Field 8. 3. <i>S. Decoratus</i> which the bio agent <i>Stichotrema</i> cannot parasite so it requires extra attention. 4. <i>Stichotrema</i> presence and monitoring was updated by OPRA Entomologist. <i>Stichotrema</i> eggs have been collected in the field and reared at Makakiwa insectary to boost the natural population in the plantation and the smallholders. 5. CRB/-G (<i>Oryctes</i>) survey and monitoring at Cenaka updated by OPRA Entomologist – There were no new reports or significant incident encountered as yet. However the main concern is the rotten trunk from replanted blocks which post a potential habitat for breeding and subsequent outbreak. 6. OPRA Entomologist has highlighted that there were no funds released by OPIC to do sanitation in the replanted blocks. <p>HOPL ensures the judicious use of pesticides by adhering strictly to national regulations, using only chemicals that have been approved for application. When selecting pesticides, the focus is on choosing environmentally compatible options that pose the least risk to the surrounding ecosystem. This includes a preference for less toxic pesticides and those that target specific pests, rather than broad-spectrum pesticides that could inadvertently harm beneficial organisms such as predators and parasites that naturally control pest populations.</p> <p>In managing pest and disease control, chemicals are applied only when necessary—specifically when pest outbreaks reach a threshold known as</p>	
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		<p>the economic injury level, where the damage caused would lead to significant economic losses if left untreated. However, before resorting to chemical methods, HOPL prioritizes biological control strategies. This approach involves encouraging and conserving host plants that support the natural enemies of pests, allowing these beneficial species to thrive and naturally regulate pest populations, thereby reducing the need for chemical interventions. Through these practices, HOPL aims to maintain a balanced and sustainable environment within the plantation.</p> <p>Officer/Staff who detect pest report to Entomology (PNG-OPRA), as recorded in "Pest Infestation Request (PestReq)". Sample seen: PestReq No. 124; date reported to PNGOPRA 27 December 2023; date visited 9 January 2024; report sent 13 January 2024. Recommendation: Damage assessment carried out on reported area showed severe defoliation by coconut leaf miner. Targetted Trunk Injection (TTI) using Dimehypo is recommended for approximately 56.7 Ha. Monitoring to be carried out on surrounding blocks. In addition, blocks recommended for TTI are to be monitored for 10 weeks after treatment. If the reinfestation is detected, complete the PestRec for follow up inspection.</p> <p>Some training related to the IPM has been held. For example:</p> <ul style="list-style-type: none">- Chemical weeding training on 22 April 2024. Facilitated by Supervisor to cover the issue related to flow rate test and swath width test. Attended by 10 participants (chemical supervisor, chemical sprayer and chemical mixer). Venue at chemical shed.- Chemical weeding training on 18 April 2024. Facilitated by Supervisor to cover the issue related to safety working practices in chemical use and handling, knapsack filling and walking speed. Attended by 10 participants (chemical supervisor, chemical sprayer and chemical mixer). Venue at chemical shed.	
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		<ul style="list-style-type: none"> - Integrated Pest Management training on 10 January 2024 located in Kiba Plantation. Attended by 19 participants of TTI and spray applicator. Topic wearing full PPE when handling chemical. - Integrated Pest Management training on 12 January 2024 located in Kiba Plantation. Attended by 9 participants of TTI applicator. Topic chemical (Dimehypo) application with correct ratio. - Integrated Pest Management training on 6 February 2024 located in Kiba Plantation. Attended by 15 participants of TTI and spray applicator. Topic Control of Insect of oil palm; trunk injection procedure and circle and path spraying. - Integrated Pest Management training on 7 March 2024 located in Kiba Plantation. Attended by 12 participants of spray applicator. Topic Circle and path spraying control target and productivity. - Chemical weeding refreshment training on 4 July 2024 at Bakada Plantation. Facilitated by Supervisor to cover the issue related to spray methods, flow rate, timing, sprayer targets, policies, family violence, OHS. Attended by 16 participants. - Chemical weeding refreshment training on 14 July 2024 at Bakada Plantation. Facilitated by Supervisor to cover the issue related to flow rate. Attended by 15 participants. <p>Smallholder: The Integrated Pest Management (IPM) program in smallholder areas is primarily guided by the collaboration of the Hargy Oil Palm Limited (HOPL), the Oil Palm Industry Corporation (OPIC), and the Papua New Guinea Oil Palm Research Association (PNG-OPRA). These organizations work closely with smallholder farmers through the Smallholder Agriculture Advisory Services (SHAAS) Extension officers, who provide on-the-ground support and guidance. SHAAS Extension officers conduct regular field visits, where they train farmers on best practices for pest identification, monitoring, and control, ensuring that the IPM strategies are effectively implemented to enhance crop yield and sustainability in these communities. For example:</p>	
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		<ul style="list-style-type: none"> - Lalopo Office Station on 29 August 2023. Refreshment training facilitated by smallholder extension staff regarding Production and BMP. Attended by 19 participants. Solomon Pagege and Ieisou Mage as a smallholders sampled in this assessment were listed. - Uasilau Sec-2, Wainamasile (Walo VOP) on 18 April 2024. Training covered topic related to the CLUA arrangement facilitated by HOPL smallholder extension staff and OPIC officer. Attended by 30 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. - Walo Community Ground on 28 May 2024. Training covered topic related to the RSPO awareness, transport arrangement, crop quality and harvesting. Facilitated by HOPL smallholder extension staff. Attended by 27 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. - Uasilau Sec-3B on 11 July 2024. Training covered topic related to the BMP, facilitated by HOPL smallholder extension staff. Attended by 28 participants including the smallholders sampled on this assessment. - Smallholder of Tiauru LSS Section 1, 2 & 3: RSPO Requirements awareness on 4 March 2024, facilitate by HOPL-SHAAS and Sustainability Department. Attended by 33 participants. The topic is regarding RSPO requirements, including ethical conduct policy, child labour, protective equipment, use of chemicals, waste management, RTE species, buffer zone, new planting or replanting (including that fire cannot be used for replanting land preparation), consequences of not complying with RSPO criteria, and crop quality. - Smallholder of Tiauru LSS: Field Day regarding RSPO Requirements including BMP, production, FFB inspection zone and security, on 7 February 2024, facilitate by HOPL-SHAAS, OPIC Staff, Police and Security. Attended by 59 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, child labour, ethical conduct policy, buffer zone, RTE species), importance of upkeep, importance of regular harvesting, 	
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		<p>importance of crop quality, importance of fertilizer, production figures, security awareness including prohibit use of fire on waste disposal and replanting.</p> <ul style="list-style-type: none"> - Tiauru LSS Section 4, on 13 May 2024. Training covered topic related to the best management practices including integrated pest management, and others such as block upkeep – slashing, pruning, frond stacking, circle weeding and roadside slashing. Training facilitated by HOPL smallholders' extension staff, attended by 32 participants. - Tiauru LSS Section 3 and 2, on 14 May 2024. Training covered topic related to the best management practices including integrated pest management, and others such as block upkeep – slashing, pruning, frond stacking, circle weeding and roadside slashing. Training facilitated by HOPL smallholders' extension staff, attended by 30 participants. - Tiauru LSS Section 1, on 17 May 2024. Training covered topic related to the RSPO requirements including, ethical conduct, child labour, family violence, sexual harassment, PPE, use of chemical, waste management, RTE species, buffer zone, new planting & replant, grievance procedure, consequences of not complying with RSPO criteria. - Record of training on pesticide handling smallholder 2024: on 05/03/2024 at East Independent Estate, 19 participants (2 female); 05/03/2024 at Ewasse, 53 participants (19 female), on 06/03/2024 at Matililiu, 41 participants (16 female); 12/03/2024 at Kabaiya, 15 participants (4 female); 19/03/2024 at Gomu-Urumaili, 32 participants (14 female); 08/04/2024 at Soi, 44 participants (2 female); 17/04/2024 at Kaiamu, 36 participants (9 female); 03/05/2024 at West Independent Estate, 25 participants (3 female); 16/07/2024 at Bubu, 37 participants (7 female). - Mini Field Day – Management for oil palm farmers on 11 June 2024; located at Mataururu Block 10-1008 (OPRA BMP Block); facilitated by 	
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		<p>HOPL Smallholder extension and PNG OPRA; cover topics related to saving scheme, Fertiliser, pest and disease, ethical conduct policy, child labour, chemical requirement and safety uses, waste management, RTE species, buffer zone, grievance, new planting and replant, consequences of not compliant, transport-production, road and pick up schedule; Attended by 69 participants including from independent estate i.e Babex Estate.</p> <p>Based on interview, all smallholder are aware regarding integrated pest management, especially to reduce the use of chemical material.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. Any imported species must first be approved in PNG by National Agriculture Quarantine and Inspection Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI).</p> <p>- Minor compliance -</p>	<p>There have been no significant changes to the invasive species management practices, despite an update to the relevant procedure. The updated procedure is outlined in the Highland Oil Palm Limited (HOPL) Integrated Pest Management (IPM) Plan, documented under No. PLN-SUS-SUS-001-07; Revision 7, dated 29 July 2022. This plan specifies that both resident pests and any potential invasive species that might be introduced are to be effectively managed using a range of appropriate IPM techniques.</p> <p>The IPM plan emphasizes the importance of early detection and prompt action to prevent pest populations from reaching levels that would require large-scale control measures. To achieve this, routine patrols are conducted regularly throughout the plantations to monitor for signs of pest infestations. These patrols are a critical component of the overall strategy, allowing for the early identification of any pest issues and the swift implementation of control measures that can effectively manage the situation before it escalates. Procedure consists of pest identification, understanding the biology and ecology of pest, monitoring of pest populations and related activities, determine action threshold – economic injury level, choosing appropriate combination of management controls, prevention and intervention.</p>	Complied

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7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on interview with workers and smallholder and the visual observation during field visit as well, there is no use of fire for pest control.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>A comprehensive and documented justification for all agrochemical use is available through the Approved Product List, which details the specifics of products approved for industrial and agricultural applications. This list includes information such as the product name, type of pesticide, active ingredients, LD50 values, and approved agricultural uses. These guidelines are applied to both company-owned plantations and smallholder blocks to ensure compliance and effective pest management.</p> <p>The justification for these agrochemical uses is provided by a government agency, specifically through an "Environment Permit" issued by the Conservation and Environment Protection Authority (CEPA). This permit is issued in accordance with Section 65 of the Environment Act 2000, which governs the use of agrochemicals to ensure environmental protection. For example, the permit for Dimehypo (Bisultap) is documented under permit number P-144, issued on 4 July 2021, and remains valid until 3 July 2026. This permit serves as a regulatory endorsement, ensuring that the use of this chemical is both authorized and monitored for compliance with environmental standards.</p> <p>Based on field visit to spraying activity – circle and path at Hargy Estate - Barema Plantation, Navo Estate – Kiba Plantation and Pandi Estate – Bakada Plantation obtained information that workers can demonstrated that spraying only applied to the specific area and weeds. There are no uses of Pesticides that are categorised as World Health Organisation Class</p>	Complied

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		<p>1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Workers are using PPE such as overall, head cover, hand gloves and gum boots. Medical surveillance is regularly conducted, and evidence can be shown by the company. In the field there is no worker under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p> <p>Smallholders: During this ASA3_1 audit, verified that no insecticide was issued to the smallholders. In case of chemical control of pest such as Saxava, insecticide application was done by HOPL – under supervision of PNG OPRA. For weed control, Smallholders typically manage it through slashing, a manual method where weeds are cut down using tools like machetes. This traditional practice is common among many smallholder farmers. However, for associated smallholders who opt for chemical weed control methods, such as spraying herbicides, the task is carried out by individuals who have received specialized training. These trained smallholders are issued certificates to validate their competence in safe and effective herbicide application.</p>	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>Smallholder requirements: Organization managing the smallholders to maintain records of herbicide issue to smallholders. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms maintained the record of pesticide use, active ingredient, LD50 and hectare of area treated – for each estate/division in document “Toxicity Analysis by Division”. For example, there is an application of isopropyl amine glyphosate in January – June 2024 for 1.888 Ha area of Barema Plantation, volume 1,401 kg of active ingredients, with toxicity/Ha 59.65 kg_BM50/Ha, toxicity/output 3.51 kg_BM50/Ha, active ingredients per hectare 0.74 kg/ha.</p> <p>In Kiba Plantation - Navo Estate , volume of pesticide use in July 2024 for glyphosate is 370.80 L, for L.I.700 is 48.33 L, for Ally 20 DF is 11,768 g. Volume of pesticide use in June 2024 for glyphosate is 269.15 L, for L.I.700 is 44.33 L, for Ally 20 DF is 5,792 g. Volume of pesticide use in May 2024 for glyphosate is 258.58 L, for L.I.700 is 45.86 L, for Ally 20 DF is 4,908 g.</p>	Complied

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		<p>In Bakada Plantation - Pandi Estate, volume of pesticide uses in for period January – June 2024 for glyphosate is 2,430 L, for L.I.700 is 367 L, for Ally 20 DF is 40 kg. Volume of pesticide use in January - December 2024 for glyphosate is 2,524 L, for L.I.700 is 402 L, for Ally 20 DF is 164 kg, for Dimehypo is 149 L.</p> <p>Smallholders: Record of pesticide use in smallholders is available during audit. For period January to June 2024, pesticide use in smallholder are <i>Glyphosate</i> for Block spraying 300 L; <i>Glyphosate</i> for Palm Poisoning (replanting) 1,501 L; and <i>Dimehypo</i> for Pest Treatment 2,205 Litres. Smallholders typically manage weed control through slashing, a manual method where weeds are cut down using tools like machetes. This traditional practice is common among many smallholder farmers. However, for associated smallholders who opt for chemical weed control methods, such as spraying herbicides, the task is carried out by individuals who have received specialized training. Whilst, Palm poisoning and pest treatment are only conducted by trained HOPL workers.</p>	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>Smallholder requirements: Organization managing the smallholders to manage IPM for smallholders. - Critical (Major) compliance -</p>	<p>Available HOPL Integrated Pest Management Plan (PLN-SUS-SUS-001-07) Rev.7 dated 29 July 2022, therein includes Methods of Reducing Pesticides use, justification of agrochemical use, integrated pest management plan safety with chemicals. The document described methods of reducing pesticides usage: More prudent use of pesticides, with key components:</p> <ul style="list-style-type: none"> - Applying pesticides as needed, rather than on a fixed schedule. - Avoidance of persistent pesticides and those that bio-accumulate. - Decreased use of chemical spraying and increased efficiency of spray equipment. - Use of buffers near waterways to reduce possible contamination of non-target sectors of the ecosystem. - Spraying use. 	Complied

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		<ul style="list-style-type: none"> - Use of pesticides in combination with other control methods namely mechanical, biological, and cultural controls. <p>As part of the Continuous Improvement Plan, the use of pesticides is deliberately minimized to promote more sustainable agricultural practices. This approach is integrated into the broader framework of the Integrated Pest Management (IPM) Plan, which is specifically designed to manage oil palm pests effectively while carefully controlling the application of pesticides. The goal is to address pest issues in a way that poses the least possible risk to human health, property, and the environment.</p> <p>In both the plantations and nurseries, a cautious approach is taken when it comes to pesticide use. Insecticides are not applied as a preventive measure, which is often referred to as prophylactic treatment. Instead, they are used only when there is a confirmed outbreak of insects that is likely to cause significant damage to the crops. This reactive rather than preventive use of insecticides helps to minimize unnecessary chemical exposure and ensures that pesticides are employed only when absolutely necessary to protect the oil palm plants from serious harm. By adopting these practices, the IPM Plan supports the sustainable cultivation of oil palms while safeguarding the environment and reducing reliance on chemical controls.</p> <p>Here is set of Herbicide Management Protocol for oil palm cultivation that used by HOPL. It provides specific guidelines on the timing and method of herbicide application at different stages of the oil palm's growth, from planting up to more than four years after planting:</p> <ul style="list-style-type: none"> - 0-12 months after planting; No herbicide is to be applied. Allow only hand weeding to promote young palm and LCP growth. - 1-2 Years; Apply pre-mixed herbicide around the palm base to 3m wide whilst lifting up the fronds as illustrated. - 2-4 Years; Apply pre-mixed herbicide around the edge of the frond drips to prevent creepers growing onto the palm as illustrated. 	
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		<ul style="list-style-type: none"> - > 4 YAP; The circle must be sprayed using double circuit method. In this method, the sprayer sprays to the palm circle in the direction of his left hand towards the palm base. Once he completes the first loop, he turns back to the direction of the spray, steps about half a metre away and continue spraying until he completes the second loop as illustrated. <p>Smallholders: The Oil Palm Industry Corporation (OPIC) provides herbicides to smallholder who wish to carry out spraying in their cultivation areas, particularly focusing on maintaining the palm circle and paths free of weeds. HOPL and OPIC has been actively involved in educating smallholders about the principles and practices of Integrated Pest Management (IPM). This education is crucial for empowering smallholders to manage pests in a sustainable manner that minimizes harm to the environment, their crops, and their health.</p> <p>The IPM program in smallholder areas is guided and supported by HOPL and the Papua New Guinea Oil Palm Research Association (PNGOPRA), working in collaboration with the Smallholder Agriculture Advisory Services (SHAAS) Extension officers. These officers play a pivotal role in providing on-the-ground training, technical support, and continuous guidance to smallholder farmers, ensuring that IPM strategies are properly implemented and adhered to.</p> <p>Records of training sessions and field days facilitated by HOPL and PNGOPRA highlight the ongoing efforts to educate smallholders. These records include details of workshops, demonstrations, and field visits where farmers are trained on topics such as pest identification, monitoring techniques, and the judicious use of herbicides and other control methods. Available records of training and field day facilitated by HOPL – PNGOPRA, e.g.</p>	
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		<ul style="list-style-type: none"> - Lalopo Office Station on 29 August 2023. Refreshment training facilitated by smallholder extension staff regarding Production and BMP. Attended by 19 participants. Solomon Pagege and Ieisou Mage as a smallholders sampled in this assessment were listed. - Uasilau Sec-2, Wainamasile (Walo VOP) on 18 April 2024. Training covered topic related to the CLUA arrangement facilitated by HOPL smallholder extension staff and OPIC officer. Attended by 30 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. - Walo Community Ground on 28 May 2024. Training covered topic related to the RSPO awareness, transport arrangement, crop quality and harvesting. Facilitated by HOPL smallholder extension staff. Attended by 27 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. - Uasilau Sec-3B on 11 July 2024. Training covered topic related to the BMP, facilitated by HOPL smallholder extension staff. Attended by 28 participants including the smallholders sampled on this assessment. - Smallholder of Tiauru LSS Section 1, 2 & 3: RSPO Requirements awareness on 4 March 2024, facilitate by HOPL-SHAAS and Sustainability Department. Attended by 33 participants. The topic is regarding RSPO requirements, including ethical conduct policy, child labour, protective equipment, use of chemicals, waste management, RTE species, buffer zone, new planting or replanting (including that fire cannot be used for replanting land preparation), consequences of not complying with RSPO criteria, and crop quality. - Smallholder of Tiauru LSS: Field Day regarding RSPO Requirements including BMP, production, FFB inspection zone and security, on 7 February 2024, facilitate by HOPL-SHAAS, OPIC Staff, Police and Security. Attended by 59 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, child labour, ethical conduct policy, buffer zone, RTE species), importance of upkeep, importance of regular harvesting, 	
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		importance of crop quality, importance of fertilizer, production figures, security awareness including prohibit use of fire on waste disposal and replanting.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	Based on interviews conducted with workers and smallholders, it has been confirmed that there is no prophylactic use of pesticides across the entire area managed by Hargy Oil Palms Limited. The approach to pesticide application is strategically minimized as part of the company's Continuous Improvement Plan. This plan emphasizes the adoption of an Integrated Pest Management (IPM) strategy designed to effectively manage oil palm pests while using pesticides only as needed. The primary goal of this strategy is to address pest and weed problems with the utmost consideration for reducing risks to human health, property, and the surrounding environment. Within both the plantations and the nursery, pesticides are not applied as a preventive measure. Instead, they are used especially in response to identified and suspected outbreaks that have the potential to cause significant damage.	Complied
7.2.5	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 used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat 7.2.5b Why there is no other alternative which can be used 7.2.5c Which process was applied to verify why there is no other less hazardous alternative 7.2.5d What is the process to limit the negative impacts of the application	Based on the record of pesticide in chemical store and type of pesticide usage during the field visit obtained information that there are no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat used in whole area of HOPL including in smallholders area.	Complied

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	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>Smallholder requirements:</p> <p>Smallholders not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Smallholders to follow the policies of the organization managing the smallholders</p> <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>Smallholder requirements:</p> <p>Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Training of pesticide handling and application are routinely conducted, e.g.</p> <ul style="list-style-type: none"> • Hargy Estate – Barema Plantation, for example Chemical weeding training on 22 April 2024. Facilitated by Supervisor to cover the issue related to flow rate test and swath width test. Attended by 10 participants (chemical supervisor, chemical sprayer and chemical mixer). Venue at chemical shed. • Chemical weeding training on 18 April 2024. Facilitated by Supervisor to cover the issue related to safety working practices in chemical use and handling, knapsack filling and walking speed. Attended by 10 participants (chemical supervisor, chemical sprayer and chemical mixer). Venue at chemical shed. • Integrated Pest Management training on 10 January 2024 located in Kiba Plantation. Attended by 19 participants of TTI and spray applicator. Topic: wearing full PPE when handling chemical. • Integrated Pest Management training on 12 January 2024 located in Kiba Plantation. Attended by 9 participants of TTI applicator. Topic: chemical (Dimehypo) application with correct ratio. • Integrated Pest Management training on 6 February 2024 located in Kiba Plantation. Attended by 15 participants of TTI and spray applicator. Topic: Control of Insect of oil palm; trunk injection procedure and circle and path spraying. 	Complied

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		<ul style="list-style-type: none"> • Integrated Pest Management training on 7 March 2024 located in Kiba Plantation. Attended by 12 participants of spray applicator. Topic: Circle and path spraying control target and productivity. • Chemical weeding refreshment training on 4 July 2024 at Bakada Plantation. Facilitated by Supervisor to cover the issue related to spray methods, flow rate, timing, sprayer targets, policies, family violence, OHS. Attended by 16 participants. • Chemical weeding refreshment training on 14 July 2024 at Bakada Plantation. Facilitated by Supervisor to cover the issue related to flow rate. Attended by 15 participants. • Dissemination of SOP #3 Chemical Shed on 23 September 2023. Facilitated by Division Manager of Hargy Division 1 and attended by chemical supervisor and chemical mixer. Venue at chemical shed. • Dissemination of SOP #4 Chemical Mixing on 23 September 2023. Facilitated by Division Manager of Hargy Division 1 and attended by chemical supervisor and chemical mixer. Venue at chemical shed. • Integrated Pest Management Training on 5 July 2023 that facilitated by PNG OPRA Expert. Located in HOPL Conference Room and attended by 22 participants. <p>Prior to work, Overseer and Supervisors performed to check the completeness of the sprayers including PPE, such as belonging in lockers, overall, gumboot, orange cap, hand gloves knapsacks and nozzles. This evident based on Daily Sprayers Checklist (FOR-PLT-UPK-006-03). Available PPE Issue and Record Sheet (FOR-PLT-UPK-005-04) that record issuance of PPE, such as overall, gum boots and hang loves.</p> <p>Smallholder: Smallholders typically manage weed control through slashing, a manual method where weeds are cut down using tools like machetes. This traditional practice is common among many smallholder farmers. However, for associated smallholders who opt for chemical weed control methods,</p>	
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		<p>such as spraying herbicides, the task is carried out by individuals who have received specialized training. These trained smallholders are issued certificates to validate their competence in safe and effective herbicide application.</p> <p>To ensure that spraying is conducted safely and in accordance with best agricultural practices, HOPL and the Oil Palm Industry Corporation (OPIC) have organized special training programs focused on Agricultural Safety and Crop Spraying. These training sessions are designed to equip smallholders with the knowledge and skills necessary to handle and apply herbicides responsibly, minimizing risks to themselves, others, and the environment.</p> <p>The auditor team has verified a sample of these certificates to confirm that the training has been successfully completed by the participating smallholders, e.g.:</p> <ul style="list-style-type: none"> • Smallholder on behalf of Noel Tamata (son of the owner Burnawae Tamata, portion 01-0225 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Uasilau LSS Subdivision of Bialla District, West New Britain Province, on 24 June 2024; valid for 3 years. • Smallholder on behalf of Paul Gana (owner of portion 01-0192 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 19 June 2023; valid for 3 years. • Smallholder on behalf of Jonah Tony (owner of portion 01-0259 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 24 July 2024; valid for 3 years. • Based on site verification at Chemical Shed of smallholder namely Noel Tamata and Jonah Tony. The chemical shed is used to keep all chemicals material, including spraying tools. An interview with the 	
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		<p>respective smallholder (certified sprayer), clearly that he understands how the correct handling, storage, application and disposal requirements.</p> <p>Smallholder training: The Integrated Pest Management (IPM) program in smallholder areas is primarily guided by the collaboration of the Hargy Oil Palm Limited (HOPL), the Oil Palm Industry Corporation (OPIC), and the Papua New Guinea Oil Palm Research Association (PNG-OPRA). These organizations work closely with smallholder farmers through the Smallholder Agriculture Advisory Services (SHAAS) Extension officers, who provide on-the-ground support and guidance. SHAAS Extension officers conduct regular field visits, where they train farmers on best practices for pest identification, monitoring, and control, ensuring that the IPM strategies are effectively implemented to enhance crop yield and sustainability in these communities. For example:</p> <ul style="list-style-type: none"> • Lalopo Office Station on 29 August 2023. Refreshment training facilitated by smallholder extension staff regarding Production and BMP. Attended by 19 participants. Solomon Pagege and Ieisou Mage as a smallholders sampled in this assessment were listed. • Uasilau Sec-2, Wainamasile (Walo VOP) on 18 April 2024. Training covered topic related to the CLUA arrangement facilitated by HOPL smallholder extension staff and OPIC officer. Attended by 30 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. • Walo Community Ground on 28 May 2024. Training covered topic related to the RSPO awareness, transport arrangement, crop quality and harvesting. Facilitated by HOPL smallholder extension staff. Attended by 27 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. • Uasilau Sec-3B on 11 July 2024. Training covered topic related to the BMP, facilitated by HOPL smallholder extension staff. Attended by 28 participants including the smallholders sampled on this assessment. 	
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		<ul style="list-style-type: none"> • Smallholder of Tiauru LSS Section 1, 2 & 3: RSPO Requirements awareness on 4 March 2024, facilitate by HOPL-SHAAS and Sustainability Department. Attended by 33 participants. The topic is regarding RSPO requirements, including ethical conduct policy, child labour, protective equipment, use of chemicals, waste management, RTE species, buffer zone, new planting or replanting (including that fire cannot be used for replanting land preparation), consequences of not complying with RSPO criteria, and crop quality. • Smallholder of Tiauru LSS: Field Day regarding RSPO Requirements including BMP, production, FFB inspection zone and security, on 7 February 2024, facilitate by HOPL-SHAAS, OPIC Staff, Police and Security. Attended by 59 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, child labour, ethical conduct policy, buffer zone, RTE species), importance of upkeep, importance of regular harvesting, importance of crop quality, importance of fertilizer, production figures, security awareness including prohibit use of fire on waste disposal and replanting. • Mini Field Day – Management for oil palm farmers on 11 June 2024; located at Mataururu Block 10-1008 (OPRA BMP Block); facilitated by HOPL Smallholder extension and PNG OPRA; cover topics related to saving scheme, Fertiliser, pest and disease, ethical conduct policy, child labour, chemical requirement and safety uses, waste management, RTE species, buffer zone, grievance, new planting and replant, consequences of not compliant, transport-production, road and pick up schedule; Attended by 69 participants including from independent estate i.e Babex Estate. • Record of training on pesticide handling smallholder 2024: on 05/03/2024 at East Independent Estate, 19 participants (2 female); 05/03/2024 at Ewasse, 53 participants (19 female), on 06/03/2024 at Matililiu, 41 participants (16 female); 12/03/2024 at Kabaiya, 15 participants (4 female); 19/03/2024 at Gomu-Urumaili, 32 participants 	
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		(14 female); 08/04/2024 at Soi, 44 participants (2 female); 17/04/2024 at Kaiamu, 36 participants (9 female); 03/05/2024 at West Independent Estate, 25 participants (3 female); 16/07/2024 at Bubu, 37 participants (7 female).	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Based on site visit and interview, storage of all pesticides in HOPL found to be consistent with the Material Safety Data Sheet and Best Agricultural Practice. The guidelines of pesticide storage are available under the procedure of Plantation Management Practice – Pesticide Practices. Each estate under HOPL is equipped with a designated chemical shed specifically designed for the safe storage of herbicides and pesticides. Within these sheds, agrochemicals are meticulously organized and segregated based on their type, reducing the risk of cross-contamination, and ensuring that each chemical is stored under optimal conditions. The chemical sheds are also equipped with a mixing bay where chemicals are prepared for application, as well as a washing basin for cleaning equipment and personal protective equipment (PPE). Available Chemical Container Recycling Record (FOR-PLT-UPK-007-03) that balance the number of containers in and out, container type and signature of the respective person.</p> <p>To further enhance safety, all chemicals are pre-mixed before being taken to the field, eliminating the need to handle pure, undiluted chemicals in the field, which reduces potential exposure risks. After use, all work uniforms, PPE, and spraying tools are thoroughly washed and securely stored in a locked room to prevent unauthorized access and ensure that they remain in good condition for future use. Additionally, all estates follow a disposal protocol for empty herbicide containers. These containers are safely disposed of in designated landfills, ensuring that they do not pose a hazard to the environment or to human health.</p> <p>Smallholder: Smallholders commonly manage weed control through slashing, a traditional method where weeds are manually cut down using tools like</p>	Complied

		<p>machetes. This approach is widely practiced among smallholder farmers due to its simplicity and effectiveness. However, for associated smallholders who choose to control weeds through chemical spraying, the task is exclusively carried out by individuals who have undergone specialized training. These trained smallholders have been issued certificates that verify their competence in handling and applying herbicides safely and effectively.</p> <p>During field visit, special attention was given to the practices of smallholders who utilize pesticides. It was observed that the storage of pesticides is carefully managed, with all pesticide storage areas being located at a safe distance from housing to minimize the risk of accidental exposure to residents. These storage facilities, often referred to as chemical sheds, are designed to securely house pesticides and are locked when not in use, ensuring that unauthorized access is prevented and that the chemicals are safely contained.</p> <p>In addition to secure storage, provisions have been made for the safe disposal of contaminated containers. Each smallholder's site includes a designated chemical waste pit where all ex-pesticides containers are disposed of. Chemical waste pit is for disposing chemical used stuff such as punched containers, gloves, measuring cans, and should not contained domestic or other waste inside that chemical waste pit. This pit is constructed in accordance with safety guidelines to prevent environmental contamination and to ensure that hazardous materials are handled responsibly. The careful management of pesticides—from secure storage to the safe disposal of waste—demonstrates a proactive effort to mitigate risks and protect both human health and the environment.</p>	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing	The management of empty chemical containers at the company follows a process to ensure safety and environmental compliance. After use, each container undergoes a thorough triple rinsing procedure, which involves rinsing the container three times to remove any residual chemicals. Empty	Complied

	<p>spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.</p> <p>Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p> <p>- Minor compliance -</p>	<p>chemical containers are stored securely and, when appropriate, are reused for mixing new batches of pesticides or herbicides. This practice of reusing containers is closely monitored, and detailed records are maintained to document the recycling and disposal of these containers. For instance, the Chemical Container Recycling Record, identified as No. FOR-ESD-UPK-012-02, provides a comprehensive log of all containers that have been recycled. Similarly, the Chemical Container Disposal Record, titled No. FOR-ESD-EMS-012-03, tracks the disposal of containers that can no longer be reused.</p> <p>In Hargy Estate, Navo Estate and Pandi Estate the disposal of used chemical containers is guided by a specific Standard Operating Procedure (SOP) titled Disposal of Used Chemical Containers, identified as SOP No. PRO-SUS-EMS-022-05, dated 8 March 2021. According to this SOP, the process begins with triple rinsing of the containers. For containers used for pesticide or herbicide application, the rinsate (the liquid resulting from rinsing) is added to the spray tank to ensure no chemical is wasted. In the case of containers that held water treatment chemicals, the same triple rinsing process is applied, particularly for smaller 20-liter containers. Following rinsing, containers that are not intended for reuse must be punctured or slashed to prevent them from being repurposed improperly. The SOP specifies that all plastic containers that will not be reused should be punctured or slashed, while metal containers are strictly prohibited from being reused under any circumstances. Available Chemical Container Disposal Record (FOR-SUS-EMS-012-05) that recorded all containers disposed to landfill after being cut to avoid any recycling.</p> <p>Smallholder:</p> <p>Smallholders commonly manage weed control through slashing, a traditional method where weeds are manually cut down using tools like machetes. This approach is widely practiced among smallholder farmers due to its simplicity and effectiveness. However, for associated smallholders who choose to control weeds through chemical spraying, the task is</p>	
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		<p>exclusively carried out by individuals who have undergone specialized training. Based on interview with respective smallholder, all pesticide containers undergo steps such as each container is triple rinsed, a process that involves filling the container with water, shaking it vigorously, and then emptying the rinse water into a spray tank or another designated area. This triple rinsing procedure is repeated three times to ensure that any residual pesticide is completely removed, reducing the risk of contamination, and ensuring that no harmful chemicals are left in the container. Once the containers have been thoroughly rinsed, they are then punctured or slashed.</p> <p>During field visit, it was observed that provisions have been made for the safe disposal of contaminated containers. Each smallholder's site includes a designated chemical waste pit where all ex-pesticides containers are disposed of. Chemical waste pit is for disposing chemical used stuff such as punched containers, gloves, measuring cans, and should not contained domestic or other waste inside that chemical waste pit. This pit is constructed in accordance with safety guidelines to prevent environmental contamination and to ensure that hazardous materials are handled responsibly. The careful management of safe disposal of waste demonstrates a proactive effort to mitigate risks and protect both human health and the environment.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>There were no pesticides applied aerially in whole area of HOPL including in Smallholders area.</p>	Complied

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7.2.10	<p>(C) Specific bi-annual medical surveillance for pesticide operators handling organophosphate insecticides, and documented action to treat related health conditions, is demonstrated.</p> <p>Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 3_1, Hargy Oil Palm Limited (HOPL) conducted specific annual medical surveillance for pesticide operators, maintaining this as a regular practice. Records related to the health condition of pesticide operators are documented under "Baseline Surveillance for Sprayers." This documentation includes demographic data, occupational and medical history, and basic examinations (eyes, nose, throat, respiratory, skin, rash, bones) to assess fitness for working with agrochemicals.</p> <p>Sample document verification for the year 2024 includes:</p> <ul style="list-style-type: none"> - Barema Plantation, total Pesticide Operators: 18 sprayers and 1 mixer operator. Records of Pesticides Sprayers Fit to Work, dated 21 March 2023: <ul style="list-style-type: none"> o Mr. Ben Nick (Employee number: 42713) – Mixed Operator. The result of the medical check-up (MCU) is satisfactory. o Mr. Danny Tausi (Employee number: 43621) – Sprayer. The result of the MCU is satisfactory. o Mr. Peter Malon (Employee number: 4315) – Sprayer. The result of the MCU is satisfactory. - Kiba Plantation, total Pesticide Operators: 16 sprayers and 1 mixer operator. Records of Pesticides Sprayers Fit to Work, dated 19 July 2024: <ul style="list-style-type: none"> o Mr. Edwin Marcus Kamba (Employee number: 83344) – Chemical Applicator. The MCU result indicates fitness for work. o Mr. Steven Moles (Employee number: 28074) – Chemical Mixing Operator. The MCU result indicates fitness for work. <p>Records of Pesticides Sprayers Fit to Work, dated 29 June 2024:</p> <ul style="list-style-type: none"> o Mr. Deton Joel (Employee number: 83350) – Chemical Applicator. The MCU result indicates fitness for work. 	Complied
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		<ul style="list-style-type: none"> - Bakada Plantation, total Pesticide Operators: 17 sprayers and 1 mixer operator. Records of Pesticides Sprayers Fit to Work, dated 5th July 2024: <ul style="list-style-type: none"> o Mr. Demas Wapi (Employee number: 64625) – Chemical Applicator. The MCU result indicates fitness for work. o Mr. Luke Mondo (Employee number: 64870) – Chemical Applicator. The MCU result indicates fitness for work. o Mr. Wesly Rave (Employee number: 65062) – Chemical Applicator. The MCU result indicates fitness for work. <p>During a field observation at Block 07C01 and 07D07, Barema Plantation Division 1; Block 21F10 Kiba Plantation Division 2; and Block 14D14, Bakada Plantation Abulmosi Division, all pesticide workers was found to be fit to work, confirming their compliance with health and safety standards.</p> <p>This comprehensive surveillance ensures that all pesticide operators at HOPL are in good health and fit for their roles, adhering to safety and regulatory requirements.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>During this ASA3_1 field observation was conducted to the circle and path spraying activity at Block 07C01 and 07D07, Barema Plantation Division 1; Block 21F10 Kiba Plantation Division 2; and Block 14D14, Bakada Plantation Abulmosi Division. Based on field visit to spraying activity – circle and path at Hargy Estate - Barema Plantation, Navo Estate – Kiba Plantation and Pandi Estate – Bakada Plantation obtained information that workers can demonstrated that spraying only applied to the specific area and weeds. Workers are using PPE such as overall, head cover, hand gloves and gum boots. Medical surveillance is regularly conducted, and evidence can be shown by the company. In the field there is no worker under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions. All spraying workers are male. Review to employee master sheet, concluded that there is no recruitment being made to under 18 years old worker.</p>	Complied

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		<p><u>Smallholders:</u> Smallholder generally performs slashing to control weeds. At the smallholder blocks who performed spraying for weeds control, pesticides are only applied by those that have attend the Agriculture Safety and Crop Spraying conducted by OPIC and HOPL. There was no evidence observed that spraying was conducted by other parties, such as women or children.</p> <p>Sample of training record on Agricultural safety and crop spraying:</p> <ul style="list-style-type: none"> - Smallholder on behalf of Noel Tamata (son of the owner Burnawae Tamata, portion 01-0225 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Uasilau LSS Subdivision of Bialla District, West New Britain Province, on 24 June 2024; valid for 3 years. - Smallholder on behalf of Paul Gana (owner of portion 01-0192 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 19 June 2023; valid for 3 years. - Smallholder on behalf of Jonah Tony (owner of portion 01-0259 Tiauru LSS) who hold the Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 24 July 2024; valid for 3 years. 	
Criterion 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.</p> <p>Smallholder requirements: Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit.</p> <p>- Minor compliance -</p>	<p>The organization had waste management plan which issued on 23 July 2024. The structure and outline of the plan are:</p> <ul style="list-style-type: none"> - Project environmental setting - Sources and types of waste generating activities. - Waste management and principles. - Site specific potential environmental effects and waste management strategy. - Performance monitoring and reporting. 	Complied

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		<p>The waste management corporate with sustainable principle (reduce, reuse, recycle treatment and disposal) as a key feature. The waste management plan covers all activities on organization business scope:</p> <ul style="list-style-type: none">- Land Clearing and preparation.- Road Construction- Plantation establishment, maintenance and harvesting.- Residential compounds and office establishment- Associated infrastructure- Medical waste- Field Equipment servicing- Vehicle workshop- HOPL Palm Oil Mills- CPO and PKO Bulk Storage tanks. <p>In that management plan, the organization already had treatment for each waste type, for examples:</p> <ul style="list-style-type: none">- Empty herbicide 20 litter container are not disposed of after use, but are collected, triple-rinsed and reused for mixing spray chemicals and transported to the plantations. Once they become old and unusable are triple rinsed removed chemical residues, punctured or cut and disposed into plastic pit at the landfill to avoid being used as water containers.- For smallholder, all empty chemical containers after use are collected triple rinsed and re-used for chemical mixing. Once they become old and unusable are triple rinsed removed chemical residues, punctured or cut and disposed into chemical waste pit located within the smallholder block.- The strategy for domestic waste management is that all waste are collected weekly and disposed into the domestic waste pit at the landfill site. Garbage/putrescible waste is to be separated into biodegradables and non-biodegradables at the residences.	
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		<ul style="list-style-type: none"> - For all medical waste would be collected in bio-hazard bin, taken to the medical waste incinerator at Atata and Area 6 Landfill. - All used oil would be stored in 1000L containers and transported to central vehicle workshop. This is the supplied to Hargy Mill and sprayed onto fibre to be used as fuel for stream generation for the mill boiler. Where there is an option for recycling of waste oil, the waste oils collected and stored in appropriate containers or drums from collection by recycler. - For POME in Hargy Oil Mill, after undergoing further biological treatment it flows out into the sea whereas at Navo Mill final effluent is pumped into the fields and into irrigation trenches. At Barema , it using anaerobic digester within the ETP before downstream aerobic treatment using ponding system. The digester is equipped wit biogas recovery system to recover generated biogas. - EFB is collected and transported to the field for application at the palm bases and inter-rows. <p>All Landfills sites have individual pits for different categories of waste:</p> <ul style="list-style-type: none"> - Industrial waste pit (scrap metal, wiring, old PPE, etc) - Domestic pit (domestic trash, tins and plastic, etc) - Septic pit (septic pump out) - Hydrocarbon pit (Oil Contaminated waste, such as rags, gloves, filters, hydraulic hoses, etc). - Plastic pit (crushed/cut rinsed chemical containers, fertilizer plastic bags, etc). <p>No chemical or hazardous materials or liquid are allowed on site unless cleared by the sustainability department.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.	<p>The organization had evidence of waste management implementation, for examples:</p> <ul style="list-style-type: none"> - Mill Chemical container recycling record for Hargy Mill: 	Complied

Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.

Smallholder requirements:

The requirements fully applicable to smallholders.

- Minor compliance -

Date of Issuance	Requester	Quantity	Container Type
1 June 2024	Police	2	200 L
23 July 2024	Construction Department	2	200 L
24 July 2024	Barema Plantation	24	200 L
24 July 2024	Barema Plantation	19	200 L

- Used oil usage record for Hargy Mill:

Date	Quantity Used	Used For
26 June 2024	1000 L	Boiler
16 July 2024	3000 L	Boiler
17 July 2024	1000 L	Boiler

- Chemical Container Disposal record from Hargy Mill to landfill on 29 July 2024. The record consists of any type of waste such as caustic soda, hydrochloric acid, HCL drum, petroleum.

- Landfill record of Barema Estate for Period July 2024:

Date	Type of Waste	From
4 July 2024	Domestic Waste	Mill Office
10 July 2024	Industrial Waste	Mill Compound
17 July 2024	Hydrocarbon	Mill Factory
26 July 2024	Plastic Waste	Plantation Field

- Medical waste disposal record to incinerated site from Barema Mill for period 2024:

Date	Type of Waste			
	Bio Bag	Sharps Box	Expired Drugs	PPE
4 Jan 24	2	-	1	Yes
3 Apr 24	3	-	1	Yes
27 May 24	2	1	-	Yes

			<table><tr><td>4 Jul 24</td><td>1</td><td>-</td><td>-</td><td>Yes</td></tr><tr><td>2 Aug 24</td><td>1</td><td>-</td><td>1</td><td>Yes</td></tr></table>	4 Jul 24	1	-	-	Yes	2 Aug 24	1	-	1	Yes																																																				
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		Based observation on landfill location in Barema Plantation and Kiba Plantation and Bakada Plantation, all the type of waste has been disposed by each type of landfill and no indication of pollution to environment (the location of landfill is far from water sources and compound area).	
7.3.3	<p>Open fire is not used for waste disposal by the Unit of Certification.</p> <p>Smallholder requirements:</p> <p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Minor compliance -</p>	<p>Based on the results of field observations at the location of the scope of certification, such as compound housing, mill operational locations and plantation field, the auditors did not find any traces of waste burning.</p> <p>Based on sampled members of smallholder consultation, there's no issue related to fire land or fire waste on scope certification area. All sampled smallholder aware about prohibition of open fire for waste disposal.</p>	Complied
Criterion 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	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>Smallholder requirements:</p> <p>Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders.</p> <p>- Minor compliance -</p>	<p>According to the company's standard operational procedures, Hargy Oil Palms Limited (HOPL) actively engages in a range of good agricultural practices designed to maintain and enhance soil fertility. These practices are integral to ensuring the long-term productivity and sustainability of their plantations. One of the key activities undertaken by the company is the regular analysis of leaf and soil samples. Through these analyses, HOPL gains insights into the current state of soil fertility, allowing them to identify the specific nutrients and inputs needed to optimize soil health and boost crop productivity.</p> <p>By understanding the nutrient levels and overall condition of the soil, HOPL can make informed decisions about the type and amount of fertilizers required. To maximize the production of Fresh Fruit Bunches (FFB), the company employs an approach that includes the use of organic and inorganic fertilizers. Organic fertilizers, such as empty fruit bunches (EFB), are used to enhance soil structure, increase microbial activity, and provide essential nutrients in a sustainable manner. Inorganic fertilizers, on the</p>	Complied

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		<p>other hand, are applied to deliver specific nutrients that are immediately available to the plants, thereby supporting optimal growth and yield.</p> <p>The application of fertilizers is closely monitored and recorded to ensure that the right balance of nutrients is maintained throughout the year. The record-keeping allows the company to track the effectiveness of fertilization strategies and make any necessary adjustments to improve results. For example, the records of fertilizer applications within the current year provide detailed information on the types and quantities of fertilizers used across different estates and divisions. By adhering to these standard operational procedures and maintaining a focus on good agricultural practices, HOPL is able to sustain soil fertility and support the ongoing productivity of oil palm plantations.</p> <p>Available records of good agriculture practice training regarding fertilizer application, e.g. in Kiba Plantation on 22 March 2024, attended by 12 participants; on 18 March 2024, attended by 11 participants.</p> <p>Smallholders also implementing good agricultural practices as communicated through extension services delivered by HOPL.</p> <ul style="list-style-type: none"> • Lalopo Office Station on 29 August 2023. Refreshment training facilitated by smallholder extension staff regarding Production and BMP. Attended by 19 participants. Solomon Pagege and Ieisu Mage as a smallholders sampled in this assessment were listed. • Uasilau Sec-2, Wainamasile (Walo VOP) on 18 April 2024. Training covered topic related to the CLUA arrangement facilitated by HOPL smallholder extension staff and OPIC officer. Attended by 30 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume. • Walo Community Ground on 28 May 2024. Training covered topic related to the RSPO awareness, transport arrangement, crop quality and harvesting. Facilitated by HOPL smallholder extension staff. 	
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		<p>Attended by 27 participants including the smallholders sampled on this assessment on behalf of Ume Mulu dan Timothy Lume.</p> <ul style="list-style-type: none"> • Uasilau Sec-3B on 11 July 2024. Training covered topic related to the BMP, facilitated by HOPL smallholder extension staff. Attended by 28 participants including the smallholders sampled on this assessment. • Mini Field Day – Management for oil palm farmers on 11 June 2024; located at Mataururu Block 10-1008 (OPRA BMP Block); facilitated by HOPL Smallholder extension and PNG OPRA; cover topics related to saving scheme, Fertiliser, pest and disease, ethical conduct policy, child labour, chemical requirement and safety uses, waste management, RTE species, buffer zone, grievance, new planting and replant, consequences of not compliant, transport-production, road and pick up schedule; Attended by 69 participants including from independent estate i.e Babex Estate. 	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. Tissue testing is conducted annually to determine fertiliser requirements for the following year. Soil testing is carried out at replant.</p> <p>Guidance: Smallholders are provided with access to test results applicable to the Company Management Unit closes to their block.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders to take tissue samples from representative Smallholders annually.</p> <p>- Minor compliance -</p>	<p>HOPL practices periodic tissue and soil analysis. The periodic tissue and soil sampling carried out by Hill Laboratories. Available Laboratory Job Number 3102008; Date Registered: 27/10/2022; File Creation Date: 31/01/2023, mentioned that 36 soil sample and 70 leaf sample taken from Barema Plantation). Tissue sampling is taken on annual basis prior to the manuring program being established. The sample comprise of 22 parameters; analysis type: pH, Olsen Phosphorus, Anion Storage Capacity, Potassium, Magnesium, Sodium, CEC, Total Base Saturation, Volume Weight, Organic matter, total carbon, total nitrogen, C/N ration, total saturation and MAF units.</p> <p>Available Soil analysis result for Pandi Estate for location Abulmosi, Alaba, Alangili, Gamupa, Gilo, Vamakuma, Toka. Analysis result consists of depth; pH; Olsen P; Nitrogen; Organic material; total C; P; K; Ca; Mg; Na.</p> <p>In the other hand, HOPL also conduct Foliar Analysis by Applied Agricultural Resources Sdn. Bhd. dated September – October 2023. Major element checked (% on DM) are Ash, N, P, K, Ca, Mg. Minor element checked are Cl (%), S (%) and B (ppm). Available foliar analysis report of Hargy Estate,</p>	Complied

		<p>Navo Estate and Pandi Estate. Foliar Analysis for 2024 is not performed yet, based on information from management, leaf and soil sample taking will be performed in September – October 2024.</p> <p>Smallholder: Tissue sampling analysis in smallholder are performed by PNG-OPRA. Available leaf sampling test result from APPLIED AGRICULTURAL RESEARCH SDN. BHD. dated in 2023. Major element checked (% on DM) are Ash, N, P, K, Ca, Mg. Minor element checked are Cl (%), S (%) and B (ppm). Analysis results are available from Sample Reference No. BIA-SH-BAE-09-0948-0223L to BIA-SH-SOI-BMP-31-1651-0423L or Lab Reference No. PC24/PNGOPRA 174 to PC24/PNGOPRA 292. Foliar Analysis for 2024 is not performed yet, based on information from SHAAS, leaf and soil sample taking will be performed in September – October 2024.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>During field visit, it was observed that Hargy Estate – Barema Plantation was implemented the application of Empty Fruit Bunches (EFB). According to information obtained from an interview with the division manager, the EFB is applied at a dosage rate of 40 tons per hectare per year. The application is carried out in the interrow areas of the plantation, arranged in a U-shaped configuration to optimize distribution. In total, an amount of 16,168 tons of EFB has been applied across the plantation. This practice is part of the plantation's nutrient management strategy and helps in enhancing soil fertility and sustainability.</p> <p>POME from Barema POM applied in Hargy Estate – Barema Plantation Block E19, E20 and E21. Volume of POME applied is monitored by Barema POM as seen on Discharge to Irrigation Trench. For 2023, volume of POME applied is 14,043 m³; for January – June 2024, POME applied is 27,521.30 m³. POME from Navo POM applied in Navo Estate – Atata Plantation. Volume of POME applied is monitored by Navo POM as seen on Discharge to Irrigation Trench. Volume of POME applied in January 2024 is 1,869.02 m³; in February 2024 is 10,580.96 m³, in March 2024 is 1,812.27 m³ in April</p>	Complied

		2024 is 637.59 m ³ . There was fluctuation of POME application due to affected by Ulawun volcano eruption in November 2023.	
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders to maintain records of fertiliser distribution.</p> <p>- Minor compliance -</p>	<p>Records for fertilizer application are systematically documented and maintained in the Fertilizer Booklet and the Oil Palm Management Practice (OMP) Report. These records provide a detailed account of all fertilizer inputs used in the management of oil palm plantations. During this annual surveillance assessment, fertilizer usage for the first half of 2024 (from January to June) was capture. This verification process involved reviewing the document titled Monthly Fertilizer Actuals by Division, which provides a comprehensive breakdown of fertilizer application on a monthly basis. This document ensures accurate tracking and accountability of fertilizer use, facilitating effective management and adherence to agricultural practices.</p> <p>Hargy Estate – Barema Plantation Division 1</p> <ul style="list-style-type: none"> • Kieserite: 27 Tons • MOP: 35 Tons • NP Blend (70:30): 9 Tons • Urea: 87 Tons • Empty Fruit Bunches: 14,154 Tons <p>Hargy Estate – Barema Plantation Division 2</p> <ul style="list-style-type: none"> • Kieserite: 16 Tons • MOP: 58 Tons • Urea: 86 Tons • Empty Fruit Bunches: 2,014 Tons <p>Navo Estate – Kiba Plantation Division 1:</p> <ul style="list-style-type: none"> • DAP: 38 Tons • Kieserite: 129 Tons • MOP: 22 Tons • NP Blend (70:30): 49 Tons <p>Navo Estate – Kiba Plantation Division 2:</p> <ul style="list-style-type: none"> • Fertibor 25 kg: 2 Tons 	Complied

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		<ul style="list-style-type: none"> • Kieserite: 55 Tons • NP Blend (70:30): 59 Tons • TSP: 2 Tons • EFB: 1,399 Tons <p>Pandi Estate – Bakada Plantation:</p> <ul style="list-style-type: none"> • DAP: 184.95 Tons • Fertibor 25 kg: 1.87 Tons • Kieserite: 52.45 Tons • MOP: 276.95 Tons • NP Blend (70:30): 327.05 Tons • TSP: 1.20 Tons • Urea: 2.30 Tons <p>Smallholder:</p> <p>Records of fertilizer input in smallholder are available can be seen on fertilizer docket. For example:</p> <ul style="list-style-type: none"> • Outgrowers Department Goods & Services Delivery Docket No. 40021 dated 10 July 2023 on behalf of Ieizou Mage (Uasilau LSS 05-0189) applied 8 bags fertilizer (Urea) on 10 July 2023. • Outgrowers Department Goods & Services Delivery Docket No. 36066 dated 14 July 2023 on behalf of Timothy Lume (Walo VOP 46-0019) applied 8 bags fertilizer (Urea) on 14 July 2023. • Outgrowers Department Goods & Services Delivery Docket No. 45390 dated 1 July 2024 on behalf of Paul Gena (Tiauru LSS 01-0192) applied 20 bags fertilizer (Urea) on 1 July 2024. • Outgrowers Department Goods & Services Delivery Docket No. 45325 dated 5 July 2024 on behalf of Noel Tamata (Tiauru LSS 01-0225) applied 10 bags fertilizer (Urea) on 5 July 2024. • Recap of fertilizer use in Smallholders for 1st Semester of 2024 per Subdivision: Apupul 38.70 tons; Baekakea 9.20 tons; Barema 41.95 tons; Bubu 11.30 tons; Ewasse 12.40 tons; Gomu/Urumaili 26.90 tons; 	
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		Mataururu 18.10 tons; Matililiu 15.40 tons; Noau 21.00 tons; Wilelo 57.10 tons.	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>The available maps that identify marginal and fragile soils, including areas of steep terrain, are based on the HOPL Soil Map Biialla Project 2020. This map, created on a scale of 1:84,000 and dated February 2020, provides a detailed overview of the soil types and topography within various key locations of the Hargy Oil Palms Limited (HOPL) operations. These locations include the Hargy Plantation, Barema Plantation, Atata Plantation, Kiba Plantation, Karla Plantation, Ibana Plantation, and Bakada Plantation, as well as all associated smallholder plots and mills. Identification of marginal and fragile soils, including steep terrain was also referring to Soil Analysis issued by Hill Laboratories dated 10 April 2006.</p> <p>The soil map is a crucial resource for understanding the distribution and characteristics of different soil types across these plantations. It categorizes the soils within the HOPL areas into several types, reflecting the diverse soil composition found throughout the region. The soil types identified in the map include loam to sandy loam, heavy loam to sandy clay loam, organic loams, silty loam, sand to loamy sand, clay loam to silty clay loam, and loamy sand with gravel. Each of these soil types presents unique agricultural opportunities and challenges, particularly in relation to their suitability for palm oil cultivation and their vulnerability to erosion or degradation, especially on steep terrains.</p> <p>This detailed mapping serves as an essential tool for sustainable land management within the HOPL plantations. By identifying areas with marginal and fragile soils, the map helps in the planning and implementation of agricultural practices that can minimize environmental impact and maintain soil health, ensuring the long-term productivity of the land.</p>	Complied

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		<p>Hargy Pit 1 Soil description was as follows:</p> <ul style="list-style-type: none"> • Parent material: Volcanic alluvial materials; • Landform: Alluvial plain on foot slope; • Slope: Flat; • Previous land use: Logged forest; • Vegetation: Logged secondary forest; • Surface features: Thick litter layer and no outcrops, deep water trench common feature; • Ground cover: good ground cover with forest under growth; • Soil drainage: well drained; • Comments: there were no stones and gravel found throughout the profile, there were orange inclusions at 150-200 cm depth; • Description: Brown (10YR 4/3); sandy clay loam; friable; weakly developed fine-medium sub angular blocky structure; slightly sticky; plastic; many fine pores; rapid porosity; many fine and medium and few coarse roots, diffuse boundary to. <p>Below is detail of soil type in HOPL:</p> <ul style="list-style-type: none"> • Yanaswali Plantation – Vamakuma Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:16,950. ± 90% is Sandy clay loam; 10 % is River gravel. • Yanaswali Plantation – Sena Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:17,200. 100 % is loamy sand/gravel. • Bakada Plantation – Magalona Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:20,230. ± 65% is loamy sand/gravel; ± 35 % is loamy sand. • Karla Plantation Soils. Scale 1:40,200. Surface soil texture: ± 70% is sand to loamy sand, ± 20% is loam to sandy loam, 10% is heavy loam to sand clay loam. • Ibana Plantation Soils, Scale 1:37,440. Surface soil texture: 100% is sand to loamy sand. 	
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		<ul style="list-style-type: none"> • Hargy Plantation Soils. Surface soil texture: sand to loamy sand (15%), heavy loam to sand clay loam (68%), clay loam to silty clay loam (5%), No data (10%), organic loam to sandy clay loam (2%). • Barema Plantation Soils. Surface soil texture: silty clay (70%), organic loam to sand clay loam (15%), clay loam to silty clay loam (15%). • Bakada Plantation - Alangily Soils, scale 1:26,590. Surface soil texture: sandy loam (90%), loamy sand (10%). • Bakada Plantation – Alaba Soils, scale 1:31,110. Surface soil texture: loamy sand/gravel (80%), loamy sand (20%). • Bakada Plantation – Abulmosi soils, scale 1:25,290. Surface soil texture: loamy sand/gravel (90%), loamy sand (10%). <p>Based on site visit and interview with plantation management, there is no peat in whole HOPL plantation area including smallholder area, and steep terrain is not planted, but keep as conservation area or buffer zone.</p>	
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p> <p>Smallholder requirements:</p> <p>Smallholders do not plant on unsuitable slopes. Organization managing the smallholders to advise on slope suitability after consideration of gradient, soil type, harvesting safety and other relevant issue.</p> <p>- Minor compliance -</p>	<p>Based on field observation in Hargy Estate – Barema Plantation, Navo Estate – Kiba Plantation and Pandi Estate – Bakada Plantation obtained information that there is no extensive replanting of oil palm on steep terrain in HOPL area including in smallholders area.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview, there is no new planting on steep terrain in HOPL area including in smallholders.</p>	Complied
<p>Criterion 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.</p>			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and</p>	<p>The available maps that identify marginal and fragile soils, including areas of steep terrain, are based on the HOPL Soil Map Bialla Project 2020. This map, created on a scale of 1:84,000 and dated February 2020, provides a</p>	Complied

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	<p>fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>detailed overview of the soil types and topography within various key locations of the Hargy Oil Palms Limited (HOPL) operations. Identification of marginal and fragile soils, including steep terrain was also referring to Soil Analysis issued by Hill Laboratories dated 10 April 2006. Soil maps and soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations to maintain long-term suitability of land for palm oil cultivation.</p> <p>The certificate holder has established a comprehensive management strategy for addressing fragile and problematic soils, which is detailed in their New Development Procedure (PRO-ESD-GEN-001-12), issue No. 12, dated 19 September 2023. This document outlines guidelines for sustainable land use, particularly in areas where soil and topographic conditions pose challenges for agricultural activities.</p> <p>The requirements outlined in the procedure include several critical measures:</p> <ul style="list-style-type: none"> • Limited Planting on Fragile and Marginal Soils: When planting on these soils cannot be entirely avoided, the procedure requires that specific plans be developed to ensure the protection of the soil. These plans should include strategies for minimizing erosion, maintaining soil fertility, and preventing land degradation. The use of appropriate soil conservation techniques and careful monitoring is essential to ensure that the planting does not lead to long-term environmental damage. • Avoidance of Planting on Slopes Exceeding 25°: The procedure clearly prohibits planting on slopes greater than 25° due to the high risk of soil erosion and landslides in these areas. Planting on such steep slopes can result in significant soil loss, reduced water retention, and increased vulnerability to environmental hazards. By avoiding planting on these slopes, the certificate holder aims to preserve soil integrity and prevent potential environmental disasters. 	
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		<ul style="list-style-type: none"> Avoidance of Planting on Contiguous Areas of Peat Soils: The procedure also stipulates that planting on contiguous areas of peat soils that are more than 3 meters deep and cover an area greater than 150 hectares should be avoided. Peat soils are highly sensitive environments that store significant amounts of carbon, and disturbing these soils can lead to substantial greenhouse gas emissions and other ecological consequences. By protecting these areas, the procedure supports the conservation of vital carbon sinks and the prevention of habitat loss. <p>Based on site visit and interview with plantation management, there is no peat in whole HOPL plantation area, and steep terrain is not planted, but keep as conservation area or buffer zone.</p>	
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Based on thorough field observations and detailed interviews with plantation management and staff, it has been confirmed that there is no evidence of extensive planting on marginal or fragile soils within the entire plantation area. The entire plantation is situated on mineral soils, which are generally more stable and less prone to the issues commonly associated with marginal and fragile soils, such as erosion, poor fertility, and difficulty in sustaining crop growth. Mineral soils typically offer better drainage, higher fertility, and greater structural stability compared to other soil types, making them more suitable for intensive agricultural activities, such as the cultivation of oil palms. The absence of planting on marginal and fragile soils is a significant aspect of the plantation's sustainable land management practices.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The available soil analysis, conducted by Hill Laboratories and issued on 10 April 2006, along with the HOPL Soil Map for the Bialla Project 2020, provides insights into the soil characteristics and topographic features of the plantation area.</p> <p>The soil surveys and topographic information gathered from these studies are essential in guiding the sustainable development and management of the plantation. The detailed soil analysis provides data on soil properties,</p>	Complied

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		<p>such as texture, fertility, pH levels, and organic matter content, which are fundamental in determining the land's suitability for oil palm cultivation.</p> <p>The soil suitability map is a key resource for assessing the long-term viability of the land for oil palm agriculture, including guide the planning of drainage and irrigation systems, roads and other infrastructure. It allows the company to identify areas with optimal soil conditions that can support healthy and productive oil palm plantations over the long term. It also helps in recognizing zones that may require special management practices or might not be suitable for planting due to poor soil quality or other limiting factors.</p>	
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL</p>	Not Applicable

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		Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area.	
		This indicator is not applicable.	
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area.	Not Applicable
		This indicator is not applicable.	
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those	Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area. This indicator is not applicable.	Not Applicable

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	<p>with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p>PROCEDURAL NOTE:</p> <p>PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. In the HCV-HCS assessment report by Hijau Daun dated June 2023, approved by HCVRN on 15 March 2024 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area.</p> <p>This indicator is not applicable.</p>	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water</p>	<p>As informed in Environmental Policy (POL-HRD-GEN-001-08), the organization will actively seek to minimise adverse environmental impacts from its operations by maintaining and continuously improving the quality of the environment and at the same time increase community confidence</p>	Complied

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	sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:	in its business activities. The organization commit to minimise or eliminate the release of pollutants to the environment (including the water sources).												
	7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	The company has had procedure Management of water on Hargy Oil Palms Limited Established Water Management Plan No.PLN-SUS-GEN-002-11 r.11 dated 30 August 2023. The procedure informs the legal and regulatory requirements, water extraction sources, water usage, water discharge plan, maintaining water quality, water utility maintenance program, routine reporting of monitoring result (with New Britain Laboratory Service).												
	7.8.1b Workers have adequate access to clean water.	The organization also conducted water testing for clean water provided to housing compound, for examples the latest testing results for Barema Mill Compound, Navo Mill Compound and Kiba Plantation Compound in May 2024 by New Britain Laboratory Service, Mosa:												
	- Minor compliance -	Barema Mil Compound												
		<table><tr><th>Parameters</th><th>Threshold</th><th>Results</th></tr><tr><td>E. Coli (colonies/100 ml)</td><td>none</td><td>0</td></tr><tr><td>Total Solids (mg/L)</td><td>1500</td><td>160</td></tr><tr><td>Turbidity (NTU)</td><td>25</td><td>5</td></tr></table>	Parameters	Threshold	Results	E. Coli (colonies/100 ml)	none	0	Total Solids (mg/L)	1500	160	Turbidity (NTU)	25	5
	Parameters	Threshold	Results											
	E. Coli (colonies/100 ml)	none	0											
	Total Solids (mg/L)	1500	160											
	Turbidity (NTU)	25	5											
		Navo Mil Compound												
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7.8.2	<div><div><div>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</div><div><div>Smallholder requirements:</div><div>Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste.</div><div>- Critical (Major) compliance -</div></div></div></div>	<div><div>Based on field observation in riparian of Barema River (Block 07E25) and Lobo River (Block 08A29) there's no indication of chemical use and all the conservation area already managed well. The organization also planted mangrove plants for enrich the coast in the conservation area of Hargy Oil Mill.</div></div>	Complied												

7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The organizations showed latest record of mill effluent testing results, here's the record:</p> <table><tr><th>Indicators</th><th>Navo Mill</th><th>Barema Mill</th><th>Hargy Mill</th></tr><tr><td>pH</td><td>8</td><td>8.5</td><td>8.1</td></tr><tr><td>Total Solids (mg/L)</td><td>5000</td><td>3600</td><td>1650</td></tr><tr><td>Total suspended solids (mg/L)</td><td>300</td><td>440</td><td>260</td></tr><tr><td>BOD (mg/L)</td><td>61</td><td>47</td><td>20</td></tr><tr><td>COD (mg/L)</td><td>978</td><td>929</td><td>690</td></tr><tr><td>Dissolved Oxygen (mg/L)</td><td>4.7</td><td>4.2</td><td>4.5</td></tr></table> <p>The laboratory is accredited by Papua New Guinea Accreditation Scheme (PNGLAS Accredited Laboratory No. 056) and done on 9 July 2024. Based on that testing record, the results still not exceed the maximum permissible level.</p> <p>For Barema Mill and Navo Mill, several POME applied to field as land application. Here's the record for period 2024:</p> <p>Barema Mill</p> <table><tr><th>Month</th><th>Quantity (m3)</th></tr><tr><td>January 2024</td><td>2,984.00</td></tr><tr><td>February 2024</td><td>3,077.00</td></tr><tr><td>March 2024</td><td>912.00</td></tr><tr><td>April 2024</td><td>2,784.00</td></tr><tr><td>May 2024</td><td>2,784.00</td></tr><tr><td>June 2024</td><td>1,502.00</td></tr></table> <p>Navo Mill</p>	Indicators	Navo Mill	Barema Mill	Hargy Mill	pH	8	8.5	8.1	Total Solids (mg/L)	5000	3600	1650	Total suspended solids (mg/L)	300	440	260	BOD (mg/L)	61	47	20	COD (mg/L)	978	929	690	Dissolved Oxygen (mg/L)	4.7	4.2	4.5	Month	Quantity (m3)	January 2024	2,984.00	February 2024	3,077.00	March 2024	912.00	April 2024	2,784.00	May 2024	2,784.00	June 2024	1,502.00	Complied
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>The organization showed the record of water usage for each mill:</p> <p>Hargy Oil Mill</p> <table><tr><th>Period</th><th>FFB (MT)</th><th>Water (MT)</th><th>Wate Usage/FFB</th><th>Target/Budget</th></tr><tr><td>July 2023</td><td>11,508</td><td>10,256</td><td>0.89</td><td>1</td></tr><tr><td>Aug 2023</td><td>12,089</td><td>10,739</td><td>0.89</td><td>1</td></tr><tr><td>Sep 2023</td><td>11,141</td><td>9,104</td><td>0.82</td><td>1</td></tr><tr><td>Oct 2023</td><td>13,200</td><td>10,772</td><td>0.82</td><td>1</td></tr><tr><td>Nov 2023</td><td>14,028</td><td>13,660</td><td>0.97</td><td>1</td></tr><tr><td>Dec 2023</td><td>14,582</td><td>14,021</td><td>0.96</td><td>1</td></tr><tr><td>Jan 2024</td><td>13,503</td><td>11,938</td><td>0.88</td><td>1</td></tr><tr><td>Feb 2024</td><td>11,108</td><td>9,559</td><td>0.86</td><td>1</td></tr><tr><td>Mar 2024</td><td>9,962</td><td>9,192</td><td>0.92</td><td>1</td></tr><tr><td>Apr 2024</td><td>13,680</td><td>11,942</td><td>0.87</td><td>1</td></tr><tr><td>May 2024</td><td>16,252</td><td>14,121</td><td>0.87</td><td>1</td></tr><tr><td>Jun 2024</td><td>15,220</td><td>12,158</td><td>0.80</td><td>1</td></tr></table> <p>Barema Oil Mill</p>	Period	FFB (MT)	Water (MT)	Wate Usage/FFB	Target/Budget	July 2023	11,508	10,256	0.89	1	Aug 2023	12,089	10,739	0.89	1	Sep 2023	11,141	9,104	0.82	1	Oct 2023	13,200	10,772	0.82	1	Nov 2023	14,028	13,660	0.97	1	Dec 2023	14,582	14,021	0.96	1	Jan 2024	13,503	11,938	0.88	1	Feb 2024	11,108	9,559	0.86	1	Mar 2024	9,962	9,192	0.92	1	Apr 2024	13,680	11,942	0.87	1	May 2024	16,252	14,121	0.87	1	Jun 2024	15,220	12,158	0.80	1	Complied
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		<table><tr><th>Period</th><th>FFB (MT)</th><th>Water (MT)</th><th>Wate Usage/FFB</th><th>Target/Budget</th></tr><tr><td>July 2023</td><td>12,234</td><td>12,861</td><td>1.05</td><td>1</td></tr><tr><td>Aug 2023</td><td>13,687</td><td>12,670</td><td>0.93</td><td>1</td></tr><tr><td>Sep 2023</td><td>14,447</td><td>12,738</td><td>0.88</td><td>1</td></tr><tr><td>Oct 2023</td><td>17,303</td><td>18,829</td><td>1.09</td><td>1</td></tr><tr><td>Nov 2023</td><td>20,277</td><td>17,506</td><td>0.86</td><td>1</td></tr><tr><td>Dec 2023</td><td>17,666</td><td>14,665</td><td>0.83</td><td>1</td></tr><tr><td>Jan 2024</td><td>17,662</td><td>17,715</td><td>1.00</td><td>1</td></tr><tr><td>Feb 2024</td><td>14,174</td><td>11,903</td><td>0.84</td><td>1</td></tr><tr><td>Mar 2024</td><td>16,491</td><td>17,839</td><td>1.08</td><td>1</td></tr><tr><td>Apr 2024</td><td>14,097</td><td>14,435</td><td>1.02</td><td>1</td></tr><tr><td>May 2024</td><td>16,969</td><td>20,258</td><td>1.19</td><td>1</td></tr><tr><td>Jun 2024</td><td>13,712</td><td>14,595</td><td>1.06</td><td>1</td></tr></table> <p>Navo Oil Mill</p> <table><tr><th>Period</th><th>FFB (MT)</th><th>Water (MT)</th><th>Wate Usage/FFB</th><th>Target/Budget</th></tr><tr><td>July 2023</td><td>16,540</td><td>17,363</td><td>1.05</td><td>1</td></tr><tr><td>Aug 2023</td><td>18,070</td><td>17,023</td><td>0.94</td><td>1</td></tr><tr><td>Sep 2023</td><td>15,949</td><td>18,496</td><td>1.16</td><td>1</td></tr><tr><td>Oct 2023</td><td>22,063</td><td>23,869</td><td>1.08</td><td>1</td></tr><tr><td>Nov 2023</td><td>15,194</td><td>13,733</td><td>0.90</td><td>1</td></tr><tr><td>Dec 2023</td><td>17,004</td><td>19,930</td><td>1.17</td><td>1</td></tr><tr><td>Jan 2024</td><td>20,040</td><td>24,134</td><td>1.20</td><td>1</td></tr><tr><td>Feb 2024</td><td>16,942</td><td>18,186</td><td>1.07</td><td>1</td></tr><tr><td>Mar 2024</td><td>14,976</td><td>16,436</td><td>1.10</td><td>1</td></tr><tr><td>Apr 2024</td><td>17,149</td><td>23,948</td><td>1.40</td><td>1</td></tr><tr><td>May 2024</td><td>17,838</td><td>22,511</td><td>1.26</td><td>1</td></tr><tr><td>Jun 2024</td><td>14,802</td><td>19,850</td><td>1.34</td><td>1</td></tr></table> <p>The increasing of water usage on the April - June 2024 period for Navo Mill is because of the implementation of new turbine.</p>	Period	FFB (MT)	Water (MT)	Wate Usage/FFB	Target/Budget	July 2023	12,234	12,861	1.05	1	Aug 2023	13,687	12,670	0.93	1	Sep 2023	14,447	12,738	0.88	1	Oct 2023	17,303	18,829	1.09	1	Nov 2023	20,277	17,506	0.86	1	Dec 2023	17,666	14,665	0.83	1	Jan 2024	17,662	17,715	1.00	1	Feb 2024	14,174	11,903	0.84	1	Mar 2024	16,491	17,839	1.08	1	Apr 2024	14,097	14,435	1.02	1	May 2024	16,969	20,258	1.19	1	Jun 2024	13,712	14,595	1.06	1	Period	FFB (MT)	Water (MT)	Wate Usage/FFB	Target/Budget	July 2023	16,540	17,363	1.05	1	Aug 2023	18,070	17,023	0.94	1	Sep 2023	15,949	18,496	1.16	1	Oct 2023	22,063	23,869	1.08	1	Nov 2023	15,194	13,733	0.90	1	Dec 2023	17,004	19,930	1.17	1	Jan 2024	20,040	24,134	1.20	1	Feb 2024	16,942	18,186	1.07	1	Mar 2024	14,976	16,436	1.10	1	Apr 2024	17,149	23,948	1.40	1	May 2024	17,838	22,511	1.26	1	Jun 2024	14,802	19,850	1.34	1	
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		The organization also showed the evidence of payment record (Record ref No. 1710194149000001, dated 17 October 2023) for all valid environment permits which refer to “Year 2023 Notice of Administration (Annual) Fee” by Conservation and Environmental Protection Authority on 20 March 2023.																																			
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																					
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. - Minor compliance -	<div>The organization has the record of fossil fuel for period 2023/2024:</div> <div><div>Hargy Mill</div><table><thead><tr><th>Period</th><th>Kilowatt hour (diesel)</th></tr></thead><tbody><tr><td>July 2023</td><td>128,240</td></tr><tr><td>Aug 2023</td><td>159,440</td></tr><tr><td>Sep 2023</td><td>152,960</td></tr><tr><td>Oct 2023</td><td>175,200</td></tr><tr><td>Nov 2023</td><td>131,600</td></tr><tr><td>Dec 2023</td><td>129,280</td></tr><tr><td>Jan 2024</td><td>146,400</td></tr><tr><td>Feb 2024</td><td>162,240</td></tr><tr><td>Mar 2024</td><td>145,760</td></tr><tr><td>Apr 2024</td><td>187,040</td></tr><tr><td>May 2024</td><td>203,280</td></tr><tr><td>Jun 2024</td><td>175,760</td></tr></tbody></table><div>Based on explanation of manager, the increasing of diesel fuel (especially in May 2024) because of steam machine problem, so they are using the low capacity of generator (which use more fuel).</div><div><div>Barema Mill</div><table><thead><tr><th>Period</th><th>Diesel usage (liters)</th></tr></thead><tbody><tr><td>July 2023</td><td>41,516</td></tr><tr><td>Aug 2023</td><td>24,150</td></tr><tr><td>Sep 2023</td><td>22,646</td></tr></tbody></table></div></div>	Period	Kilowatt hour (diesel)	July 2023	128,240	Aug 2023	159,440	Sep 2023	152,960	Oct 2023	175,200	Nov 2023	131,600	Dec 2023	129,280	Jan 2024	146,400	Feb 2024	162,240	Mar 2024	145,760	Apr 2024	187,040	May 2024	203,280	Jun 2024	175,760	Period	Diesel usage (liters)	July 2023	41,516	Aug 2023	24,150	Sep 2023	22,646	Complied
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		Oct 2023	20,642		
		Nov 2023	10,752		
		Dec 2023	18,181		
		Jan 2024	47,070		
		Feb 2024	41,192		
		Mar 2024	20,135		
		Apr 2024	25,176		
		May 2024	51,289		
		Jun 2024	28,547		
		The increase in fossil fuel use in Feb to June was due to low crop (under 16,000 MT FFB processed), so the fuel material used for the processing process was diesel.			
Navo Mill					
		Period	Diesel usage (Liters)		
		July 2023	74,670		
		Aug 2023	111,824		
		Sep 2023	55,686		
		Oct 2023	57,751		
		Nov 2023	75,402		
		Dec 2023	83,152		
		Jan 2024	68,828		
		Feb 2024	89,455		
		Mar 2024	63,169		
		Apr 2024	58,259		
		May 2024	46,211		
		Jun 2024	54,888		
Generally, the FFB process on mill will optimize with recycle fuel (waste product), except when the FFB production condition in the field is in low crop status.					

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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a GHG mitigation plan document in the form of "Environmental Aspect Impacts Master Register" (Dated 19 September 2023) for the 2024 period in an effort to increase the % reduction in GHG emissions. The activities for GHG mitigation cover all units in scope certification (Mills and Plantation) which include:</p> <ul style="list-style-type: none"> - Preventive maintenance for all machines. - Road Maintenance Program - Buffer zone monitoring - Regular Cleaning - Monthly monitoring of Fossil fuel use. - Chemical used monitoring. - Methane capture in Barema POM. 	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited shows the HCV-HCS assessment reports:</p> <ul style="list-style-type: none"> - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Southern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the south consist of the assessment areas of 13,399.36 ha and total conservation area 2,419.96 ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Central Section), Papua New Guinea" 8 August 2023 by PT. Hijau Daun. The assessment covers estates in the central consist of the assessment areas of 17,967.38 ha and total conservation area 2,126.25 ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Northern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the northern consist of the assessment areas of 21,674.38 ha and total conservation area 4,653.66 ha. 	Complied

		<p>The HCV and HCS assessment conducted by Jules Crahshaw (Full License ALS14006JC) as lead assessor. In this assessment, the HCVRN Common Guidance (CG) for HCV identification is used. HCS guidance is based on version 2 of the HCS toolkit which released dated May 2017. The assessment study one step is FPIC process. There have been number of FPIC activities that have spanned many tears for each of the projects that are being considered. The data captured method was similar across AOI, which involved participatory mapping and focus group discussion. This involved all the affected communities such as representative people from Bageta, people form Uasilau, People from Nakanai Tribe & Menge Tribe, and people from Baikakea.</p>							
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored</p> <p>- Critical (Major) compliance -</p>	<p>Regarding identification of significant pollutants, the mill has identified the sources of pollutants in the company's operations, namely: smoke emissions, noise, and boiler emissions.</p> <p>Currently, management practice includes issuance of hearing protective equipment to workers (earmuffs/ear plugs) working in high noise areas within the mill. For emissions, current monitoring includes hourly visual observation carried out by mill laboratory personnel for continuous monitoring of emissions and assessment of compliance with the regulated levels and environmental code of practice for Oil Palm Processing Industry. Monthly, the Sustainable Department monitor it through inspections and audits whereby reports are presented to the mill management for corrective actions should any deficiencies area identified.</p> <p>The organization also showed the record of emission testing results, for examples:</p> <p>Hargy Mill</p> <table><tr><th>Period</th><th>Smoke Density (%)</th><th>Target/Budget (%)</th></tr><tr><td>July 2023</td><td>0.9</td><td>40</td></tr></table>	Period	Smoke Density (%)	Target/Budget (%)	July 2023	0.9	40	Complied
Period	Smoke Density (%)	Target/Budget (%)							
July 2023	0.9	40							

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		Aug 2023	4.1	40				
		Sep 2023	4.1	40				
		Oct 2023	1.5	40				
		Nov 2023	4.3	40				
		Dec 2023	2.2	40				
		Jan 2024	1.4	40				
		Feb 2024	2.6	40				
		Mar 2024	0.9	40				
		Apr 2024	1.1	40				
		May 2024	2.9	40				
		Jun 2024	1.3	40				
		Barema Mill						
		Period	Smoke Density (%)	Target/Budget (%)				
		July 2023	19.2	40				
		Aug 2023	13.6	40				
		Sep 2023	14.4	40				
		Oct 2023	19.1	40				
		Nov 2023	20.3	40				
		Dec 2023	15.8	40				
		Jan 2024	17.8	40				
		Feb 2024	12.5	40				
		Mar 2024	23.8	40				
		Apr 2024	16.8	40				
		May 2024	15.7	40				
		Jun 2024	16.2	40				
		Navo Mill						
		Period	Smoke Density (%)	Target/Budget (%)				
		July 2023	0.9	40				
		Aug 2023	4.1	40				

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		<table><tr><td>Sep 2023</td><td>4.1</td><td>40</td></tr><tr><td>Oct 2023</td><td>1.5</td><td>40</td></tr><tr><td>Nov 2023</td><td>4.3</td><td>40</td></tr><tr><td>Dec 2023</td><td>2.2</td><td>40</td></tr><tr><td>Jan 2024</td><td>1.4</td><td>40</td></tr><tr><td>Feb 2024</td><td>2.6</td><td>40</td></tr><tr><td>Mar 2024</td><td>0.9</td><td>40</td></tr><tr><td>Apr 2024</td><td>1.1</td><td>40</td></tr><tr><td>May 2024</td><td>2.9</td><td>40</td></tr><tr><td>Jun 2024</td><td>1.3</td><td>40</td></tr></table> <p>Based on that testing results, the smoke density still on target (below 40%).</p> <p>As a monitoring control for pollutant, each mill had conducted “Pollution Control Device Verification checklist” for every month. All the pollution control devices inspected regularly at scheduled intervals and cleaned when necessary. For examples, the record on 25 March 2024 at Barema Mill with the results is “All interceptor drains during this inspection were noticed in clean condition”.</p>	Sep 2023	4.1	40	Oct 2023	1.5	40	Nov 2023	4.3	40	Dec 2023	2.2	40	Jan 2024	1.4	40	Feb 2024	2.6	40	Mar 2024	0.9	40	Apr 2024	1.1	40	May 2024	2.9	40	Jun 2024	1.3	40	
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Jun 2024	1.3	40																															
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area																																	
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Replanting 2024 conducted at Navo Estate – Ibana Plantation, and smallholder block, e.g. LSS Blocks No.01-0225 on behalf of Burnawae Tamata – Tiauru LSS and Ivule Independent Estate (No.770002). Based on field visit, document review and interview, there is no of new planting or replanting preparation carried out by burning in Hargy Oil Palms Limited’s plantation area.	Complied																														
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Replanting 2024 conducted at Navo Estate – Ibana Plantation, and smallholder block, e.g. LSS Blocks No.01-0225 on behalf of Burnawae Tamata – Tiauru LSS and Ivule Independent Estate (No.770002). Based on field visit, document review and interview, there is no of new planting or replanting preparation carried out by burning in Hargy Oil Palms Limited’s plantation area.	Complied																														

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		During ASA3_1, audit team conducted verification/check on company's readiness for firefighting infrastructures and teams.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	<p>Hargy Oil Palms Limited (HOPL) has established a Zero Burning Policy within its operational guidelines, reflecting commitment to fire prevention and control. This policy is further supported by the preparation of the Environmental Aspects and Impacts Master Register (REG-SUS-EMS-001-19) and Management Plan (PLN-SUS-EMS-001-11). HOPL has consistently communicated its fire prevention and control measures to employees and adjacent stakeholders, ensuring everyone is well-informed and engaged in these critical efforts. This communication is conducted in close coordination with the Oil Palm Industry Corporation (OPIC) and the Papua New Guinea Oil Palm Research Association (PNG OPRA), emphasizing a collaborative approach to fire safety. Several records seen related to the fire awareness training as follows:</p> <ol style="list-style-type: none"> 1. Smallholder Tiauru LSS Section 1, 2 & 3: RSPO Requirements awareness on 4 March 2024, facilitate by HOPL-SHAAS and Sustainability Department. Attended by 33 participants. One of the topic is that fire cannot be used for replanting land preparation or pest and weed control. 2. Smallholder Tiauru LSS: Field Day regarding RSPO Requirements including BMP, production, FFB inspection zone and security, on 7 February 2024, facilitate by HOPL-SHAAS, OPIC Staff, Police and Security. Attended by 59 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, child labour, ethical conduct policy, buffer zone, RTE species), importance of upkeep, importance of regular harvesting, importance of crop quality, importance of fertilizer, production figures, security awareness including prohibit use of fire on waste disposal and replanting. 3. Navo POM: Monthly checklist of fire emergency equipment, including awareness to Navo POM employees, dated 17 July 2024. Available 	Complied

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		<p>record of Fire extinguisher register; there are 41 fire extinguishers available and in good conditions.</p> <p>4. Navo Estate – Kiba Plantation: Training on General disciplinary including fire prevention, dated 2 February 2024. Topic covered: environmental policy, no deforestation, conservation on RTE species, conserve buffer zone, no fire for land preparation and fire prevention during replanting in the plantation. The training attended by 16 participants.</p> <p>5. Pandi Estate – Bakada Plantation: Refreshment training to 18 cutters from Alaba – whose working for company, dated 13 June 2024; to 3 sprayers on 6 March 2024; to 25 fertiliser applicators from Sabalbala – whose working for company, dated 19 January 2024; to 16 spraying applicators, dated 15 January 2024. The topic covering Environment including RTE and Fire awareness.</p>	
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12</p> <p>The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.</p> <p>The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.</p> <p>High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards. Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).</p> <p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and 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 HCVs or HCS forests.</p>	<p>Hargy Oil Palms Limited can demonstrated A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>Liability disclosure Hargy Oil Palms Limited's has been submitted to RSPO as reply by email dated 26 June 2023 stated "The RaCP (RaCP-0327) status</p>	Complied

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	<p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>for Hargy Oil Palms Limited is Not Applicable. Therefore, as there are changes in the hectarage, It would be great if you can advise the management unit to submit the updated liability disclosure or information to the RSPO compensation team."</p> <p>Hargy Oil Palms Limited responded by sending the information on 23 September 2023.</p> <p>The following response "acknowledge receipt" from RSPO on 25 September 2023.</p>	
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The final report of "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd Papua New Guinea" 28 July 2023 by PT. Hijau Daun has received Satisfactory feedback from HCVRN on 15 March 2024 (Central Section), 12 January 2024 (Southern Section), 8 January 2024 (Northern Section).</p> <p>Hargy Oil Palms Limited shows the HCV-HCS assessment reports:</p> <ul style="list-style-type: none"> - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Southern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the south consist of smallholder areas of 13,454.61 Ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Central Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the centre consist of company owned estates (in lease), smallholder areas, unregistered blocks and other additional area of 18,505.17 Ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Northern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the north consist of company owned estates (in lease) and smallholder areas of 19,982.52 Ha. <p>The HCV-HCS assessment process referring to HCVRN Common Guidance for HCV Identification, and HCS Toolkit dated May 2017. The HCV</p>	Complied

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		<p>assessment led by ALS Lead Assessor Jules Crawshaw – full license (ALS14006JC) and as social team leader. The assessment team comprise of Jeffrey Lawrence (vegetation expert), Eliuda Pilake (vegetation expert), Bulisa Iova (birds and mammal expert), Diane Mirio (social expert), Shira Dumba (social expert), Ega Oktavianus Putra (birds expert).</p> <p>The HCV-HCS assessment timeline:</p> <ul style="list-style-type: none">- Scoping study fieldwork 27 April 2019-23 May 2019;- Compilation of secondary and available primary data August-September 2022;- Planning for fieldwork and agreement on field method for primary data collection August-September 2022;- Field work and primary data collection including direct stakeholder consultation 10 October – 2 November 2022;- Data Analysis and Interpretation November 2022-February 2023;- Writing SEIA included land tenure and social baseline study November 2022-February 2023;- Final Consultation to report interim HCV findings on 6 March-24 March 2023;- Preparation of Draft Report including HCVA maps and management and monitoring recommendations on March-July 2023; <p>The HCV assessment reports submitted for ALS on 28 July 2023.</p> <p>Based on the approved HCV-HCS assessment reports there are conservation values identified:</p> <table><tr><th>Location</th><th>HCV-HCS area (Ha)</th></tr><tr><td>Hargy Estate</td><td>1,872.76</td></tr><tr><td>Navo Estate</td><td>2,683.12</td></tr><tr><td>Pandi Estate</td><td>1,069.90</td></tr><tr><td>Smallholder area</td><td>1,103.52</td></tr></table>	Location	HCV-HCS area (Ha)	Hargy Estate	1,872.76	Navo Estate	2,683.12	Pandi Estate	1,069.90	Smallholder area	1,103.52	
Location	HCV-HCS area (Ha)												
Hargy Estate	1,872.76												
Navo Estate	2,683.12												
Pandi Estate	1,069.90												
Smallholder area	1,103.52												
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and</p>	Complied										

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	<p>indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE:</p> <p>There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land/ plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Alaba area; there is no new planting replaced primary forest for extension area.</p> <p>Hargy Oil Palms Limited shows the HCV-HCS assessment reports:</p> <ul style="list-style-type: none">- "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Southern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the south consist of smallholder areas of 13,454.61 Ha.- "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Central Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the centre consist of company owned estates (in lease), smallholder areas, unregistered blocks and other additional area of 18,505.17 Ha.- "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Northern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the north consist of company owned estates (in lease) and smallholder areas of 19,982.52 Ha. <p>Based on the approved HCV-HCS assessment reports there are conservation values identified:</p> <table><tr><th>Location</th><th>HCV-HCS area (Ha)</th></tr><tr><td>Hargy Estate</td><td>1,872.76</td></tr><tr><td>Navo Estate</td><td>2,683.12</td></tr><tr><td>Pandi Estate</td><td>1,069.90</td></tr><tr><td>Smallholder area</td><td>1,103.52</td></tr></table>	Location	HCV-HCS area (Ha)	Hargy Estate	1,872.76	Navo Estate	2,683.12	Pandi Estate	1,069.90	Smallholder area	1,103.52	
Location	HCV-HCS area (Ha)												
Hargy Estate	1,872.76												
Navo Estate	2,683.12												
Pandi Estate	1,069.90												
Smallholder area	1,103.52												
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed.</p>	<p>Based on site visit, document review and interview with plantation managers and smallholders; there was no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p>	Complied										

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	<p>implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified) that may result from the actions of the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> - The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area. - Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there was no peat in whole HOPL Plantations including in Smallholders area. <p>Hargy Oil Palms Limited shows the HCV-HCS assessment reports:</p> <ul style="list-style-type: none"> - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Southern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the south consist of smallholder areas of 13,454.61 Ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Central Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the centre consist of company owned estates (in lease), smallholder areas, unregistered blocks and other additional area of 18,505.17 Ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Northern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the north consist of company owned estates (in lease) and smallholder areas of 19,982.52 Ha. - In the HCV-HCS assessment report by Hijau Daun dated June 2023 and HOPL soil map, there is no peat in HOPL operation including in smallholders (LSS, VOP, independent estate) area. - The final report of "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd Papua New Guinea" 28 July 2023 by PT. Hijau Daun has received Satisfactory feedback from HCVRN on 15 March 2024 (Central Section), 12 January 2024 (Southern Section), 8 January 2024 (Northern Section). 	
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		<p>Hargy Oil Palms Limited prepared HCV/HCS, Peatlands and Conservation Area Management Plan, dated 30 March 2021. The management plan presents a summary of findings and recommendations from HCV assessments for Hargy Oil Palms Limited. The generic recommendations for conservation areas within all the plantations and smallholders are: Demarcate boundaries of HCV/HCS, other conservation areas and peatlands; Collaborate with the smallholder growers to create a simple management plan for each area; Collaborate with local communities to establish and maintain appropriate riparian buffers; Maintain or improve water quality in all rivers in the area of operations.</p> <p>The management and monitoring plan consultation with stakeholders carried out in conjunction with the latest HCV-HCS assessment, reported in 7.12.5</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There are areas under community rights that identified with HCV-HCS value. This identification as per document "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Northern-Central-Southern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun.</p> <p>Hargy Oil Palms and the HCV-HCS assessor made consultation with the surrounding communities, including smallholders to encourage involvement in maintaining and managing the conservation areas. Record of consultation meeting attended by male and female community members verified:</p> <ul style="list-style-type: none"> - HCV-HCS Stakeholder Awareness with Noau village, dated 5 October 2022, attended by 30 community members and smallholders. - HCV-HCS Stakeholder Awareness with Tiauru Community, dated 10 October 2022, attended by 15 community members. - HCV-HCS Stakeholder Awareness with Barema village, dated 12 October 2022 by Jules Crawshaw, attended by 32 community members and smallholders. 	Complied

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		<ul style="list-style-type: none"> - Meeting with Gamupa community on Gamupa Consultation, dated 13 March 2023, by Jules Crawshaw. The consultation meeting attended by 59 persons (12 female and 47 male). - Meeting with Kaiaumu community on Kaiaumu HCV Final Consultation, dated 16 March 2023, by Jules Crawshaw and Diane Mirio. The consultation meeting attended by 32 persons (5 female and 27 male). - Meeting with Bubu community on Bubu HCV-HCS, dated 13 March 2023, by Jules Crawshaw and Diane Mirio. The consultation meeting attended by 24 persons (7 female and 17 male). <p>Communities that have lost access and rights to land for plantation expansion are given opportunities. Employees at Hargy also have rights to manage and registered their smallholders blocks to Hargy. However, at the time, no new development after 15 November 2018 in scope of certificate holder.</p> <p>The compensation offered, based on the New Britain Palm Oil model, PGK20 hectare for vacant land (i.e. buffer zones/areas too steep to plant) and PGK75 hectare for planted areas.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>Smallholder requirements:</p> <p>Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> <p>- Minor compliance -</p>	<p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>Hargy Estate:</p> <ul style="list-style-type: none"> - Barema Plantation made communication/socialization on RTE species protection, HCV and HCS area on 11 July 2024. <p>Navo Estate:</p> <ul style="list-style-type: none"> - Kiba plantation Compound Meeting Minutes dated 4 June 2024. 	Complied

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7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Unit of certification conduct periodical monitoring on HCV area, natural ecosystem and RTE species in monthly basis.</p> <p>Monitoring HCV using HCV/HCS Inspection form. Sample taken:</p> <ul style="list-style-type: none"> - Barema plantation: Block #D01, D07, E11-E34, Division 2. Dated 24 Jul 2024. - Bakada Plantation: Block # 11C12, 11C11, 11C10, Division Abulmosi, Magalona, Alaba boundary, dated 30 Jul 2024. - Kiba plantation: Block 12F26, Division 1, dated 25 Jul 2024. 	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area; there is no new planting replaced primary forest for extension area.</p> <p>Hargy Oil Palms Limited shows the HCV-HCS assessment reports:</p> <ul style="list-style-type: none"> - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Southern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the south consist of smallholder areas of 13,454.61 Ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Central Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the centre consist of company owned estates (in lease), smallholder areas, unregistered blocks and other additional area of 18,505.17 Ha. - "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd (Northern Section), Papua New Guinea" 28 July 2023 by PT. Hijau Daun. The assessment covers estates in the north consist of company owned estates (in lease) and smallholder areas of 19,982.52 Ha. - The final report of "Integrated High Conservation Value/High Carbon Stock Approach Assessment Report – Hargy Oil Palms Ltd Papua New Guinea" 28 July 2023 by PT. Hijau Daun has received Satisfactory 	Complied

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		<p>feedback from HCVRN on 15 March 2024 (Central Section), 12 January 2024 (Southern Section), 8 January 2024 (Northern Section).</p> <p>Audit team inquire the RSPO secretariat on Hargy Oil Palms Limited's liability disclosure; as a response the RSPO secretariat on 26 Juner 2023 stated "The RaCP (RaCP-0327) status for Hargy Oil Palms Limited is Not Applicable. Therefore, as there are changes in the hectarage, It would be great if you can advise the management unit to submit the updated liability disclosure or information to the RSPO compensation team."</p> <p>Hargy Oil Palms Limited responded by sending the information on 23 September 2023.</p> <p>The following response "acknowledge receipt" from RSPO on 25 September 2023.</p>	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2024** for **Hargy Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.30	OER	22.74
PKO	1.83	KER	4.86

Production	t/yr	Land Use	Ha
FFB Process	156,234.02	OP Planted Area	16,024.17
CPO Produced	35,530.26	OP Planted on peat	-
PKO Produced	7,597.54	Conservation (forested)	-
		Conservation (non-forested)	-
		Total	16,024.17

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	23,946.92	0.34	-	-	52,027.24	0.00	75,974.16	0.34
CO ₂ Emission from fertilizer	7,685.91	0.11	-	-	689.11	0.00	8,375.02	0.11
NO ₂ Emission	-	-	-	-	-	-	-	-
Fuel Consumption	1,518.96	0.02	-	-	699.33	0.00	2,218.29	0.02
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	-22,698.51	-0.33	-	-	-43,173.23	0.00	-65,871.74	-0.33
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	12,046.95	0.17	0.00	0.00	11,131.15	0.00	23,178.10	0.17

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	30,624.51	0.20
Fuel Consumption	2,120.85	0.01
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	32,745.36	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	9,853.31
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	9,853.31

*This mill has no kernel crusher operation.

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

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

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The GHG emissions that were produced in **2024** for **Barema Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.83
PKO	2.07

Extraction	%
OER	24.11
KER	5.07

Production	t/yr
FFB Process	188,384.72
CPO Produced	45,417.65
PKO Produced	9,560.25

Land Use	Ha
OP Planted Area	28,356.36
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	-
Total	28,356.36

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	38,194.86	0.40	-	-	48,669.01	0.00	86,863.87	0.40
CO ₂ Emission from fertilizer	8,273.21	0.09	-	-	762.09	0.00	9,035.29	0.09
NO ₂ Emission	-	-	-	-	-	-	-	-
Fuel Consumption	2,184.77	0.02	-	-	535.50	0.00	2,720.26	0.02
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	-36,203.67	-0.38	-	-	-42,005.13	0.00	-78,208.80	-0.38
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	14,136.90	0.15	0.00	0.00	8,944.28	0.00	23,081.17	0.15

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	21952.86	0.12
Fuel Consumption	796.40	0.00
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	22,749.26	0.12

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	17,106.10
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	17,106.10

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	50
Divert to methane captured (flaring) (%)	50
Divert to methane captured (energy generation) (%)	-

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The GHG emissions that were produced in **2024** for **Navo Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	1.03	OER	24.18
PKO	-	KER	5.28

Production	t/yr	Land Use	Ha
FFB Process	207,068.94	OP Planted Area	22,670.52
CPO Produced	50,070.50	OP Planted on peat	-
PKO Produced	10,936.08	Conservation (forested)	-
		Conservation (non-forested)	-
		Total	22,670.52

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	71,681.70	0.42	-	-	25,779.66	0.00	97,461.36	0.42
CO ₂ Emission from fertilizer	5,968.35	0.04	-	-	583.51	0.00	6,551.86	0.04
NO ₂ Emission	-	-	-	-	-	-	-	-
Fuel Consumption	3,910.25	0.02	-	-	245.36	0.00	4,155.61	0.02
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	-67,944.74	-0.40	-	-	-22,438.46	0.00	-90,383.21	-0.40
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	14,881.23	0.09	0.00	0.00	4,922.59	0.00	19,803.83	0.09

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	40,589.02	0.20
Fuel Consumption	2,609.49	0.01
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	43,198.50	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

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

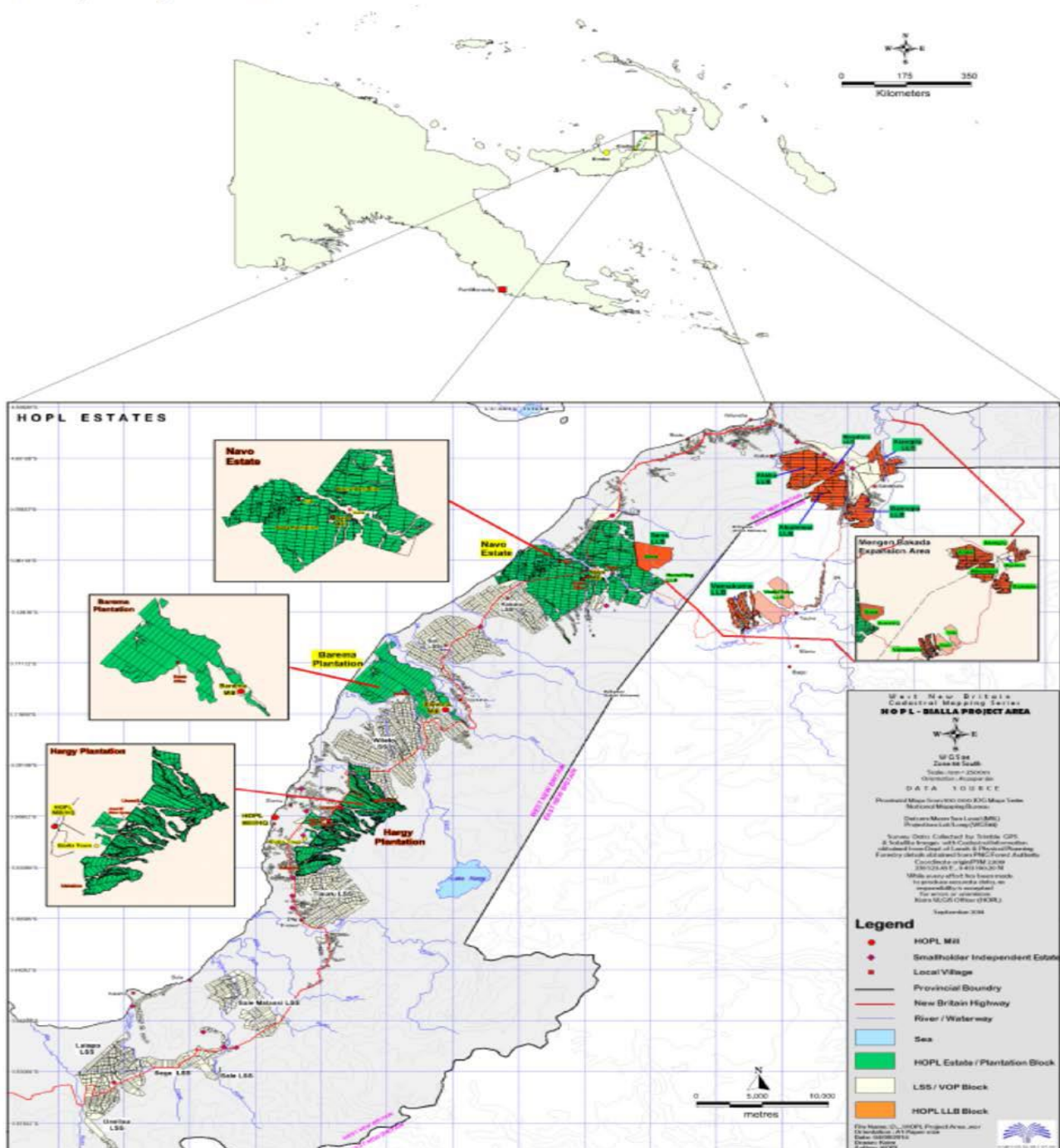
*This mill has no kernel crusher operation.

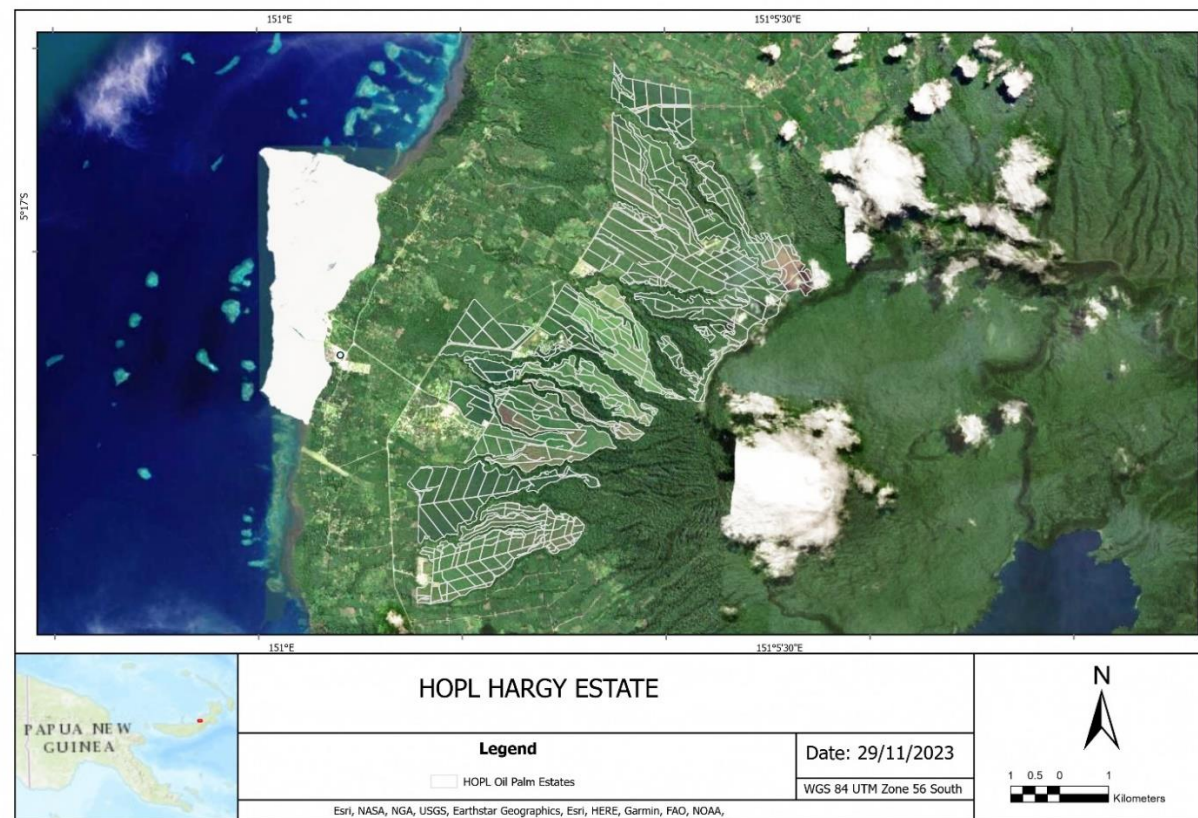
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	-
Divert to anaerobic diversion (%)	100

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

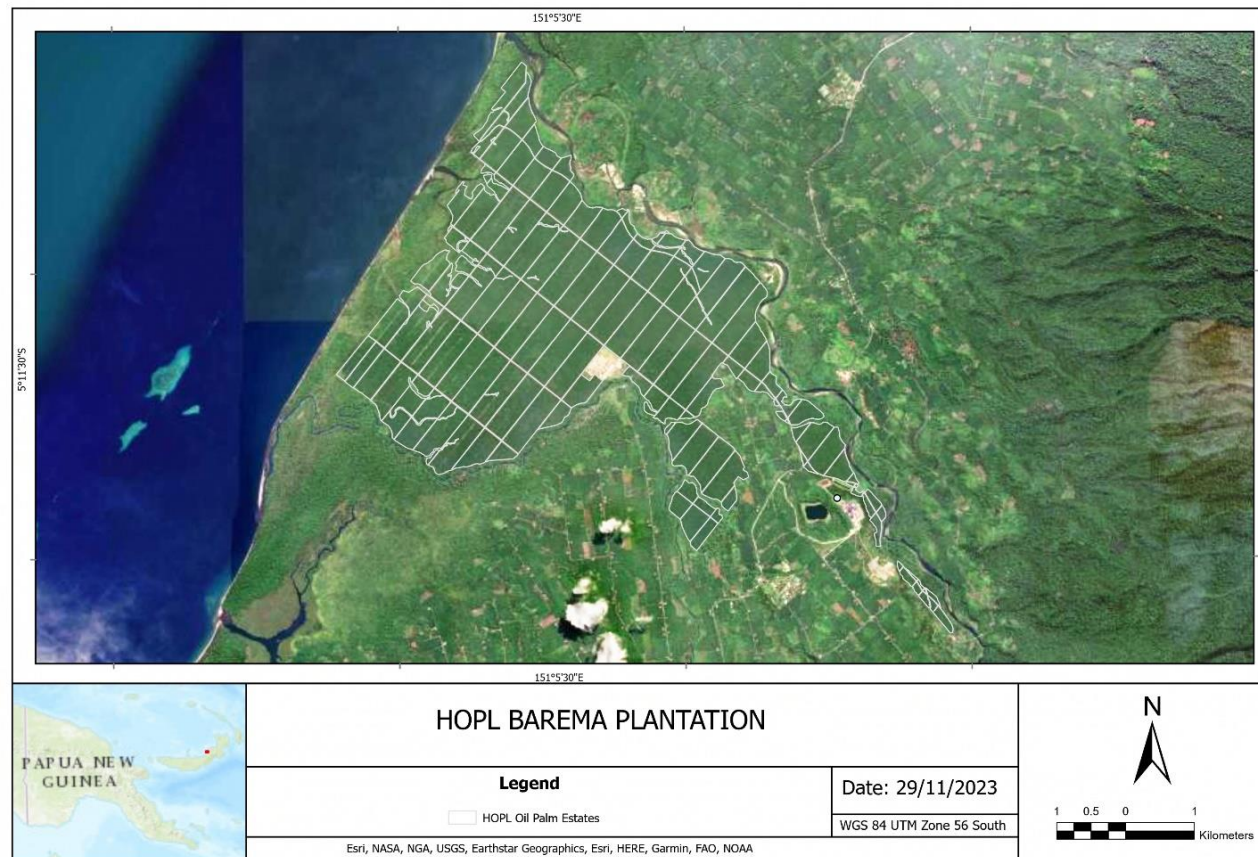
Appendix C: Location Map of Certification Unit and Supply bases

PNG Map Showing HOPL Estates

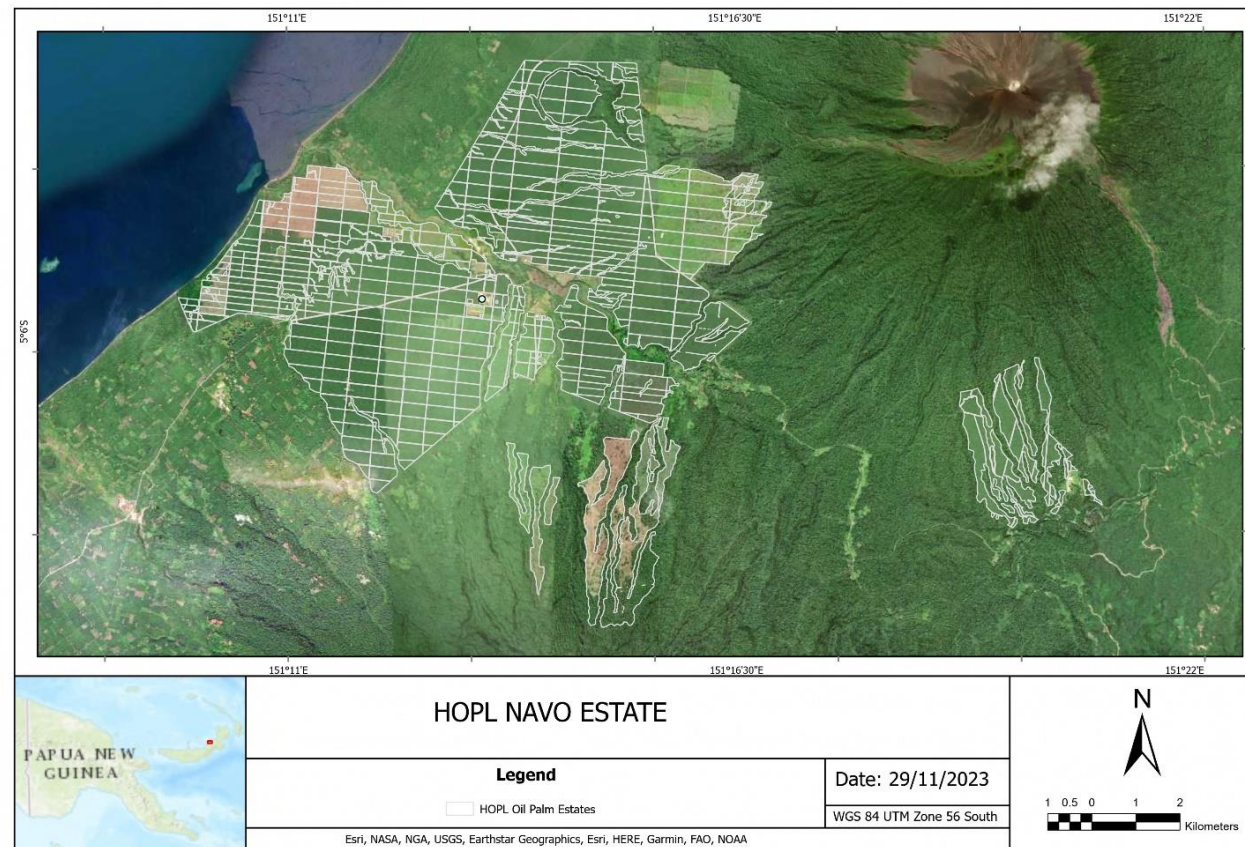


Appendix D: Estate Field Map**Hargy Estate – Hargy Plantation**

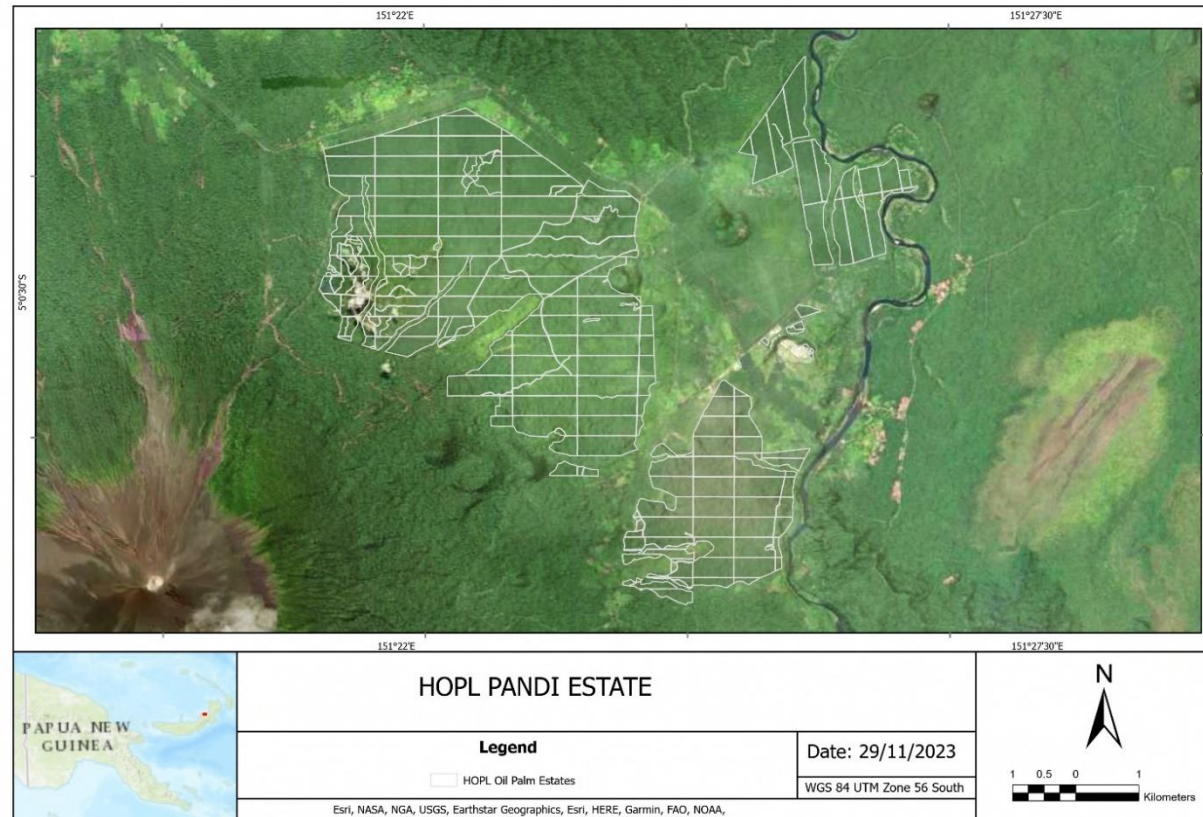
Hargy Estate – Barema Plantation



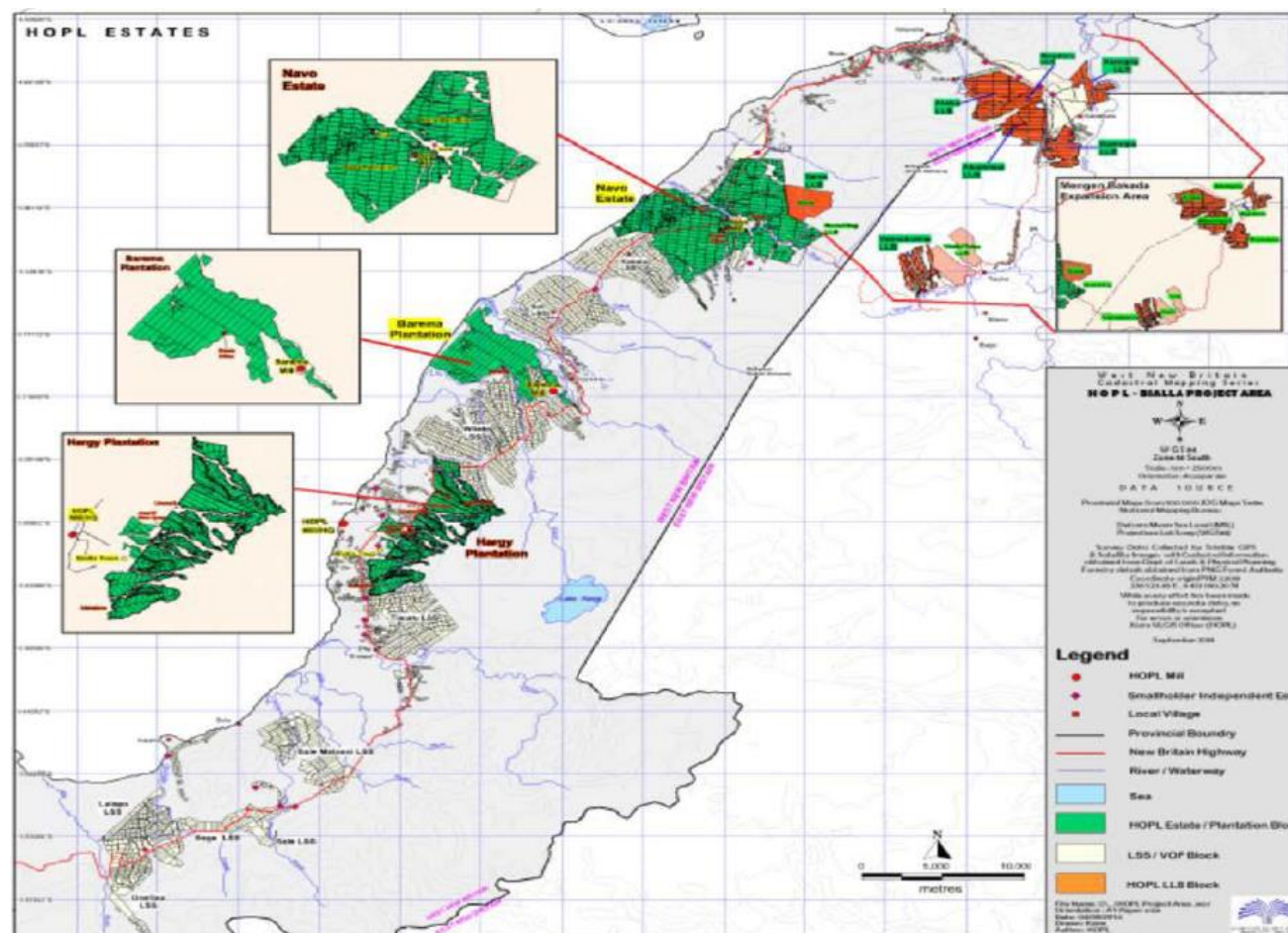
Navo Estate – Atata Plantation, Kiba Plantation and Ibana Plantation



Pandi Estate – Bakada Plantation



Smallholders Area (white) Surrounding the Estates (colour)



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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	1.2 (medium risk)	N/A	N/A
Justification of Risk Factor Applied	This is ASA 3_1 audit. The smallholders have geographical and socioeconomic homogeneity (similarity). Additionally there is no expansion or member addition.	N/A	N/A
Number of samples	73	N/A	N/A
Remarks	Sample = $\sqrt{y} \times (1.2)$ = $\sqrt{3646} \times (1.2)$ = 60.38×1.2 = $72.46 \approx 73$	N/A	N/A

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
1	PAUL GENA	Tiauru	5°21'24.73" S	151°2'40.73" E	6.00	6.00	96.00	01.01.2003	010192
2	WASEI WALAKI	Tiauru	5°21'17.85" S	151°2'24.91" E	6.00	6.00	96.00	01.01.2004	010202
3	KENI WINGOMI	Tiauru	5°21'0.09" S	151°2'46.82" E	5.35	5.35	85.60	01.01.2002	010205
4	BURNAWAE TAMATA	Tiauru	5°21'59.80" S	151°2'29.55" E	6.10	6.10	97.60	01.01.1994	010225
5	JAMES LIU	Tiauru	5°21'49.89" S	151°1'43.51" E	6.08	6.08	97.28	01.01.2000	010243
6	JONAH TONY	Tiauru	5°21'47.24" S	151°3'1.77" E	5.14	5.14	82.24	01.01.2003	010259
7	ANDRIAS KAPI	Wilelo	5°14'53.82" S	151°3'40.16" E	6.00	6.00	96.00	01.01.2007	020697
8	PAUL TONNY	Wilelo	5°14'39.33" S	151°3'37.58" E	4.06	4.06	64.96	01.01.2013	020708
9	ANIAS ATAMBO	Wilelo	5°14'46.01" S	151°4'11.36" E	5.95	5.95	95.20	01.01.2004	020718
10	JIMMY PETER	Wilelo	5°14'37.15" S	151°4'29.38" E	6.00	6.00	96.00	01.01.1996	020746
11	PHILIP JUREI	Wilelo	5°14'28.25" S	151°4'24.76" E	5.89	5.89	94.24	01.01.2006	020748
12	JOE ARUKUIN	Wilelo	5°15'5.15" S	151°4'24.00" E	6.54	6.54	104.64	01.01.2006	020781
13	BRIAN WOS	Barema	5°14'59.79" S	151°6'50.27" E	4.00	4.00	64.00	01.01.2006	031359
14	TERENCE MUGE	Barema	5°13'20.90" S	151°7'23.27" E	6.00	6.00	96.00	01.01.2004	031371
15	ROBIN TARAICA	Barema	5°12'55.17" S	151°7'47.00" E	5.83	5.83	93.28	01.07.2006	031399
16	VERONICA VULUM	Barema	5°13'1.06" S	151°7'40.99" E	6.00	6.00	96.00	01.01.2003	031400
17	LAMESA SAGAGOLO	Malassi	5°29'20.88" S	151°0'3.08" E	5.66	5.66	90.56	01.01.1998	040682
18	ANTON YAMBA	Malassi	5°27'15.72" S	150°58'58.97" E	1.87	1.87	29.92	01.01.1996	040782
19	JONAH IOVILE	Malassi	5°27'41.72" S	150°58'51.10" E	2.94	2.94	47.04	01.01.1998	041192
20	PUPUI SOLAGAGA	Uasilau	5°32'0.86" S	150°52'49.29" E	8.00	8.00	128.00	01.01.1999	050150
21	IEISOU MAGE	Uasilau	5°33'17.08" S	150°52'54.93" E	8.00	8.00	128.00	01.01.2000	050189
22	KOVULOVO MELAMULI	Uasilau	5°33'46.14" S	150°52'51.32" E	5.11	5.11	81.76	01.10.2015	050193
23	NOBERT BOKIA	Gigipuna-Sovula	5°11'38.72" S	151°7'56.85" E	4.00	4.00	64.00	01.01.2012	060602
24	BENEDICT MANGAU	Gigipuna-Sovula	5°12'3.39" S	151°8'2.99" E	4.17	4.17	66.72	01.01.2012	060609

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			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
25	CAROL LOME	Gigipuna-Sovula	5°11'16.31" S	151°8'24.15" E	2.00	2.00	32.00	01.01.2006	060651
26	KALISTAS VULELE	Gigipuna-Sovula	5°11'23.26" S	151°8'26.15" E	1.00	1.00	16.00	01.01.2002	060653
27	FELIX GULDIA	Gigipuna-Sovula	5°10'53.51" S	151°7'40.45" E	2.00	2.00	32.00	01.01.2000	060674
28	GERARD NIU	Noau	4°57'50.83" S	151°20'50.22" E	2.00	2.00	32.00	01.01.2011	070711
29	KAVEU PAULU	Noau	4°58'2.44" S	151°19'18.05" E	2.00	2.00	32.00	01.01.1992	070719
30	REBON MALILA	Noau	4°58'28.29" S	151°18'5.10" E	2.73	2.73	43.68	01.01.1992	070727
31	MICHEAL DIAA VAA	Noau	4°57'51.97" S	151°20'21.45" E	1.93	1.93	30.88	01.01.2023	070747
32	MESAK BUBU	Sulu	5°26'49.86" S	150°57'55.45" E	1.98	1.98	31.68	01.01.1999	080813
33	WESLEY TOMARE	Baikakea	5°15'10.98" S	151° 6' 58.90" E	1.86	1.86	29.76	01.01.2014	090063
34	JOHN MOU	Baikakea	5°17'3.17" S	151°3'26.84" E	2.00	2.00	32.00	01.01.2003	090932
35	BAEKAKEA UNITED CHUR	Baikakea	5°16'9.14" S	151°2'13.28" E	2.00	2.00	32.00	01.01.2006	090943
36	JOHN VULOLO	Baikakea	5°16'12.54" S	151°3'23.84" E	1.90	1.90	30.40	01.01.2006	090944
37	TIMOTHY BABO	Apupul	5°16'43.96" S	151°1'41.50" E	2.00	2.00	32.00	01.01.2002	131336
38	ELIAS DOME	Apupul	5°16'47.25" S	151°2'0.22" E	1.70	1.70	27.20	01.01.2007	131347
39	THOMAS MISA	Pakisi	5°14'12.67" S	151°8'1.43" E	4.00	4.00	64.00	01.01.2000	141401
40	RUDOLF BATARI	Pakisi	5°14'25.31" S	151°8'24.33" E	2.00	2.00	32.00	01.01.2002	141423
41	TOMMY BATARI	Pakisi	5°14'27.69" S	151°8'37.65" E	5.00	5.00	80.00	01.01.2015	141424
42	ALISTA BUA (JNR)	Kaiamu	5°28'5.90" S	150°55'50.48" E	2.00	2.00	32.00	01.01.2002	160107
43	ROBOAM TOMARUM	Kaiamu	5°29'54.58" S	150°55'4.36" E	3.00	3.00	48.00	01.01.2001	160113
44	DAINAH TAVUVU	Kaiamu	5°27'51.76" S	150°55'30.82" E	2.00	2.00	32.00	01.01.1999	161640
45	NANCY VILAU	Kaiamu	5°29'9.57" S	150°55'5.10" E	1.97	1.97	31.52	01.01.2001	161670
46	BARRY LUME	Matililiu	5°20'8.97" S	151°0'25.83" E	2.10	2.10	33.60	01.01.2008	171722
47	FREDDY SENGI	Soi	5°9'33.39" S	151°7'25.05" E	4.00	4.00	64.00	01.01.2003	311502
48	ARON WAFUKA	Soi	5°9'8.07" S	151°6'13.65" E	5.90	5.90	94.40	01.01.1993	311523
49	JAMES ILOIGE	Lalopo	5°31'19.02" S	150°53'45.49" E	2.00	2.00	32.00	01.07.1995	321109
50	CLARA VIOBUBU	Lalopo	5°31'32.10" S	150°53'12.83" E	4.00	4.00	64.00	01.01.1995	321114
51	ONIKE TAVISOU	Lalopo	5°31'37.05" S	150°53'5.29" E	2.00	2.00	32.00	01.02.1995	321118
52	SUPEI ATALOU	Lalopo	5°30'39.50" S	150°54'10.92" E	8.00	8.00	128.00	01.01.1995	321148
53	LIVEGA INU	Lalopo	5°30'59.07" S	150°54'45.89" E	4.00	4.00	64.00	01.01.2000	321164
54	CHRISTINE KESIA SOA	Lalopo	5°32'24.14" S	150°54'16.54" E	2.00	2.00	32.00	01.01.2001	321187
55	PAUL PAKULA	Kabaiya	5°8'17.91" S	151°11'18.79" E	5.41	5.41	86.56	01.01.1999	331969
56	BOMA MAINO	Kabaiya	5°8'27.91" S	151°11'23.69" E	2.58	2.58	41.28	01.01.1995	331971
57	STEVEN TUO	Kabaiya	5°6'49.26" S	151°8'39.08" E	4.00	4.00	64.00	01.01.1995	331980
58	EZEKIEL THOMAS	Kabaiya	5°6'44.92" S	151°8'43.92" E	4.10	4.10	65.60	01.01.1995	331981
59	FRANCIS SINSIO	Kabaiya	5°7'16.48" S	151°8'26.50" E	3.17	3.17	50.72	01.01.1996	331987
60	MATHEW PALPALI (JNR)	Kabaiya	5°6'34.06" S	151°9'40.02" E	4.00	4.00	64.00	01.01.1994	332005
61	MECHTILD LUVI	Tianepou	5°1'4.49" S	151°14'39.90" E	1.97	1.97	31.52	01.01.2005	380104
62	MARTHA BALELE	Tianepou	5°2'47.94" S	151°13'30.12" E	2.00	2.00	32.00	01.01.2012	380118
63	GEORGINA PATU	Tianepou	5°1'54.97" S	151°15'13.62" E	2.00	2.00	32.00	01.01.2013	380146
64	URUSULA BITAI	Tianepou	5°0'43.90" S	151°14'32.08" E	2.00	2.00	32.00	01.01.2013	380175
65	CORNELIUS LAI	Gamupa	5°1'31.30" S	151°25'22.62" E	1.79	1.79	28.64	01.01.2004	390022
66	KOALE MAOKO	Nantabu	4°55'19.08" S	151°23'50.78" E	1.64	1.64	26.24	01.01.2002	440045
67	OTTO KOALE	Malaso	5°4'17.78" S	151°12'52.83" E	1.82	1.82	29.12	01.01.2003	450018

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68	MADLYNE LAIA	Malaso	5°3'56.77" S	151°12'6.34" E	1.98	1.98	31.68	01.01.2011	450028
69	UME MULU	Walo	5°31'8.30" S	150°52'47.98" E	1.69	1.69	27.04	01.01.2009	460009
70	TIMOTHY LUME	Walo	5°31'26.97" S	150°52'35.32" E	2.00	2.00	32.00	01.01.2012	460019
71	TANISOU POVEI	Walo	5°31'17.85" S	150°52'52.47" E	2.00	2.00	32.00	01.01.2016	460031
72	IVULE HOLDING LIMITED	West New Britain Province	5°29'41.64" S	150°59'30.31" E	80.43	80.43	1,286.88	01.01.2000	770002
73	BABEX	West New Britain Province	5°22'28.37" S	151°1'11.84" E	43.00	43.00	688.00	01.01.2000	770010

Note: 73 smallholders are sampled in this ASA 3_1 audit.

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
FOSFA	The Federation of Oils, Seeds and Fats Associations
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
SHAAS	Smallholder Agriculture Advisory Services
SIA	Social Impact Assessment
SOP	Standard Operating Procedure