

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (1_2)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: Golden Agri-Resources Ltd
Client Company / Parent Company Address: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535
Certification Unit: PT Bumi Permai Lestari – Bukit Perak Mill Location of Certification Unit: Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka Barat, 33364, Bangka Belitung Province, Indonesia
Date of Final Report: 04/09/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Golden Agri-Resources Ltd		
RSPO Membership Number	1-0096-11-000-00	Membership Approval Date	30/01/2005
Address	RSPO registered company : 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Liaison Office : Sinar Mas Land Plaza, Tower II, 30 th Floor, JL. MH Thamrin No.51, Jakarta 10350, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Bumi Permai Lestari – Bukit Perak Mill		
Location / Address	Desa Dendang, Kecamatan Kelapa, Kabupaten Bangka Barat, 33364, Bangka Belitung Province, Indonesia		
Website	http://www.goldenagri.com.sg		
Management Representative	Yahya Mustakim	E-mail	yahya.mustakim@sinarmas-agri.com
Telephone	+62-21 5033 8899	Facsimile	+62-21 5033 8899

2. Certification Information			
Certificate Number	RSPO 733239	Certificate Start Date	08/09/2022
Date of First Certification	23/09/2015	Certificate Expiry Date	07/09/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	The objective of the assessment was to conduct an Annual Surveillance Assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 tonnes FFB/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BSI-ISPO 750840	ISPO	BSI	18/07/2026
EU-ISCC-Cert-ID218-20240294	ISCC	Intertek	13/08/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Perak Mill	Dendang Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia	1° 49' 13.26" S	105° 33' 07.52" E
Bukit Perak Estate	Dendang Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia	1° 51' 28.94" S	105° 35' 54.73" E
Bukit Permata Estate	Terentang & Kacung Village, Kelapa District, Bangka Barat Regency, Kepulauan Bangka Belitung Province, Indonesia	1° 51' 09.56" S	105° 30' 6.68" E

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
Bukit Perak Estate	3,793.62	51.66	439.67	4,284.95	88.5%
Bukit Permata Estate	1,603.55*	29.55	166.90	1,800.00	89.1%
Total	5,397.17	81.21	606.57	6,084.95	88.7%
Note: *There was a re-measurement at Bukit Permata Estate (BPTE) which resulted in changes to the planted area and other areas.					

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Perak Estate	352.92	3,440.70	-	-	3,440.70	352.92
Bukit Permata Estate	1,572.24	-	-	31.31	31.31	1,572.24
Total (ha)	1,925.16	3,440.70	-	31.31	3,472.01	1,925.16
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 (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (July - Aug 2023)	Current license period (Sept 2023 – June 2024)	
Bukit Perak Estate	52,477.13*	8,824.14	39,510.06	53,592
Bukit Permata Estate	239.96*	47.81	168.69	118
Total	52,717.09*	48,550.70		53,710**
Note: *estimated las year added extension volume on May and August 2024 **The yield forecast is to low (15 MT/ha/year) due to that most of the Bukit Permata Estate area is Immature Area				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
		Previous license period (July - Aug 2023)	Current license period (Sept 2023 – June 2024)	
Bukit Intan Estate*		206.96	-	
-		-	-	
Total		206.96		
Note: *RSPO Certificate No. INTERTEK-RSPO-0175641				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)			
Out growers / smallholders	Tonnage (MT) / year		
	Estimated last year	Actual (July 2023 – June 2024)	Forecast

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	(Sept 2023 – Aug 2024)	Previous license period (July - Aug 2023)	Current license period (Sept 2023 – June 2024)	(Sept 2024 – Aug 2025)
BPAE		11,393.95	47,882.21	
BLSE		2,015.79	8,293.50	
GMLX		15,549.24	59,302.16	
BSHX		618.96	2,137.00	
KALX		447.59	4,683.38	
MNPX		211.35	130.91	
KBMX		1,972.26	7,239.24	
Total		161,877.54		

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	July 2023	4,248.76	16,004.84	20,253.60
2	August 2023	4,830.15	16,204.30	21,034.45
3	September 2023	4,965.31	13,908.45	18,873.76
4	October 2023	4,658.89	14,592.73	19,251.62
5	November 2023	4,408.07	14,244.47	18,652.54
6	December 2023	4,295.07	14,968.85	19,263.92
7	January 2024	3,756.35	11,576.77	15,333.12
8	February 2024	3,474.70	10,168.08	13,642.78
9	March 2024	3,567.84	9,780.32	13,348.16
10	April 2024	3,792.19	13,044.20	16,836.39
11	May 2024	3,863.05	16,144.76	20,007.81
12	June 2024	2,897.28	11,239.77	14,137.05
TOTAL		48,757.66	161,877.54	210,635.20

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Sept 2023 – Aug 2024)	Actual (July 2023 – June 2024)		Forecast (Sept 2024 – Aug 2025)
	Previous license period (July - Aug 2023)	Current license period (Sept 2023 – June 2024)	
FFB	FFB		FFB

52,717.09 mt	9,078.91 mt	39,678.75 mt	53,710 mt
	TOTAL	48,757.66	
CPO (OER: 20 %)	CPO (OER:19.57 %)		CPO (OER: 20.17 %)
10,251.18 mt	2,500.73 mt	7,746.16 mt	10,883 mt
	TOTAL	10,246.89 mt	
PK (KER: 5.50 %)	PK (KER: 5.46 %)		PK (KER: 5.63 %)
2,896.79 mt	621.75 mt	2,164.59 mt	3,023 mt
	TOTAL	2,786.34 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	July 2023	1,513.24	354.33
2	August 2023	987.49	532.51
3	September 2023	1,033.45	260.16
4	October 2023	953.78	250.90
5	November 2023	867.95	239.39
6	December 2023	821.77	237.57
7	January 2024	716.51	212.44
8	February 2024	677.13	205.26
9	March 2024	707.74	229.74
10	April 2024	729.51	198.03
11	May 2024	701.17	190.50
12	June 2024	537.16	140.62
TOTAL		10,246.89	2,786.34

11. Summary of Actual Volume sold					
Current License period (Sept 2023 – June 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	500	7,022	-	-	7,522
PK (MT)	2,310	-	-	-	2,310
Credits	-	-	-	-	-
Previous License period (July - Aug 2023)					

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CPO (MT)	-	1,901	-	-	1,901
PK (MT)	430	-	-	-	430
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	PT SUMBER INDAH PERKASA	RSPO_PO1000006557	500	2,620
2	PT TAPIAN NADENGGAN	RSPO_PO1000010342	-	120
TOTAL			500	2,740

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sumber Indah Perkasa	ISCC	8,923	-
TOTAL			8,923	-

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

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

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

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

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

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A
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.
Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 05 – 07 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.2.4

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

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

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

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

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

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.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Bukit Perak Mill	X	X	X	X	X
Bukit Perak Estate	X	X	X	X	X
Bukit Permata Estate	X	X	X	X	X

Tentative Date of Next Visit: July 7, 2025 - July 9, 2025

Total Number of Mandays: 12

2.2 BSI Assessment Team

Name	Role	Competency
Naila Karima	Team Leader	<p>Education: Holds a bachelor's degree majoring Occupational Safety and Health, Faculty of Public Health, University of Indonesia.</p> <p>Work Experience: Working experience as auditor since 2012 covering RSPO and ISPO.</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, SA8000, RSPO Labour Auditing Training, RSPO ISH Standard Training Course, ISO 9001, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input 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>
Andi Pratama Pasaribu	Team Member	<p>Education: Holds a Bachelor Degree majoring Social Economy, Jember University</p> <p>Work Experience: 5 years working experience as Field Agronomy Assistant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, Endorsed RSPO P&C Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course, ISO45001:2018 Lead Auditor Course, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p>

		Aspect covered in this audit: <input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)
Mujinius Jalaraya	Team Member	Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB). Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor. Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training Language proficiency: Fluent in Bahasa Indonesia and 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 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)
Eko Prastio Ramadhan	Team Member	Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB). Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 8 years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001. Training attended: Completed ISO 14001:2015 Lead Auditor Course, ISO 45001:2018, GRI Standard Training, Training of Trainer, Refreshment Course of RSPO P&C Auditor, Refreshment Course of RSPO SCC Auditor, RSPO Independent Smallholder Lead Auditor Training, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course and Identification of HCV Areas Training. Language proficiency: Fluent in Bahasa Indonesia and English 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)

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Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	NK	APP	MJ	EPR
Monday, 05/08/2024	09.40-10.55	Flight Jakarta to Pangkal Pinang (GA-136)	√	√	√	√
	10.55-14.00	Travelling to PT Bumi Permai Lestari	√	√	√	√
	14.00-15.00	Opening Meeting (RSPO): • Presentation by Certificate Holder • Presentation by Lead Auditor • Confirmation audit scope, requirements, document access permission and clarifying audit plan.	√	√	√	√
	15.00-16.30	Document review General information; time bound plan; partial certification verification; RSPO P&C (Management Plan); Best Management Practices, Social policy and implementation, Continual Improvement)	√	√	√	√
	16.30-17.00	Daily progress & preparation for next day (Map, Muster cheat, public consultation, etc)	√	√	√	√
Tuesday, 06/08/2024	08.00-12.00	Stakeholder consultation • Stakeholder consultation to relevant agencies of Bangka Barat Regency; • Stakeholder consultation with local community/villagers; • Stakeholder consultation with previous landowners; • Stakeholder consultation with gender committee and worker union.	√			√
		Field Visit Bangka Bulking to verify Supply Chain		√		
		Document Review Bukit Perak POM Data verification of RSPO P&C (Best management practices Mill and Estate, OHS, EMS, Social and Labour)			√	
	12.00-14.00	Break	√	√	√	√
	14.00-16.30	Field Visit Bukit Perak POM to verify: • RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous & Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond • Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop		√	√	√
		Stakeholder Consultation and Document review: Interview with Gender Committee, Labour Union, worker representative, FFB Supplier, Local Contractor	√			
	16.30-17.00	Washup meeting & Reporting	√	√	√	√

Date	Time	Subjects	NK	APP	MJ	EPR
Wednesday, 07/08/2024	08.00-12.00	Field visit to Bukit Permata Estate to verify: <ul style="list-style-type: none"> • Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope • Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. • Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. • Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities. • Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. • Visit to HGU boundary poles, border with surrounding entities. • Visit to HCV area, riparian zone 	√	√		
	08.00-12.00	Field visit to Bukit Perak Estate to verify: <ul style="list-style-type: none"> • Visit to plantation activity and interview workers: harvesting, spraying, fertilizer application, EFB application, area with slope • Visit to plantation IPM implementation: barn owl boxes, beneficial plant nursery. • Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. • Visit to worker housing: house condition, water supplies, sanitation, medical, access to affordable food, welfare amenities. • Chemical warehouse, mixing bay, fertilizer store, workshop, fire-fighting equipment. • Visit to HGU boundary poles, border with surrounding entities. • Visit to HCV area, riparian zone 			√	√
	12.00-14.00	Break	√	√	√	√

Date	Time	Subjects	NK	APP	MJ	EPR
Friday 09/08/2024	14.00-16.30	Document review Bukit Permata Estate & Bukit Perak Estate <ul style="list-style-type: none"> Review support to smallholder inclusion/support independent smallholder. Review information related to Economic management plan. Estate best management practices, IPM. Review information related to OHS Management System, EIA, and Environmental MS, Training, waste management, GHG mitigation. Review information related to Stakeholder Consultation and Communication, Legal Requirements, Land & Legal issue, Conflict resolution, HCV, Natural and biodiversity conservation. Review information related to Policy and commitment, smallholder welfare, FFB suppliers, social requirements, contract agreement, human rights, workers' welfare. 	√	√	√	√
	16.30-17.00	Washup meeting & Reporting	√	√	√	√
	11.00-12.00	Closing Meeting <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) Comments, Responses and Questions 	√	√	√	√

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. Golden Agri-Resources Ltd.'s RSPO Timebound Plan dated 2 May 2024. The timebound plan include name of all subsidiary companies, all estates and all mills under Golden Agri Resources Ltd.	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, there are numbers of estates and mills which has not been certified yet, due to reasons such as new acquisitions, RaCP in progress and land title in progress. The RSPO Membership for Golden Agri-Resources Ltd. dated 30 January 2005. Golden Agri-Resources Ltd. submitted the updated RSPO Timebound Plan to RSPO Secretariat on 3 April 2024. RSPO Secretariat has approved the timebound plan on 2 May 2024.	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.	Yes, there are 22 units of new acquisitions made in 2021, therefore target year for new acquisition to be certified is 2024. Golden Agri-Resources Ltd., has submitted the updated RSPO Timebound Plan to RSPO Secretariat on 3 April 2024. RSPO Secretariat has approved the timebound plan on 2 May 2024.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there are deviations from the maximum 5 years period since membership obtained in 30 January 2005. Golden Agri-Resources Ltd. has reported reason for deviation in the latest RSPO Timebound Plan. RSPO Secretariat has approved the timebound plan on 2 May 2024.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there has been change to the time-bound plan since the last audit, due to withdrawn of a CB from RSPO certification. The updated time-bound plan is still relevant and consistent with latest ACOP reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there is no deviations in the time-bound plan. Each certification unit has a specified timeline for the audit implementation.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure. Each certification unit has a specified timeline for the audit implementation.	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.	<p>Golden Agri Resources (GAR) has reported all replacement of primary forest to maintain HCV and HCS through submission of LUCA.</p> <p>Several companies under GAR initiated plantation development after November 2005, while the HCV/NKT assessment took place during the period 2010 - 2013.</p> <p>GAR and its subsidiaries initiated the Remediation and Compensation Procedure (RaCP), starting with the disclosure and Zero Liability reporting to RSPO via email on 29 August 2014. Among the 25 companies, 7 of them are certified units, while the remaining 19 are uncertified units. Here is the progress update for RaCP as of 1 August 2024:</p> <ul style="list-style-type: none"> - MUs with potential liability: 33 - LUCA submitted (MUs): 20 - LUCAs review completed (MUs): 20 - CN required (MUs): 32 - CN submitted (MUs): 19 - CN approved (MUs): 18 - CP submitted (MUs): 11 - CP endorsed (MUs): 11 - RP required (MUs): 27 - RP submitted (MUs): 1 - RP approved (MUs): 1 <p>HCV assessments for the 18 reports were conducted between 2010 and 2018 by both external consultants and internal teams. The assessments were carried out by an assessment team led by a Team Leader approved by RSPO. The Reference for HCV assessments was the "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia" (Toolkit HCV 2008). Peer review was conducted by an independent consultant, also approved by RSPO.</p> <p>The company consistently follows up on the RaCP process, ensuring that RSPO's timebound requirements for units that are not yet certified are promptly fulfilled.</p> <p>The Remediation and Compensation Plan is covered twelve entities under the group of Golden Agri-Resources, Ltd (GAR), with the total liabilities of 4,727.69 Ha. These entities</p>	Complied

	are PT KGP (RaCP-1048), PT BAS (RaCP-1037), PT Tapan Nadenggan (RaCP-1077, RaCP-1079), PT BSP (RaCP-1039), PT KDP (RaCP-1050), PT SIP (RaCP-1074), PT SKU (RaCP-2257, RaCP-2256, RaCP-2258), PT PIP (RaCP-1057), and PT ALS (RaCP-1033). The main goal of this project is to support the conservation and restoration of the Bunut Hulu Village Forest through the sustainable community-based management of its forest-lake ecosystem and biodiversity. The Bunut Hulu Village Forest (BHVF) has a size of 4,763 ha and is located in the sub-District of Bunut Hilir, District of Kapuas Hulu, West Kalimantan Province, Indonesia. The project area supports the livelihoods of 1,153 community members.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>GAR and its subsidiaries conducted planting after January 2010. There are 18 companies that have undergone the RSPO New Planting Procedure (NPP) and completed a 30-day public consultation process in April 2014. Out of these, 3 companies have undergone the certification process, namely PT TN (JLYM), PT BSP (BSWM), and PT BAS (SMLM). However, 15 companies have not yet obtained RSPO certification.</p> <ol style="list-style-type: none"> 1. PT Satya Kisma Usaha (Batang Gading Estate) – Jambi, 2. PT Kresna Duta Agroindo – Kaltim, 3. PT Mitra Karya Agroindo – Kalteng, 4. PT Binasawit Abadipratama – Kalteng, 5. PT Aditunggal Mahajaya – Kalteng, 6. PT Agrolestari Sentosa – Kalteng 7. PT Agrokarya Primalestari – Kalteng, 8. PT Buana Adhitama – Kalteng, 9. PT Agrolestari Mandiri – Kalbar, 10. PT Paramitra Internusa Persada – Kalbar 11. PT Persada Graha Mandiri – Kalbar 12. PT Bangun Nusa Mandiri – Kalbar, 13. PT Kartika Prima Cipta – Kalbar, 14. PT Kencana Graha Permai (Delima Estate) – Kalbar, 15. PT Cahaya Nusa Gemilang – Kalbar. 	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance	There are no land conflicts. The company has established a mechanism for resolving land conflicts in accordance with RSPO	Complied

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<p>with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8..</p>	<p>criteria 4.2, 4.6, 4.7, and 4.8. These procedures are outlined in the Standard Operating Procedure (SOP) for Social Conflict Handling, registered under SOP/SMART/SCRD/NSDV/I/002 with revision 1 dated 18 May 2016, and the SOP for Handling Complaints and Dissatisfaction, registered under SOP/SMART/GIMS-SCMD/USDV/I/001 with revision 2 dated 11 April 2017. These procedures govern agreed-upon social conflict resolution. Conflict resolution can be conducted in a participatory manner or involve third-party mediation.</p> <p>The company also has procedures for addressing complaints before they escalate into conflicts. The specific process is outlined in SOP/SMART/GIMS-SCMD/USDV/I/001 with revision 2 dated 11 April 2017, which ensures that complaints are handled promptly and appropriately. GAR has initiated the process of becoming an RSPO DSF (Dispute Settlement Facility) member under the "Grower" category.</p> <p>Here's a summary of the complaint progress related to GAR as found on the RSPO website:</p> <ol style="list-style-type: none"> 1. Complaint RSPO/2021/12/CRP, date submitted 8 Nov 2021, date accepted 14 Feb 2022, addressed to PT Ramajaya Pramukti (a subsidiary of Golden Agri Resources Ltd) by Lembaga Adat Kenegerian Petapahan (Ninik Mamak Kenegerian Petapahan), Bahtera Alam & Sawit Watch. Update as of 3 May 2024: The appeal submission period has expired. The Complaint is formally closed. 2. Complaint RSPO/2021/11/HN, dated 11 July 2021, was lodged against PT SMART Tbk (West Kalimantan Region) regarding alleged procurement of Fresh Fruit Bunches (FFB) and Crude Palm Oil (CPO) from PT Kapuasindo Palm Industri (PT KPI), a subsidiary of Kencana Group (not an RSPO member), which had been involved in a series of violations against workers and indigenous communities in the district. 	
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	<p>Update as of 12 April 2022:</p> <p>The appeal submission period has concluded. The complaint is now formally closed.</p> <p>3. Complaint RSPO/2020/04/IR, dated 2 March 2020, against GAR (Central Kalimantan Region) by the Forest Peoples Programme & Elk Hills Research concerning allegations of land legality and bribery cases. From GAR's side, GIS-2 analysis for alert land clearance after November 2014, following discussions with the RSPO GIS manager on 21 May 2021, approved the sampling methodology.</p> <p>Update as of 26 June 2024:</p> <p>Briefing Note under peer review prior submission to the Complaints Panel.</p> <p>4. Complaint PreCAP/2014/03/IR, was lodged on 13 October 2014, against PT Kartika Prima Cipta (West Kalimantan) by the Forest Peoples Programme (FPP) & Transformasi Untuk Keadilan – Indonesia (TUK-I) regarding the Free, Prior, and Informed Consent (FPIC) process and 6 other issues. With the consent of GAR and FPP, RSPO divided the conflict resolution verification process into 5 phases (Phase 1 for NPP, maximum land holding, and new land development; Phase 2 for legality; Phase 3 for smallholders; Phase 4 for FPIC; and Phase 5 for HCV). GAR has responded up to Phase 5 on 26 August 2021, addressing all stages.</p> <p>As of 29 May 2024, Following a directive by the CP, the Respondent has submitted additional documents to the Secretariat, which have been furnished to the CP for their perusal.</p> <p>The Secretariat will proceed to draft the decision letter upon receiving confirmation from the CP members.</p> <p>Update as of 26 June 2024:</p> <p>The CP endorsed the Secretariat's proposal to proceed with the drafting of the decision letter.</p>	
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>In the RSPO Case Tracker, Audit team noted there was no active complaint related to labour disputes.</p> <p>The company has established procedures for addressing employee complaints before they escalate into conflicts. The procedure is the Complaint and Conflict Handling SOP, designated as SOP/SMART/SUST/IV/003, issued on 1 July 2014, with revision 3 on 8 March 2022.</p> <p>Procedures regarding employee issues are outlined in an internal flowchart because employees fall under the category of internal stakeholders. The means of lodging complaints involve official letters submitted through labour unions or deposited into suggestion boxes strategically placed in accessible locations.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>In the RSPO Case Tracker, Audit team noted there was not active complaint related to legal non-compliance.</p> <p>The company adheres to the applicable regulations in accordance with RSPO requirement 2.1.3, ensuring there are no violations of relevant plantation regulations. The company has established mechanisms to evaluate compliance with regulations as outlined in SOP/SMART/UMUM/SADV/I/002. This Standard Operating Procedure (SOP) outlines the procedures for meeting requirements, the necessary documentation, and flowcharts that provide a detailed process for evaluating compliance with legal regulations.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>The company has conducted a Compliance Audit/Internal Sustainability Verification (ISV) to assess conformity with RSPO standards and has also established a System within the company unit to be certified.</p> <p>For example:</p> <ul style="list-style-type: none"> - Internal audit for PT Adhi Tunggal Mahajaya – Sako Mill and its supply bases carried out on 11-15 December 2023. - Internal audit for PT Agrokarya Prima Lestari – Kuayan Mill and its supply bases carried out on 18-22 December 2023. 	<p>Complied</p>

	- Internal audit for PT SMART Tbk – Bukit Kapur Mill and its supply bases carried out on 6-10 November 2023.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	<p>Yes, there are critical non-compliance raised during internal audits to uncertified management units. Management has prepared correction and corrective action.</p> <ul style="list-style-type: none"> - Internal audit for PT Adhi Tunggal Mahajaya – Sako Mill and its supply bases; Internal audit team issued Critical NC related to 6.7.3 and 7.12.8; management has addressed correction and corrective action. - Internal audit for PT Agrokarya Prima Lestari – Kuayan Mill and its supply bases; Internal audit team issued Critical NC related to 2.1.1 and 2.3.1; management has addressed correction and corrective action. - Internal audit for PT SMART Tbk – Bukit Kapur Mill and its supply bases; Internal audit team issued Critical NC related to 2.1.1, 2.3.1, 7.2.7, 7.8.2, 7.12.2 and 7.12.4; management has addressed correction and corrective action. 	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Audit team sent email to Wetlands, Sawit Watch, Aid Environment, WALHI, WWF, Forest Watch Indonesia, WCS Indonesia, LINKS and Solidaridad, until assessment ends, audit team did not received any response.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	There is a scheme smallholder associated to Tanjung Kembiri POM, that is Tanjung Rusa Plasma, however the scheme smallholder is not certified yet due to RaCP is in progress and Land Title is in progress.	Complied

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Actual Certification Year	Plan Year for Certification	Remark
				Latitude	Longitude					
Batu Ampar Mill	Indonesia	Batu Ampar Mill	Serongga Village, Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2156	116.0170	-	Certified	2012	-	
Batu Ampar Mill	Indonesia	Batu Ampar Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2656	116.0170	3,944.07	Certified	2012	-	
Batu Ampar Mill	Indonesia	Batu Mulia Estate	Kelumpang Hilir Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	3.2156	116.1047	2,929.02	Certified	2012	-	
Belian Mill	Indonesia	Belian Mill	Desa Tua Abang Village, Semitau Sub District, Kapuas Hulu District Propinsi Kalimantan Barat Province, Indonesia	0.4875	111.8447	-	Certified	2024	-	
Belian Mill	Indonesia	Tengkawang Estate	Tua Abang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5362	111.7985	9,049.75	Certified	2024	-	
Belian Mill	Indonesia	Tengkawang Estate (Non Certified)	Tua Abang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5362	111.7985	180.87	Not Certified	-	2026	RaCP in progress
Belian Mill	Indonesia	Kapuas Hulu Estate	Perigi Village, Silat Hilir Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4069	111.7451	2,703.41	Not Certified	-	2025	RaCP in progress
Belian Mill	Indonesia	Sungai Beran Estate	Sentabai Village, Silat Hilir Sub District, Kab. Kapuas Hulu District, Kalimantan Barat Province, Indonesia	0.4509	111.7400	2,810.85	Not Certified	-	2025	RaCP in progress
Belian Mill	Indonesia	Muara Tawang Estate	Mantan Village, Suhaidd Sub District, Kapuas Hulu District, Kalimantan Barat Province, Indonesia	-2.0149	112.2989	2,376.91	Not Certified	-	2025	RaCP in progress

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Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Actual Certification Year	Plan Year for Certification	Remark
				Latitude	Longitude					
Belian Mill	Indonesia	Belian Estate	Seberuang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4850	111.8495	4,116.88	Certified	2024	-	
Belian Mill	Indonesia	Belian Estate (Non Certified)	Seberuang Village, Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4850	111.8495	76.70	Not Certified	-	2026	RaCP in progress
Belian Mill	Indonesia	Belian Kkpa	Semitau Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.5361	111.8600	1,798.13	Not Certified	-	2026	RaCP in progress
Belian Mill	Indonesia	Muara Tawang Kkpa	Suhaid Sub District, Kapuas Hulu District, Kalimantan Barat Province, Indonesia	0.5272	112.0851	1,052.36	Not Certified	-	2026	RaCP in progress
Belian Mill	Indonesia	Kapuas Hulu Kkpa	Sub District, Kapuas Hulu District, Kalimantan Barat Province Indonesia	0.4729	111.7439	1,187.94	Not Certified	-	2026	RaCP in progress
Bukit Kapur Mill	Indonesia	Bukit Kapur Mill	Bangkalan Melayu Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.9427	116.0461	-	Not Certified	-	2027	RaCP in progress
Bukit Kapur Mill	Indonesia	Sungai Cantung Estate	Bangkalan Melayu Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.9591	116.0020	3,473.00	Not Certified	-	2027	Land Title in progress, RaCP in progress
Bukit Kapur Mill	Indonesia	Bukit Kapur Estate	Karang Liwar Village, Kelumpang Hulu Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.8903	116.0432	2,950.00	Not Certified	-	2027	Land Title in progress, RaCP in progress
Bukit Perak Mill	Indonesia	Bukit Perak Mill	Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8458	105.5508	-	Certified	2015	-	
Bukit Perak Mill	Indonesia	Bukit Perak Estate	Dendang Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8125	105.4951	4,111.50	Certified	2015	-	

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Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Actual Certification Year	Plan Year for Certification	Remark
				Latitude	Longitude					
Bukit Perak Mill	Indonesia	Bukit Permata Estate	Terentang and Kacung Village, Kelapa District, Bangka Barat Regency, Bangka Belitung Province, Indonesia	1.8625	105.4778	1,973.45	Certified	2015	-	
Bukit Perak Mill	Indonesia	Bukit Permai Estate	Desa Sarang Mandi Village, Desa Romadhon Village, Sungai Selan Sub District, Bangka Tengah District, Bangka Belitung Province Indonesia	-2.2666	105.9378	3,151.07	Not Certified	-	2026	RaCP in progress
Bukit Perak Mill	Indonesia	Bukit Lestari Estate	Desa Sarang Mandi Village, Desa Romadhon Village, Sungai Selan Sub District, Bangka Tengah District, Bangka Belitung Province Indonesia	-2.2666	105.9378	664.27	Not Certified	-	2026	RaCP in progress
Bumi Palma Mill	Indonesia	Bumi Palma Estate (Non Certified)	Bagan Jaya Village, Tempuling Sub District, Indragiri Hilir District, Riau Province, Indonesia	0.6039	102.9886	39.21	Not Certified	-	2026	Land Title in progress,
Bumi Palma Mill	Indonesia	Bumi Palma Mill	Bagan Jaya Village, Tempuling Sub District, Indragiri Hilir District, Riau Province, Indonesia	0.5981	102.9836	-	Certified	2014	-	
Bumi Palma Mill	Indonesia	Bumi Palma Estate	Bagan Jaya Village, Tempuling Sub District, Indragiri Hilir District, Riau Province, Indonesia	0.6039	102.9886	3,404.80	Certified	2014	-	
Bumi Palma Mill	Indonesia	Bumi Lestari Estate	Pebanaan Village, Kritang Sub District, Indragiri Hilir District, Riau Province, Indonesia	0.5997	103.0264	3,285.20	Certified	2014	-	
Bumi Palma Mill	Indonesia	Kharisma Estate	Talang Perigi Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	-0.5710	102.2390	350.37	Not Certified	-	2026	RaCP in progress

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Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Actual Certification Year	Plan Year for Certification	Remark
				Latitude	Longitude					
Bumi Palma Mill	Indonesia	Kharisma Plasma	Talang Perigi Village, Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	-0.5620	102.2400	102.24	Not Certified	-	2026	RaCP in progress
Bumi Sawit Mill	Indonesia	Bumi Sawit Estate (Non Certified)	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5289	104.3347	773.39	Not Certified	-	2025	Land Title in progress,
Bumi Sawit Mill	Indonesia	Bumi Sawit Mill	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5456	104.3442	-	Certified	2015	-	
Bumi Sawit Mill	Indonesia	Bumi Sawit Estate	Tanjung Miring Village, Rambang Kuang District, Ogan Ilir Regency, South Sumatera Province, Indonesia	3.5289	104.3347	8,823.90	Certified	2015	-	
Hanau Mill	Indonesia	Hanau Mill	Hanau Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.4114	112.1092	-	Certified	2012	-	
Hanau Mill	Indonesia	Hanau Estate	Hanau Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.4114	112.1092	4,890.00	Certified	2012	-	
Hanau Mill	Indonesia	Tasik Mas Estate	Hanau Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.3414	112.0928	5,045.48	Certified	2012	-	
Hanau Mill	Indonesia	Tanjung Paring Estate	Batu Ampar Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.2803	112.1325	4,717.06	Certified	2012	-	
Hanau Mill	Indonesia	Langadang Estate	Batu Ampar Sub District, Seruyan District, Central Kalimantan, Province, Indonesia	2.2347	112.1078	2,409.57	Certified	2012	-	
Hanau Mill	Indonesia	Medang Sari Estate	Desa Runtu Village, Arut Selatan Sub District, Kotawaringin Barat District Kalimantan Tengah Province Indonesia	-2.4179	111.6959	2,436.00	Not Certified	-	2027	Land Title in progress, RaCP in progress

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				Latitude	Longitude					
Indrasakti Mill	Indonesia	Indrasakti Mill	Sungai Limau Village,Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	0.5950	102.3050	-	Certified	2013	-	
Indrasakti Mill	Indonesia	Indrasakti Estate	Sungai Limau Village,Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	0.5783	102.3325	820.87	Certified	2013	-	
Indrasakti Mill	Indonesia	Indrasakti (plasma)	Sungai Limau Village,Rakit Kulim Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.3088	-0.5693	5,023.50	Certified	2013	-	
Indrasakti Mill	Indonesia	Indralestari (plasma)	Talang Bersemi Village,Batang Cenaku Sub District, Indragiri Hulu District, Riau Province, Indonesia	102.1495	-0.7280	4,245.50	Certified	2013	-	
Indrasakti Mill	Indonesia	Indragiri (plasma)	Kuala Gading Village,Batang Cenaku Sub District,Indragiri Hulu District, Riau Province, Indonesia	102.2672	-0.6351	5,295.00	Certified	2013	-	
Indrasakti Mill	Indonesia	Mandian Jaya PLASMA	Bandar Padang Village, Kec Seberida Sub District, Indragiri Hulu District, Riau Province, Indonesia	-0.5930	102.3600	404.62	Certified	2022	-	
Jak Luay Mill	Indonesia	Jak Luay Mill	Jakluay Village,Muara Wahau Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	0.1322	116.9144	-	Certified	2015	-	
Jak Luay Mill	Indonesia	Jak Luay Estate	Jakluay Village,Muara Wahau Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	0.1656	116.9313	3,845.74	Certified	2015	-	
Jak Luay Mill	Indonesia	Pantun Mas Estate	Sidomulyo Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	1.0322	116.9526	5,072.32	Certified	2015	-	
Jak Luay Mill	Indonesia	Long Buluh Estate	Jakluay Village,Muara Wahau Sub District,Kutai Timur District,Kalimantan Timur Province,Indonesia	0.1656	116.9509	3,489.14	Certified	2015	-	

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Jak Luay Mill	Indonesia	Bukit Subur Estate	Jakuyak Village, Telen Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1822	116.8416	3,264.55	Certified	2015	-	
Jak Luay Mill	Indonesia	Long Buluh Estate (Non Certified)	Jakluay Village, Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1656	116.9509	329.66	Not Certified	-	2026	HCV/HCS Study in progress
Jak Luay Mill	Indonesia	Bukit Subur Estate (Non Certified)	Jakuyak Village, Telen Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.1822	116.8416	569.62	Not Certified	-	2026	HCV/HCS Study in progress
Jak Luay Mill	Indonesia	Jakluay KKPA	Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.9378	116.8812	2,979.56	Not Certified	-	2026	Land Title in progress RaCP in progress
Jak Luay Mill	Indonesia	Bukit Subur Plasma	Muara Wahau Sub District, Kutai Timur District, Kalimantan Timur Province, Indonesia	0.8673	116.8580	712.29	Not Certified	-	2026	Land Title in progress RaCP in progress
Jalemo Mill	Indonesia	Jalemo Mill	Jalemo Village, Tumbang Jutu Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3482	113.5022	-	Not Certified	-	2026	Land Title in progress RaCP in progress
Jalemo Mill	Indonesia	Manuhing Estate	Tumbang Kalaken Village, Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3745	113.4438	2,209.84	Not Certified	-	2026	Land Title in progress RaCP in progress
Jalemo Mill	Indonesia	Kajui Estate	Tumbang Sepan Village, Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3907	113.4877	3,590.20	Not Certified	-	2026	Land Title in progress RaCP in progress

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Jalemo Mill	Indonesia	Jalemo Estate	Hujung Prata Village, Rungan Barat Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesia	-1.3593	113.5048	3,289.48	Not Certified	-	2026	Land Title in progress RaCP in progress
Jalemo Mill	Indonesia	Manuhing KKPA	,Manuhing Sub District, Gunung Mas District, Kalimantan Tengah Province, Indonesi	-1.3745	113.4438	64.86	Not Certified	-	2027	Land Title in progress RaCP in progress
Jelatang Mill	Indonesia	Jelatang Mill	Jelatang Village, Pamenang Sub-District, Merangin District, Jambi Province, Indonesia	2.1283	102.3753	-	Certified	2014	-	
Jelatang Mill	Indonesia	Bangko Estate	Jelatang Village, Pamenang Sub-District, Merangin District, Jambi Province, Indonesia	2.1117	102.3661	237.96	Certified	2014	-	
Kasuari Mill	Indonesia	Kasuari Mill	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9731	140.0299	-	Certified	2023	-	
Kasuari Mill	Indonesia	Cendrawasih Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9314	139.9666	4,242.94	Certified	2023	-	
Kasuari Mill	Indonesia	Nuri Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.8949	139.9259	3,999.06	Certified	2023	-	
Kasuari Mill	Indonesia	Rajawali Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-2.9938	140.0926	7,402.00	Certified	2023	-	
Kasuari Mill	Indonesia	Mambruk Estate	Kampung Lapua Village, Kaureh District, Jayapura Regency, Papua Province, Indonesia	-3.0306	140.0458	3,407.15	Not Certified	-	2025	RaCP in progress

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Kenanga Mill	Indonesia	Kenanga Mill	Randai Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1197	110.5939	-	Certified	2015	-	
Kenanga Mill	Indonesia	Kencana Estate	Rangkung Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1325	110.5775	3,243.64	Certified	2015	-	
Kenanga Mill	Indonesia	Cendana Estate	Belaban Village, Marau Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	2.1053	110.6086	3,591.85	Certified	2015	-	
Kenanga Mill	Indonesia	Kenanga Estate	Randai Village, Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1396	110.5079	2,618.10	Not Certified	-	2026	RaCP in progress
Kenanga Mill	Indonesia	Delima Estate	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1231	110.5572	1,857.49	Not Certified	-	2024	RaCP in progress
Kenanga Mill	Indonesia	Kencana Kemitraan	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.0833	110.5835	1,108.22	Not Certified	-	2026	RaCP in progress
Kenanga Mill	Indonesia	Kenanga Kemitraan	Marau District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.0896	110.5516	439.00	Not Certified	-	2026	RaCP in progress
Kenari Mill	Indonesia	Kenari Mill	Pangkalan Baru Village, Tribun Jaya Sub District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1655	110.9210	-	Not Certified	-	2026	RaCP in progress
Kenari Mill	Indonesia	Gaharu Estate	Periangan Village, Jelai Hulu District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1000	110.8647	1,885.97	Not Certified	-	2026	RaCP in progress
Kenari Mill	Indonesia	Kenari Estate	Kenari Sub District District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1708	110.9236	2649.75	Not Certified	-	2026	RaCP in progress
Kenari Mill	Indonesia	Gaharu Kemitraan	Jelai Hulu District, Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.1119	110.9264	557.47	Not Certified	-	2027	RaCP in progress

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Kenari Mill	Indonesia	Kenari Kemitraan	Ketapang Regency, Kalimantan Barat Province, Indonesia	-2.2064	110.8981	336.31	Not Certified	-	2027	RaCP in progress
Kijang Mill	Indonesia	Kijang Mill	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.0450	-	Certified	2012	-	
Kijang Mill	Indonesia	Kijang Mas Estate	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8447	101.0494	2,369.39	Certified	2012	-	
Kijang Mill	Indonesia	Kijang Kencana (plasma)	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8547	101.0911	8,147.79	Certified	2012	-	
Kijang Mill	Indonesia	Kijang Mas Estate (Non Certified)	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8447	101.0494	56.00	Not Certified	-	2025	Land Title in progress,
Kuayan Mill	Indonesia	Kuayan Mill	Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9712	112.3698	-	Not Certified	-	2027	Land Title in progress, RaCP in progress
Kuayan Mill	Indonesia	Bukit Santuhai Estate	Tumbang Keminting Village, Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9490	112.3935	3,638.97	Not Certified	-	2027	Land Title in progress, RaCP in progress
Kuayan Mill	Indonesia	Seranau Estate	Tumbang Sapiri Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0334	112.4052	3,655.08	Not Certified	-	2027	Land Title in progress, RaCP in progress
Kuayan Mill	Indonesia	Sapiri Estate	Tukang Langit Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.8724	112.5321	2,392.65	Not Certified	-	2027	Land Title in progress, RaCP in progress
Kuayan Mill	Indonesia	Tajur Beras Estate	Pematang Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0870	112.4630	3,660.80	Not Certified	-	2027	Land Title in progress,

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				Latitude	Longitude					
										RaCP in progress
Kuayan Mill	Indonesia	Bukit Dua Estate	Rantau Katang Village, Telaga Antang Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.7376	112.5294	1,804.58	Not Certified	-	2027	Land Title in progress, RaCP in progress
Kuayan Mill	Indonesia	Sapiri Plasma	Tukang Langit Village, Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-1.9371	112.7821	434.93	Not Certified	-	2027	Land Title in progress, RaCP in progress
Kuayan Mill	Indonesia	Sungai Sambon Plasma	Mentaya Hulu Sub District, Kota Waringin Timur District, Kalimantan Tengah Province, Indonesia	-2.0724	112.4382	470.29	Not Certified	-	2027	Land Title in progress, RaCP in progress
Langga Payung Mill	Indonesia	Langga Payung Mill	Halongonan Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.6775	99.8869	-	Certified	2012	-	
Langga Payung Mill	Indonesia	Langga Payung Estate	Halongonan Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.7275	99.8436	5,308.53	Certified	2012	-	
Langga Payung Mill	Indonesia	Paya Baung Estate	Simangambat Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.6275	99.9625	2,651.09	Certified	2012	-	
Langga Payung Mill	Indonesia	Paya Baung Estate (Non Certified)	Simangambat Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.6275	99.9625	113.00	Not Certified	-	2027	Land Title in progress
Langga Payung Mill	Indonesia	Normark Estate	Kota Pinang Sub District, Padang Lawas Utara District, Sumatera Utara Province, Indonesia	1.8275	99.9711	2,195.10	Certified	2012	-	

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Langling Mill	Indonesia	Langling Mill	Langling Village,Bangko Sub-District,Merangin District, Jambi Province, Indonesia	2.1283	102.3753	-	Certified	2014	-	
Langling Mill	Indonesia	Bangko Estate	Langling Village,Bangko Sub-District,Merangin District, Jambi Province, Indonesia	2.1117	102.3661	955.36	Certified	2014	-	
Langling Mill	Indonesia	Batang Gading Estate	Bukit Kemang Village, Tanah Bumbu Sub District, Kab. Muara Bungo District,Jambi Province, Indonesia	-1.5503	101.8828	2,237.27	Not Certified	-	2025	RaCP in progress Land Title in progress
Langling Mill	Indonesia	Batang Gading KKPA	Bukit Kemang Village, Tanah Bumbu Sub District, Kab. Muara Bungo District,Jambi Province, Indonesia	-1.5510	101.8590	1,494.39	Not Certified	-	2026	RaCP in progress Land Title in progress
Leidong West Mill	Indonesia	Leidong West Mill	Terentang Village,Kelapa Sub District,Bangka Barat District,Bangka Belitung Province, Indonesia	1.9292	105.4764	-	Certified	2014	-	
Leidong West Mill	Indonesia	Leidong West Selatan Estate	Berang Village,Simpang Teritip Sub District,Bangka Barat District,Bangka Belitung Province, Indonesia	1.9958	105.4997	642.73	Certified	2014	-	
Leidong West Mill	Indonesia	Leidong West Utara Estate	Milsak, Tumbak Petar,Jebus & Ranggi Asam Village,Jebus Sub District,Bangka Barat District,Bangka Belitung Province, Indonesia	1.7625	105.4981	746.52	Certified	2014	-	
Leidong West Mill	Indonesia	Bukit Intan Estate	Terentang,Kacung Village,Kelapa Sub District,Bangka Barat District,Bangka Belitung Province, Indonesia	1.8958	105.5097	5,055.02	Certified	2014	-	
Leidong West Mill	Indonesia	Bukit Mas Estate	Ibul Village,Kelapa Sub District,Bangka Barat District,Bangka Belitung Province, Indonesia	1.9292	105.4681	3,183.50	Certified	2014	-	

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Libo Mill	Indonesia	Libo Mill	Samsam Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.2061	-	Certified	2013	-	
Libo Mill	Indonesia	Libo Estate	Samsam Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9447	101.2061	4,871.77	Certified	2013	-	
Libo Mill	Indonesia	Nenggala Estate	Samsam Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.8947	101.2342	2,203.84	Certified	2013	-	
Libo Mill	Indonesia	Sungai Rokan Estate	Samsam Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9114	101.2172	4,139.72	Certified	2013	-	
Libo Mill	Indonesia	Sungai Tapung (plasma)	Sukamaju & Kota Bangun Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7781	101.2458	5,585.00	Certified	2013	-	
Muara Kandis Mill	Indonesia	Muara Kandis Mill	Lubuk Pandan Village, Muara Lakitan Sub District, Karya Sakti Village, Muara Kelingi Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9453	103.1708	-	Certified	2015	-	
Muara Kandis Mill	Indonesia	Muara Kandis Estate	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9286	103.1772	6,635.44	Certified	2015	-	
Muara Kandis Mill	Indonesia	Muara Tawas Estate	Karya Mukti Village, Lubuk Tua Village, Muara Kelingi Sub-District, Muara Megang Village, Megang Sakti Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9953	103.1186	4,322.84	Certified	2015	-	
Muara Kandis Mill	Indonesia	Muara Kandis Estate (Non Certified)	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	2.9286	103.1772	421.59	Not Certified	-	2025	Land Title in progress,
Muara Kandis Mill	Indonesia	Muara Tawas Estate	Karya Mukti Village, Lubuk Tua Village, Muara Kelingi Sub-District, Muara Megang	2.9953	103.1186	55.60	Not Certified	-	2025	Land Title in progress,

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			Village, Megang Sakti Sub-District,Musi Rawas District, Sumatera Selatan Province, Indonesia							
Muara Kandis Mill	Indonesia	Pendawa Plasma	Lubuk Pandan Village, Muara Lakitan Sub District, Muara Kelingi Sub-District,Musi Rawas District, Sumatera Selatan Province, Indonesia	-2.9021	103.2113	1,795.50	Not Certified	-	2026	RaCP in progress
Muara Wahau Mill	Indonesia	Muara Wahau Mill	Sukamaju Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1325	117.0065	-	Certified	2014	-	
Muara Wahau Mill	Indonesia	Muara Wahau Estate	Makmur Jaya Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1658	117.0065	3,603.12	Certified	2014	-	
Muara Wahau Mill	Indonesia	Gunung Kombeng Estate	Sukamaju Village,Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.1325	117.0203	3,274.42	Certified	2014	-	
Muara Wahau Mill	Indonesia	Gunung Kombeng KKPA	Kongbeng Sub District,Kutai Timur District,Kalimantan Timur Province, Indonesia	1.0992	117.0117	2,214.00	Not Certified	-	2026	Land Title in progress, RaCP in progress
Nagasakti Mill	Indonesia	Nagasakti Mill	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0503	-	Certified	2012	-	
Nagasakti Mill	Indonesia	Nagamas Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0464	5,042.58	Certified	2012	-	
Nagasakti Mill	Indonesia	Nagasakti Estate	Sekijang Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8114	101.0875	5,167.22	Certified	2012	-	
Nagasakti Mill	Indonesia	Ramabakti Estate	Beringin Lestari Village,Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.1722	2,903.79	Certified	2012	-	

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Nagasakti Mill	Indonesia	Nagamas Estate (Non Certified)	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.7947	101.0464	253.00	Not Certified	-	2025	Land Title in progress,
Nagasakti Mill	Indonesia	Nagasakti Estate	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8114	101.0875	60.00	Not Certified	-	2025	Land Title in progress,
Padang Halaban Mill	Indonesia	Padang Halaban Mill	Aek Kuo Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.3442	99.8394	-	Certified	2011	-	
Padang Halaban Mill	Indonesia	Padang Halaban Estate	Merbau Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.3442	99.8394	7,464.92	Certified	2011	-	
Padang Halaban Mill	Indonesia	Pernantian Estate	Merbau Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.2608	99.7808	2,387.07	Certified	2011	-	
Padang Halaban Mill	Indonesia	Adipati Estate	Merbau Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.3108	99.9564	2,490.00	Certified	2011	-	
Padang Halaban Mill	Indonesia	Kanopan Ulu Estate	Kuala Hulu Sub District, Labuhanbatu Utara District, Sumatera Utara Province, Indonesia	2.5942	99.6161	4,845.85	Certified	2011	-	
Pangkalan Panji Mill	Indonesia	Pangkalan Panji Mill	Pangkalan Panji Village, Banyuasin III District, Banyuasin District, South Sumatera, Province Indonesia	2.9622	104.4664	-	Certified	2015	-	
Pangkalan Panji Mill	Indonesia	Sawit Mas Estate	Pangkalan Panji Village, Banyuasin III District, Banyuasin Regency, South Sumatera Province, Indonesia	2.9456	104.4643	3,753.00	Certified	2015	-	
Pangkalan Panji Mill	Indonesia	Sawit Mas Estate	Pangkalan Panji Village, Banyuasin III District, Banyuasin Regency, South Sumatera Province, Indonesia	2.9456	104.4643	2,291.00	Not Certified	-	2025	Land Title in progress,
Pekawai Mill	Indonesia	Pekawai Mill	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5212	110.4589	-	Certified	2024	-	RaCP Process (initial certification 2023)

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Pekawai Mill	Indonesia	Kayung Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5452	110.4578	200.60	Not Certified	-	2027	Land Title in progress
Pekawai Mill	Indonesia	Kayung Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5452	110.4578	136.60	Not Certified	-	2027	RaCP Process
Pekawai Mill	Indonesia	Pekawai Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5215	110.4617	58.30	Not Certified	-	2027	Land Title in progress
Pekawai Mill	Indonesia	Pekawai Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5215	110.4617	494.37	Not Certified	-	2027	RaCP Process
Pekawai Mill	Indonesia	Sungai Kelik Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.6174	110.4144	1,526.01	Not Certified	-	2027	Land Title in progress
Pekawai Mill	Indonesia	Sungai Kelik Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.6174	110.4144	770.74	Not Certified	-	2027	RaCP Process
Pekawai Mill	Indonesia	Nanga Tayap Estate (excluded from scope)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5750	110.5309	438.96	Not Certified	-	2027	RaCP Process
Pekawai Mill	Indonesia	Kayung Estate (scope audit 2023)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5452	110.4578	2,449.75	Certified	2024	-	RaCP Process (initial certification 2023)
Pekawai Mill	Indonesia	Pekawai Estate (scope audit 2023)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5215	110.4617	3,035.71	Certified	2024	-	RaCP Process (initial

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										certification 2023)
Pekawai Mill	Indonesia	Sungai Kelik Estate (scope audit 2023)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.6174	110.4144	5,118.09	Certified	2024	-	RaCP Process (initial certification 2023)
Pekawai Mill	Indonesia	Nanga Tayap Estate (scope audit 2023)	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5750	110.5309	4,234.58	Certified	2024	-	RaCP Process (initial certification 2023)
Pekawai Mill	Indonesia	Kayung Kemitraan	Nanga Tayap Sub District, Ketapang District, Kaimantan Barat Province Indonesia	-1.5727	110.4223	2,650.57	Not Certified	-	2026	Land Title in progress & RaCP Process
Pelakar Mill	Indonesia	Pelakar Mill	Tanjung Village,Bathin VIII Sub-District,Pauh Sub District,Sarolangun District, Jambi Province, Indonesia	2.2117	102.6464	-	Certified	2020	-	
Pelakar Mill	Indonesia	Pelakar Estate	Tanjung Village,Bathin VIII Sub-District,Sarolangun District, Jambi Province, Indonesia	2.2117	102.6931	4,405.90	Certified	2020	-	
Pelakar Mill	Indonesia	Batang Merangin Estate	Kasang Melintang Village,Pauh Sub-District,Sarolangun District, Jambi Province, Indonesia	2.1117	102.3661	5,226.47	Certified	2020	-	
Pelakar Mill	Indonesia	Tiga Serumpun KKPA	Tanjung Village,Bathin VIII Sub-District,Sarolangun District, Jambi Province, Indonesia	2.1283	102.3761	2,787.83	Not Certified	-	2026	Land Title in progress & RaCP Process

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Perdana Mill	Indonesia	Perdana Mill	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4225	112.3596	-	Not Certified	-	2027	Land Title in progress RaCP Process
Perdana Mill	Indonesia	Perdana Estate	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4202	112.3645	4,009.91	Not Certified	-	2027	Land Title in progress RaCP Process
Perdana Mill	Indonesia	Lenggana Estate	Selunuk Village, Seruyan Raya Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4185	112.4174	2,308.02	Not Certified	-	2027	Land Title in progress RaCP Process
Perdana Mill	Indonesia	Semandau Estate	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4317	112.3082	3,788.62	Not Certified	-	2027	Land Title in progress RaCP Process
Perdana Mill	Indonesia	Muara Dua Estate	Terawan Village, Seruyan Raya Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.4526	112.3852	4,125.33	Not Certified	-	2027	Land Title in progress RaCP Process
Ramarama Mill	Indonesia	Ramarama Mill	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5614	101.0764	-	Certified	2012	-	
Ramarama Mill	Indonesia	Ramarama Estate	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	4,091.94	Certified	2012	-	
Ramarama Mill	Indonesia	Amarta Jaya (plasma)	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5341	101.0798	4,426.00	Certified	2012	-	
Ramarama Mill	Indonesia	Ramarama Estate (Non Certified)	Petapahan Village, Tapung Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	319.00	Not Certified	-	2025	Land Title in progress,

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Ramarama Mill	Indonesia	Ramarama KKPA	Tapung Sub District,Kampar District, Riau Province, Indonesia	0.5600	100.9980	760.00	Not Certified	-	2026	Land Title in progress
Ramarama Mill	Indonesia	Berkat Ridho KKPA	Sekijang Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.8614	101.0450	796.74	Not Certified	-	2025	Land Title in progress
Ramarama Mill	Indonesia	Produsen Rama Sawit KKPA	Petapahan Village, Tapung Hilir Sub District, Kampar District, Riau Province, Indonesia	0.5781	101.1139	248.68	Not Certified	-	2025	Land Title in progress
Rantau Panjang Mill	Indonesia	Rantau Panjang Mill	Jak Luay Village, Muara Wahau Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	-	Certified	2023	-	
Rantau Panjang Mill	Indonesia	Rantau Panjang Estate (scope audit 2023)	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	4,573.54	Certified	2023	-	
Rantau Panjang Mill	Indonesia	Rantau Panjang KKPA	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9726	116.8412	981.76	Not Certified	-	2026	RaCP Process Land Title in progress
Rantau Panjang Mill	Indonesia	Rantau Panjang Estate (excluded from scope)	Rantau Panjang Village, Telen Sub District, Kab. Kutai Timur District, Kalimantan Timur Province Indonesia	0.9733	116.8414	1,059.98	Not Certified	-	2027	Land Title in progress
Sako Mill	Indonesia	Sako Mill	Suka Mandang Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0356	112.2387	-	Not Certified	-	2027	RaCP Process Land Title in progress
Sako Mill	Indonesia	Mentaya Estate	Ayawan Village, Seruyan Tengah Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.0149	112.2989	3,342.05	Not Certified	-	2027	RaCP Process Land Title in progress

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Sako Mill	Indonesia	Kuayan Estate	Keminting Village,Bukit Sentuhai Sub District, Kota Waringin Timur District, Kalimantan Tengah Province,Indonesia	-1.9751	112.3566	3,519.82	Not Certified	-	2027	RaCP Process Land Title in progress
Sako Mill	Indonesia	Sungai Nusa Estate	Gantung Pengayuh Village,Seruyan Tengah Sub District, Seruyan District,Kalimantan Tengah Province,Indonesia	-2.0960	112.2343	3,230.68	Not Certified	-	2027	RaCP Process Land Title in progress
Sako Mill	Indonesia	Sungai Ayawan Estate	Suka Mandang Village,Seruyan Tengah Sub District, Seruyan District,Kalimantan Tengah Province,Indonesia	-2.0744	112.2426	3,741.59	Not Certified	-	2027	RaCP Process Land Title in progress
Sako Mill	Indonesia	Sako Plasma	Seruyan Tengah Sub District, Seruyan District,Kalimantan Tengah Province,Indonesia	-2.2470	112.1931	1,014.42	Not Certified	-	2027	RaCP Process Land Title in progress
Samsam Mill	Indonesia	Samsam Mill	Bekalar Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9614	101.3000	-	Certified	2013	-	
Samsam Mill	Indonesia	Samsam Estate	Bekalar Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9614	101.3000	2,812.13	Certified	2013	-	
Samsam Mill	Indonesia	Kandista Estate	Belutu Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9447	101.3514	3,562.64	Certified	2013	-	
Samsam Mill	Indonesia	Palapa Estate	Bekalar Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9614	101.2808	3,209.80	Certified	2013	-	
Samsam Mill	Indonesia	Samsam Estate (Non Certified)	Bekalar Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9614	101.3000	29.16	Not Certified	-	2025	Land Title in progress,
Samsam Mill	Indonesia	Kandista Estate (Non Certified)	Belutu Village,Kandis Sub District,Siak District, Riau Province, Indonesia	0.9447	101.3514	181.00	Not Certified		2025	Land Title in progress,

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Samsam Mill	Indonesia	Sungai Rokan Estate (Non Certified)	Samsam Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.9114	101.2172	103.00	Not Certified		2025	Land Title in progress,
Samsam Mill	Indonesia	Nenggala Estate (Non Certified)	Samsam Village,Kandis Sub District, Siak District, Riau Province, Indonesia	0.8947	101.2342	422.00	Not Certified		2025	Land Title in progress,
Sawita Mill	Indonesia	Sawita Mill	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5477	116.1401	-	Certified	2024	-	RaCP Process (initial certification 2023)
Sawita Mill	Indonesia	Sawita Estate	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5516	116.1416	3,440.14	Certified	2024	-	RaCP Process (initial certification 2023)
Sawita Mill	Indonesia	Sawita Estate (excluded from scope)	Rantau Buda Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province Indonesia	-2.5516	116.1416	443.45	Not Certified	-	2027	RaCP Process
Sawita Mill	Indonesia	Pamukan Estate	Manunggul Baru Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.5533	116.2249	3,055.15	Certified	2024	-	RaCP Process (initial certification 2023)
Sawita Mill	Indonesia	Pamukan Estate (excluded from scope)	Manunggul Baru Village, Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-2.5533	116.2249	1,941.13	Not Certified	-	2027	RaCP Process
Sawita Mill	Indonesia	Sawita Kkpa	Sungai Durian Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia	-1.5503	101.8828	1,154.47	Not Certified	-	2025	RaCP Process Land Title in progress

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Semilar Mill	Indonesia	Semilar Mill	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2483	112.3406	-	Certified	2013	-	
Semilar Mill	Indonesia	Semilar Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2517	112.3497	4,288.63	Certified	2013	-	
Semilar Mill	Indonesia	Sei Rindu Estate	Pantap Village, Mentaya Hulu District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.2536	112.4081	3,990.60	Certified	2013	-	
Semilar Mill	Indonesia	Mandang Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2744	112.3381	5,170.35	Certified	2013	-	
Semilar Mill	Indonesia	Puri Estate	Biru Maju Village, Telawang District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.3061	112.4203	3,638.42	Certified	2013	-	
Semilar Mill	Indonesia	Sei Rindu Estate (Non Certified)	Pantap Village, Mentaya Hulu District, Kotawaringin Timur District, Kalimantan Tengah Province, Indonesia	2.2536	112.4081	203.92	Not Certified	-	2026	Land Title in progress,
Sungai Air Jernih Mill	Indonesia	Sungai Air Jernih Mill	Pauh Village, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0853	102.4697	-	Not Certified		2025	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Mentawak Kkpa	Baru Village, Air Hitam Sub District, Sarolangun District, Jambi Province, Indonesia	-2.1070	102.7030	924.87	Not Certified	-	2026	RaCP Process Land Title in progress
Sungai Air Jernih Mill	Indonesia	Sungai Air Jernih Estate	Pauh Village, Pauh Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0844	102.8033	2,980.38	Not Certified	-	2025	RaCP in progress

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Sungai Air Jernih Mill	Indonesia	Sungai Mentawak Estate	Baru Village, Air Hitam Sub District, Sarolangun District, Jambi Province, Indonesia	-2.0603	102.7106	2,801.36	Not Certified	-	2025	RaCP in progress
Sungai Air Jernih Mill	Indonesia	Sungai Merak Estate	Wentawak Baru Village, Air Hitam District, Sarolangun Regency, Jambi Province, Indonesia	-2.0194	102.6364	4,566.80	Not Certified	-	2025	RaCP in progress
Sungai Bengkal Mill	Indonesia	Sungai Bengkal Mill	Betung Bedarah Barat Village, Tebo Ilir Sub District, Tebo District, Jambi Province, Indonesia	1.6117	102.6100	-	Certified	2015	-	
Sungai Bengkal Mill	Indonesia	Sungai Bengkal Estate	Betung Bedarah Barah Village, Tebo Ilir Sub District, Rantau Api, Penapalan Village, Tanah Ilir Sub District, Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.5950	102.6100	2,364.49	Certified	2015	-	
Sungai Bengkal Mill	Indonesia	Muara Kilis Estate	Muara Kilis Village, Tebo Ilir Sub District, Kandang, Pelayangan and Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.4450	102.5686	1,460.54	Certified	2015	-	
Sungai Bengkal Mill	Indonesia	Sungai Bengkal KKPA	Betung Bedarah Barah Village, Tebo Ilir Sub District, Rantau Api, Penapalan Village, Tanah Ilir Sub District, Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	1.5950	102.6100	1,062.58	Certified	2015	-	
Sungai Bengkal Mill	Indonesia	Muara Kilis KKPA	Muara Kilis Village, Tebo Ilir Sub District, Kandang, Pelayangan and Sungai Keruh Village, Tebo Tengah Sub District, Tebo District, Jambi Province, Indonesia	2.2117	102.6422	938.77	Not Certified	-	2026	RaCP Process Land Title in progress

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Sungai Buaya Mill	Indonesia	Sungai Buaya Mill	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1458	105.4386	-	Certified	2014	-	
Sungai Buaya Mill	Indonesia	Sungai Buaya Estate	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1792	105.4358	5,114.39	Certified	2014	-	
Sungai Buaya Mill	Indonesia	Mesuji (plasma)	Brabasan Village, Tanjung Raya Sub District, Mesuji District, Lampung Province, Indonesia	3.9958	105.3472	5,194.76	Certified	2014	-	
Sungai Buaya Mill	Indonesia	Gedung Aji Lama (plasma)	Panduan Rajawali Village, Meraksa Aji Sub District, Tulang Bawang District, Lampung Province, Indonesia	4.3125	105.4317	5,009.95	Certified	2014	-	
Sungai Buaya Mill	Indonesia	Sungai Buaya Estate (Non Certified)	Talang Batu Village, Mesuji Timur Sub District, Mesuji District, Lampung Province, Indonesia	4.1792	105.4358	99.89	Not Certified		2025	RaCP Process (Disclosure)
Sungai Kedang Mill	Indonesia	Sungai Kedang Mill	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6587	115.4964	-	Not Certified	-	2025	RaCP Process
Sungai Kedang Mill	Indonesia	Sungai Tohan Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6267	115.5141	1,773.36	Not Certified		2026	RaCP Process
Sungai Kedang Mill	Indonesia	Sungai Kedang Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6843	115.5019	2,803.05	Not Certified	-	2025	RaCP Process
Sungai Kedang Mill	Indonesia	Sungai Tohan Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6267	115.5141	3,593.55	Not Certified	-	2025	RaCP Process
Sungai Kedang Mill	Indonesia	Kedang Pahu Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6679	115.4458	2,439.58	Not Certified	-	2025	RaCP Process

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Sungai Kedang Mill	Indonesia	Sungai Pahu Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6141	115.4520	2,782.66	Not Certified	-	2025	RaCP Process
Sungai Kedang Mill	Indonesia	Sungai Pahu Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6679	115.4458	567.56	Not Certified	-	2026	RaCP Process
Sungai Kikim Mill	Indonesia	Sungai Kikim Mill	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6343	103.2197	-	Certified	2024	-	RaCP Process (initial certification 2023)
Sungai Kikim Mill	Indonesia	Sungai Kikim Estate (excluded from scope)	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6293	103.2387	171.23	Not Certified	-	2027	Land Title in progress
Sungai Kikim Mill	Indonesia	Sungai Pangi Estate (excluded from scope)	Ulak Bandung Village, Kikim Barat Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.5507	103.1897	74.93	Not Certified	-	2027	Land Title in progress
Sungai Kikim Mill	Indonesia	Sungai Musi Estate (excluded from scope)	Gunung Kembang Lama Village, BTS Ulu Sub District, Musi Waras District, Sumatera Selatan Province, Indonesia	-3.5018	103.2300	131.54	Not Certified	-	2027	Land Title in progress
Sungai Kikim Mill	Indonesia	Sungai Musi Estate (excluded from scope)	Gunung Kembang Lama Village, BTS Ulu Sub District, Musi Waras District, Sumatera Selatan Province, Indonesia	-3.5018	103.2300	63.23	Not Certified	-	2027	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Saling Estate (excluded from scope)	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6249	103.2398	555.55	Not Certified	-	2027	Land Title in progress
Sungai Kikim Mill	Indonesia	Sungai Kikim Estate	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6293	103.2387	1,845.29	Not Certified	-	2023	

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Sungai Kikim Mill	Indonesia	Sungai Enim Estate	Arahan Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6300	103.6489	1,882.41	Not Certified	-	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Lematang Estate	Arahan Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6300	103.6489	2,437.39	Not Certified	-	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Bungur Estate	Patikal Lama Village, Kikim Timur District, Lahat Regency, Sumatera Selatan Province, Indonesia	-3.6581	103.4236	3,080.97	Not Certified	-	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Lingsing Estate	Tanjung Lontar Village, Merapi Timur Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6359	103.3057	1,032.87	Not Certified	-	2025	RaCP in progress
Sungai Kikim Mill	Indonesia	Sungai Kikim Estate (scope audit 2023)	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6293	103.2387	1,957.64	Certified	2024	-	RaCP Process (initial certification 2023)
Sungai Kikim Mill	Indonesia	Sungai Pangi Estate (scope audit 2023)	Ulak Bandung Village, Kikim Barat Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.5507	103.1897	4,040.47	Certified	2024	-	RaCP Process (initial certification 2023)
Sungai Kikim Mill	Indonesia	Sungai Musi Estate (scope audit 2023)	Gunung Kembang Lama Village, BTS Ulu Sub District, Musi Waras District, Sumatera Selatan Province, Indonesia	-3.5018	103.2300	3,065.37	Certified	2024	-	RaCP Process (initial certification 2023)
Sungai Kikim Mill	Indonesia	Sungai Saling Estate (scope audit 2023)	Sungai Laru Village, Kikim Tengah Sub District, Lahat District, Sumatera Selatan Province, Indonesia	-3.6249	103.2398	2,569.20	Certified	2024	-	RaCP Process (initial

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										certification 2023)
Sungai Kupang Mill	Indonesia	Sungai Kupang Mill	Sungai Kupang Village,Kelumpang Hulu Sub District,Kotabaru District,Kalimantan Selatan Province, Indonesia	3.0822	116.0142	-	Certified	2020	-	
Sungai Kupang Mill	Indonesia	Sungai Kupang Estate	Sangking Baru Village,Kelumpang Selatan Sub District,Kotabaru District,Kalimantan Selatan Province, Indonesia	3.0656	116.1181	5,196.11	Certified	2020	-	
Sungai Kupang Mill	Indonesia	Sungai Panci Estate	Kelumpang Hilir Sub District,Kotabaru District,Kalimantan Selatan Province, Indonesia	3.1822	116.0256	4,077.40	Certified	2012	-	
Sungai Kupang Mill	Indonesia	Sungai Panci (plasma)	Kelumpang Hilir Sub District,Kotabaru District,Kalimantan Selatan Province, Indonesia	3.1819	115.9986	3,822.17	Certified	2012	-	
Sungai Kupang Mill	Indonesia	Sungai Manunggul Estate	Sang Sang Village, Kelmpang Hilir District, Kota Baru Regency, Kalimantan Selatan Province, Indonesia	-2.7797	116.1733	1,055.17	Not Certified	-	2027	Land Title in progress RaCP in progress
Sungai Kupang Mill	Indonesia	Sungai Kupang KKPA	Telagasari Village, Kelmpang Hilir District, Kota Baru Regency, Kalimantan Selatan Province, Indonesia	-3.1129	116.1855	3,858.70	Not Certified	-	2025	Land Title in progress RaCP in progress
Sungai Magalau Mill	Indonesia	Sungai Magalau Mill	Sangsang Village,Kelumpang Tengah Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.7866	116.1707	-	Not Certified	-	2026	RaCP in progress
Sungai Magalau Mill	Indonesia	Senakin Estate	Sangsang Village,Sampanahan Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.8081	116.1867	2,930.77	Not Certified	-	2026	RaCP in progress

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				Latitude	Longitude					
Sungai Magalau Mill	Indonesia	Sungai Magalau Estate	Sukamaju Village,Kelumpang Tengah Sub District, Kotabaru District,Kalimantan Selatan Province, Indonesia	-2.6658	116.1611	1,481.21	Not Certified	-	2026	RaCP in progress
Sungai Merah Mill	Indonesia	Sungai Merah Mill	Sidomukti Village,Gedung Aji Baru Sub District,Tulang Bawang District, Lampung Province, Indonesia	4.2458	105.5889	-	Certified	2014	-	
Sungai Merah Mill	Indonesia	Sungai Merah Estate	Sidang Gunung Tiga Village,Rawajitu Utara Sub District,Mesuji District,Lampung Province, Indonesia	4.2292	105.6347	4,046.01	Certified	2014	-	
Sungai Merah Mill	Indonesia	Gedung Aji Baru (plasma)	Sidoarjo Village,Penawartama Sub District,Tulang Bawang District,Lampung Province, Indonesia	4.1792	105.4400	4,505.75	Certified	2014	-	
Sungai Merah Mill	Indonesia	Sungai Merah Estate (Non Certified)	Sidang Gunung Tiga Village,Rawajitu Utara Sub District,Mesuji District,Lampung Province, Indonesia	4.2292	105.6347	241.54	Not Certified	-	2025	RaCP Process (Disclosure)
Sungai Perak Mill	Indonesia	Sungai Perak Mill	Besiq,Bermai,Muara Niliq,Mantar,Muara Begai Village,Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6619	115.5892	-	Not Certified	-	2025	RaCP in progress
Sungai Perak Mill	Indonesia	Sungai Perak Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6820	115.6030	2,803.48	Not Certified	-	2025	RaCP in progress
Sungai Perak Mill	Indonesia	Sungai Basung Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6421	115.6085	2,809.46	Not Certified	-	2025	RaCP in progress
Sungai Perak Mill	Indonesia	Sungai Pikan Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.5957	115.6298	2,347.96	Not Certified	-	2025	RaCP in progress

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				Latitude	Longitude					
Sungai Perak Mill	Indonesia	Sungai Pilos Estate	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.6776	115.5297	3,3354.73	Not Certified	-	2025	RaCP in progress
Sungai Perak Mill	Indonesia	Sungai Pikan Plasma	Damai & Muara Lawa Sub District, Kutai Barat District, Kalimantan Timur Province, Indonesia	-0.5957	115.6298	2,266.34	Not Certified	-	2026	RaCP in progress
Sungai Rungau Mill	Indonesia	Sungai Rungau Mill	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3206	112.3339	-	Certified	2013	-	
Sungai Rungau Mill	Indonesia	Sungai Rungau Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3286	112.3161	3,073.15	Certified	2013	-	
Sungai Rungau Mill	Indonesia	Sungai Seruyan Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3089	112.2578	4,870.84	Certified	2013	-	
Sungai Rungau Mill	Indonesia	Terawan Estate	Selunuk Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.3453	112.3786	4,481.87	Certified	2013	-	
Sungai Rungau Mill	Indonesia	Tangar Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.2292	112.2928	4,445.15	Certified	2013	-	
Sungai Rungau Mill	Indonesia	Bukit Tiga Estate	Rungau Raya Village, Danau Selunuk District, Seruyan District, Kalimantan Tengah Province, Indonesia	2.1864	112.3222	3,281.78	Certified	2013	-	
Tanah Laut Mill	Indonesia	Tanah Laut Mill	Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2831	-	Certified	2012	-	
Tanah Laut Mill	Indonesia	Tanah Laut Estate	Sungai Cuka, Sumber Jaya, Bukit Mulya Pasir Putih, Kintap Kecil Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2953	3,112.77	Certified	2012	-	

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				Latitude	Longitude					
Tanah Laut Mill	Indonesia	Kintapura Estate	Kintapura, Salaman Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8319	115.1400	1,443.50	Certified	2012	-	
Tanah Laut Mill	Indonesia	Tanah Laut Estate (Non Certified)	Sungai Cuka, Sumber Jaya, Bukit Mulya Pasir Putih, Kintap Kecil Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8153	115.2953	395.88	Not Certified	-	2027	Land Title in progress
Tanah Laut Mill	Indonesia	Kintapura Estate (Non Certified)	Kintapura, Salaman Village, Kintap Sub District, Tanah Laut District, Kalimantan Selatan Province, Indonesia	3.8319	115.1400	636.33	Not Certified	-	2027	Land Title in progress
Tangar Mill	Indonesia	Tangar Mill	Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2438	112.2981	-	Not Certified	-	2027	RaCP in progress Land Title in progress
Tangar Mill	Indonesia	Sulin Estate	Wanatirta Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2238	112.2625	4,163.59	Not Certified	-	2027	RaCP in progress Land Title in progress
Tangar Mill	Indonesia	Nahiyang Estate	Sandul Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2469	112.1932	3,740.09	Not Certified	-	2027	RaCP in progress Land Title in progress
Tangar Mill	Indonesia	Katayang Estate	Sahabu Village, Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.1285	112.2342	3,453.87	Not Certified	-	2027	RaCP in progress Land Title in progress
Tangar Mill	Indonesia	Sulin Plasma	Batu Ampar Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia	-2.2470	112.1931	2,101.55	Not Certified	-	2027	RaCP in progress Land Title in progress

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				Latitude	Longitude					
Tanjung Kembiri Mill	Indonesia	Tanjung Kembiri Mill	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	3.0464	107.7717	-	Certified	2014	-	
Tanjung Kembiri Mill	Indonesia	Tanjung Kembiri Estate	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	3.0297	107.7689	6,089.30	Certified	2014	-	
Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Estate	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	3.0631	107.7542	5,251.28	Certified	2014	-	
Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Plasma,	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	-3.0970	107.7630	496.99	Not Certified	-	2026	RaCP in progress Land Title in progress
Tanjung Kembiri Mill	Indonesia	Tanjung Rusa Estate (Non Certified)	Kembiri Village, Membalong Sub District, Belitung District, Bang Belitung Province, Indonesia	3.0631	107.7542	5,251.28	Not Certified	-	2026	Land Title in progress,
Tanjung Kembiri Mill	Indonesia	Tanjung Sawit Estate	Perpat Village, Membalong District, Belitung Regency, Bangka Belitung Province, Indonesia	-3.0783	107.6437	2,633.80	Not Certified	-	2026	RaCP in progress Land Title in progress HCV in progress
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Mill	Jambai Makmur Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2975	-	Certified	2013	-	
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Estate	Jambai Makmur Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2650	3,253.00	Certified	2013	-	

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				Latitude	Longitude					
Ujung Tanjung Mill	Indonesia	Ujung Tanjung Estate (Non Certified)	Jambai Makmur Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9947	101.2650	559.48	Not Certified	-	2025	Land Title in progress,
Ujung Tanjung Mill	Indonesia	Kandis Sejahtera KKPA	Pencing Bekulo Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9817	101.1525	544.39	Not Certified	-	2025	Land Title in progress,
Ujung Tanjung Mill	Indonesia	Swadaya Mas Bersama KKPA	Libo Jaya Village, Kandis Sub District, Siak District, Riau Province, Indonesia	0.9602	101.3692	512.21	Not Certified	-	2025	Land Title in progress,

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

During this Assessment there were zero (0) Critical; zero (0) Minor nonconformities and zero (0) Opportunity For Improvement raised. The PT Bumi Permai Lestari Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	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	NIL

Positive Findings	
PF #	Description
PF 1	NIL

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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	<p>OFI Statement:</p> <p>Indicator 2.3.2</p> <p>Unit of certification has identified FFB suppliers who are categorized as indirect suppliers as follows:</p> <ul style="list-style-type: none"> • CV Gunung Mas Lestari (GMLX) • Bumdes Sinar Harapan (BSHX) • CV Multi Nusa Pratama (MNPX) • Bina Mandiri Farmers Group (KBMX) <p>Based on of document review and interviews with FFB supplier representatives, for example GMLX (CV Gunung Masa Lestari) and BSHX (Bumdes Sinar Harapan) it is known that suppliers receive FFB from other parties outside the plantations they manage so that they are included as indirect suppliers. There is a statement letter from the supplier of FFB GMLX and BSHX stating that the origin of FFB is from land that has obtained all land acquisition permits and is cultivated in accordance with the terms and conditions of regulations in force in Indonesia.</p> <p>It has been shown the geolocation data and village origin of the FFB supplier for the two indirect suppliers as well as the number of supplier members, namely 1,151 farmers for GMLX and 449 farmers for BSHX. Of the 1,151 farmers supplying GMLX, 44 people have SHM, 141 people have SKT, and 966 other people have unknown land legal rights. Of the 449 farmers supplying BSHX, 16 people already have SHM, 123 people have SKT and 310 other people have unknown land legal rights.</p> <p>Based on this, the unit of certification has the opportunity to remain consistent in completing detailed information for each FFB supplier according to the planned timeline.</p> <p>Verification / Follow-up actions:</p> <p>During this assessment, the auditor team verified the list of noncertified suppliers as follows:</p> <ol style="list-style-type: none"> 1. PT Agrolestari Subur Sejahtera - Bukit Permai Estate (Noncertified Source). <ul style="list-style-type: none"> ✓ Supplier has signed agreement between PT Bumi Permai Lestari and PT Agrolestari Subur Sejahtera on FFB processing dated 31 December 2020 (valid until 31 December 2025). ✓ FFB Purchasing Department has verified the coordinate area, land title under HGU No. 09 year 2021 dated 3 November 2021 (3,383.40 Ha) and plantation permit IUP No. 002/19/T/Perkebunan/2004. 2. PT Agrolestari Hijau Sentosa - Bukit Lestari Estate (Noncertified Source) <ul style="list-style-type: none"> ✓ Supplier has signed agreement between PT Bumi Permai Lestari and PT Agrolestari Hijau Sentosa on FFB processing dated 31 December 2020 (valid until 31 December 2025). ✓ FFB Purchasing Department has verified the coordinate area, land title under HGU No. 08 year 2021 dated 3 November 2021 (697.91 Ha) and plantation permit IUP No. 001/19/T/Perkebunan/2004. 3. All external supplier consolidated under PT Sawit Mas Sejahtera who become a main external FFB supplier for PT Bumi Permai Lestari – Bukit Perak Mill. The auditor team has verified the FFB processing agreement between PT Bumi Permai Lestari and PT Sawit Mas Sejahtera dated 31 December 2019 (valid until 31 December 2025). Furthermore, PT Sawit Mas Sejahtera cascading their FFB supplier as follows: <ol style="list-style-type: none"> 1. PT Sawit Mas Sejahtera – CV. Gunung Mas Lestari/GMLX (Noncertified Source). <ul style="list-style-type: none"> ✓ Supplier has signed the supplier declaration on document "Surat Pernyataan" on 1 October 2021.

- ✓ FFB Purchasing Department in collaborated with Koltiva in 2022 conducted geolocational mapping in 2022 on additional smallholders that supplied to this agent. Until this assessment found total 1,297 smallholders/supplier (2,984.09 Ha). All their plot located in permitted areas.
- ✓ Sample land title verified on behalf of:
 - Mulyadi: Land statement letter from Village Head of Kelapa No. 28/Ket/01/2007 dated 15 January 2007 for plot 2.00 Ha.
 - Sanjaya Saputra Gunawan: Land statement letter from Village Head of Pusuk No. 591.1/SPPH/10/19.05.04.2004/2014 dated June 2004 for plot 0.9 Ha.
- 2. PT Sawit Mas Sejahtera – Bumdes Sinar Harapan/BSHX (Noncertified Source)
 - ✓ Supplier has signed the supplier declaration on document "Surat Pernyataan" on 1 October 2021.
 - ✓ FFB Purchasing Department in collaborated with Koltiva in 2022 conducted geolocational mapping in 2022 on additional smallholders that supplied to this agent. Until this assessment found total 98 smallholders/supplier (98.10 Ha). All their plot located in permitted areas.
 - ✓ Sample land title verified on behalf of:
 - Adisah: Land statement letter from Village Head of Tugang No. 500/886/19.05.04.2012/2020 dated 21 September 2020 for plot 2.00 Ha.
 - Sukandi: Land statement letter from Village Head of Pebuar No. 140/42/19.05.03.2019/2020 dated 11 June 2020 for plot 5.00 Ha.
- 3. PT Sawit Mas Sejahtera – Koperasi Tani Bintang Maju/KBMX (Noncertified Source)
 - ✓ Supplier has signed the FFB Purchasing Agreement No. 22/SP/D&L-BPL/III/2023 dated 2 March 2023. Valid 5 year since signed (2 March 2028).
 - ✓ FFB Purchasing Department in collaborated with Koltiva in 2022 conducted geolocational mapping in 2022 on additional smallholders that supplied to this agent. Until this assessment found total 331 smallholders/supplier (536 Ha). All their plot located in permitted areas.
 - ✓ Sample land title verified on behalf of:
 - Feri: Private Land Tittle/SHM No. 00994 dated 15 Aug 2018 for plot 0.9579 Ha Located in Air Bulin Village.
 - Mulyadi: Land statement letter from Village Head of Kelapa No. 20/Ket/01/2007 dated 15 January 2007 for plot 2.00 Ha.
- 4. PT Sawit Mas Sejahtera – CV. Multi Nusa Pratama/MNPX (Noncertified Source)
 - ✓ Supplier has signed the supplier declaration on document "Surat Pernyataan" on 1 January 2022.
 - ✓ FFB Purchasing Department conducted geolocational mapping in 2023 on additional smallholders that supplied to this agent. Until this assessment found total 8 smallholders/supplier (16 Ha). All their plot located in permitted areas.
 - ✓ Sample land title verified on behalf of:
 - Sanjaya Saputra Gunawan: Land statement letter from Village Head of Pusuk No. 591.1/19/10/19.05.04.2004/2014 dated 6 June 2014 for plot 4.9 Ha.
- 5. PT Sawit Mas Sejahtera – CV. Kacung Agro Lestari/KALX (Noncertified Source)
 - ✓ Supplier has signed the supplier declaration on document "Surat Pernyataan" on 1 August 2023.
 - ✓ FFB Purchasing Department conducted geolocational mapping in 2023 on additional smallholders that supplied to this agent. Until this assessment found total 176 smallholders/supplier (176 Ha). All their plot located in permitted areas.

	<ul style="list-style-type: none"> ✓ Sample land title verified on behalf of: ✓ Sumadi: Private Land Tittle/SHM No. 01108 dated 19 September 2018 for plot 0.8745 Ha Located in Air Bulin Village. <p>Based on the explanation above, it can be concluded that the unit of certification has completing detailed information for each FFB supplier. The improvements made by the unit of certification have been satisfactory.</p>
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
ASA1 – NCR 1	Major	2.1.1	Transfer Client	Closed on 13/12/2016
ASA1 – NCR 2	Major	4.7.2	Transfer Client	Closed on 15/12/2016
ASA1 – NCR 3	Major	6.5.2	Transfer Client	Closed on 24/12/2016
SA – NCR 1	Major	5.2.1	Transfer Client	Closed on 13/04/2017
SA – NCR 2	Major	6.1.1 & 6.1.2	Transfer Client	Closed on 17/04/2017
SA – NCR 3	Major	6.5.1	Transfer Client	Closed on 09/07/2018
ASA2 NCR 1	Minor	2.2.2	Transfer Client	Closed on 28/08/2017
ASA2 NCR 2	Major	4.7.2	Transfer Client	Closed on 09/07/2018
ASA2 NCR 3	Minor	4.7.5	Transfer Client	Closed on 09/07/2018
ASA2 NCR 4	Minor	5.1.3	Transfer Client	Closed on 09/07/2018
ASA2 NCR 5	Major	5.3.3	Transfer Client	Closed on 04/10/2018
ASA3 NCR 1	Major	2.1.1	Transfer Client	Closed on 04/10/2018
ASA3 NCR 2	Major	4.6.6	Transfer Client	Closed on 04/10/2018
ASA3 NCR 3	Major	SCCS 5.5.2	Transfer Client	Closed on 04/10/2018
ASA3 NCR 4	Major	SCCS 5.6.1	Transfer Client	Closed on 04/10/2018
ASA4 NCR 1	Major	SCCS E.4.2	Transfer Client	Closed on 06/08/2019

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Bumi Permai Lestari – Bukit Perak Mill 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 / RSPO ISH standard 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)
Governmental Department	<ul style="list-style-type: none"> - Manpower Agency (Dinas Tenaga Kerja) - Lands Office (Badan Pertanahan Nasional) - Environmental Office (Dinas Lingkungan Hidup) - Agriculture Office (Dinas Ketahanan Pangan dan Pertanian) 	Phone interview & Face to Face Interview
External & Contractor	<ul style="list-style-type: none"> - CV Berlian Utama - CV Kacung Agro Lestari - Kelompok Tani Bintang Maju 	Phone interview & Face to Face Interview
Internal	<ul style="list-style-type: none"> - Worker Union - Gender Committee - New mother - <i>Koperasi Karyawan</i> 	Face to face interview
Communities	<ul style="list-style-type: none"> - Tunggang Village - Air Bulin Estate 	Phone interview & Face to Face Interview

Stakeholders comment	
	<p>Feedbacks: Kepala PTSP/Dinas Tenaga Kerja</p> <ul style="list-style-type: none"> • The company has reported WLKP online. • There are workers with PKWT (contract) status and have been registered with the Manpower Agency. • The company has implemented a minimum wage and determined wage scales based on length of service, position and others. • The company has made efforts to absorb local workers from surrounding village communities. • There is no issue of child labor in the company's operational areas. • There were no reports of industrial relations problems to the department in the last one year period. • The company has registered workers in the BPJS <i>Kesehatan</i> and BPJS <i>Ketenagakerjaan</i> programs. • There is a workers' union in the company and it has been registered with the labor department. • The Collective Labour Agreement for the 2024 – 2026 period has been submitted for online registration and is currently still in the process of file verification by the department.

	<ul style="list-style-type: none"> If there is a request for data/information from the department, the company will respond according to the data request. The agency is aware of the documents that can be accessed by the public.
	Audit Team verification and response: There is no issue on this, no further verification needed.
	Feedbacks: Dinas Lingkungan Hidup <ul style="list-style-type: none"> There is a DELH application for areas not yet covered in the AMDAL document and plans to increase mill processing capacity. The company are encouraged to immediately complete the DELH master document. Mandatory reports such as RKL RPL implementation reports, hazardous waste management reports, liquid waste management reports have been reported to the department regularly. In the last one year there have been no reports from outside parties/community regarding the issue of pollution from the environmental impact of mill and oil palm plantation operational activities. The company has carried out environmental management and monitoring in accordance with environmental documents and company commitments. The last DLH supervision was carried out in July 2024, in general there are no records for managing and monitoring environmental impacts that have been carried out, however companies are encouraged to immediately complete environmental documents (DELH) which are in the process of being completed (clarity of scope/area according to area from PUPR Land Spatial Planning).
	Audit Team verification and response: Auditor has been verified the issue, see indicator 4.1.1
	Feedbacks: Dinas Pertanian <ul style="list-style-type: none"> Communication between Agency with the company is going well. For PT BPL's plantation class assessment a field visit will be carried out in September-October 2024. Currently, the availability of land to become plasma plantations is very limited. Therefore, in the Bangka Barat region, 20% of the company's obligation to create plasma plantations can be diverted to productive economic activities. This is in accordance with a circular from the Directorate General of Plantations. This transition to productive economic activities will be assessed by a team from the Indonesian Ministry of Agriculture regarding the activity valuation which must still be equivalent to 20% of community plasma development. The company has carried out productive economic activities for the community in the form of providing seed credit. For the next activity, there is a pilot project plan between the Agenct and the company to cultivate 5 cows and build their pens. The cattle will be handed over to the community livestock groups that have been identified. One company in Bangka Barat is exploring replanting community oil palm with PSR through the BPDPKS program, there is an opportunity for PT Bumi Permai Lestari to take part
	Audit Team verification and response: <ul style="list-style-type: none"> The company has a " Perjanjian Kemitraan Dalam Rangka Fasilitasi Sarana Produksi Kredit Bibit " which informs the definition of the Cooperation Agreement, objectives, time period, costs, type of agreement, supporting documents, land legality, FFB sales and credit instalments, payment for FFB, rights and obligations parties, taxes, sanctions, force majeure, dispute resolution, etc.\

	<ul style="list-style-type: none"> Based on the documents that have been checked, the company has distributed the seed credit program since 2023. For 2024, seed credit has been provided to 3 villages, namely Kacung Village, Dendang Village and Tugang Village. Seed delivery verification record: <ul style="list-style-type: none"> Kacung Village, delivery in March – April 2024 with a total of 6,885 seedlings Tugang Village, delivery in May – June 2024 with a total of 3,965 seedlings Dendang Village, delivery in April – June 2024 with a total of 7,712 seedlings Partnership Agreement Document for the purpose of facilitating seed credit production facilities No: 27/SPK/D&L-BPL/IX/2023 and No: 009/SPK/GAPOK PUU/IX/2023 dated 12 September 2023 between Gapoktan Panca Usaha Utama and PT Bumipermi Lestari . The term of cooperation is 1 planting cycle and can be renewed at any time. The requirements for land involved in the partnership are that the land is not in dispute, does not overlap with other uses, is in a Non-Forestry Cultivation Area, is not ex-mined, is not a peat area and is not in the process of a partnership with another company. Farmers who participate in the partnership are independent farmers, former plasma farmers who manage their land independently, are not tied to selling FFB to other parties, and have proof of land ownership. The palm oil – cattle integration program has received approval from top management of PT Bumi Permai Lestari (CEO 2) based on an email dated 10 June 2024. Based on interviews with company representatives related to the PSR program, it was stated that companies are ready to participate as long as they follow the applicable provisions, for example community land has been certified and replanting from oil palm to oil palm.
	<p>Feedbacks: Land Agency</p> <ul style="list-style-type: none"> HGU is still valid There have never been any land disputes or complaints from the community Communication goes well Regular reports every year <p>Audit Team verification and response: There is no issue on this, no further verification needed.</p>
	<p>Feedbacks: Head of Tugang Village</p> <ul style="list-style-type: none"> Communication and relations between the company, the village and community have been going well The company always responds when there is a proposal from the village government or community The village has a BUMDes in the agricultural sector. The majority of residents in Tugang Village work as rubber farmers and oil palm farmers Until now, there has been no involvement from the village government in preparing the CSR program The company has provided social assistance or CSR to the community directly but is not accompanied by correspondence (administration). In the future, every social assistance provided will be accompanied by correspondence or documentation of its activities Tugang Village has 5 Ha of village land which is currently unutilized. Ask for help from the company to procure seeds and fertilizer so that the land can be utilized optimally and reduce the level of unemployment in the community. Clarity of ownership status of 30 Ha of land near the Tugang Village area. The village government knows that the land belongs to the company, the land was cleared by CV Duriah. However, currently the information is that the land belongs to CV Duriah. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> Based on a review of documents for incoming and outgoing letters for the period 2023 and 2024, it was observed that there were no incoming letters from Tugang Village regarding requests for employment information.

	<ul style="list-style-type: none"> The company's land is in the HGU area, there is nothing outside the HGU. The land opened by CV Duriah is not land owned by the company. Based on field verification, the planted area of PT Bumi Permai Lestari is within the HGU. Based on the document review, we have observed the minutes of the handover of CSR assistance in Tugang Village, for example the Minutes of Handover of Material Assistance for Repairing Worship Facilities in February 2024 and the Minutes of Handover of Assistance for Heavy Equipment (Graders) for repairing farming roads dated 13 November 2023. All documents are signed by the Estate Manager, Chair of the Prayer Room Management, D&L PT BPL and Tugang Village and accompanied by photos of the delivery of aid. The current availability of seeds is not sufficient for 5 Ha of land, the program can be planned for next year. Based on seed credit verification data, in Tugang Village there was a delivery of seeds in May – June 2024 with a total of 3,965 seedlings. The company has carried out two times social assistance activities, namely the Cheap Market and the Basic Food Market. The cheap market sells goods at below market prices while the Basic Food Market provides free basic food packages to the poor.
	<p>Feedbacks: Head of Air Bulin Village</p> <ul style="list-style-type: none"> Communication and relations between the company, the village and community have been going well No land disputes. The company has provided social assistance or CSR, for example assistance with health checks and heavy equipment to repair agricultural production roads. The boundaries between the village and the company are known to the parties. There is village land that has been used for sports facilities that needs repair, it is hoped that the company can help as in previous years <p>Audit Team verification and response: There is no issue on this, no further verification needed.</p>
	<p>Feedbacks: Contractor (CV Berlian Utama)</p> <ul style="list-style-type: none"> The contractor is responsible for housing and office renovation/maintenance (civil engineering). The contractor understands the criteria requirements for service delivery: building according to budget, construction process meets company timeline. The contractor understands the provisions on not using child labor, forced labor, human trafficking, and salary payment as per minimum wage. The contractor understands the OHS requirement, as explained by the company prior to work start, such as PPE provision: helmet, vest, safety shoes, etc. No issue with contract payment from company to contractor. <p>Audit Team verification and response: There is no issue on this, no further verification needed.</p>
	<p>Feedbacks: FFB Supplier (CV Kacung Agro Lestari & Kelompok Tani Bintang Maju)</p> <ul style="list-style-type: none"> FFB suppliers have been verified by the company with geolocation information of FFB origin and proof of land ownership. FFB suppliers understands the criteria requirements for FFB that can be supplied to the mill. If it is not suitable, the FFB will be returned to the supplier. The FFB price is set by the company in accordance with market prices and FFB price notifications are conveyed to suppliers via WhatsApp. FFB suppliers understands the requirement on ethical conduct, prohibit the use of child labor, forced labor and human trafficking.

	<ul style="list-style-type: none"> FFB suppliers vehicles and drivers are checked for completeness when delivering FFB to mill, including a cover letter, the driver must wear a helmet and shoes, and a driver's license.
	<p>Audit Team verification and response:</p> <p>There is no issue on this, no further verification needed.</p>
	<p>Feedbacks: Gender Committee of BPRM, BPRE & BPTE</p> <ul style="list-style-type: none"> There have been no reports of sexual harassment, violence or violations of reproductive rights in the last 1 year. Gender Committee work program for the 2023/2024 period, policy socialization is carried out during morning briefings before work, <i>posyandu</i>, and inspections of daycare. Leave for pregnant women is 1.5 months before and 1.5 months after giving birth with full wages. The company has given permission to women worker who breastfeed their babies during working hours. Employee housing is generally still adequate, if there is damage, it can be reported by the Division Assistant to be followed up by the Civil Engineering Assistant for repairs according to material availability.
	<p>Audit Team verification and response:</p> <p>There is no issue on this, no further verification needed.</p>
	<p>Feedbacks: PUK SPSI PT BPL</p> <ul style="list-style-type: none"> Communication between the union and the company has been well established. Labor unions that are currently active for the period 2022 – 2025. The labor union consists of workers' representatives and is not a management representative. Union membership is voluntary, with a membership fee of IDR 10,000/month/worker. <i>Perjanjian Kerja Bersama</i> currently for the period 2022 – 2024, will be expired on 01 September 2024. The company has implemented a minimum wage, wage structure/scale and registered workers with BPJS <i>Kesehatan</i> and BPJS <i>Ketenagakerjaan</i>
	<p>Audit Team verification and response:</p> <p>There is no issue on this, no further verification needed.</p>
	<p>Feedbacks: Koperasi Karyawan Setia Mandiri</p> <ul style="list-style-type: none"> Employee cooperatives engage in savings and loan activities. The company has facilitated the existence of cooperatives, one of which is by paying member fees, savings and loans through payroll. The Annual Member Meeting was held on 5 June 2024 with a discussion of the balance sheet (assets and liabilities), distribution of <i>SHU</i> agreed upon by cooperative members and evaluation of the cooperative management to improve performance in the coming year.
	<p>Audit Team verification and response:</p> <p>There is no issue on this, no further verification needed.</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
-	-	-	-	-	-
<p>Note:</p> <p>The scope area has been already conducted replanting activities, so it's not considered to contact previous land owner. As informed by surrounding communities, there's no negative issues related to land conflict.</p>					


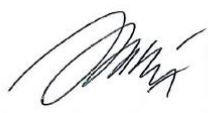
Previous land owner / user comment	
	Feedbacks:-
	Audit Team verification and response:-

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Naila Karima	Name: Yahya Mustakim
Company Name: On behalf BSI Services Malaysia Sdn. Bhd.	Company Name: PT Bumi Permai Lestari
Title: Lead Assessor	Title: Head of Sustainability Management System and Certification Operations Sustainability
Signature: 	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.) 

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	Information available to stakeholder specified in the Information List for SMART's stakeholder (F/SMART/UMUM /SADV/004/003) updated on 06 June 2024. List of the information available to the public and stakeholder, such as: <ul style="list-style-type: none"> a. Employees data and salary b. Tax identification number c. Records of tax payment d. Environment document/s e. Establishment Deeds f. Certificate of land rights g. HCV identification assessment document h. Social impact assessment document i. CSR Report j. Safety Committee Report k. RSPO Audit Report l. Human Rights Policy m. Pollution mitigation and reduction plan n. Grievance and complaint records o. Plantation permit 	Complied

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	<p>PT Bumi Permai Lestari has document procedure for Stakeholder Engagement (No document: SOP/SMART/SENS-CSR/SADV/I/001). documents are written in Bahasa Indonesia, for ease of understanding by local staff, worker and by local people near the concession area. The procedure has been socialized to the internal or external stakeholder on February 2024, May 2024 and June 2024.</p> <p>All the publicly accessible document as explain in the previous indicator (1.1.1) such as company policy and sustainability report can be downloaded in their official website. The public summary of certification, for example RSPO public summary report can be downloaded in RSPO website. Meanwhile, the remain document can be accessed through the official request letter to the management representatives.</p> <p>Based on consultation with the stakeholders, review of Logbook of incoming mail and response, and review of mandatory report, it is known that the information provided to stakeholders delivered in Indonesian language. There is no migrant worker, and all surrounding communities understood Indonesian language.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>Recording information requests can be seen in Logbook of Incoming and Outgoing Mail. From the Logbook review, there was no request for data/information from the stakeholders, therefore there was no response. The incoming letter was about invitation to participate in traditional ceremony, invitation to attending webinar from Ministry of Environment and Forestry related to PROPER Assessment and notification for field verification or statutory bodies visit.</p> <p>The company also regularly submitted the mandatory report to the related agency such as in aspect of plantation and land legality (HGU utilization report, plantation progress report), environmental (environmental license document implementation report, waste management report), OHS (employment report, OHS management report), that will be mentioned in related indicators.</p> <p>It has been verified mandatory report submission in the period of 2024. The recent mandatory report submission as follows :</p> <ul style="list-style-type: none"> - Safety Committee Report Q1/2024 dated 6 April 2024 - Safety Committee Report Q2/2024 dated 9 July 2024 	Complied

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		<ul style="list-style-type: none"> - Environment Management and Monitoring Report (RKL RPL) Semester 1/2024 dated 22 July 2024 - Land Application Monitoring Report Semester 1/2024 dated 26 July 2024 - Hazardous waste management and monitoring report Q1/2024 dated 30 April 2024 - Firefighting Handling and Precaution Report Semester 2/2023 dated 30 January 2024 <p>HGU Realization Report 2023 dated 30 December 2023</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure to describe the process of information sharing/dissemination defined in Social communication procedures SOP Communication and Consultation Procedure No. SOP/SMART/UMUM/SADV/I/04 dated 1 July 2014. Consultation and communication with stakeholders conducted by collecting community leaders, village heads and local community or visiting the office/the village hall to meet with the village head, village officials and community. The response to requests for information by the above procedure is at least 30 days or 4 weeks. Procedures and a list of information available in Indonesian and easily understood.</p> <p>Documents available to the public and stakeholder can be provided to stakeholders according to their relevance through a written request to the organization. Information provided to the public and stakeholder was disseminated to the stakeholder together with social procedure (Information request and response procedure, environmental complain handling, land conflict resolution procedure, and social communication procedure).</p> <p>PT Bumi Permai Lestari has also appointed management official to consult and communicate with stakeholders. Evidence seen:</p> <ul style="list-style-type: none"> • Bukit Perak POM appointed Mr. Mas'ulin, Mill Manager, based on Production Controller – Region Babel No.002/PC- BABEL/VIII/2023; Perihal Penanggungjawab Sosial” dated 21 August 2023. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community, cultural leader, religious leader, social 	Complied

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		<p>organization, and government officials</p> <ul style="list-style-type: none"> Bukit Permata Estate appointed Mr. Agus Israwadi, Estate Manager, based on Regional Controller – Region Babel No.047/RC- BABEL/SPO/III/2024; Perihal Penanggungjawab Sosial” dated 4 March 2024. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community, cultural leader, religious leader, social organization and government officials. Bukit Perak Estate appointed Mr. Prima Okky S, Estate Manager, based on Regional Controller – Region Babel No.046/RC-BABEL/SPO/III/2024; Perihal Penanggungjawab Sosial” dated 4 March 2024. In Section 2. Implementing communication and consultation process with stakeholder. Section 3. Build good relationship with community, cultural leader, religious leader, social organization and government officials. <p>The dissemination of communication procedure to worker has been conducted in period of February 2024, May 2024 and June 2024.</p> <p>Based on interview with workers, contractors, governmental agencies, the stakeholders aware of the type of information available and the procedures for accessing the information based on regular oral dissemination from Public Relation Staff in the formal or informal meeting. All stakeholders know and understand how they should ask for information to the organization and how to communicate with the organization. Moreover, even though not requested, the company regularly sent mandatory report in Indonesian language.</p>	
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>The company has a List of stakeholders updated in 12 June 2024 by SPO Officer and Estate Manager BPPE, which includes 11 types of stakeholders i.e:</p> <ol style="list-style-type: none"> 1. Statutory bodies 2. Villages official 3. Internal stakeholder 	Complied

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		<ol style="list-style-type: none"> 4. Labour organizations 5. Contractors 6. FFB suppliers 7. Workers Cooperative (Koperasi Karyawan) 8. University 9. Hazardous waste transporter 10. OHS Training Provider 11. Environment Laboratorium <p>Each categories have a detailed PIC name and contact number.</p>	
Criteria 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.</p> <p>- Minor compliance -</p>	<p>The company has a policy and has declared it regarding the code of ethics, recorded in the Golden Agri-Resources Business and Human Rights Policy dated June 2021 which contains:</p> <ol style="list-style-type: none"> 1. Respecting the rights and dignity of workers in accordance with legal provisions, providing fair treatment without discrimination and building harmonious industrial relations 2. Respecting workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining trade unions/labor unions 3. Preventing forced labor practices and not using workers from human trafficking 4. Ensuring that no children are employed in all lines of operations 5. Ensuring the safety of the company's work environment and operations 6. Recognizing equal rights and participation of women around the operating unit 7. Creating safe and healthy work area conditions and providing environmental protection 	Complied

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		<p>8. Respecting the rights of local and indigenous communities in accordance with applicable laws and regulations where the company operates</p> <p>9. Respecting and protecting the rights of whistleblowers and human rights defenders</p> <p>10. Complying with legal provisions regarding the prevention of bribery and corruption practices</p> <p>11. Taking steps to resolve and restore negative impacts in accordance with applicable laws and regulations where the company operates if there is a human rights violation</p> <p>The policy has been socialized to the internal or external stakeholder on February 2024, May 2024 and June 2024. Records of socialization are available and has been reviewed.</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>The implementation through carried out internal audit against RSPO P&C on annual basis, covering indicator related to code of ethical conduct implementation in company operation and contractor:</p> <ul style="list-style-type: none"> Internal Audit RSPO & ISPO Report as per document Laporan Internal Audit RSPO & ISPO dated 25 – 27 March 2024. In this internal audit no findings that have identified. Contract "Surat Perjanjian Kerja No. 036/PSM2/BPTE/BPSL/JKTO/INF/V/2024" dated 10 May 2024. Article 4 point 8 stated that the contractor worker/s shall have BPJS Ketenagakerjaan and BPJS Kesehatan. Article 5 point 6 stated the contractor shall have all required permit/license to conduct their work. In point 7 stated that the contractor agree to comply all regulations regarding man power such as worker minimum age is 18 years old. Contractor inspection to review contractor readiness and implementation/understanding. Sampled for "Evaluasi Kontraktor CV Berlian Utama" dated 25 July 2024. The SPO Officer checked on work environment 	Complied

		<p>condition, PPE use, emergency readiness, working tool condition, contractor competence, business ethics understanding incl. integrity, avoid bribery and corruption, avoid money-laundering, fair competition. This evaluation acknowledged by Estate Manager.</p> <p>Evaluation of contractor compliance to regulations has conducted by the company such as :</p> <ul style="list-style-type: none"> Records of payment for worker's BPJS period of May 2024 of Rp. 4,xxx,xxx is available Records of worker list CV Berlian Utama period June 2024 is available Working contract between CV Berlia Utama and its workers is available Payslip of CV Berlian Utama workers on behalf of Kxxxx and Jxxxx period July 2024 which is IDR 3,750,000. Based on salary list the lowest was IDR 3,750,000 and the highest was IDR 4,250,000. The minimum wage is IDR 3,640,000 so the salary above the minimum wage. 	
Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -	PT. Bumi Permai Lestari implementing legal compliance and evaluation refers to "SOP SMART Pemenuhan Peraturan dan Persyaratan Lainnya" dated 1 July 2014. The identification and register of applicable legal and other requirement under form "Daftar Peraturan dan Persyaratan Lainnya". The compliance evaluation of applicable legal and other requirement carried out minimum once per annum. The compliance evaluation recorded under form "Evaluasi Kepatuhan Terhadap Peraturan dan Persyaratan Lainnya". Records that has been reviewed such as : <ul style="list-style-type: none"> Health and Safety Aspect, regulations evaluation last updated on 1 June 2024 Manpower Aspect, regulations evaluation last updated on 15 July 2024 	Complied

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		<ul style="list-style-type: none"> • Environment Aspect, regulations evaluation last updated on 1 June 2024 • Social Aspect, regulations evaluation last updated on 15 July 2024 <p>The newest regulations has been evaluated by the company such as :</p> <ul style="list-style-type: none"> • <i>Kepmenaker No 88 tahun 2023 tentang Pedoman Pencegahan dan Penanganan Kekerasan Seksual di Tempat Kerja</i> • <i>Permenaker No 11 tahun 2023 tentang Keselamatan dan Kesehatan kerja di ruang terbatas</i> • <i>Kepmenaker No 2 tahun 2023 tentang Peraturan Pelaksanaan PP Nomor 66 tahun 2014 tentang Kesehatan Lingkungan</i> • <i>PP No 49 tahun 2023 tentang Perubahan Kedua atas PP No 44 tahun 2015 tentang Penyelenggaraan Program Jaminan Kecelakaan Kerja dan Jaminan Kematian</i> • <i>UU No 4 tahun 2024 tentang Kesejahteraan Ibu dan Anak</i> 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>Unit of Certification has procedure compliance with regulation & other requirements which described in SOP/SMART/GENERAL/SADV/I/002 dated 1 July 2014. Procedure inform for example compliance with requirements, evaluating compliance with law, SPO requirements and other. The responsible person to update list according the SOP was PCDV for the national level and SPO officer for the regional level.</p> <p>UoC also has a list if legal regulation which described in Summary and Review of Conformity with Regulation and Other Requirements with the aspect of agribusiness, employment, environment, legality, and other requirement related the company activities. UoC evaluated legal compliance for third parties with the principle of continuous improvement as described in indicator 2.2.2.</p> <p>The company also carried out internal audit against RSPO P&C on annual basis, covering indicator related regulation compliance and contractor:</p>	Complied

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		<ul style="list-style-type: none"> Internal Audit RSPO & ISPO Report as per document Laporan Internal Audit RSPO & ISPO dated 25 – 27 March 2024. In this internal audit no findings that have identified. Contract “Surat Perjanjian Kerja No. 036/PSM2/BPTE/BPSL/JKTO/INF/V/2024” dated 10 May 2024. Article 4 point 8 stated that the contractor worker/s shall have BPJS Ketenagakerjaan and BPJS Kesehatan. Article 5 poin 6 stated the contractor shall have all required permit/license to conduct their work. In point 7 stated that the contractor agree to comply all regulations regarding man power such as worker minimum age is 18 years old. Contractor inspection to review contractor readiness and implementation/understanding. Sampled for “Evaluasi Kontraktor CV Berlian Utama” dated 25 July 2024. The SPO Officer checked on work environment condition, PPE use, emergency readiness, working tool condition, contractor competence, business ethics understanding incl. integrity, avoid bribery and corruption, avoid money-laundering, fair competition. This evaluation acknowledged by Estate Manager. <p>Evaluation of contractor (CV Berlian Utama) compliance to regulations has conducted by the company such as :</p> <ul style="list-style-type: none"> Records of payment for worker’s BPJS period of May 2024 of Rp. 4,xxx,xxx is available Records of worker list CV Berlian Utama period June 2024 is available Working contract between CV Berlia Utama and its workers is available Payslip of CV Berlian Utama worker, the lowest was IDR 3,750,000 meanwhile the minimum wage is IDR 3,640,000 	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	The unit of certification has monitoring of HGU pole and a maintenance plan with a frequency of monitoring every three months. Based on the results of the last monitoring carried out in June 2024. Records of monitoring such as :	Complied

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	- Minor compliance -	<ul style="list-style-type: none"> • BPRE, there are 101 HGU poles and as per 22 June 2024 all of them in good condition • BPTE, there are 43 HGU poles and as per 20 May 2024 all of them in good condition. <p>Field observation of HGU poles</p> <p>Bukit Perak Estate</p> <ul style="list-style-type: none"> • BPN 31 Coordinate : 1° 49' 06.806" S 105° 33' 54.587" E, Block E32 • BPN 34 Coordinate : 1° 48' 50.501" S 105° 33' 41.043" E, Block D30 • BPN 87 Coordinate : 1° 48' 27.852" S 105° 33' 41.336" E, Block C30 • BPN 88 Coordinate : 1° 48' 11.249" S 105° 33' 41.382" E, Block C30 • BPN 89 Coordinate : 1° 48' 11.105" S 105° 33' 20.579" E, Block C28 • BPN 32 Coordinate : 1° 49' 01.125" S 105° 33' 54.258" E, Block E32 <p>Bukit Permata Estate</p> <ul style="list-style-type: none"> • BPN 137 Coordinate : 1° 52' 14.318" S 105° 30' 30.139" E, Block K12 • BPN 136 Coordinate : 1° 51' 53.927" S 105° 30' 30.257" E, Block K11 • BPN 135 Coordinate : 1° 51' 53.231" S 105° 30' 10.371" E, Block K10 	
Criteria 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 available.</p> <p>- Minor compliance -</p>	<p>The company has a list of contractors and is well maintained in the format of Monitoring of Contractual Agreement of Manufacturing and Payment. The contracted parties were FFB Suppliers, CPO transporter, Civil contractor. Details :</p> <ul style="list-style-type: none"> • PT Satrindo Jaya Agropalma (CPO transporter) • PT EMKL • PT BSA Logistic • CV Berlian Utama (Civil contractor) 	Complied

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		<ul style="list-style-type: none"> • CV Gunung Mas Lestari (FFB supplier) • BUMDES Sinar Harapan • CV Multi Nusa Pratama • CV Kacung Agro Lestari • Koperasi Tani Bintang Maju <p>All of them have contract agreement with PT Bumi Permai Lestari.</p>	
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>Records of contract such as :</p> <ul style="list-style-type: none"> • Contract "Surat Perjanjian Kerja No. 036/PSM2/BPTE/BPSL/JKTO/INF/V/2024" dated 10 May 2024. Article 4 point 8 stated that the contractor worker/s shall have BPJS Ketenagakerjaan and BPJS Kesehatan. Article 5 poin 6 stated the contractor shall have all required permit/license to conduct their work. In point 7 stated that the contractor agree to comply all regulations regarding man power such as worker minimum age is 18 years old. • "Surat Pernyataan" BUMDES Sinar Harapan to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations abn no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 • "Surat Pernyataan" CV Gunung Mas Lestari to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 • "Surat Pernyataan" CV Kacung Agro Lestari to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply 	Complied

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		<p>to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024</p> <ul style="list-style-type: none"> • "Surat Pernyataan" CV Multi Nusa Pratama to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024. • "Perjanjian Kemitraan Jual Beli Tandan Buah Segar Kelapa Sawit TBS No. 22/SP/D&L-BPL/IIII/2023 dan No. 004/SP/KT BM/IIII/2023" dated 2 March 2023 between PT Bumi Permai Lestari and Kelompok Tani Bintang Maju. This contract valid for 5 years. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 <p>Evaluation of contractor (CV Berlian Utama) compliance to regulations has conducted by the company such as :</p> <ul style="list-style-type: none"> • Records of payment for worker's BPJS period of May 2024 of Rp. 4,xxx,xxx is available • Records of worker list CV Berlian Utama period June 2024 is available • Working contract between CV Berlia Utama and its workers is available • Payslip of CV Berlian Utama worker, the lowest was IDR 3,750,000 meanwhile the minimum wage is IDR 3,640,000 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>Records of contract such as :</p> <ul style="list-style-type: none"> • Contract "Surat Perjanjian Kerja No. 036/PSM2/BPTE/BPSL/JKTO/INF/V/2024" dated 10 May 2024. Article 4 point 8 stated that the contractor worker/s shall have BPJS Ketenagakerjaan and BPJS Kesehatan. Article 5 point 6 stated the contractor shall have all required permit/license to conduct their work. In point 7 stated that the contractor 	Complied

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		<p>agree to comply all regulations regarding manpower such as worker minimum age is 18 years old.</p> <ul style="list-style-type: none"> • "Surat Pernyataan" BUMDES Sinar Harapan to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 • "Surat Pernyataan" CV Gunung Mas Lestari to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 • "Surat Pernyataan" CV Kacung Agro Lestari to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 • "Surat Pernyataan" CV Multi Nusa Pratama to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024. • "Perjanjian Kemitraan Jual Beli Tandan Buah Segar Kelapa Sawit TBS No. 22/SP/D&L-BPL/IIII/2023 dan No. 004/SP/KT BM/IIII/2023" dated 2 March 2023 between PT Bumi Permai Lestari and Kelompok Tani Bintang Maju. This contract valid for 5 years. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations and no behaviour that lead to gratification, corruption and bribery. This commitment signed on 29 June 2024 	
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		<p>Evaluation of contractor (CV Berlian Utama) compliance to regulations has conducted by the company such as :</p> <ul style="list-style-type: none"> Records of payment for worker's BPJS period of May 2024 of Rp. 4,xxx,xxx is available Records of worker list CV Berlian Utama period June 2024 is available Working contract between CV Berlian Utama and its workers is available Payslip of CV Berlian Utama worker, the lowest was IDR 3,750,000 meanwhile the minimum wage is IDR 3,640,000 	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari - Bukit Perak Mill received FFB from direct suppliers sources as follows:</p> <ul style="list-style-type: none"> Bukit Perak Estate – own estate (RSPO certified). Bukit Permata Estate – own estate (RSPO certified). Bukit Intan Estate – PT MP Leidong West Indonesia (RSPO certified - Certificate No. INTERTEK-RSPO-0175641) Bukit Permai Estate (BPAE) – PT Agrolestari Subur Sejahtera (RSPO non certified) Bukit Lestari Estate (BLSE) – PT Agrolestari Hijau Sentosa (RSPO non certified) <p>It has been shown geolocation information and examples of land legality information for these direct suppliers</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Unit of certification has identified FFB suppliers who are categorized as indirect suppliers. All external supplier consolidated under PT Sawit Mas Sejahtera who become a main external FFB supplier for PT Bumi Permai Lestari – Bukit Perak Mill. The auditor team has verified the FFB processing agreement between PT Bumi Permai Lestari and PT Sawit Mas Sejahtera dated 31 December 2019 (valid until 31 December 2025). Furthermore, PT Sawit Mas Sejahtera cascading their FFB supplier as follows:</p>	Complied

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		<ol style="list-style-type: none"> 1. PT Sawit Mas Sejahtera – CV. Gunung Mas Lestari/GMLX (Noncertified Source). <ul style="list-style-type: none"> ✓ Supplier has signed the supplier declaration on document “Surat Pernyataan” on 1 October 2021. ✓ FFB Purchasing Department in collaborated with Koltiva in 2022 conducted geolocational mapping in 2022 on additional smallholders that supplied to this agent. Until this assessment found total 1,297 smallholders/supplier (2,984.09 Ha). All their plot located in permitted areas. ✓ Sample land title verified on behalf of: <ul style="list-style-type: none"> • Mulyadi: Land statement letter from Village Head of Kelapa No. 28/Ket/01/2007 dated 15 January 2007 for plot 2.00 Ha. • Sanjaya Saputra Gunawan: Land statement letter from Village Head of Pusuk No. 591.1/SPPH/10/19.05.04.2004/2014 dated June 2004 for plot 0.9 Ha. 2. PT Sawit Mas Sejahtera – Bumdes Sinar Harapan/BSHX (Noncertified Source) <ul style="list-style-type: none"> ✓ Supplier has signed the supplier declaration on document “Surat Pernyataan” on 1 October 2021. ✓ FFB Purchasing Department in collaborated with Koltiva in 2022 conducted geolocational mapping in 2022 on additional smallholders that supplied to this agent. Until this assessment found total 98 smallholders/supplier (98.10 Ha). All their plot located in permitted areas. ✓ Sample land title verified on behalf of: <ul style="list-style-type: none"> • Adisah: Land statement letter from Village Head of Tugang No. 500/886/19.05.04.2012/2020 dated 21 September 2020 for plot 2.00 Ha. 	
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		<ul style="list-style-type: none"> Sukandi: Land statement letter from Village Head of Pebuar No. 140/42/19.05.03.2019/2020 dated 11 June 2020 for plot 5.00 Ha. <p>3. PT Sawit Mas Sejahtera – Koperasi Tani Bintang Maju/KBMX (Noncertified Source)</p> <ul style="list-style-type: none"> ✓ Supplier has signed the FFB Purchasing Agreement No. 22/SP/D&L-BPL/III/2023 dated 2 March 2023. Valid 5 year since signed (2 March 2028). ✓ FFB Purchasing Department in collaborated with Koltiva in 2022 conducted geolocational mapping in 2022 on additional smallholders that supplied to this agent. Until this assessment found total 331 smallholders/supplier (536 Ha). All their plot located in permitted areas. ✓ Sample land title verified on behalf of: <ul style="list-style-type: none"> Feri: Private Land Tittle/SHM No. 00994 dated 15 Aug 2018 for plot 0.9579 Ha Located in Air Bulin Village. Mulyadi: Land statement letter from Village Head of Kelapa No. 20/Ket/01/2007 dated 15 January 2007 for plot 2.00 Ha. <p>4. PT Sawit Mas Sejahtera – CV. Multi Nusa Pratama/MNPX (Noncertified Source)</p> <ul style="list-style-type: none"> ✓ Supplier has signed the supplier declaration on document “Surat Pernyataan” on 1 January 2022. ✓ FFB Purchasing Department conducted geolocational mapping in 2023 on additional smallholders that supplied to this agent. Until this assessment found total 8 smallholders/supplier (16 Ha). All their plot located in permitted areas. ✓ Sample land title verified on behalf of: <ul style="list-style-type: none"> Sanjaya Saputra Gunawan: Land statement letter from Village Head of Pusuk No. 591.1/19/10/19.05.04.2004/2014 dated 6 June 2014 for plot 4.9 Ha. 	
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		<p>5. PT Sawit Mas Sejahtera – CV. Kacung Agro Lestari/KALX (Noncertified Source)</p> <ul style="list-style-type: none"> ✓ Supplier has signed the supplier declaration on document “Surat Pernyataan” on 1 August 2023. ✓ FFB Purchasing Department conducted geolocational mapping in 2023 on additional smallholders that supplied to this agent. Until this assessment found total 176 smallholders/supplier (176 Ha). All their plot located in permitted areas. ✓ Sample land title verified on behalf of: ✓ Sumadi: Private Land Tittle/SHM No. 01108 dated 19 September 2018 for plot 0.8745 Ha Located in Air Bulin Village. 	
Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.			
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has set the long-term management plan in document ‘5 Year Feasibility Analysis’ that covering the items as follows:</p> <ul style="list-style-type: none"> • Land area statement (planting years, non-planted areas, i.e. HCV, conservation areas, enclaves) with updated location maps. Maps area completed with title, legend, source, scale and projections/ georeferenced. <i>See detail in table 5.</i> • Quality of planting materials (Dami Mas and Socfindo) • Crop projection = Fresh Fruit Bunches (FFB) yield trends • Mill extraction rates = Oil Extraction Rate (OER) trends • Cost of Production = cost per ton of Crude Palm Oil (CPO) trends • Forecast price. • Financial indicators – profitability forecast (income vs cost) • Projected expansion (area, mill capacity, infrastructure, social amenities) • General strategy and allocation for environmental and social management • The Management Plan is subjected to an annual review. The management 	Complied

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plan is reviewed annually by top management including Regional Controller, Production Controller, Estate Manager and Mill Manager, and revised as appropriate; based on the achievement against the plan and other parameters may change.

PT Bumi Permai Lestari has had the management plan period 2024 – 2028 (approved by Director on 12 February 2024) as follows:

General assumption	Unit	Period				
		2024	2025	2026	2027	2028
Mill capacity	Ton/Hr	60	60	60	60	60
Maximum FFB processed per year		53,710	104,642	129,709	144,601	152,000
Extraction						
OER	%	20.17	20.17	20.17	20.17	20.17
KER	%	5.63	5.63	5.63	5.63	5.63
Price						
CPO	IDR/Kg	10,821	10,821	10,821	10,821	10,821
PK	IDR/Kg	5,572	5,572	5,572	5,572	5,572
Mature Area	Ha	2,570	3,509	5,345	5,345	5,453
FFB Projected						
BPPE	Ton	53,592	85,236	97,457	104,321	108,508

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		<table><tr><td>BPTE</td><td>Ton</td><td>118</td><td>19,406</td><td>32,252</td><td>40,280</td><td>43,492</td></tr><tr><td>Total</td><td>Ton</td><td>53,710</td><td>104,642</td><td>129,709</td><td>144,601</td><td>152,000</td></tr><tr><td colspan="7">Revenue</td></tr><tr><td>Revenue CPO</td><td>IDR</td><td>291,828</td><td>411,721</td><td>475,597</td><td>517,724</td><td>543,979</td></tr><tr><td>Revenue PK</td><td>IDR</td><td>41,981</td><td>59,228</td><td>68,417</td><td>74,477</td><td>78,254</td></tr><tr><td>Total</td><td>IDR</td><td>333,809</td><td>470,949</td><td>544,014</td><td>592,202</td><td>622,234</td></tr><tr><td colspan="7">Cost</td></tr><tr><td>Estate</td><td>IDR</td><td>-92,768</td><td>-138,211</td><td>-199,609</td><td>-205,098</td><td>-210,866</td></tr><tr><td>Mill</td><td>IDR</td><td>-22,362</td><td>-26,938</td><td>-27,333</td><td>-27,290</td><td>-29,100</td></tr><tr><td colspan="7"></td></tr><tr><td>Net Profit</td><td>IDR</td><td>38,482</td><td>96,304</td><td>95,885</td><td>119,178</td><td>128,792</td></tr></table> <p><i>Note: IDR (000,000)</i> <i>This is including non-certified area and FFB from supplier.</i></p> <p>Based on interview with top management at unit, the auditor team noted that unit of certification did not have a plan to engage with oil palm independent smallholder.</p>	BPTE	Ton	118	19,406	32,252	40,280	43,492	Total	Ton	53,710	104,642	129,709	144,601	152,000	Revenue							Revenue CPO	IDR	291,828	411,721	475,597	517,724	543,979	Revenue PK	IDR	41,981	59,228	68,417	74,477	78,254	Total	IDR	333,809	470,949	544,014	592,202	622,234	Cost							Estate	IDR	-92,768	-138,211	-199,609	-205,098	-210,866	Mill	IDR	-22,362	-26,938	-27,333	-27,290	-29,100								Net Profit	IDR	38,482	96,304	95,885	119,178	128,792	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Based on document verification and interview with top management, obtained information that replanting activity has been done in January 2023. According to the field visit during this assessment, found that there is no old palm left. Currently, all palm categorized to immature and early mature areas. <i>See palm age detail in Table 6. Planting and cycle.</i>	Complied																																																																													
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -	PT Bumi Permai Lestari has held management review for sustainability and operational in annual bases, the latest management review was held on Friday, 26 April 2024 in Meeting Room Bukit Perak Estate (attended 23 participants).	Complied																																																																													

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Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.

3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The Unit of Certification (UoC) established, maintained and implemented the documented procedures to conduct annual internal audit as per SOP/SMART/UMUM/SADV/I/009. Internal audit conducted once a year. Internal audit conducted to determine whether the UoC conforms to the requirements in the RSPO P&C Indonesia National Interpretation 2020. Sighted the report of RSPO Internal Audit of Bumi Permai Lestari issued by Sustainability Compliance – OSDV. Internal audit conducted on 25 to 27 March 2024.</p> <p>The outcomes of the internal audits and all actions taken to correct non-conformities subject to annual management review. Management review conducted on 26 April 2024, attended by RC, PC, EM, FM and all key personnel's. Minutes of meeting available covers internal audit result, stakeholder feedback, process performance and product conformity, status of preventive and corrective action, follow up from previous management review, change that could affect management system, and recommendation for improvement.</p>	Complied									
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>Annual Communication of Progress (ACOP) 2023 also submitted to the RSPO Secretariat under organization name Golden Agri-Resources Ltd, membership No. 1-0096-11-000-00 with links https://rspo.org/members/1-0096-11-000-00/</p> <p>Based on document verification, for The RSPO metric template known annual data 12-month periods use (January to December 2023) for schedule reporting annual data peat area, pesticide usage, average LTIFR (Lost Time Injury Frequency Rate) and fresh water usage.</p> <p>Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The data presented can be ascertained in accordance with the existing raw data. Certification Unit already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:</p> <table><tr><td>Name of RSPO Member</td><td>:</td><td>Golden Agri Resources</td></tr><tr><td>RSPO Membership Number</td><td>:</td><td>1-0096-11-000-00</td></tr><tr><td>Name of Certified Unit</td><td>:</td><td>Bukit Perak POM</td></tr></table>	Name of RSPO Member	:	Golden Agri Resources	RSPO Membership Number	:	1-0096-11-000-00	Name of Certified Unit	:	Bukit Perak POM	Complied
Name of RSPO Member	:	Golden Agri Resources										
RSPO Membership Number	:	1-0096-11-000-00										
Name of Certified Unit	:	Bukit Perak POM										

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		<table><tr><td>Name of Certification Body</td><td>:</td><td>BSI Services Malaysia Sdn Bhd</td></tr><tr><td>RSPO PalmTrace ID Number</td><td>:</td><td>RSPO_PO1000001761</td></tr><tr><td>Number of Mills</td><td>:</td><td>1</td></tr><tr><td>Number of Estates</td><td>:</td><td>2</td></tr><tr><td>Production Area (ha) - Estate</td><td>:</td><td>3472.01</td></tr><tr><td>Certified Area (ha) - Estate</td><td>:</td><td>6084.95</td></tr><tr><td>High Conservation Value (HCV) Area (ha)</td><td>:</td><td>81.21</td></tr><tr><td>Peatlands - Planted (ha)</td><td>:</td><td>0</td></tr></table>	Name of Certification Body	:	BSI Services Malaysia Sdn Bhd	RSPO PalmTrace ID Number	:	RSPO_PO1000001761	Number of Mills	:	1	Number of Estates	:	2	Production Area (ha) - Estate	:	3472.01	Certified Area (ha) - Estate	:	6084.95	High Conservation Value (HCV) Area (ha)	:	81.21	Peatlands - Planted (ha)	:	0	
Name of Certification Body	:	BSI Services Malaysia Sdn Bhd																									
RSPO PalmTrace ID Number	:	RSPO_PO1000001761																									
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High Conservation Value (HCV) Area (ha)	:	81.21																									
Peatlands - Planted (ha)	:	0																									
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.																											
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change information since previous assessment. The company had procedure which covers all activities in operational area, here's the detail:</p> <ul style="list-style-type: none">SOP/SMART/MCAR/I/TA-PPA (<i>Perencanaan Penanaman Areal Baru</i>)SOP/SMART/MCAR/II/TA-PRP (<i>Perencanaan Replanting</i>)SOP/SMART/MCAR/III/TA-BBT (<i>Pembibitan</i>)SOP/SMART/MCAR/IV/TA-PLB (<i>Pembukaan Lahan Baru</i>)SOP/SMART/MCAR/V/TA-TNM (<i>Penanaman</i>)SOP/SMART/MCAR/VI/TA-RPL (<i>Replanting</i>)SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman</i>)SOP/SMART/MCAR/VIII/TA-PGM (<i>Pengendalian Gulma</i>)SOP/SMART/MCAR/IX/TA-PPK (<i>Pemupukan</i>)SOP/SMART/MCAR/X/TA-PTB (<i>Pemeliharaan Tanaman Belum Menghasilkan</i>)SOP/SMART/MCAR/XI/TA-PMP (<i>Persiapan Menjelang Panen</i>)SOP/SMART/MCAR/XII/TA-PTM (<i>Pemeliharaan Tanaman Menghasilkan</i>)SOP/SMART/MCAR/XIII/TA-PNN (<i>Panen</i>)SOP/SMART/MCAR/XIV/TA-PPT (<i>Pemuatan dan Pengangkutan TBS</i>)	Complied																								

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		<ul style="list-style-type: none"> SOP/SMART/MCAR/XV/TA-PCH (<i>Pengukuran Curah Hujan dengan Ombrometer</i>) SOP/SMART/MCMD/I/TM-PKS/Rev.06, Standard Operational Procedure of Palm Oil Process in SMART Group, revision 6 issued by Head Office Jakarta dated 1 Nov 2012. <p>All verified documents have been confirmed to be valid documents (latest revision) and presented in Bahasa Indonesia. The SOP document is available in the Estate and Mill units.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Unit of certification has had several mechanisms to check the consistency implementation of procedures in a regular basis. One of them is internal audit and contractor evaluation. For example:</p> <ul style="list-style-type: none"> Operational Internal Audit for Bukit Perak Mill on 18 – 25 March 2024. Operational Internal Audit for Bukit Perak Estate on 26 February – 2 March 2024. Operational Internal Audit for Bukit Permata Estate on 29 April – 10 May 2024. Contractor work inspection namely CV Berlian Utama on 25 July 2024. <p>Ensuring consistency in the implementation of procedures, the company routinely conducts internal audits for both agronomists and mills. Based on consultation with stakeholder (CV Berlian Utama), they are already aware that their work results (including code ethic) will be checked by company before being paid.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has held management review for sustainability and operational in annual bases, the latest management review was held on Friday, 26 April 2024 in Meeting Room Bukit Perak Estate (attended 23 participants).</p>	Complied
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			

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3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>Initial Social Environmental Impact Assessment Document (ANDAL) of Bukit Perak Mill and Estates was approved by Ministry of Agricultural on 16 February 1996 with number: 046/ANDAL/RKL-RPL/BA/II/1996. The document covering 14.000 Ha area and mill with capacity 30 ton FFB/hours up to 60 ton FFB/hours.</p> <p>PT Bumi Permai Lestari as unit of certification established Social Environment Impact Assessment document known as AMDAL, consist of:</p> <ol style="list-style-type: none"> 1. Environmental Impact Framework or Kerangka Acuan ANDAL year 1993, conducted by independent consultant PT Gangsar Dipta Consultants. Approval from AMDAL commission Ministry of Agriculture Number 1431/AMDAL/III/1994, dated 9 March 1994. 2. Environmental Impact Assessment (AMDAL) conducted in 1995 by independent consultant (PT HSW International). The AMDAL document already approved by Ministry of Agriculture on 16 February 1996 as refer to letter number 046/ANDAL/RKL-RPL/BA/II/1996. 3. Environmental Management and Monitoring Plan (RKL-RPL). <p>Scope of AMDAL is covering environmental and social aspects assessment for all plantation and mill operations. Hectarage of AMDAL scope is referred to location permit ("Persetujuan Prinsip No.Hk.350/E4.226/03.90 dan Surat Panitia-B No. 540.1/5665/26) with total area is 14,000 Ha and Mill capacity 30 MT FFB/hour up to 60 MT FFB/hour.</p> <p>Participatory with affected parties was conducted during SEIA through Economic and Social Questionnaire "Pedoman Wawancara Untuk Sampel Penduduk" with adjacent communities of certification unit.</p> <p>Curently there were a change of area of PT BPL after redeliniated with total area 14,319.08 ha. PT BPL also has a plan to increase the mill cappacity. PT BPL has propose the SEIA amendment to Environmental Office of Bangka Barat regency.</p> <p>Latest update of EIA revision – DELH (Dokumen Evaluasi Lingkungan Hidup):</p> <ul style="list-style-type: none"> - DELH document has been compiled by independent consultant PT Arta Pasada Consult, February 2019 – Dokumen Evaluasi Lingkungan Hidup 	Complied
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		<p>(DELH) Kegiatan Perkebunan dan pabrik Pengolahan Kelapa Sawit, luas lahan 14,319.08 ha dan kapasitas pabrik 90 ton TBS/jam.</p> <ul style="list-style-type: none"> - Invitation from DLH Bangka Barat Regency to a coordination meeting regarding the completeness of administrative files related to environmental approval directions, letter No. 660/124A/DLH/2024 dated 4 July 2024. - Minutes of the coordination meeting regarding the completeness of administrative files related to environmental approval directives, Bangka Barat Regency dated 12 July 2024. Result of meeting: <ol style="list-style-type: none"> 1. The Environmental Service will clarify the PKKPR (Approval of Suitability of Spatial Utilization Activities) that has been submitted by PT BPL to the PUPR Service and PMPTSP Service of Bangka Barat Regency. 2. Will consult and coordinate with the Food Security and Agriculture Service of West Bangka Regency regarding the relationship between the principle permit and HGU of PT BPL. 3. An internal coordination meeting will be held with the West Bangka Regency Environmental Agency and consultation will be held with the Ministry of Environment and Forestry regarding the types of environmental documents for PT BPL. <p>Another SIA has been conducted by company on 2014 by internal assessor of PT Smart Tbk. SIA and management and monitoring plan has been conducted in consultation of affected parties, public consultation dated 17/10/2014 with surrounding community from kacung Village, Tugang Village, Dendang Village, pangkal beras Village, Air Bulin Village, Camat kelapa, Dinas Lingkungan Hidup, Polsek, Disnaker, Distanbun.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Environmental Management and Monitoring Plan (RKL-RPL) is part of SEIA or AMDAL document, where the participatory of affected parties was conducted during the assessment.</p> <p>Bukit Perak Mill and its supply bases has established identification the environmental aspect and impact assessment and reviewed annually. The plan</p>	Complied

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		<p>was including monitoring that adaptive to operational changes and effective of the mitigation measures.</p> <p>The plan based on RKL RPL that covered:</p> <ul style="list-style-type: none"> - Monitoring air ambience quality and noise 6 monthly - Monitoring surface water quality of Lagok river every 3 months - Monitoring erosion rate at area with slope >16% and sedimentation annually - Potential of fire every 6 months - Air emission quality from vehicle annually - Monitoring society perception annually - Monitoring flora and fauna every 3 months <p>Social impact management and monitoring plan according to SIA document 2014:</p> <ul style="list-style-type: none"> - Providing workforce information to village officials - Preparation of annual CSR plans - Improvement of housing facilities and infrastructure - Handling complaints from housing residents <p>For social aspect, participation of stakeholders particularly communities surrounding the plantation has been involved in assistance program of small business empowerment.</p> <p>SIA and management and monitoring plan has been conducted in consultation of affected parties, public consultation dated 17/10/2014 with surrounding community from kacung Village, Tugang Village, Dendang Village, pangkal beras Village, Air Bulin Village, Camat kelapa, Dinas Lingkungan Hidup, Polsek, Disnaker, Distanbun.</p>	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	<p>There was social environmental management plan year 2024, some program has been implemented such as WWTP management with mud dredging regularly, circulation of POME, POME treatment; planted vetiver grass in river border; regular</p>	Complied

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	- Critical (Major) compliance -	<p>maintenance to heavy equipment to reduce air pollution; control domestic wastewater, preparation of annual CSR plans, providing workforce information to village officials, public perception monitoring, etc.</p> <p>There were no significant changes required in current practices of identification and evaluation of environmental aspect and impact. The implementation of RKL-RPL was reported periodically every six months (semester) to DLH Bangka Barat Regency, DLH Bangka Belitung Province, Ministry of Environmental and Forestry (KLHK), and <i>Pusat Pengendalian Pembangunan Ekoregion Sumatera</i>. Receipt note was also sighted. Observation was sighted for semester I of 2024. Receipt note was also sighted, dated 22 July 2024 to DLHK Provinsi Bangka Belitung; TTE No. 1721139699-1326 dated 16/07/2024.</p> <p>SIA review (including management and monitoring plan) conducted twice a year. Latest SIA review conducted on Dec 2023, reported on February 2024 for SIA review 2022 – 2023. SIA review has been involving the affected parties as evident in "Daftar Hadir Kegiatan Review Dampak Sosial" dated 14 – 16 November 2023. Affected parties involved both internal company and external from Tugang Village, Terentang Village, Pangkal Beras Village, Air Bulin Village, Kacung Village, Dendang Village.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>The company has established recruitment SOPs including Employment procedures for recruitment, selection, hiring, promotion, retirement, and termination.</p> <ul style="list-style-type: none"> Recruitment process <p>The company has developed the procedure for recruitment as per SOP of Recruitment No. KHI-smart/001-00, dated 01 March 2018, which explain:</p> <ul style="list-style-type: none"> Without distinction of race, caste, nationality, religion, and others. Not withhold formal identity from prospective worker. Not accept prospective workers who are under 18 years old. Not charges fees or security deposits to prospective workers. Recruitment of workers based on need. Recruitment of employee in accordance with the requirements of the position. 	Complied

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		<ul style="list-style-type: none"> • Promotion The company has established the procedure for Promotion No: KHI-smart/010-00 dated 1st August 2017, which explain: <ul style="list-style-type: none"> - Promotion is based on the result of work performance assessment - Promotion is carried out based on annual evaluation • Retirement or Termination Termination Procedure (No.KHI-SMART/024-00 dated January 2, 2020 which explained termination of employment due resignation, reaching retirement age, committing serious mistake, efficiency and others. The company also has determined the age of termination as 55 years old; HR department will issue the decree letter of retirement for employee whose age 55 years old, and the employee will receive the benefit of retirement. Termination of employment can be caused by disciplinary action and some of the following: the employee deceased, the employee does not achieve the standard performance set by the company, the termination of the work agreement, retirement, the existence of a court decision that has permanent legal force. <p>The procedures for recruitment, selection, hiring, promotion, retirement, and termination are also documented in Collective Labor Agreement Period of 2024 – 2026. Collective Labor Agreement/PKB are signed by Union and company and witnessed by Government (Manpower agency). Some of the matters covered by the CLA include:</p> <ul style="list-style-type: none"> • Recruitment, selection and hiring stipulated in article 6 and 7. "<i>Penerimaan pekerja</i>". • Promotion, Rotation stipulated in article 8. • Retirement and termination stipulated in article 40 - 43 "<i>Pemutusan Hubungan Kerja</i>" <p>All procedure and Collective Labor Agreement (CLA) available in Indonesian Language and has been communicated to all workers.</p>	
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		Based on interview with Labor Union known the procedure of recruitment, selection, promotion, and termination were regularly comminated to the worker. All workers are treated equally in accordance with collective labor agreement/PKB including rights of worker as well.	
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	<p>The company documented all worker procedures that have been carried out properly such as recruitment, promotion, performance appraisal, and others.</p> <p>Based on interview with management representative, known at the surveillance audit, there was no new recruitment process in the period August 2023 to June 2024.</p> <p>The following are some examples of worker procedures that have been well implemented and documented by the company, i.e: -</p> <p>The assessment (evaluation) period is 01 January to 31 December, work performance assessment form (assessed aspects, discipline, work quantity, work quality, cooperation, work attitude and responsibility). The company showed a recap of BPTE Employee Work Performance Assessments dated 4 January 2024 for 87 employees with an average rating of Good criteria.</p> <p><u>Termination</u> - The termination procedure has been implemented well. Sample seen, in year 2024, there were termination for some workers that has been conducted in accordance with CLA and legal regulation. For instance, has been shown the documentation of termination and calculation of financial compensation in accordance with regulation (long of work, basic salary, allowance, severance payment, rewards, annual leave). For instance, the final decision has been made based on Agreement of Termination (namely: AYN – head of security in Bukit Permata Estate), observed documents as follows:</p>	Complied

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		<ul style="list-style-type: none"> • Agreement Document "Perjanjian Bersama" - Pension dated 15 May 2023, signed by worker (AYN) and Estate Manager, acknowledge the chairman of labour union. • <i>Perhitungan Uang PHK</i>/Termination Calculation for "Pension" on behalf AYN – head of security in Bukit Permata Estate, join date 26 November 1994 and leave date on 15 May 2023, years of services 28 years 5 month. The calculation has followed regulation PP 35/2021. • Payment receipt – dated 15 May 2023, (namely: AYN – head of security in Bukit Permata Estate). 	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Risk Assessment for all operations regarding to health and safety was available within the scope of oil palm mill processes activities and agricultural estate activities has already conducted, as it was considered the stages of OHS risk control hierarchy such as elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment) in order to OHS risk precautions.</p> <p>Hazard Identification and Risk control determination (HIRADC) was rocrd in document "Formulir Identifikasi Sumber Bahaya dan Pengendalian Resiko" F/SMART/HJESS-EHSD/SADV/002/003. HIRADC document latest updated on January 2024.</p> <p>Mill risk assessment cover processes and activities attached to the realisation of product CPO such as: weighing bridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, dispatch CPO, firefighting simulation, water treatment, chemical warehouse, etc.</p> <p>Estates risk assessment covers processes and activities such as: spraying, fertilizing, weeding, replanting, road maintenance, firefighting simulation harvesting, transportation, warehouse, workshop, infrastructure, polyclinic, etc. It also covered all the risk attached to the products.</p> <p>The risk assessment were reviewed yearly and should any accident had occurred. The last reviewed of Hazard Identification and Risk control determination (HIRADC) was conducted on January 2024.</p>	Complied

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		<ul style="list-style-type: none"> OHS risk and control has been socialized to all workers through master morning or safety briefing. Sample seen for OHS socialization, minutes of socialization dated 24 April 2024 in Bukit Permata Estate, dated 13 – 17 May 2024 in Bukit Perak Estate and dated 24 March 2024 in Bukit Perak Mill. 	
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>During ASA 1.2, PT Bumi Permai Lestari has shown the procedure and work instruction related to OHS management system implementation, such as:</p> <ul style="list-style-type: none"> - Development and Communication Policy (SOP/SMART/HESS-EHSD/SADV/I/01) - Hazard Identification and Risk Assessment – SOP Identifikasi Sumber Bahaya, Penilaian dan Pengendalian Risiko (SOP/SMART/HESS-EHSD/SADV/I/02) - OHS objectives and targets (SOP/SMART/HESS-EHSD/SADV/I/03) - OHS Programmes (SOP/SMART/HESS-EHSD/SADV/I/04) - Incident and Occupational Disease Handling (SOP/SMART/HESS-EHSD/SADV/I/05) - Material Handling (SOP/SMART/HESS-EHSD/SADV/I/06) - Design Review (SOP/SMART/HESS-EHSD/SADV/I/07) - Infrastructures Maintenance and Changes (SOP/SMART/HESS-EHSD/SADV/I/08) - Lock Out Tag Out (SOP/SMART/HESS-EHSD/SADV/I/009) - PPE Management (SOP/SMART/HESS-EHSD/SADV/I/010) - First Aid (SOP/SMART/HESS-EHSD/SADV/I/011) - Health Measurement (SOP/SMART/HESS-EHSD/SADV/I/012) - Fire Extinguisher (SOP/SMART/HESS-EHSD/SADV/I/013) - Hydrant Utilization (SOP/SMART/HESS-EHSD/SADV/I/014) - Safe work permit (SOP/SMART/HESS-EHSD/SADV/I/015) - OHS Measurement and Monitoring (SOP/SMART/HESS-EHSD/SADV/I/016) - OHS Management Review (SOP/SMART/HESS-EHSD/SADV/I/017) 	Complied

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		<p>Risk Assessment for all operations regarding health and safety was available within the scope of oil palm mill processes activities and agricultural estate activities. As it was considered the stages of OHS risk control hierarchy, that is elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment).</p> <p>PT Bumi Permai Lestari has prepare the OHS program 2024, such as:</p> <p>Bukit Perak Estate/Bukit Permata Estate:</p> <ul style="list-style-type: none"> - Hazard identification and risk analysis and determined risk control, target January 2024 – done in January 2024 - Risk control implementation, target January – December 2024 – implemented accordingly - Identification of fire prone area, target January – December 2024 – Fire prone area has been mapped and weekly patrol conducted to minimize the risk of fire, since latest audit there is no case of fire. - OHS policy socialization, target May 2024 – Socialization of OHS policy has been conducted on 13 – 17 May 2024. - Training: Emergency response (February 2024), Fertilizing and pest and disease control (February 2024), MSDS socialization (May 2024) – Emergency response training conducted on 8 March 2024, Fertilizing and pest and disease control training conducted on 31 Jan 2024, MSDS socialization conducted on 13 – 17 May 2024. - Regular medical checkup, target February 2024 – MCU for sprayer, fertilizer workers (33 workers) has been conducted on 27 May 2024 (including spirometri and cholinesterase). - PPE provision, target March and September 2024 – PPE provision for workers has been done in March 2024 for division I – V (harvester, loosefruit picker, sprayer, fertilizer, upkeeper) - PPE inspection, target January – December 2024 – PPE inspection has been conducted monthly. 	
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		<ul style="list-style-type: none"> - P2K3 quarterly reporting, target Jan, April, Jul and Oct 2024 – report of P2K3 period Q1 Jan – Mar 2024 has been submitted on 14 June 2024 to Manpower office of Kepulauan Bangka Belitung Province. - Socialization on high risk working, target May 2024 – has been conducted on 13 – 17 May 2024 <p>Bukit Perak Mill:</p> <ul style="list-style-type: none"> - Monthly meeting of P2K3, target Jan – Dec 2024 – has been conducted accordingly. - Fire simulation, target March 2024 – has been conducted on 8 March 2024. - First aid training, target Feb 2024 – has been conducted on 7 February 2024 - APAR & Hydrant inspection, target Jan – Dec 2024 - has been conducted accordingly. - PPE inspection, target Jan – Dec 2024 - has been conducted accordingly. - First aid equipment monitoring, target Jan – Dec 2024 - has been conducted accordingly. - Regular MCU, target Feb – Mar 2024 – Has been conducted accordingly. - Special MCU, target May 2024 – has been conducted on 27 May 2024. - Boiler safety monitoring, target Feb 2024 - has been conducted on 27 May 2024. - OHS signboard monitoring, target bimonthly – has been conducted accordingly - P2K3 quarterly reporting, target Jan, April, Jul and Oct 2024 • PPE usage socialization, target Jan – Dec 2024 - has been conducted on 27 May 2024. 	
Criteria 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 all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and	<p>The company has shown the document of annual training program in each unit based on training need analysis matrix that submitted by SPO Officer (refer to document F/SMART/UMUM/SADV/003/001).</p> <p>Program Training 2024 – such as:</p>	Complied

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	<p>which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • BMP aspect: manuring training, IPM training and pesticide management training - planned in January 2024. • GMP aspect: emergency trip boiler – planned on February 2024. • OHS aspect: fire drill (planned in February 2024), first aid training (planned in February 2024), dissemination accident evaluation (planned on July 2024), dissemination of HIRADC & PPE (planned in March 2024). • Environment aspect: hazardous waste management training (planned on January 2024) • Refreshment and awareness of RSPO, ISPO, ISCC, Supply chain for workers – planned on March 2024 • Awareness of RSPO, ISPO, ISCC, Supply chain for FFB Supplier and contractor – planned on June 2024 • Dissemination of GAR Social Environmental Policy – planned on February 2024 <p>Those programs covered training for workers, contractors, FFB supplier, taking into account gender – specific needs and covers applicable aspects of P&C Principles.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>The company has demonstrated the record of training program realization for period 2024, such as:</p> <ul style="list-style-type: none"> • Training emergency trip boiler dated 20 July 2024 with participant is boilerman, engine room operator, and helper Bukit Perak Mill • Refreshment training of RSPO, ISPO, ISCC, SCCS for Mill workers, dated 08 to 09 March 2024 with participant 16 workshop workers, 5 sortaser, 37 operators, helper and supporting process station. • Awareness training of RSPO, ISPO, ISCC and SCCS for FFB supplier and contractor, dated 29 June 2024, with participant CV GMLX, PT 3Berdikari, CV MNPX, BumDes Sinar Harapan, KTBM/KBMX, PT Satrindo Jaya Agropalma, CV Kacung Agro Lestari, CV Berlian Utama. • First Aider Training, dated 07 February 2024, with participant foreman BPPE, BPTE and BPRM. 	Complied

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		<ul style="list-style-type: none"> • Fire drill and emergency simulation, dated 08 March 2024, with participant emergency response team BPRE, BPTE and BPRM. • IPM training, dated 31 January 2024, with participant warehouse clerk, foreman, spraying worker, and census worker. <p>The company already has a record of training participation for each personnel, for example shown by a recap of the list of attendance of personnel to take part in training or outreach as follows:</p> <ul style="list-style-type: none"> • Boilerman in BPRM: Training / Socialization has attended: emergency simulation (23 January 2024), emergency trip boiler (05 February 2024, 14 May 2024 and 20 July 2024), dissemination of GSEP (28 February 2024), refreshment training of RSPO, ISPO, and ISCC (08 March 2024). • Bahroini worker BPTE: first aider training (07 February 2024), spraying, manuring and IPM training (31 January 2024), refreshment training RSPO, ISPO & ISCC (11 January 2024), dissemination of GSEP (21 June 2024), dissemination of OHS Policy (24 April 2024), dissemination of HCV and environment aspect (02 May 2024). 	
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>Refreshment training related to RSPO Supply Chain for staff/personnel carrying out the tasks critical has been held on 19 March 2024. Based on the interview with related officer such as security, weighbridge operator and production clerk obtain information that they have been aware related to the implementation of RSPO Supply Chain for mill. Especially to record and monitoring certified and noncertified material, maintaining positive stock in mass balance sheet.</p>	Complied
<p>Criteria 3.8: Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against</p>	<p>Bukit Perak POM implemented Mass Balance Module. Mill received FFB from certified and uncertified sources as follows:</p> <ul style="list-style-type: none"> • Bukit Perak Estate – own estate (RSPO certified). 	Not Applicable

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	<p>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>	<ul style="list-style-type: none"> • Bukit Permata Estate – own estate (RSPO certified). • Bukit Intan Estate – PT MP Leidong West Indonesia (RSPO certified - Certificate No. INTERTEK-RSPO-0175641) • PT Agrolestari Subur Sejahtera - Bukit Permai Estate (Noncertified Source). • PT Agrolestari Hijau Sentosa - Bukit Lestari Estate (Noncertified Source). • PT Sawit Mas Sejahtera – Gunung Mas Lestari/GMLX (Noncertified Source). • PT Sawit Mas Sejahtera – Bumdes Sinar Harapan/BSHX (Noncertified Source). • PT Sawit Mas Sejahtera – Koperasi Tani Bintang Maju/KBMX (Noncertified Source). • PT Sawit Mas Sejahtera – Multi Nusa Pratama/MNPX (Noncertified Source). • PT Sawit Mas Sejahtera – Kacung Agro Lestari/KALX (Noncertified Source). 	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Bukit Perak POM implemented Mass Balance Module. Mill received FFB from certified and uncertified sources as follows:</p> <ul style="list-style-type: none"> • Bukit Perak Estate – own estate (RSPO certified). • Bukit Permata Estate – own estate (RSPO certified). • Bukit Intan Estate – PT MP Leidong West Indonesia (RSPO certified - Certificate No. INTERTEK-RSPO-0175641) • PT Agrolestari Subur Sejahtera - Bukit Permai Estate (Noncertified Source). • PT Agrolestari Hijau Sentosa - Bukit Lestari Estate (Noncertified Source). • PT Sawit Mas Sejahtera – Gunung Mas Lestari/GMLX (Noncertified Source). • PT Sawit Mas Sejahtera – Bumdes Sinar Harapan/BSHX (Noncertified Source). • PT Sawit Mas Sejahtera – Koperasi Tani Bintang Maju/KBMX (Noncertified Source). • PT Sawit Mas Sejahtera – Multi Nusa Pratama/MNPX (Noncertified Source). • PT Sawit Mas Sejahtera – Kacung Agro Lestari/KALX (Noncertified Source). 	Complied

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3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	<p>Based on the last public summary report and certificate, unit of certification awarded total certified product as follows:</p> <ul style="list-style-type: none"> • FFB: 30,207.76 MT • CPO: 6,041.55 MT • PK: 1,661.42 MT <p>On May & August 2024, unit of certification requested additional volume, so the total certified product as follows:</p> <ul style="list-style-type: none"> • FFB: 52,717.09 MT • CPO: 10,251.18 MT • PK: 2,896.79 MT 	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>Unit of certification has registered in RSPO IT Platform.</p> <ul style="list-style-type: none"> • RSPO Membership Number: 1-0096-11-000-00 (Golden Agri Resources Ltd) • Member name: PT Bumi Sawit Permai – Bukit Perak Mill • PalmTrace Member ID: RSPO_PO1000001761 	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall 	<p>The mill has procedure related supply chain for example:</p> <ul style="list-style-type: none"> • Procedure of Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17 dated 24/03/2022). • SOP Of FFB processing (No. SOP/SMART/MCMD/I/TM-PKS) • SOP of reporting certified product (No. SOP/SMART/CERS-EHSD/SADV/003) • SOP of document and record controlling (No. SOP/SMART/UMUM/SADV/I/001) <p>Supply chain procedure has referred to the latest RSPO Supply chain system. Procedure also covered all aspect in SCCS MB Module for example receiving and recording that identify the traceability of RSPO certified and non-certified FFB source, FFB Processing, announcement in RSPO palm trace, key person</p>	Complied

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	<p>be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>(weighbridge clerk, despatch CPO/Kernel officer, production clerk, and administration Head).</p> <p>Based on interview with weight bridge officer and security they can explain their job description including the source of FFB and how to document certified and non-certified FFB source.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Internal audit procedure for RSPO SCCS implementation refers to "SOP Internal Audit No. SOP/SMART/UMUM/SADV/I/009" dated 1 July 2014. "Section 2.2.1 – Penyusunan Program Internal Audit" stated Internal Audit carried out minimum once per annum and possible to be added based on need.</p> <p>Section "2.4.10 Penyusunan Rencana Perbaikan dan Pencegahan" stated Unit Head will prepare and implement correction and corrective action.</p> <p>Internal audit for Supply Chain Requirement for Mill carried out along with P&C's. The last internal audit (2024) was taken on 25 – 27 March 2024. No noncompliance raised during this assessment. The auditor has verified the record of RSPO P&C training:</p> <ul style="list-style-type: none"> J*** A***: RSPO P&C Lead Auditor Training facilitated by Checkmark Training on 1 – 6 August 2022 (JA-RSPO-P&C-06/08/22). Y**** F. A***: RSPO P&C Lead Auditor Training facilitated by Checkmark Training on 7 – 12 June 2021 (YFA-RSPO-P&C-08/06/21). R***** T*****: RSPO P&C Lead Auditor Training facilitated by Checkmark Training on 7 – 12 June 2021 (RT-RSPO-P&C-08/06/21). <p>PT Bumi Permai Lestari has held management review for sustainability and operational in annual bases, the latest management review was held on Friday, 26 April 2024 in Meeting Room Bukit Perak Estate (attended 23 participants). Management review meeting have discussed the following:</p>	Complied

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		<ul style="list-style-type: none">• Result of Internal Audit.• Customer feedback.• Process performance and product conformity.• Result of Internal Audit.• Preventive and corrective actions status.• Follow up from previous management review.• Change that could affect management system.• Recommendation for improvement.			
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>As explained above, Bukit Perak Mill (RSPO certificate No. RSPO 733239) received FFB from certified and noncertified sources as follows:</p> <ul style="list-style-type: none">• Bukit Perak Estate – own estate (RSPO certified).• Bukit Permata Estate – own estate (RSPO certified).• Bukit Intan Estate – PT MP Leidong West Indonesia (RSPO certified - Certificate No. INTERTEK-RSPO-0175641)• PT Agrolestari Subur Sejahtera - Bukit Permai Estate (Noncertified Source).• PT Agrolestari Hijau Sentosa - Bukit Lestari Estate (Noncertified Source).• PT Sawit Mas Sejahtera – Gunung Mas Lestari/GMLX (Noncertified Source).• PT Sawit Mas Sejahtera – Bumdes Sinar Harapan/BSHX (Noncertified Source).• PT Sawit Mas Sejahtera – Koperasi Tani Bintang Maju/KBMX (Noncertified Source).• PT Sawit Mas Sejahtera – Multi Nusa Pratama/MNPX (Noncertified Source).• PT Sawit Mas Sejahtera – Kacung Agro Lestari/KALX (Noncertified Source). <p>According to the mass balance sheet, unit of certification received FFB from certified sources during this period as follows:</p> <table><tr><td></td><td>Actual</td></tr></table>		Actual	Complied
	Actual				

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		<table><tr><th rowspan="2">Estate</th><th colspan="2">(July 2023 – June 2024)</th></tr><tr><th>Previous license period (July - Aug 2023)</th><th>Previous license period (July - Aug 2023)</th></tr><tr><td>Bukit Perak Estate</td><td>8,824.14</td><td>39,510.06</td></tr><tr><td>Bukit Permata Estate</td><td>47.81</td><td>168.69</td></tr><tr><td>Total</td><td colspan="2">48,550.70</td></tr></table>	Estate	(July 2023 – June 2024)		Previous license period (July - Aug 2023)	Previous license period (July - Aug 2023)	Bukit Perak Estate	8,824.14	39,510.06	Bukit Permata Estate	47.81	168.69	Total	48,550.70		
				Estate	(July 2023 – June 2024)												
			Previous license period (July - Aug 2023)		Previous license period (July - Aug 2023)												
			Bukit Perak Estate	8,824.14	39,510.06												
			Bukit Permata Estate	47.81	168.69												
		Total	48,550.70														
		See details in table 7.															
		Received FFB from other certified unit															
		<table><tr><th rowspan="2">Estate</th><th colspan="2">Actual (July 2023 – June 2024)</th></tr><tr><th>Previous license period (July - Aug 2023)</th><th>Previous license period (July - Aug 2023)</th></tr><tr><td>Bukit Intan Estate*</td><td>206.96</td><td>-</td></tr><tr><td>Total</td><td colspan="2">206.96</td></tr></table>	Estate	Actual (July 2023 – June 2024)		Previous license period (July - Aug 2023)	Previous license period (July - Aug 2023)	Bukit Intan Estate*	206.96	-	Total	206.96					
				Estate	Actual (July 2023 – June 2024)												
			Previous license period (July - Aug 2023)		Previous license period (July - Aug 2023)												
			Bukit Intan Estate*	206.96	-												
		Total	206.96														
		Note:															
		*RSPO Certificate No. INTERTEK-RSPO-0175641															
		They also received FFB from noncertified sources as follows:															
		<table><tr><th rowspan="2">Out growers / smallholders</th><th colspan="2">Actual (July 2023 – June 2024)</th></tr><tr><th>Previous license period (July - Aug 2023)</th><th>Previous license period (July - Aug 2023)</th></tr><tr><td>BPAE</td><td>11,393.95</td><td>47,882.21</td></tr></table>	Out growers / smallholders	Actual (July 2023 – June 2024)		Previous license period (July - Aug 2023)	Previous license period (July - Aug 2023)	BPAE	11,393.95	47,882.21							
Out growers / smallholders	Actual (July 2023 – June 2024)																
	Previous license period (July - Aug 2023)		Previous license period (July - Aug 2023)														
BPAE	11,393.95	47,882.21															

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BLSE	2,015.79	8,293.50
GMLX	15,549.24	59,302.16
BSHX	618.96	2,137.00
MNPX	447.59	4,683.38
KBMX	211.35	130.91
KALX	1,972.26	7,239.24
Total	161,877.54	

See details in table 9.

Records of incoming FFB certified source (Bukit Perak Estate – own estate):

- FFB Delivery Note "Surat Pengantar Buah" through eFact 2.0 originated from Division 1 Sawit Mas Estate No. 2262/TBS/02/24/07/F067 dated 31 July 2024. Complex 226219D31/Block H-37 and 226219D31/Block H-36; total bunches 761; Vehicle No. BN 8133 RC.
- Weighbridge card K222 BPRM G 74631 No. B011568 018849 originated from Bukit Perak Estate; Division 2; total bunches 761; 1st weight 15,140 kg; 2nd weight 10,560 kg; 3rd weight 4,580 kg; Delivery Note 2622/TBS/02/24/07/F067; Transporter 3500126 PT Satrindo Jaya Agropalma; Driver Sedi; Clerk Nalupiza.

Records of incoming non-certified FFB sampled:

- FFB Delivery Note "Surat Pengantar Buah" through eFact 2.0 originated from Division 01 Bukit Permai Estate No. 6220/TBS/01/24/07/C137 dated 31 July 2024. Complex 622096G02; total bunches 524; Vehicle No. BN 8471 PA.

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		<ul style="list-style-type: none"> Weighbridge card K222 BPRM G 73815 No. A006037 0188331 originated from Bukit Permai Estate; Division 01; total bunches 524; 1st weight 14,660 kg; 2nd weight 3,930 kg; 3rd weight 10,730 kg; Delivery Note 6226/TBS/01/24/07/C137; Transporter 3500126 PT Satrindo Jaya Agropalma; Driver Yanto; Clerk Nalupiza. <p>Related the handling of nonconforming oil palm products has been set in the SOP of Handling Complaints and Dissatisfaction document number SOP/SMART/SUST/IV/003 Rev3.0 dated 14 February 2022 which inform generally applied to all complaint's aspects including complaints for nonconforming products from buyer.</p>	
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>PT Bumi Permai Lestari – Bukit Perak Mill refers to procedure "Procedure of Supply Chain Certification Standard Mass Balance (PT.BPL.BPRM/SOP/SCCS-MB/17 dated 24/03/2022). Section 6.7 explains the product sales/dispatch starting from Delivery Order receiving, product dispatch process, weighing, delivery, registration of transaction.</p> <p>Unit of certification has documented the information related to the goods out can be seen on the shipping announcement. Sample taken:</p> <ol style="list-style-type: none"> Transaction code TR-82f30797-018e: <ul style="list-style-type: none"> Delivery order No. 2650113115 dated 20/07/2023; Contact No. DIC/2650/200723/0001; Product: Palm Kernel; Quantity: 100 MT; Buyer: PT Sumber Indah Perkasa – Jakarta; Certification information: RSPO MB RSPO 733239. Bill of Lading No. 03/030823/LMP; Carrier: PT. Lautan Mulia Purnama; Shipper: PT Bumi Permai Lestari; Consignee: PT Sumber Indah Perkasa; Vessel: KM. Arta Mulia 2; Port of Loading: Pangkal Balam; Port of Discharge: Lampung – Indonesia; Shipper Description: Palm Kernel 100.000 kg; Shipping Instruction: No. 098/IP/2650/07/2023; Contract: 	Complied

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		<p>DIC/2650/200723/0001; DO No. 2650/KER/2650/23/T028; PO. 4800072569; Certificate No. RSPO 733239-23070052/RSPO MB.</p> <ul style="list-style-type: none"> Shipping announcement TR-82f30797-018e Seller: PT Bukit Permai Lestari – Bukit Perak Mill; Member ID: RSPO_PO100001761; Seller Contract No: DIC/2650/200723/0001; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Bukit Permai Lestari – Bukit Perak Mill; Mill Country: Indonesia; Volume: 100 MT; Transport Detail; Transport Medium: Water; Shipping B/L Date: 03/08/2023; Departure Details Country: Indonesia; Port/City: Pangkal Balam Bangka; Arrival Details Country: Indonesia; Port/City: Lampung; Ship Name: KM Arta Mulia 2; B/L Number: 03/030823/LMP; Transaction ID: TR-82f30797-018e; Status: confirmed; Announced Date: 18/08/2023. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557. <p>2. Transaction code TR-e8232b3b-8770:</p> <ul style="list-style-type: none"> Delivery order No. 2650113241 dated 22/01/2024; Contact No. DIC/2650/220124/0001; Product: Palm Kernel; Quantity: 100,000 Kg; Buyer: PT Sumber Indah Perkasa – Jakarta; Certification information: RSPO MB RSPO 733239. Bill of Lading No. 03/260124/LMP; Carrier: PT. Lautan Mulia Purnama; Shipper: PT Bumi Permai Lestari; Consignee: PT Sumber Indah Perkasa; Vessel: KM. Rokan Permai; Port of Loading: Pangkal Balam; Port of Discharge: Lampung – Indonesia; Shipper Description: Palm Kernel 100.000 kg; Shipping Instruction: No. 013/IP/2650/01/2024; Contract: DIC/2650/220124/0001; DO No. 2650/KER/2650/24/T004; PO. 4800076678; Certificate No. RSPO 733239-240710067/RSPO MB. Shipping announcement TR-e8232b3b-8770 Seller: PT Bukit Permai Lestari – Bukit Perak Mill; Member ID: RSPO_PO100001761; Seller Contract No: DIC/2650/220124/0001; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Bukit Permai Lestari – Bukit Perak Mill; Mill Country: Indonesia; Volume: 100 MT; Transport Detail; Transport 	
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		<p>Medium: Water; Shipping B/L Date: 26/01/2024; Departure Details Country: Indonesia; Port/City: Pangkal Balam Bangka; Arrival Details Country: Indonesia; Port/City: Lampung; Ship Name: KM Rokan Permai; B/L Number: 01/260124/LMP; Transaction ID: TR-e8232b3b-8770; Status: confirmed; Announced Date: 09/02/2024. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557.</p> <p>3. Transaction code TR-31d40d4c-130d:</p> <ul style="list-style-type: none"> • Delivery order No. 2650113254 dated 207/02/2024; Contact No. DIC/2650/070224/0001; Product: Palm Kernel; Quantity: 100,000 Kg; Buyer: PT Sumber Indah Perkasa – Jakarta; Certification information: RSPO MB RSPO 733239. • Bill of Lading No. 01/160224/LMP; Carrier: PT. Lautan Mulia Purnama; Shipper: PT Bumi Permai Lestari; Consignee: PT Sumber Indah Perkasa; Vessel: KM. Vidi No. 1; Port of Loading: Pangkal Balam; Port of Discharge: Lampung – Indonesia; Shipper Description: Palm Kernel 100.000 kg; Shipping Instruction: No. 021/IP/2650/02/2024; Contract: DIC/2650/070224/0001; DO No. 2650/KER/2650/24/T006; PO. 4800077078; Certificate No. RSPO 733239-24020068/RSPO MB. • Shipping announcement TR-31d40d4c-130d Seller: PT Bukit Permai Lestari – Bukit Perak Mill; Member ID: RSPO_PO100001761; Seller Contract No: DIC/2650/070224/0001; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Bukit Permai Lestari – Bukit Perak Mill; Mill Country: Indonesia; Volume: 100 MT; Transport Detail; Transport Medium: Water; Shipping B/L Date: 16/02/2024; Departure Details Country: Indonesia; Port/City: Pangkal Balam Bangka; Arrival Details Country: Indonesia; Port/City: Lampung; Ship Name: KM Vidi No. 1; B/L Number: 01/160224/LMP; Transaction ID: TR-31d40d4c-130d; Status: confirmed; Announced Date: 12/02/2024. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557. <p>4. Transaction code TR-ce88de91-8942:</p>	
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		<ul style="list-style-type: none"> • Delivery order No. 2650113348 dated 10/07/2024; Contact No. DIC/2650/100724/0001; Product: Palm Kernel; Quantity: 100,000 Kg; Buyer: PT Sumber Indah Perkasa – Jakarta; Certification information: RSPO MB RSPO 733239. • Bill of Lading No. 02/170724/LMP; Carrier: PT. Lautan Mulia Purnama; Shipper: PT Bumi Permai Lestari; Consignee: PT Sumber Indah Perkasa; Vessel: KM. Bandar Bestari 06; Port of Loading: Pangkal Balam; Port of Discharge: Lampung – Indonesia; Shipper Description: Palm Kernel 100.000 kg; Shipping Instruction: No. 108/IP/2650/07/2024; Contract DIC/2650/100724/0001; DO No. 2650/KER/2650/24/T030; PO. 4800080267; Certificate No. RSPO 733239-24070078/RSPO MB. • Shipping announcement TR-ce88de91-8942 Seller: PT Bukit Permai Lestari – Bukit Perak Mill; Member ID: RSPO_PO100001761; Seller Contract No: DIC/2650/100724/0001; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Bukit Permai Lestari – Bukit Perak Mill; Mill Country: Indonesia; Volume: 100 MT; Transport Detail; Transport Medium: Water; Shipping B/L Date: 17/07/2024; Departure Details Country: Indonesia; Port/City: Pangkal Balam Bangka; Arrival Details Country: Indonesia; Port/City: Lampung; Ship Name: KM Bandar Bestari 06; B/L Number: 02/170724/LMP; Transaction ID: TR-ce88de91-8942; Status: confirmed; Announced Date: 30/07/2024. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557. 	
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>BPRM didn't conduct outsource of milling activities. Outsource is for CPO and PK transport. Mill has a list of contractors for transporting oil palm products which inform name of contractor, address, work agreement and validity period as follow:</p> <ul style="list-style-type: none"> • Agreement No.001/BPL/BPRM/04/2022.CPO dated 22 April 2022 between PT Bumi Permai Lestari and PT BSA Logistic Indonesia (PT BSA Logistic is holding for PT Satrindo Jaya Agropalma) valid until 31 December 2024 for CPO transportation. There is a statement letter from the Director of PT BSA Logistics Indonesia dated 31 March 2023 stating that they are willing to 	Complied

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	<ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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>comply with the conditions required for sustainable palm oil certification and are willing to be questioned in the framework of a certification audit conducted by a certification body.</p> <p>Agreement No.001/BPL/BPRM/01/2024 – PK dated 2 January 2024 between PT Bumi Permai Lestari and PT EMKL Tiga Berdikari valid until 30 December 2024 for PK transportation. There is a statement letter from the Director of PT EMKL Tiga Berdikari Indonesia dated 29 June 2024 stating that they are willing to comply with the conditions required for sustainable palm oil certification and are willing to be questioned in the context of a certification audit conducted by a certification body.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>BPRM has the record detail information of its contractor covering company profile, contact person, address and phone number. The list of contractors is:</p> <ol style="list-style-type: none"> 1. PT BSA Logistic: on behalf of Yosi Faradiman (contact detailed available); address Pangkal Pinang – Bangka. 2. PT EMKL Tiga Berdikari: on behalf of Nopianto (contact detailed available); address Jakarta. 	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is no new contractor used by the BPRM for the physical handling of RSPO certified oil palm product since the last assessment.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory 	PT Bumi Permai Lestari – Bukit Perak Mill refers to Procedure of Supply Chain Certification Standard Mass Balance (PT. BPL. BPRM/SOP/SCCS-MB/17 dated 24/03/2022). The procedure explains all aspects of supply chain and traceability scope in Bukit Perak and Bukit Permata Estate: consist of FFB receiving, weighing, FFB quality checking, processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank	Complied

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <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>for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping; document control.</p> <p>Bukit Perak Mill; maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>Evidence of minimum 2 years retention times can be seen at document:</p> <ul style="list-style-type: none"> Bill of Lading No. 01/160622/HSA; Carrier: PT. Harsasancaya Abadi; Shipper: PT Bumi Permai Lestari; Consignee: PT Smart Tbk; Vessel: KM. Kelinci Mas Tiga and KM. Bumi Elaeis Tiga; Port of Loading: Pangkal Balam; Port of Discharge: Marunda Jakarta – Indonesia; Shipper Description: Crude Palm Oil (CPO) 110.000 kg; Shipping Instruction: No. 058/IP/2650/06/2022; Contract DIC/2650/140622/0001; PO. 4800064410; Certificate No. RSPO 733239-22061022/RSPO MB. Bill of Lading No. 01/070722/LMP; Carrier: PT. Lautan Mulia Purnama; Shipper: PT Bumi Permai Lestari; Consignee: PT Sumber Indah Perkasa; Vessel: KM. Arta Mulia 2; Port of Loading: Pangkal Balam; Port of Discharge: Lampung – Indonesia; Shipper Description: Crude Palm Oil (CPO) 180.000 kg; Shipping Instruction: No. 066/IP/2650/07/2022; Contract DIC/2650/290622/0001; DO. 2650/KER/2650/22/T017; PO. 4800064744; Certificate No. RSPO 733239-22070032/RSPO MB. <p>The procedure of Supply Chain Section 7 (Documentation) stipulates storage and control of recording related to product sales, transportation until product delivery must be stored according to procedure of document and record control (SOP/SMART/UMUM/SADV/I/001 – Section 2.4.12.e) with minimum retention period of 10 years.</p> <p>Audit team verified the implementation of the procedure through checking delivery dockets and weighbridge.</p> <ol style="list-style-type: none"> PT Bumi Permai Lestari – Bukit Perak Mill maintains mass balance spreadsheet to monitor the proportion of certified FFB, non-certified FFB, certified CPO, non-certified CPO, certified PK and non-certified PK. 	
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		<p>b. PT Bumi Permai Lestari – Bukit Perak Mill through mass balance spreadsheet monitors the proportion of certified CPO and certified PK.</p> <p>c. Based on document review against Pangkalan Panji POM mass balance spreadsheet period 2023 - 2024 (to date June 2024), CH has never sold short.</p> <p>As per Mass Balance Report June 2024 obtain information that mill has positive stock 1,736.73 MT (CPO) and 1,315.74 MT (PK). It can be concluded there is no short selling during this audit.</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>	According to the long-term projection, top management has set the extraction rate for the next 5 years where OER 20.17% and KER 5.63%. Based on daily production report above, the extraction rate (OER/KER) reported and updated in daily basis. Since January – July 2024 is OER is 18.42%; KER is 5.36%.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	According to the long-term projection, top management has set the extraction rate for the next 5 years where OER 20.17% and KER 5.63%. Based on daily production report above, the extraction rate (OER/KER) reported and updated in daily basis. Since January – July 2024 is OER is 18.42%; KER is 5.36%.	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>	PT Bumi Permai Lestari – Bukit Perak Mill uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Bukit Perak and Bukit Permata Estate).	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>PT Bumi Permai Lestari – Bukit Perak Mill has made shipping announcement through PalmTrace transaction for period August 2023 – July 2024. There is no shipping announcement made later than three months after dispatch. For example, transaction code TR-ce88de91-8942:</p> <ul style="list-style-type: none"> Delivery order No. 2650113348 dated 10/07/2024; Contact No. DIC/2650/100724/0001; Product: Palm Kernel; Quantity: 100,000 Kg; Buyer: 	Complied

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	<p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Sumber Indah Perkasa – Jakarta; Certification information: RSPO MB RSPO 733239.</p> <ul style="list-style-type: none"> • Bill of Lading No. 02/170724/LMP; Carrier: PT. Lautan Mulia Purnama; Shipper: PT Bumi Permai Lestari; Consignee: PT Sumber Indah Perkasa; Vessel: KM. Bandar Bestari 06; Port of Loading: Pangkal Balam; Port of Discharge: Lampung – Indonesia; Shipper Description: Palm Kernel 100.000 kg; Shipping Instruction: No. 108/IP/2650/07/2024; Contract DIC/2650/100724/0001; DO No. 2650/KER/2650/24/T030; PO. 4800080267; Certificate No. RSPO 733239-24070078/RSPO MB. • Shipping announcement TR-ce88de91-8942 Seller: PT Bukit Permai Lestari – Bukit Perak Mill; Member ID: RSPO_PO100001761; Seller Contract No: DIC/2650/100724/0001; Product Detail: CSPK; Supply Chain Model: Mass Balance; Mill Name: PT Bukit Permai Lestari – Bukit Perak Mill; Mill Country: Indonesia; Volume: 100 MT; Transport Detail; Transport Medium: Water; Shipping B/L Date: 17/07/2024; Departure Details Country: Indonesia; Port/City: Pangkal Balam Bangka; Arrival Details Country: Indonesia; Port/City: Lampung; Ship Name: KM Bandar Bestari 06; B/L Number: 02/170724/LMP; Transaction ID: TR-ce88de91-8942; Status: confirmed; Announced Date: 30/07/2024. Buyer Member Name: PT Sumber Indah Perkasa; Member ID: RSPO_PO10000006557. <p>PT Bumi Permai Lestari – Bukit Perak Mill made remove RSPO certified CSPO through PalmTrace account. For example, transaction ID: ST-TR-cbfb2f0-3600 on 06/05/2024 for removed 664.63 MT CSPO from certified stock.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT Bumi Permai Lestari – Bukit Perak Mill has not made claims regarding the support of RSPO certified oil palm products. However, the organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			

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4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.	PT Bumi Permai Lestari – Bukit Perak Mill did not conduct corporate communication. Corporate communications are conducted by Golden Agri-Resources (GAR) as RSPO member with membership No. 1-0096- 11-000-00, member since 30 January 2005 on website: https://goldenagri.com.sg .	Complied
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member’s history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	In corporate communication, GAR has display its RSPO membership status, display a link to the RSPO web address, stated that GAR support the work of the RSPO and stated GAR’s history with regard to the RSPO. GAR did not use RSPO trademark on the website.	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	On the website, GAR does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	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.	On the website, GAR ensure that all communication is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Complied
4.5	Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include: • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.”	On the website, GAR does not use the RSPO corporate logo.	Complied

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	<ul style="list-style-type: none"> • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 		
4.6	<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>	Although PT Bumi Permai Lestari – Bukit Perak Mill is a certified member, but they do not use RSPO trademark.	Not Applicable
Product-specific communications			
5.1 General			

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5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	PT Bumi Permai Lestari – Bukit Perak Mill only stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module. The communication is mainly of the RSPO certificate number and product description.	Complied
5.1.2	Product-specific communications are voluntary.	PT Bumi Permai Lestari – Bukit Perak Mill product specification communications already stated on shipping information such as FFA rate and product type (CPO or PK).	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	RSPO label is not displayed on product-specific communications.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	PT Bumi Permai Lestari – Bukit Perak Mill does not use any other 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. 	PT Bumi Permai Lestari – Bukit Perak Mill is a palm oil mill implementing RSPO P&C.	Not Applicable

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	<ul style="list-style-type: none"> The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Bumi Permai Lestari – Bukit Perak Mill is a palm oil mill implementing RSPO P&C.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	<p>PT Bumi Permai Lestari – Bukit Perak Mill only stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module. The communication is mainly of the RSPO certificate number and product description.</p> <p>There is no RSPO Label used.</p>	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	PT Bumi Permai Lestari – Bukit Perak Mill stated in sales documents, e.g., Sales Contract, Delivery Order and Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK with Mass Balance Module, and RSPO certified number is available.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the	PT Bumi Permai Lestari – Bukit Perak Mill is a palm oil mill implementing RSPO P&C.	Not Applicable

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	<p>requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products, it is essential that customers are aware that the products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
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>	<p>PT Bumi Permai Lestari – Bukit Perak Mill is an RSPO certificate holder with certificate number RSPO 733239, originally issued by BSI Services Malaysia Sdn Bhd on 18 September 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.</p>	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>	<p>PT Bumi Permai Lestari – Bukit Perak Mill is an RSPO certificate holder with certificate number RSPO 733239, originally issued by BSI Services Malaysia Sdn Bhd on 18 September 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.</p>	Complied

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	<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>		
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Bumi Permai Lestari – Bukit Perak Mill is an RSPO certificate holder with certificate number RSPO 733239, originally issued by BSI Services Malaysia Sdn Bhd on 18 September 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Bumi Permai Lestari – Bukit Perak Mill is an RSPO certificate holder with certificate number RSPO 733239, originally issued by BSI Services Malaysia Sdn Bhd on 18 September 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Bumi Permai Lestari – Bukit Perak Mill is an RSPO certificate holder with certificate number RSPO 733239, originally issued by BSI Services Malaysia Sdn Bhd on 18 September 2015. The certificate holder sold its oil palm product in bulk, there is no on pack claims attached.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Bumi Permai Lestari – Bukit Perak Mill communication has not stated information about the claimant's RSPO membership status.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT Bumi Permai Lestari – Bukit Perak Mill communication has not stated information about the claimant's RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	There is no RSPO Label used.	Complied

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5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	There is no on pack claim used.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. <p>The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</p>	<p>PT Bumi Permai Lestari – Bukit Perak Mill did not use the RSPO trademark and/or RSPO label in the product. The mill sells its product in bulk.</p> <p>Not applicable.</p>	Not Applicable
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified 	<p>PT Bumi Permai Lestari – Bukit Perak Mill did not use the RSPO trademark and/or RSPO label in the product. The mill sells its product in bulk.</p> <p>Not applicable.</p>	Not Applicable

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	<p>material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 		
Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a policy and has declared it regarding the code of ethics, recorded in the Golden Agri-Resources Business and Human Rights Policy dated June 2021 which contains:</p> <ol style="list-style-type: none"> 1. Respecting the rights and dignity of workers in accordance with legal provisions, providing fair treatment without discrimination and building harmonious industrial relations 2. Respecting workers' rights in terms of freedom of opinion, collective bargaining, and forming and joining trade unions/labor unions 3. Preventing forced labor practices and not using workers from human trafficking 4. Ensuring that no children are employed in all lines of operations 5. Ensuring the safety of the company's work environment and operations 6. Recognizing equal rights and participation of women around the operating unit 7. Creating safe and healthy work area conditions and providing environmental protection 8. Respecting the rights of local and indigenous communities in accordance with applicable laws and regulations where the company operates 9. Respecting and protecting the rights of whistleblowers and human rights defenders 	Complied

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		<p>10. Complying with legal provisions regarding the prevention of bribery and corruption practices</p> <p>11. Taking steps to resolve and restore negative impacts in accordance with applicable laws and regulations where the company operates if there is a human rights violation</p> <p>The policy has been socialized to the internal or external stakeholder on February 2024, May 2024 and June 2024. Records of socialization are available and has been reviewed.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Based on interview with workers and stakeholders during ASA 1.2, obtained information that PT Bumi Permai Lestari does not intimidate or violence (including any form of harassment or paramilitary usage) to solve any problem.</p>	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of procedure in this ASA-1.2 audit.</p> <p>PT Bumi Permai Lestari has shown procedure "SOP Penanganan Keluhan dan Ketidakpuasan (SOP/SMART/GIMS- SCMD/USDV/I/001, R.2, dated 11 April 2017)". The procedure was covering complaints and dissatisfaction records, classification, communication, planning, resolution, monitoring and reporting of complaint and dissatisfaction handling, including form of any sexual harassment to workers nor children sourced from internal and external parties.</p> <p>This procedure is used for handling of any complaints and dissatisfaction to all affected parties. Within the procedure stated:</p> <ul style="list-style-type: none"> Any complaints (direct or indirectly) receives and record in Form F/SMART/GIMS-SCMD/USDV/I/001/001 by social officer or administration head. 	Complied

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		<ul style="list-style-type: none"> Entire data and complaint information can be publicly available or classify to affected parties upon approval by reporter. Unit of certification ensure anonymity of complainants and whistle-blower with aims to reducing retaliation risks. Complaints and disputes can be delivered by mailbox to Head Office, or by phone through hotline and app or email. Response shall be made within 14 working days after complaints or disputes receives. <p>If complaints and dissatisfaction are submitted verbally (the complainant cannot read or write) or by telephone, the recipient of the report must assist in writing/recording the complaint.</p>	
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 handling procedure is in place and was disseminated annually, targeted to all workers in the Mill and Estates as well as relevant stakeholders. The dissemination conducted in written and verbally, as well as using picture in the housing complex, office, and storage complex.</p> <p>Based on interview with workers, contractors, governmental agencies, the stakeholders aware the company's mechanism to submit a grievance.</p>	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	<p>Whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and dissatisfaction No. F/SMART/SIGSCSRD/SADV/003/001. Records of complaints and dissatisfaction such as :</p> <ul style="list-style-type: none"> BPRE, period January – June 2024, no complaints recorded BPRM, period January – June 2024, 1 case of complaint related to worker's house condition. This has been resolved by the company. BPTE, period January – June 2024, 1 case of complaint related to worker's house condition. This has been resolved by the company. 	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them	<p>The company established procedure "<i>SOP Penanganan Pengaduan dan Konflik</i>" (SOP/SMART/SUST/IV/003 last revision on 8 March 2022). The procedure had mechanism related to option of access to independent legal and technical advice. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.</p>	Complied

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	and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -		
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated. - Minor compliance -	<p>Program to support local community development is based on the result of consultation during social livelihood assessment baseline on 15-19 November 2021. The identified program then re-consulted during SIA Monitoring, the last one was on 13 – 17 November 2023 and can be seen in “Laporan Pemantauan Dampak Sosial PT Bumi Permai Lestari”.</p> <p>Social Impact Assessment review at two years period refer to SOP Pengelolaan dan Pemantauan Dampak Sosial (SOP/SMART/SUST/IV/002, Rev.1, dated 1 July 2014). Stated on point 4.6.10 that review Social Management and Monitoring Plan reviewed at least once in two years.</p> <p>The company has developed “Rencana Strategis CSR 2023 – 2027 PT Bumi Permai Lestari” covered Desa Dendang, Desa Tugang, Desa Air Bulin, Desa Tumbak Petir, Desa Jebus and Desa Ranggi Asam. The aspect for CSR are :</p> <ul style="list-style-type: none"> • Education : improve the quality of education facilities, strengthen the competencies of teacher, scholarship • Health : improve the quality of health facilities, increase the welfare of mother and children and etc • Economy : develop new productive businesses and sustainable, capacity building training • Infrastructure : repair and maintenance of public facilities • Social : preserving local arts and culture, improving environmental cleanliness, supporting national holidays,improving facilities and infrastructure for arts, culture, security and sports • Environment : protection of riparian area, protection of HCV area 	Complied

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		<p>Realization of CSR in 2023 such as :</p> <ul style="list-style-type: none"> • Assistance for honorary teachers • Assistance for sports tournaments • Assistance for victims of natural disasters • Assistance for heavy equipment for repairing village roads • Assistance for clean water • Assistance for food security • And etc <p>Total cost for CSR in 2023 is IDR 167,xxx,xxx.</p>	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit has a total HGU area of 14,319.08 Ha and of this area the scope of certification is 6,084.95 Ha because of the 4 estates that are members of PT Bumi Permai Lestari (BMSE, BINE. BPTE, BPRE) only BPTE and BPRE are included the scope of this certification.</p> <p>The details of the HGU owned are as follows:</p> <ul style="list-style-type: none"> • Decree of the State Minister for Agrarian Affairs/Head of the National Land Agency No.26/HGU/BPN/95 dated 12 April 1995 for the granting of HGU for PT Bumi Permai Lestari with an area of 3,418.52 Ha. The HGU rights were originally valid until 2030 and have been extended until 2090 in accordance with the Decree of the Head of BPN No.134/HGU/BPN/2004 dated 2 November 2004. • Decree of the State Minister for Agrarian Affairs/Head of the National Land Agency No.58/HGU/BPN/95 dated 25 August 1995 for the granting of HGU for PT Bumi Permai Lestari with an area of 9,574.03 Ha. The HGU rights were originally valid until December 31, 2030 and have been extended until March 5, 2092 in accordance with the Decree of the Head of BPN No.134/HGU/BPN/2004 	Complied

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		<p>dated October 28, 2004. The HGU area was then revised to 10,900.56 Ha in accordance with the decision of the Head of BPN RI No.1/RI/HGU/BPN RI/2013 dated 9 September 2013</p> <p>Based on the explanation above, it is known that initially the area of HGU issued by the government for Unit Certification was 12,992.55 Ha and in 2013 it changed to 14,319.08 Ha. In annual HGU Utilisation Report to BPN Kabupaten Bangka Barat for Y2023 dated 30 December 2023, the area still the same.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p> <p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p> <p>Based on interview with local stakeholders, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights.</p>	Complied

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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>There are no changes in compliance statement, the land permit still valid and there are no changes in UoC map.</p> <p>The unit of certification already has maps that identify their legal rights, as shown in the Operational Map with a scale of 1 : 150,000 made by the PNMP team. The map has provided information about HGU boundaries, boundaries between blocks, enclave areas, boundary areas, including maps of river distribution and HCV.</p> <p>The reference used in making the map is the field map listed in the HGU certificate as follows:</p> <ul style="list-style-type: none"> • Certificate of Proof of Title – Land Book No.01 No.04.04.80.02.2.00001 with Situation Map No.1427/1996 of 8,234.13 Ha” dated 8 August 1996 scale 1:50,000. • Certificate of Proof of Title – Land Book No.01 No.04.04.77.04.2.00001 with Situation Map No.413/1997 of 2,666.43 Ha” dated 5 March 1997 scale 1:40,000. • Land title “Certificate of Proof of Rights – Land Book No.01 No.04.04.77.03.2.00001 with Situation Drawing Map No.1471/1996 of 3,418.52 Ha scale 1:50,000. 	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Based on the interview with stakeholder, known that preliminary information regarding the plantation development plans has been conveyed to the community. The company also conducts a social assessment process including informing what benefits will be obtained when the plantation operates. The source also said that in the process there was never any coercion on the land owners to relinquish their ownership rights. Everyone has the right to disagree with giving land to the company.</p>	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>	<p>Based on the interview with stakeholder, known, that the community represented themselves during the land acquisition process. Apart from that, there is also a village team tasked with monitoring and being a witness when the compensation process is approved</p>	Complied

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4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p> <p>Based on interview with local stakeholders, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights.</p>	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p> <p>The legal ownership right is HGU covering an area of 14,319.08 Ha with details as described in 4.4.1</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p> <p>Based on interview with local stakeholder, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations,</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p>	Complied

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	<p>during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>Based on interview with local stakeholder, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights. Everyone has the right to disagree with giving land to the company.</p> <p>Evidence of this is the existence of an enclave/land bank area, namely an area owned by the community within the company's HGU, which has refused to be compensated from the start. Based on the results of identification by the company, there is an area of 72.95 Ha in BPTE and an area of 190.05 Ha in BPRE which is still under community management.</p>	
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p> <p>Based on interview with local stakeholders, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights. The source said that the existence of the company did not have a negative impact on the residents' water or food supplies.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.</p> <p>Based on interview with local stakeholders, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an</p>	Complied

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		element of coercion on the community to relinquish their land rights. Everyone has the right to disagree with giving land to the company.	
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on the interview with stakeholder, known, that the community represented themselves during the land acquisition process. Apart from that, there is also a village team tasked with monitoring and being a witness when the compensation process is approved	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	Based on the document review and interviews with management representative it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.	Complied
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	The company has procedure of <i>SOP Ganti Rugi Tanah/Lahan</i> (No. SOP/SMART/SENS-CSR/SADV/I/003 rev. 01 dated 8 November 2017) related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Procedure for identifying land as follow: <ul style="list-style-type: none"> Identifying legal: determined by government in form of permit (location permit). Identifying customary or user right: conducted during preinventory land (company, village and district team). 	Complied

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		<ul style="list-style-type: none"> Land inventory physically verification: conducted by land ownership, local government (village and district), boundary indicator, neighbour landowner and company. <p>UoC also has <i>SOP Penerapan Persetujuan Atas Dasar Informasi Awal Tanpa Paksaan</i> (Free Prior Inform Consent) No.SOP/SMART/SENS- CSD/SADV/I/003" Rev.1 dated 8 November 2017. The SOP consist of process such as conveying information visit to community, meeting with government, meeting with community, identification and participatory mapping of the area/community land, identification result from meeting, coordination for decision making process, preparing agreement with community, coordination for agreement implementation preparation, monitoring of implementation.</p> <p>The policy has been socialized to the internal or external stakeholder on February 2024, May 2024 and June 2024. Records of socialization are available and has been reviewed.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The company has procedure of <i>SOP Ganti Rugi Tanah/Lahan</i> (No. SOP/SMART/SENS-CSD/SADV/I/003 rev. 01 dated 8 November 2017) The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>There is no changes of compliance statement compare to last assessment.</p> <p>Until now, the Unit of Certification does not yet have a smallholder scheme. This does not violate regulations because the business license owned has been obtained before 2007 when the regulation regarding smallholder scheme obligations was issued. In addition, the HGU has been extended since 2004 and 2013 so that the ATR Regulation No. 7 of 2017 cannot be applied either. Nonetheless social responsibility and community economic development efforts have been pursued</p>	Complied

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		as explained in more detail in indicator 4.3.1. Results of interviews with representatives of Terentang Village and Dendang Village found that the community empowerment program carried out did not discredit certain genders. Both men and women have the same opportunity to be involved in the program	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them. - Minor compliance -	Based on the document review and interviews with management representative it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	The company has a procedure in place to identify people and/or community groups entitled to compensation presented in <i>SOP Ganti Rugi Tanah/Lahan</i> (No. SOP/SMART/SENS-CSR/SADV/I/003 rev. 01 dated 8 November 2017). The procedure is described how to identify people and/or community groups entitled to compensation.	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. - Critical (Major) compliance -	The company has procedure <i>SOP Ganti Rugi Tanah/Lahan</i> (No. SOP/SMART/SENS-CSR/SADV/I/003 rev. 01 dated 8 November 2017). The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on auditor observation, this procedure available on each estate unit and accessible to stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	The company has developed "Rencana Strategis CSR 2023 – 2027 PT Bumi Permai Lestari" covered Desa Dendang, Desa Tugang, Desa Air Bulin, Desa Tumbak Petir, Desa Jebus and Desa Ranggi Asam. The aspect for CSR are : <ul style="list-style-type: none"> Education : improve the quality of education facilities, strengthen the competencies of teacher, scholarship 	Complied

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		<ul style="list-style-type: none"> • Health : improve the quality of health facilities, increase the welfare of mother and children and etc • Economy : develop new productive businesses and sustainable, capacity building training • Infrastructure : repair and maintenance of public facilities • Social : preserving local arts and culture, improving environmental cleanliness, supporting national holidays,improving facilities and infrastructure for arts, culture, security and sports • Environment : protection of riparian area, protection of HCV area <p>Realization of CSR in 2023 such as :</p> <ul style="list-style-type: none"> • Assistance for honorary teachers • Assistance for sports tournaments • Assistance for victims of natural disasters • Assistance for heavy equipment for repairing village roads • Assistance for clean water • Assistance for food security • And etc <p>Total cost for CSR in 2023 is IDR 167,xxx,xxx.</p>	
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	<p>There is no changes of compliance statement compare to last assessment.</p> <p>Based on interviews with management representatives and representatives of Terentang Village and Dendang Village as well as representatives of the Bangka Barat Regency Government Office, it is known that over the past year there has been no information or issues regarding land dispute in the PT BPL area,</p>	Complied

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	- Minor compliance -	<p>especially for the scope of certification, namely BPTE and BPRE.</p> <p>Within the company HGU there are still areas that are still controlled by the community. Based on the results of identification by the company, there is an area of 72.95 Ha in BPTE and an area of 190.05 Ha in BPRE which is still under community management because they did not want compensation from the start. The results of a visit to one of these areas, for example the G15 BPTE block, found that there were clear marking boundaries between community-owned plantations and company-owned plantations and there was no indication of any conflict.</p> <p>- For the FPIC process, it is contained in the SOP for the Application of Free Prior Informed Consent No. SOP/SMART/SENS- CSRD/SADV/I/003" Rev.1 dated 8 November 2017. The SOP consist of such process as conveying information visit to community, meeting with government, meeting with community, identification and participatory mapping of the area/community land, identification result from meeting, coordination for decision making process, preparing agreement with community, coordination for agreement implementation preparation, monitoring of implementation.</p>	
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>	As described in 4.8.1 there is no land conflict that exist in scope of certification	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable	Based on the document review and interviews with relevant stakeholders, it is known that until this assessment there has been no additional company area or new land compensation. The land compensation process was completed in 1994. Replanting was done in period 2018 – 2022.	Complied

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	customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Based on interview with local stakeholders, the land compensation process has been based on the agreement of both parties starting with the early stages of socialization, negotiation, and agreement. In the process there has never been an element of coercion on the community to relinquish their land rights.	
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 -	As described in 4.8.1 there is no land conflict that exist in scope of certification	Complied
Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -	There are no changes in ASA-1.2 where the company didn't have a scheme smallholder therefore the FFP price not refer to the Plantation Department of Bangka Barat Decree. The determination of the price of FFB refers to the FFB Purchase Administration procedure dated January 9 2012, on page 7 it is stated that the determination of the price of FFB takes into account the OER estimate, market prices in the area and local Plantation Agency prices.	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	Bumi Perak Mill informed FFB through short message service. The information was sent directly from FFB Purchase HO/JKT to the related supplier and forwarded to Mill Unit Head. There is no complaint on FFB pricing and the other issues. This was verify during interview with FFB suppliers. The company explain the FFB pricing through Whatsapp Message and by calling each of suppliers. Evidences of Whatsapp message received by the supplier has been sighted and reviewed during audit.	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	There are no changes of FFB supplier compare to last year.	Complied

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	- Critical (Major) compliance -	<p>Unit of certification has no program for scheme smallholder, therefore FFB price does not refer to the Plantation Department of Bangka Barat Decree but based on the company's own calculation.</p> <p>However, FFB pricing is already explained in the FFBs supplier contracts, where the FFB supplier are collecting the FFBs from independent smallholders.</p> <p>Sample contract sighted:</p> <ul style="list-style-type: none"> • "Surat Pernyataan" BUMDES Sinar Harapan to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. • "Surat Pernyataan" CV Gunung Mas Lestari to PT Sawit Mas Sejahtera dated 1 October 2021. • "Surat Pernyataan" CV Kacung Agro Lestari to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. • "Surat Pernyataan" CV Multi Nusa Pratama to PT Sawit Mas Sejahtera dated 1 October 2021. The source of FFB are from owned land. • "Perjanjian Kemitraan Jual Beli Tandan Buah Segar Kelapa Sawit TBS No. 22/SP/D&L-BPL/IIII/2023 dan No. 004/SP/KT BM/IIII/2023" dated 2 March 2023 between PT Bumi Permai Lestari and Kelompok Tani Bintang Maju. This contract valid for 5 years. <p>In contract or commitment letter stated that FFB price determined by the company and refer to applicable commercial prices and possible to change at any time.</p> <p>This indicator is Not Applicable.</p>	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	<p>Unit of certification has no program for scheme smallholder, therefore no contracts developed for smallholders.</p> <p>This indicator is Not Applicable.</p>	Not Applicable

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	- Critical (Major) compliance -		
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Agreement between Bumi Perak Mill and FFB supplier are described in Contractual Agreement or Statement Letter. FFB purchasing agreements were established in Bahasa Indonesia. Based on signed Statement Letter, it was verified that all parties understood the contractual agreements they enter into as evidence in the signature of both parties. The Agreements are fair, legal and transparent containing FFB legality, requirement, price and payment method. Both parties kept the agreement. Sample refer to 5.1.3	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given. - Critical (Major) compliance -	Unit of certification has no program for scheme smallholder, therefore no contracts developed for smallholders. However, unit of certification also have other local business such as FFB suppliers who supplied FFB to Bukit Perak Mill. In contract stated that payment shall be paid within 2 weeks. Samples of invoice reviewed during audit : <ul style="list-style-type: none"> • Invoice of CV Kacung Agro Lestari period 27 – 29 June 2024 with total IDR 243,xxx,xxx dated 29 June 2024 (Price of FFB is IDR 2,400 per Kg) • Invoice of BUMDES Sinar Harapan period 27 – 29 June 2024 with total IDR 16,xxx,xxx dated 29 June 2024 (Price of FFB is IDR 2,400 per Kg) Invoice of CV Gunung Mas Lestari period 27 – 29 June 2024 with total IDR 1,xxx,xxx,xxx dated 29 June 2024 (Price of FFB is IDR 2,400 per Kg)	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis. - Minor compliance -	- Weighbridge in Bumi Perak POM is verified by third party (PT MUGI) in annual basis. Latest verification was performed on 6 June 2024 and 24 June 2024. The calibration certificate from Dinas Koperasi, UKM dan Perdagangan Kabupaten Bangka Barat not yet issued.	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials. - Minor compliance -	At the moment, PT Bumi Permai Lestari not have a mutual agreement with independent smallholder for certification. The relationship of company and independent smallholder limited to buyer and FFB supplier.	Not Applicable

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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>PT. Bumi Permai Lestari refers to "SOP Penanganan Pengaduan dan Konflik (SOP/SMART/SUST/IV/003" last revision on 8 March 2022.</p> <ul style="list-style-type: none"> - The purpose of the SOP is to ensure that complaints and conflicts originating from within (internal) and from outside the company (external) can be resolved effectively and efficiently by taking into the principles and criteria of sustainable oil palm plantations. - The scope of this procedure includes recording of complaints and conflicts, rating, communication, planning, handling, monitoring and reporting of the handling of complaints and conflicts originating from internal and external parties of the company. This procedure also includes handling reports of sexual harassment and acts of violence that occur within the company's operational permits. - In summary, the procedure or mechanism for handling complaints and conflicts is as follows: recording of complaints and conflicts, rating (low, medium, high based on criteria set by the company, for example number of people affected, organizational level, handling level, involvement of external parties), handling plans, approval of handling plans, handling and reports, handling documentation. <p>Other than that, unit of certification also has the mechanism to allow stakeholders reports their concern, fraud, violation or any form of error through the short message, whatsapp or voice note, email, PO Box and mail address. Email: TellUs@sinarmas-agri.com Short message, whatsapp or voice note: 088-1111-8000 PO Box: 2220 Mail address: JKP 10222 Jakarta – Indonesia</p> <p>Based on interview with contractors, so far no complaint or grievance to PT Bumi Permai Lestari related to FFB sales.</p> <p>Unit of certification has no program for scheme smallholder.</p>	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company.</p> <p>Community perception monitoring or called Social Impact Monitoring, in other companies, is to obtain information from stakeholders including small farmers and</p>	Complied

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		<p>local communities about the social impacts they have including daily needs, livelihoods and suggestions for future programs.</p> <p>From the monitoring results, the company then makes a CSR program or social improvement program. If the results of the monitoring show that the community is satisfied, it will be maintained and if there are deficiencies, it will be increased through mentoring programs or the like.</p> <p>Program to support local community development is based on the result of consultation during social livelihood assessment baseline on 15-19 November 2021. The identified program then re-consulted during SIA Monitoring, the last one was on 13 – 17 November 2023 and can be seen in “Laporan Pemantauan Dampak Sosial PT Bumi Permai Lestari”.</p> <p>Social Impact Assessment review at two years period refer to SOP Pengelolaan dan Pemantauan Dampak Sosial (SOP/SMART/SUST/IV/002, Rev.1, dated 1 July 2014). Stated on point 4.6.10 that review Social Management and Monitoring Plan reviewed at least once in two years.</p> <p>The company has developed “Rencana Strategis CSR 2023 – 2027 PT Bumi Permai Lestari” covered Desa Dendang, Desa Tugang, Desa Air Bulin, Desa Tumbak Petir, Desa Jebus and Desa Rangi Asam. The aspect for CSR are :</p> <ul style="list-style-type: none"> • Education : improve the quality of education facilities, strengthen the competencies of teacher, scholarship • Health : improve the quality of health facilities, increase the welfare of mother and children and etc • Economy : develop new productive businesses and sustainable, capacity building training • Infrastructure : repair and maintenance of public facilities • Social : preserving local arts and culture, improving environmental cleanliness, supporting national holidays,improving facilities and infrastructure for arts, culture, security and sports • Environment : protection of riparian area, protection of HCV area 	
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		Unit of certification has no program for scheme smallholder. But have a program to increase local communities economy.	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company.</p> <p>Community perception monitoring or called Social Impact Monitoring, in other companies, is to obtain information from stakeholders including small farmers and local communities about the social impacts they have including daily needs, livelihoods and suggestions for future programs.</p> <p>From the monitoring results, the company then makes a CSR program or social improvement program. If the results of the monitoring show that the community is satisfied, it will be maintained and if there are deficiencies, it will be increased through mentoring programs or the like.</p> <p>Program to support local community development is based on the result of consultation during social livelihood assessment baseline on 15-19 November 2021. The identified program then re-consulted during SIA Monitoring, the last one was on 13 – 17 November 2023 and can be seen in "Laporan Pemantauan Dampak Sosial PT Bumi Permai Lestari".</p> <p>Social Impact Assessment review at two years period refer to SOP Pengelolaan dan Pemantauan Dampak Sosial (SOP/SMART/SUST/IV/002, Rev.1, dated 1 July 2014). Stated on point 4.6.10 that review Social Management and Monitoring Plan reviewed at least once in two years.</p> <p>The company has developed "Rencana Strategis CSR 2023 – 2027 PT Bumi Permai Lestari" covered Desa Dendang, Desa Tugang, Desa Air Bulin, Desa Tumbak Petir, Desa Jebus and Desa Ranggi Asam. The aspect for CSR are :</p> <ul style="list-style-type: none"> • Education : improve the quality of education facilities, strengthen the competencies of teacher, scholarship 	Complied

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		<ul style="list-style-type: none"> • Health : improve the quality of health facilities, increase the welfare of mother and children and etc • Economy : develop new productive businesses and sustainable, capacity building training • Infrastructure : repair and maintenance of public facilities • Social : preserving local arts and culture, improving environmental cleanliness, supporting national holidays,improving facilities and infrastructure for arts, culture, security and sports • Environment : protection of riparian area, protection of HCV area <p>Unit of certification has no program for scheme smallholder. But have a program to increase local communities economy such as the organization helping improve the livelihood of the local communities by buying the FFB from their land.</p> <p>-</p>	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Bukit Perak Mill receives FFB from third party which is from local communities. In their contract stated that the source of FFB are from owned land and have a clear legality document.. The supplier committed to comply to company's code of ethic, respect human rights comply to national regulations abn no behaviour that lead to gratification, corruption and bribery.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The company did not have a scheme smallholder yet.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	The company did not have a scheme smallholder yet. But, Golden Agri Resources (GAR) as parent company of PT Bumi Permai Lestari have published an annual Sustainability Report. In the last Sustainability Report 2023 page 59 informed about "Promoting Smallholder Economic Inclusion". Stated that "In 2023, 76,900 plasma smallholders supplied about 19 percent of our total intake of FFB. Our plasma smallholders regularly achieve a higher yield than the national average of	Complied

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		3.4 tonnes per hectare. In 2023, they produced a CPO yield of around 4.1 tonnes per hectare. Notably, in 2023, we helped support 270 smallholders to attain RSPO certification in Aceh, covering plantations of about 560 hectares".	
Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	<p>The company has established the policy of non-discrimination and equal opportunity as per "<i>Kebijakan Perlindungan Pekerja/Buruh dari Diskriminasi</i>" Policy No. KHI-smart/011-00 dated 1 August 2017. Policy stated that "Company protect employee/workers from discrimination act to achieve harmonious industrial relations, dynamic and fair for all workers regardless of race, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and age".</p> <p>The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>Based on public consultation with Gender Committee and Labour Union, it is known that so far this policy has been implemented properly. Everyone has the opportunity and is treated equally as workers.</p>	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees. - Critical (Major) compliance -	<p>Based on the list of workers updated in June and July 2024, it is known that workers come from various ethnicities, religions and races, including workers from surrounding villages and from outside the Bangka Barat region.</p> <p>Interviews with representatives of Manpower Office Bangka Barat Regency, Worker Union, and Mill or Estate workers during the field visit there was no indication of discrimination in the work area of PT Bumi Permai Lestari.</p>	Complied
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on	Based on interviews with representative management, information was obtained that the recruitment process for all employees was carried out through the same process where prospective employees must meet the requirements in the form of:	Complied

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	<p>skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>administrative selection (application letter, graduation letter, photocopy of personal and family identity), psychological test (for certain positions), interview and health check results. To increase the career path, responsibility, authority and scope of an employee, the company provides promotions based on skills, abilities, leadership, honesty, discipline, loyalty, attendance, etc. In the period August 2023 to June 2024 there is no recruitment of new workers.</p> <p>The assessment (evaluation) period is 01 January to 31 December, work performance assessment form (assessed aspects, discipline, work quantity, work quality, cooperation, work attitude and responsibility). The company showed a recap of BPTE Employee Work Performance Assessments dated 4 January 2024 for 87 employees with an average rating of Good criteria.</p> <p>Interviews with labour union revealed that so far the Employee Work Performance Assessments had been carried out in a transparent manner and the information could be accessed by every worker.</p>	
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>Based on field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment.</p> <p>Based on the interview with women workers in estate, there was no pregnancy test during recruitment process. The pregnancy test only carried out for female workers to make sure that they do not do any agrochemical works when pregnant.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committees had been formed and still active in all unit Estate and Mill to develop awareness, identify and address issues of concern, as well as opportunities and improvements for women. Head of Gender Committee BPTE (Neliyana), Head of Gender Committee BPRE (Rentia S.), Head of Gender Committee BPRM (Shofiatun Ni'mah).</p>	Complied

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		<p>The committee consider matters such as dissemination on women's rights, childcare facilities to be provided by the growers and millers, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding.</p> <p>Based on the interviews with workers, they also knew of the existence of the gender committee because it had been routinely socialized by its management. The results of this the workers given equal opportunities for all genders (male or female).</p> <p>Gender committee meeting on 19 April 2024 with discussion regarding no reporting of sexual harassment in the period January to March 2024, dissemination of sexual harassment prevention policies carried out at morning assembly, and <i>posyandu</i> held on the 6th of every month.</p> <p>Interviewed with Gender Committee, they are confirmed that there were no issues concerning discrimination based on gender in recruitment and promotion, harassment in the workplace, or violation of reproduction rights.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on the interviews with workers (harvesters, spraying operators, and mill operators), the workers already know that there was a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. Based on the document review of worker's pay slip in both gender and the interviews with the workers in the same grade and same job, it's known that the monthly wages received are in accordance with the grade owned by each worker. For example, salary slips for operator mil for June 2024 with ID Workers 18025 and ID Workers 18002 are known to get the same basic salary, so it can be concluded that the company already has evidence related to the application of equal pay for the same work coverage</p>	Complied

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Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

6.2.1	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Governor Decree of Kepulauan Bangka Belitung No. 188.44/1220/DISNAKER/2023, 20 November 2023, regarding minimum wage of 2024, amount IDR 3,640,000/month with a standard of 7 hours of work a day or 40 hours of work a week, the minimum wage applies to workers with a working period of less than 1 year. Valid from 01 January 2024.</p> <p>PT Bumi Permai Lestari Director Decree No. 303/CEO PSM 2/HR PSM 2/12/2023, dated 18 December 2023, regarding worker wage based on worker structure and level/grade year of 2024, in accordance with Governor Decree. Divided into groups/categories/levels namely PT1 class A5 of IDR 4,061,500 (highest wage scale), PT4 class T1 of Rp. 3,640,500 (lowest wage scale).</p> <p>In addition to the wage scale above, the Company shows Decree No. 304/CEO PSM 2/HR PSM 2/12/2023 dated 18 December 2023 concerning Wages for Workers with Daily Unit Time Work Agreements (<i>Perjanjian Kerja Harian Satuan Waktu</i> /PKH-SW) PT Bumi Permai Lestari Babel Region for 2024, amounting to Rp. 145,600/day which is paid according to effective working days.</p> <p>Sample of payslip verified month June 2024:</p> <ul style="list-style-type: none"> Bukit Permata Estate - ID workers 18025 – pesticides applicator, basic salary is IDR 3,640,500. Insurance allowance (<i>BPJS Ketenagakerjaan & BPJS Kesehatan</i>). Bukit Perak Estate - (ID workers: 12002 - Harvester), basic salary is IDR 3,647,500. Insurance allowance (<i>BPJS Ketenagakerjaan & BPJS Kesehatan</i>). <p>Based on verification the salary slip, it is known that the payment of workers' wages for that month is in accordance with the minimum wage set by the</p>	Complied
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		government. Apart from the provision of the minimum wage, the company also provides other wages in the form of allowances, <i>premi</i> and other deductions.	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>The company has demonstrated the documentation of pay and working conditions is presented in the Collective Labor Agreement (CLA) / Perjanjian Kerja Bersama PT Bumi Permai Lestari, set that the minimum wage referred to the governmental regulation.</p> <p>Collective Labor Agreement (CLA) PT Bumi Permai Lestari period 2024 – 2026 available in Indonesian Language and has been communicated to all workers. Collective Labor Agreement/PKB are signed by Union and company and witnessed by Government (Manpower Agency).</p> <p>Clauses concerning payments and conditions of employment (regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) stipulated in each contractual agreement and Collective Labor Agreement (CLA/PKB).</p> <p>Based on review of Contractual Agreement also has been stated the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice.</p> <p>For contract worker, the company also had separate agreement in <i>Perjanjian Kerja Waktu Tertentu</i>. For examples:</p> <ul style="list-style-type: none"> • <i>Perjanjian Kerja Waktu Tertentu</i> Number 003/BPRM/PKWT-A2/05/2024 between PT BPL (BPRM) and S****, working as a security, the agreement period is 6 months (01 May to 31 October 2024). The work agreement is an extension of the previous work agreement (period 01 May 2023 to 30 April 2024). The company has paid compensation (upon expiry or extension of the contract) in the amount of a month's wages in accordance with Government Regulation no. 35 of 2021. 	Complied

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		<ul style="list-style-type: none"> <i>Perjanjian Kerja Waktu Tertentu</i> Number 041/BPTE/PKWT-SW/002/2024 between PT BPL (BPTE) and A***, working as a security, the agreement period 06 February to 31 July 2024. The work agreement is an extension of the previous work agreement (period 01 June to 31 December 2023). The company has paid compensation (upon expiry or extension of the contract) in the amount of a month's wages in accordance with Government Regulation no. 35 of 2021. <p>For all contract worker, the company already submit the report to Labor Agency of Bangka Barat Regency. The latest report has been sent on 03 May 2024 (Letter Number 001/BPRM/05/2024 for BPRM) and 08 February 2024 (Letter Number 01/PKWT/DISPERINAKER/2024 for BPTE).</p> <p>Based on interview sample of workers (permanent and contract/PKWT), they have received and understood their contractual agreements.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Collective Labor Agreement (CLA) PT Bumi Permai Lestari period 2024 – 2026 are signed by Union and company and witnessed by Government (Manpower Agency).</p> <p>The set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract and Collective Labor Agreement (CLA/PKB). In those documents has been mentioned the determination of wages (including benefits and other benefit), working hours (including hours and overtime pay) has been mentioned. The working hours (maximum 40 hours per week and working from Monday to Saturday), payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, in compliance with national legal requirements).</p> <p>The legal compliance of employment regulations has been verified based on these evidence (collected based on document review, interview with workers, Gender Committee, Labor Union, Manpower Agency:</p> <ul style="list-style-type: none"> Payment: regulation of minimum wage of 2024 has been mentioned in 	Complied

		<p>indicator 6.2.1. The payment has been verified based on review of list of payment and payment slips.</p> <ul style="list-style-type: none"> • Working hours: maximum 40 hours per week (7 hours per day) and working from Monday to Saturday. For overtime working has been paid based on governmental regulation of overtime payment. Holiday is 12 days/year according government regulation. Evidenced based on verification of employee attendance lists, payslips and interviews with employees. • Sickness including menstruation leave and maternity leave: based on document review and interview with Gender Committee and Nurse/Midwife are being provided with no issue. • Worker protection: the company has provided Clinics and paramedic, regular medical check-up, and PPE in accordance with the HIRAC and MSDS. • The workers get the same benefit even though they are not a union member. Benefit in CLA in accordance with national regulations and for all workers. 	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has provided housing facilities on BSWE and BSWM. For example, list of facilities in 2024 including houses, mosque, workers hall, football field, child care, clinic, school bus, water supplies (from water treatment and wells), electricity (<i>PLM</i>), staple food store (from surrounding villages around 15 minutes).</p> <p>Based on field observation to housing complex of BPRM, BPRE and BPTE, it was known that all housing on good condition and live able, there were domestic waste sanitation, and adequate clean water facilities. This is in line with the results of interviews with housing residents who stated that the facilities provided by the certification unit were housing, electricity, clean water availability and school transportation in good condition.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Based on interviews with estate and mill workers, labor unions and gender committees, it's known that workers have no difficulty in getting affordable food and clean water sources because the company has provided cooperatives that sell daily necessities. In addition, workers can buy these needs to the markets around the company's area without any difficulties.</p>	Complied

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6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>Currently, Indonesia does not yet have a DLW benchmark, so the company sets employee wages based on the 2024 Province Minimum Wage of IDR 3,640,000 (Governor Decree of Kepulauan Bangka Belitung No. 188.44/1220/DISNAKER/2023, 20 November 2023).</p> <p>The company has calculated a living wage for year 2024 using the benefit approach that the company has provided to workers, including job support, rice allowances, facilities (provision of facilities: schools (including school transportation), housing, clean water, polyclinics (health). The calculation has been made for every grade of worker (PT4, PT3, PT2, PT1).</p> <p>Based on the verification that the determination of living wage has exceeded the minimum wage set by the government and the calculation is also based on actual and rational prices at the location of the certification unit.</p>	Complied
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on Employee List in Estate and Mill period July and June 2024, field observation in harvesting and mill process activities, as well as interview with Labor Union, Gender Committee and workers, it is known that there is no casual or temporary workers employed for core work such as in harvesting or mill's processing activities.</p> <p>The company employ temporary workers (PKWT/ <i>Perjanjian Kerja Waktu Tertentu</i>) only for non-core work (for example upkeep workers)</p>	Complied

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Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has established policy regarding freedom of association and right to collective bargaining in national languages as per “<i>Kebijakan Hubungan Industrial – Kebebasan Berserikat</i>”, nomor: KHI-SMART/018-00. The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>The company has demonstrated document of Collective Labour Agreement period 2024 – 2026, Article 3 “the recognition on the rights of the company and the union labour” and in Article 4 “leeway for trade union labour officials”. This policy is written in Indonesian and published on the sign board of each unit (estates and mill), so that all employees can understand.</p> <p>The company already has a worker union namely Pimpinan Unit Kerja Serikat Pekerja Pertanian dan Perkebunan (PUK SPSI-PP) and has been registered with the Manpower and Transmigration Office of Bangka Barat Regency with registration number No. 045.2/07/III.10/2009 dated 9 January 2009.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>The company and Labor Union regularly conducted meetings to discuss issues in the employment. Sample seen: Minute of Meeting as per document “Risalah Perundingan PKB”, conducted on 17 May 2024 with participants Head of PUK SPSI, Head of DPC SPSI, Estate and Mill Manager, and HR PSM 2.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on interview with Chairman of PUK SPPP – Serikat Pekerja Seluruh Indonesia, there was known that the company does not interfere with the formation or operation of registered labour union. There is no coercion and intervention related to membership and the course of the organization.</p>	Complied

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Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	<p>The company has published the policy for the protection of children, including prohibition of child labour and remediation as per "<i>Kebijakan Lingkungan Kerja & Hubungan Industrial – Pekerja/Buruh anak</i>" Policy No. KHI-smart/004-00 dated 1 August 2017. The policy stated that "Categorized as Childcare under 18 years old; In the process of hiring workers, it is prohibited to accept or employ children as evidenced by official identity documents (birth certificate, Identity Card and family card)". The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>This policy is included into service contract and agreement with supplier/contractor, sample seen Contract "Surat Perjanjian Kerja No. 036/PSM2/BPTE/BPSL/JKTO/INF/V/2024" dated 10 May 2024. Article 4 point 8 stated that the contractor worker/s shall have BPJS Ketenagakerjaan and BPJS Kesehatan. Article 5 poin 6 stated the contractor shall have all required permit/license to conduct their work. In point 7 stated that the contractor agree to comply all regulations regarding man power such as worker minimum age is 18 years old.</p>	Complied
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available. - Critical (Major) compliance -	Based on review of PT BPL employee documents updated in June and July 2024, it is known that there were no employees who were less than 18 years old when they started work and are currently working. This is in accordance with information submitted by the foreman level and representatives of labour unions as well as representatives of contractors and FFB suppliers which states that the minimum age limit for workers is 18 years. Warning or sign prohibiting child labor also available in main office, divisional offices and residential areas	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. - Critical (Major) compliance -	Based on the verification of the Worker's List document in June and July 2024, there are no students who are carrying out work practices in company operations.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour,	The company has published the policy for the protection of children, including prohibition of child labour and remediation as per " <i>Kebijakan Lingkungan Kerja &</i>	Complied

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	<p>and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p><i>Hubungan Industrial – Pekerja/Buruh anak</i>” Policy No. KHI-smart/004-00 dated 1 August 2017. The policy stated that “Categorized as Childcare under 18 years old; In the process of hiring workers, it is prohibited to accept or employ children as evidenced by official identity documents (birth certificate, identity card and family card)”.</p> <p>The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>This policy is included into service contract and agreement with supplier/contractor, sample seen Contract “Surat Perjanjian Kerja No. 036/PSM2/BPTE/BPSL/JKTO/INF/V/2024” dated 10 May 2024. Article 4 point 8 stated that the contractor worker/s shall have BPJS Ketenagakerjaan and BPJS Kesehatan. Article 5 point 6 stated the contractor shall have all required permit/license to conduct their work. In point 7 stated that the contractor agree to comply all regulations regarding man power such as worker minimum age is 18 years old.</p> <p>In the framework of the FFB buying and selling cooperation between the company and the FFB supplier, Statement Letter from supplier has been made which stated one of them is “respect human rights and do not discriminate, do not perform forced labour, do not employ underage workers and workers who originate from human trafficking”.</p> <p>The document of list of employees (Daftar Karyawan), updated in June and July 2024, there was noted that none of the worker employed by the company is under 18 years old.</p>	
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		In Addition, based on the results of interviews with contractors and FFB suppliers, it was conveyed that the parties were aware of the prohibition on work practices involving child labour, forced labour, and workers from human trafficking.	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a GSEP (GAR Social and Environment Policy) policy dated 01 October 2022 which was approved by the Head of Upstream, CEO Down Stream & Commercial, Executive Director & CFO, and Managing Director of Sustainability& SSE. The policy stated that the company does not tolerate acts of sexual harassment and any other forms of harassment and violence. Describes the workflow of sexual harassment handling. Complaints and grievance can submit orally and written addressed to gender committee → performed victim accompaniment and inform/report to unit head → based on information, data and evidence obtained and witnesses, the unit head verify and examination to obtain a decision, after found a guilty offender unit head may impose appropriate sanctions or company regulations through legal action.</p> <p>The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>Based on interview with Gender Committee, there was concluded that there was no sexual harassment and violence within the organisation in the last one year.</p> <p>Gender committee was established each estate and mill have appointed representative for gender committee. The committee consider matters such as dissemination on women's rights, childcare facilities to be provided by the growers and millers, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women to be given specific break times to enable effective breastfeeding.</p>	Complied

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6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Policies on the reproductive rights of workers, especially women, are included in the Policy on Industrial Relations – Female Workers (KHI-SMART/005-00) at point 2.5 which states that menstrual leave is given to female workers for 2 days-off without any salary deduction. Apart from that, the PKB for the period 2024 – 2026 is also stated to be related to menstrual Leave and Maternal Leave. Maternity leave is given 90 days (45 days before and 45 after giving birth)</p> <p>The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>Interviews with clerk/administration BPTE who gave birth in June 2024 found that the company had implemented a policy regarding maternal leave. During the leave period, the employee's wages are still paid in full without any deductions. Gender committee was established by the organization. The committee has representatives from all areas of work. The committee consider matters such as trainings on women's rights, counselling for women affected by violence, women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks, and women.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>The company has identified the need of expectant mother and new mother in a documentation. Based on the document, the needs of new mother that have been identified among others to consult the health of their fetuses and babies, to get proper medical check-up and vitamins, a place and paramedic (nurse and midwife) to give proper birth, daycare/creche, emergency response, etc.</p> <p>Management has fulfilled their need by providing:</p> <ul style="list-style-type: none"> • Clinic including company's doctor and paramedic, for getting regular check-up, consultation and giving birth. • Monthly 'Posyandu' as an event to check their maternity (fetuses) and babies under 5 years old, to give consultations and vitamins. • Maternity leave: 3 months including before and after giving birth in accordance with legal regulation. 	Complied

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		<ul style="list-style-type: none"> • Company's ambulance for emergency responds, to get to nearest hospital. • Day-care/crèche. <p>The Gender Committee and medical staff can support the assessment of new nursing mothers.</p> <p>The company provides appropriate opportunities so that mothers can carry out their obligations to provide exclusive breastfeeding (6 months based on Act No. 36 of 2009 concerning Health) or a longer period of time based on the child's needs</p> <p>Adequate lactation space should be provided for nursing mothers who have babies with 24 months of age or younger. Lactation activities should not reduce employee's income.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The company has had the system to handling complaints and grievances in the <i>SOP Penanganan Pengaduan dan Konflik</i> (SOP/SMART/ SUST/IV/003 Rev. 03 dated 14 February 2022). The scope of this procedure includes recording of complaints and conflicts, rating, communication, planning, handling, monitoring and reporting of the handling of complaints and conflicts originating from internal and external parties of the company. This procedure also includes handling reports of sexual harassment and acts of violence that occur within the company's operational permits. The procedure has set the dispute resolution in an appropriate manner, ensuring the anonymity of complainants, protecting the Human Rights Defenders, community spoke persons, and whistle blowers where requested. The system ensures that there is no risk of reprisal or intimidation to the complainants. If no deal achieved, every party might deliver the case to the lawsuits or RSPO complaint panel.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Gender Committee and women workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights in the last one year.</p>	Complied

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Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker's consent Involuntary overtime; Lack of freedom of workers to resign Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	<p>The company has policies related to business and human rights policies of Sinarmas Agri Business and Food which was signed by the Head of Policy and Compliance Division dated December 12, 2019, explaining the commitment to uphold human rights and prohibition of force and trafficked labor.</p> <p>The policy was dissemination to workers and interested parties, example: In Bukit Permata Estate dated 24 April and 21 June 2024, Bukit Perak Mill dated 28 February and 08 March 2024.</p> <p>Based on document verification (list of employees, salary slips and payroll for the period of June 2024) and interviews with company management and Manpower Agency, no work termination was identified that was not in accordance with the work contract, the determination of overtime time was in accordance with the Overtime Work Order (SPL) and was not identified there are employees who work because of debt with the company.</p> <p>Moreover, no salary deduction that against legal regulations, even though there were subsidies and deductions for <i>BPJS Ketenagakerjaan</i> contributions that were in accordance with applicable regulations. There was no identification of a work bond that impeded employee resignation, there was no indication of a cost involved in the employee recruitment process.</p> <p>Interview with sample of workers and Labor Union, there is known that there is no migrant worker within the company. All workers also have been recruited in accordance with legal regulation and provided with contractual agreement.</p>	Complied
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>The company are not employed migrant worker, but temporary worker (PKWT). The company has established a policy on Work Environment and Industrial Relations No. KHI-smart/002-00 dated August 1, 2017. This policy is also a mechanism for the use of temporary workers (either non-permanent or casual workers) with several provisions, as follows:</p> <ul style="list-style-type: none"> Temporary Work Agreement (PKWT) is an agreement between a worker/labourer and a company to establish a working relationship for a certain period or for a certain job. 	Complied

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		<ul style="list-style-type: none"> • A work agreement or contract is a written letter in Indonesian that is easily understood and agreed upon by the worker/labourer with the company as a basis and evidence of an employment relationship. • The company is responsible for the costs required for the implementation of the work agreement. • A work agreement for a specified period based on a certain period can be made for a period of 2 (two) years and may only be extended 1 (one) time for a maximum period of 1 (one) year. • If the work agreement has been extended for a certain period but due to certain conditions the work has not been completed, then the work agreement may be renewed for a certain time. 	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1.2 PT Bumi Permai Lestari has appointed responsible person for Health and Safety as per P2K3 (Safety Committee). P2K3 has been validated by Manpower Office of Kepulauan Bangka Belitung Province.</p> <p>Sample seen during ASA 1.2, such as:</p> <ul style="list-style-type: none"> - During audit ASA 1.2 there were change of P2K3 (OHS committee) of Bukit Perak Estate. OHS Committee (P2K3) approval based on decree letter from Head of Kepulauan Bangka Belitung Province's Manpower Office No.188.4/019/P2K3/DISNAKER/2024 regarding "Pengesahan Perubahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di PT Bumi Permai Lestari – Kebun Bukit Perak" - Approval of Changes to the Occupational Safety and Health Committee (P2K3) of PT Bumi Permai Lestari – Bukit Perak Estate" issued 21 May 2024. OHS Committee is led by Prima Okky Saputra (Estate Manager) and Habib Windy Lubis as the secretary concurrently as OHS expert. - During audit ASA 1.2 there were change of P2K3 (OHS committee) of Bukit Permata Estate. OHS Committee (P2K3) approval based on decree letter from Head of Kepulauan Bangka Belitung Province's Manpower Office No.188.4/015/P2K3/DISNAKER/2024 regarding "Pengesahan 	Complied

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		<p>Perubahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di PT Bumi Permai Lestari – Kebun Bukit Permata” - Approval of Changes to the Occupational Safety and Health Committee (P2K3) of PT Bumi Permai Lestari – Bukit Permata Estate” issued 16 April 2024. OHS Committee is led by Agus Israwadi (Estate Manager) and Adi Irawan as the secretary concurrently as OHS expert.</p> <ul style="list-style-type: none"> - During audit ASA 1.2 there were change of P2K3 (OHS committee) of Bukit Perak Mill. OHS Committee (P2K3) approval based on decree letter from Head of Kepulauan Bangka Belitung Province’s Manpower Office No.188.4/034/P2K3/DISNAKER/2023 regarding “Pengesahan Perubahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di PT Bumi Permai Lestari – Pabrik Bukit Perak” - Approval of Changes to the Occupational Safety and Health Committee (P2K3) of PT Bumi Permai Lestari – Bukit Perak Mill” issued 11 December 2023. OHS Committee is led by Mas’ulin (Mill Manager) and Saddam Alamsyah as the secretary concurrently as OHS expert. <p>Secretary of P2K3 is OHS expert who has validated from Minisitry of Manpower:</p> <ul style="list-style-type: none"> - OHS Expert Certificate on behalf Habib Windy Lubis is available No.Ser.17.4262/AK3/U/VI/2017 dated 5 June 2017; Decree Letter of OHS Expert from Ministry of Manpower - “Keputusan Menteri Ketenagakerjaan RI” No.5/16628/AS.01.03/2023 regarding “Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum” - Appointment of General OHS Expert dated 26 October 2023 valid until 3 years. Licence No. Reg. 0134261023/Q-AK3U/31/X/2023 dated 26 October 2023 valid until 26 October 2026. - OHS Expert Certificate on behalf Adi Irawan is available No.Ser.17.4262/AK3/U/VI/2017 dated 5 June 2017; Decree Letter of OHS Expert from Ministry of Manpower - “Keputusan Menteri Ketenagakerjaan RI” No.5/17758/AS.02.04/XII/2021 regarding “Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum” - Appointment of General OHS Expert dated 31 December 2021 valid until 3 years. License No. Reg. 23074/PK3/AJ/31/2021/P2 dated 31 December 2021 valid until 31 	
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		<p>December 2024.</p> <ul style="list-style-type: none"> - OHS Expert Certificate on behalf Saddam Alamsyah is available No.5/1295240723/AS.01.03/VII/2023 dated 24 July 2023; Decree Letter of OHS Expert from Ministry of Manpower - "Keputusan Menteri Ketenagakerjaan RI" No. 5/10861/AS.01.03/VII/2023 regarding "Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum" - Appointment of General OHS Expert dated 24 July 2023 valid until 3 years. License No. Reg. 1295240723/Q-AK3U/19/VII/2023 dated 24 July 2023 valid until 24 July 2026. <p>The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Minutes of Safety Committee Regular Meeting (mill and estate) with workers were evident.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> - Record of OHS meeting dated 16 March 2024, location in Bukit Perak Mill. The meeting was attended by OHS committee. Agenda: discussed regarding P2K3 structure, roles and responsibility update, OHS socialization and briefing, work accident statistic, PPE monitoring, previous P2K3 meeting status update. - Record of OHS meeting dated 01 March 2024, location in Bukit Perak Estate. The meeting was attended by OHS committee. Agenda: discussed regarding internal audit preparation, update FR and SR (work accident statistic), PPE monitoring, previous P2K3 meeting status update. <p>Record of OHS meeting dated 08 March 2024, location in Bukit Permata Estate. The meeting was attended by OHS committee. Agenda: discussed regarding internal audit preparation, update FR and SR (work accident statistic), socialization on housing term and condition, previous P2K3 meeting status update.</p>	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other	During ASA 1.2, PT Bumi Permai Lestari has shown the procedure for emergency response preparedness under "SOP Kesiapsiagaan dan Tanggap Darurat" (SOP/SMART/UMUMSADV/I/2005) dated 1 July 2014, and procedure on	Complied

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	<p>operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>occupational accidents and disease under "SOP Penanganan Kecelakaan dan Penyakit Akibat Kerja" No.SOP/SMART/HESS-EHSD/SADV/I/2005" dated 1 July 2014.</p> <p>The procedure described that:</p> <ul style="list-style-type: none"> - The roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health centre. - Emergency contact number of each internal emergency team and external related parties were evident. - Evacuation route and muster point are available and made known to the employee. <p>Accident and investigation reports described accident chronology, cause and impacts of the accident, analysing root causes of the accident and determine correction and corrective action. During latest audit until audit ASA2.2 there was 1 case of accident in Bukit Perak Mill dated 14 June 2024 – maintenance workers suffered minor burns from condensate water; records of accidents are available in "Laporan Kecelakaan kerja" F/SMART/HESS-EHSD/SADV/005/001. Accident investigation and evaluation recorded in "Laporan Investigasi Kecelakaan/Insiden dan keadaan Darurat" F/SMART/HESS-EHSD/SADV/005/002.</p> <p>PT Bumi Permai Lestari has shown, and appointed person has certificate and license of first aider, e.g:</p> <ul style="list-style-type: none"> - Warta (Bukit Perak Estate), lisensi petugas P3K, Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/040-P3K/DISNAKER/2024 dated 27 May 2024, valid until 27 May 2027. - Beni Agustian (Bukit Perak Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/026-P3K/DISNAKER/2024 dated 27 May 2024, valid until 27 May 2027. - Kadir (Bukit Perak Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/033-P3K/DISNAKER/2024 dated 27 May 2024, valid until 27 May 2027. 	
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		<ul style="list-style-type: none"> - Suherman (Bukit Perak Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/038-P3K/DISNAKER/2024 dated 27 May 2024, valid until 27 May 2027. - Tomi (Bukit Perak Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/039-P3K/DISNAKER/2024 dated 27 May 2024, valid until 27 May 2027. - Jani Sukaryanto (Bukit Perak Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/032-P3K/DISNAKER/2024 dated 27 May 2024, valid until 27 May 2027. - Bahroni (Bukit Permata Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/002-P3K/DISNAKER/2024 dated 29 Jan 2024, valid until 29 Jan 2027. - Syafrudin (Bukit Permata Estate), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/008-P3K/DISNAKER/2024 dated 29 Jan 2024, valid until 29 Jan 2027. - Manogar Sirait (Bukit Perak Mill), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/005-P3K/DISNAKER/2024 dated 29 Jan 2024, valid until 29 Jan 2027. - S. Zul Alwi (Bukit Perak Mill), Lisensi Petugas P3K di tempat kerja – first aider licence No. 560/007-P3K/DISNAKER/2024 dated 29 Jan 2024, valid until 29 Jan 2027. 	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA 1.2, PT Bumi Permai Lestari has demonstrated that workers use appropriate Personal Protective Equipment (PPE) which is provided free of charge to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities called “Rumah Bilas” for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.</p> <p>Based on field visits to all Bukit Perak Mill and Estate (Bukit Perak and Bukit Permata) operations (operator, sprayer, fertilizer workers, harvest, land</p>	Complied

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		<p>application, workshop) employees have used PPE in accordance with the hazards present such as using safety shoes, boots, helmets, masks, aprons, rubber gloves, leather gloves and glasses.</p> <p>PPE for workers are provided each semester, workers also can change their PPE and ask to the company if any broken PPE caused by working.</p> <p>In addition, the company has also shown evidence of PPE provision and handover for all employees as record in "Formulir Berita Acara Serah Terima APD" F/SMART/HESS-EHSD/SADV/010/002, sample seen:</p> <ul style="list-style-type: none"> - PPE provision period March 2024, division I Bukit Perak Estate, provide PPE for 38 harvesters, including safety helmet, face shield, boot shoes, dodos cover. - PPE provision period March 2024, division I Bukit Perak Estate, provide PPE for 20 loose fruit picker, including boot shoes, hand gloves. - PPE provision period March 2024, division II Bukit Perak Estate, provide PPE for 17 harvester, including including safety helmet, face shield, boot shoes, dodos cover. - PPE provision period March 2024, division I Bukit Perak Estate, provide PPE for 11 loose fruit picker, including boot shoes, hand gloves. - PPE provision period June 2024, division II Bukit Permata Estate, provide PPE for 9 upkeep workers, including boot shoes, hand gloves and apron. - PPE provision on 29 Jan 2024 in Bukit Perak Mill, provide 12 safety shoes for operator, FFB grader and laboratory. - PPE provision on 17 Jan 2024 in Bukit Perak Mill, provide 19 safety shoes. - PPE provision on 6 March 2024 in Bukit Perak Mill, provide 2 hand gloves for operator and helper boiler station. <p>PPE provision on 6 & 8 July 2024 in Bukit Perak Mill, provide 50 safety shoes for operator, mechanic, supervisor.</p>	
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6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>During ASA 1.2, PT Bumi Permai Lestari has shown that all workers in mill and estates have been covered by Medical and Social Insurance (BPJS), as required by applicable regulation.</p> <p>BPJS Ketenagakerjaan insurance are covered: Jaminan hari tua - Old age insurance (JHT), Jaminan Kecelakaan kerja - work accident insurance (JKK), Jaminan kematian – death insurance (JKM) and Jaminan Pensiun – pension insurance (JP).</p> <p>BPJS Kesehatan insurance are covered the medical expenses and hospitalization costs.</p> <p>Monthly insurance payment made by company for both insurance above to all workers. For BPJS Kesehatan monthly payment are include the dependent of workers.</p> <p>Records of insurance payment available in:</p> <ul style="list-style-type: none"> - BPJS ketenagakerjaan payment record of Bukit Perak Estate, payment period June 2024, number of workers 478, payment code 4000 0007 8419, payment dated 3 July 2024. - BPJS ketenagakerjaan payment record of Bukit Permata Estate, payment period June 2024, number of workers 87, payment code 4000 0007 8556, payment dated 2 July 2024. - BPJS ketenagakerjaan payment record of Bukit Perak Mill, payment period June 2024, number of workers 112, payment code 4000 0007 8538, payment dated 8 July 2024. - BPJS Kesehatan payment record of Bukit Permata Estate, payment period July 2024, number of workers 86 and its dependent 144, payment by bank transfer account no. 89.888***,, payment dated 8 July 2024. - BPJS Kesehatan payment record of Bukit Perak Estate, payment period June 2024, number of workers 312 and its dependent 478 payment by bank transfer account no. 89.888***, payment dated 7 June 2024. 	Complied
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		<ul style="list-style-type: none"> - BPJS Kesehatan payment record of Bukit Perak Mill, payment period June 2024, number of workers 112 and its dependent 224 payment by bank transfer account no. 89.888***, payment dated 7 June 2024. <p>Some of workers BPJS Kesehatan premium payment has been covered by local government subsidize (from village) – contribution assistance recipient, for this case company cannot paid double to BPJS Kesehatan. There are 166 workers in Bukit Perak Estate, 1 workers in Bukit Permata Estate as assistance recipients from village government.</p>	
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>PT Bumi Permai Lestari has shown the accident report available as per “Laporan Kecelakaan Kerja dan Perhitungan FR SR 2024”. Below are the statistic of accident report using lost time accident (LTA):</p> <p>Bukit Perak Estate:</p> <ul style="list-style-type: none"> - Period Jan – Dec 2023: Number of workers 518; total working hour 1,268,339 hour; number of lost day 0; FR (frequency rate) 0, SR (saverity rate) 0. - Period Jan – Jun 2024: Number of workers 478; total working hour 584,531 hour; number of lost day 0; FR (frequency rate) 0, SR (saverity rate) 0. <p>Bukit Permata Estate:</p> <ul style="list-style-type: none"> - Period Jan – Dec 2023: Number of workers 87; total working hour 174,842 hour; number of lost day 0; FR (frequency rate) 0, SR (saverity rate) 0. - Period Jan – Jun 2024: Number of workers 87; total working hour 80,808 hour; number of lost day 0; FR (frequency rate) 0, SR (saverity rate) 0. <p>Bukit Perak Mill:</p> <ul style="list-style-type: none"> - Period Jan – Dec 2023: Number of workers 112; total working hour 259,892 hour; number of lost day 0; FR (frequency rate) 0, SR (saverity rate) 0. <p>Period Jan – Jun 2024: Number of workers 87; total working hour 80,808 hour; number of lost day 0; FR (frequency rate) 0, SR (saverity rate) 0.</p>	Complied

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Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Organization has established SOP for Pests and Diseases Control, that available in the document No. SOP/SMART/MCAR/VII/TA-HPT. The process includes activities in controlling pest detection, census, control recommendations, control, and evaluation. The procedures include setting out of technique to be implemented, chemical to be used, locations to be applied, and time frame for implementation. It was observed that all IPM program has been performed based on determined schedule.</p> <p>The company also showed record of integrated pest management with early warning system, for examples:</p> <ul style="list-style-type: none"> • Rat census period January - June 2024 in Division 1 BPRE (with average results 1.50% (below threshold). • Rat census period January - June 2024 in Division 2 BPRE with average results 1.30% (below threshold). • Rat census period January - June 2024 in Division 3 BPRE with average results 1.30% (below threshold). • Rat census period January - June 2024 in Division 4 BPRE with average results 1.29% (below threshold). • Rat census period January - June 2024 in Division 5 BPRE with average results 4.01% (below threshold). • Rat census period January - June 2024 in Division 1 BPTE with average results 0.26% (below threshold). • Rat census period January - June 2024 in Division 2 BPTE with average results 0.35% (below threshold). 	Complied

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		<ul style="list-style-type: none"> Total Barn Owl Box for Period January - June 2024 in BPRE 326 with 258 unit active/occupy. Total Barn Owl Box for Period January - June 2024 in BPTE 184 with 157 unit active/occupy. <p>Based on field observation, obtained that the company planted host plants/beneficial plants as an early warning system for biological pest control. According to the interview with estate manager and staff revealed that <i>Turneria subulate</i> and <i>Antigonon leptosus</i> were planted on the side of the road in each block.</p> <p>During the field visit to both estate, auditor found that to decrease rat infestation, unit of certification has massive installed barn owl box with almost hectare cover 1 : 8 Ha. Each barn owl box equipped with monitoring box that checked by IPM officer in a monthly basis. For example, barn owl box in Block J14 Division 1 BPTE (reported not active) whilst Block H31 and H32 Division 2 BPRE (reported active).</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>There is some species that listed in Global Invasive Species existed and planted for IPM plan. For example, <i>Antigonon leptosus</i>, <i>Chromolaena odorata</i>, <i>Clidemia hirta</i>, <i>Cyperus rotundus</i>, <i>Imperata cylindrica</i>, <i>Mikania micrantha</i> and <i>Mimosa pudica</i>. The spreading is controlled manually and chemically.</p> <p>Until this assessment, there is no outbreak of invasive species.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on field visit, interview and document review, there is no use of fire for pest control in whole area of estate. This is in line with stakeholder consultation results with Plantation Agency & Environmental Agency of Bangka Barat Regency.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			

7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The company shows records of the list of pesticides used along with justification for their use, consisting of herbicides, insecticides, fungicides, acaricides and rodenticides. Following is some information on the pesticide brands used by the company:</p> <table><tr><th>Name</th><th>Active Ingredients</th><th>Justification</th></tr><tr><td>Erkafuron 20 WG</td><td>Methyl Metsulfuron</td><td>Herbicide</td></tr><tr><td>Rollup 480 SL</td><td>Glyphosate</td><td>Herbicide</td></tr><tr><td>Garlon Mix 333</td><td>Triclopyr</td><td>Herbicide</td></tr><tr><td>Starane 480 EC</td><td>Fluroxypir</td><td>Herbicide</td></tr><tr><td>Agristick</td><td>Benomyl 50%</td><td>Surfactant</td></tr><tr><td>Kao Adjuvant</td><td>-</td><td>Surfactant</td></tr></table> <p>The results of field observation on Bukit Perak and Bukit Permata Estate and interviews with pesticide applicators showed that all pesticide applicators had understood the procedures for spraying and proper use of spray equipment, targeting weeds, prohibiting spraying in river border or water reservoir areas and the actions taken when poisoning occurs in the area.</p>	Name	Active Ingredients	Justification	Erkafuron 20 WG	Methyl Metsulfuron	Herbicide	Rollup 480 SL	Glyphosate	Herbicide	Garlon Mix 333	Triclopyr	Herbicide	Starane 480 EC	Fluroxypir	Herbicide	Agristick	Benomyl 50%	Surfactant	Kao Adjuvant	-	Surfactant	Complied
Name	Active Ingredients	Justification																						
Erkafuron 20 WG	Methyl Metsulfuron	Herbicide																						
Rollup 480 SL	Glyphosate	Herbicide																						
Garlon Mix 333	Triclopyr	Herbicide																						
Starane 480 EC	Fluroxypir	Herbicide																						
Agristick	Benomyl 50%	Surfactant																						
Kao Adjuvant	-	Surfactant																						
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>- Critical (Major) compliance -</p>	<p>The company has records related to pesticide use period of June 2024 in the document "Data Toxiciy Herbisida Bukit Perak Estate Periode Juni 2024". In this document, the company records pesticide use starting from total solution use, total active ingredients, total active ingredients per area and total active ingredients per production. Here are some recording notes for management units:</p> <table><tr><th>Name</th><th>Ha Applicati on</th><th>Total Application</th><th>Total Active Ingredient</th><th>Active ingredie</th><th>FFB Produc</th><th>Total Area Application</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>	Name	Ha Applicati on	Total Application	Total Active Ingredient	Active ingredie	FFB Produc	Total Area Application								Complied							
Name	Ha Applicati on	Total Application	Total Active Ingredient	Active ingredie	FFB Produc	Total Area Application																		

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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>- Critical (Major) compliance -</p>	<p>The company shows evidence of a usage comparison in pesticide use for estate each year. Here are some examples:</p> <table><tr><td rowspan="2">Pesticide Name</td><td colspan="3">Pesticide usage</td></tr><tr><td>2021</td><td>2022</td><td>2023</td></tr><tr><td colspan="4">BPPE</td></tr><tr><td>Rollup 480 SL (Ltr)</td><td>10,181.51</td><td>15,792.27</td><td>12,892.44</td></tr><tr><td>Starane 480 EC (Ltr)</td><td>671.92</td><td>2,679.96</td><td>2,154.98</td></tr><tr><td>Rolifos 150 SL (Ltr)</td><td>85</td><td>-</td><td>90</td></tr><tr><td>Erkafuron 20 WG (Kg)</td><td>242.92</td><td>1,079.80</td><td>895.89</td></tr><tr><td>Garlon Mix 333 (Ltr)</td><td>139.37</td><td>162.60</td><td>137.46</td></tr><tr><td>Decis 25 EC (Ltr)</td><td>3.86</td><td>-</td><td>-</td></tr></table>	Pesticide Name	Pesticide usage			2021	2022	2023	BPPE				Rollup 480 SL (Ltr)	10,181.51	15,792.27	12,892.44	Starane 480 EC (Ltr)	671.92	2,679.96	2,154.98	Rolifos 150 SL (Ltr)	85	-	90	Erkafuron 20 WG (Kg)	242.92	1,079.80	895.89	Garlon Mix 333 (Ltr)	139.37	162.60	137.46	Decis 25 EC (Ltr)	3.86	-	-	Complied
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7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>In the context of integrated pest control, the company has related procedures in:</p> <ul style="list-style-type: none"> SOP/SMART/MCAR/VII/TA-HPT (<i>Pengendalian Hama dan Penyakit Tanaman</i>) SOP/SMART/MCAR/VIII/TA-PGM (<i>Pengendalian Gulma</i>) <p>In this procedure, the company establishes an early warning system in carrying out control actions. The company also prioritizes biological control by planting useful plants. Chemical action is only carried out if the census results exceed the</p>	Complied																																												

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		<p>threshold. Based on this evidence, the company does not carry out pest control by preventive means (prophylactic).</p> <p>There is no prophylactic use of pesticides. All activity is only used to reduce/eliminate existing pest, which has exceeded the economic threshold.</p>																
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p> <p>7.2.5d Process to limit the negative impacts of the application.</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>In line with the explanation in indicator 7.2.1, the company shows a recorded list of pesticides used in operational areas, as follows:</p> <table><tr><td>Name</td><td>Active Ingredients</td><td>Class</td></tr><tr><td>Erkafuron 20 WG</td><td>Methyl Metsulfuron</td><td>U (unlikely)</td></tr><tr><td>Rollup 480 SL</td><td>Glyphosate</td><td>III</td></tr><tr><td>Garlon Mix 333</td><td>Triclopyr</td><td>II</td></tr><tr><td>Starane 480 EC</td><td>Fluroxypir</td><td>U (unlikely)</td></tr></table> <p>Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from period 2022/2023.</p>	Name	Active Ingredients	Class	Erkafuron 20 WG	Methyl Metsulfuron	U (unlikely)	Rollup 480 SL	Glyphosate	III	Garlon Mix 333	Triclopyr	II	Starane 480 EC	Fluroxypir	U (unlikely)	Complied
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7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>Based on the results of interviews with members of the spraying team in Block H13 Division 2 BPTE and H32 Division 2 BPPE, it is known that the company has provided a special mixing chamber for mixed pesticides before they applied to field. In addition, based on the review of documents and records of pesticide application, the company also provides clean water, soap and a first aid kit to support the sanitation and OHS aspects required by the spraying team.</p>	Complied															

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	- Critical (Major) compliance -	The workers already aware about the mitigation of pesticide handling, from the use of PPE and chemical storage. Unit of certification also showed record of pesticide handling training on 31 January 2024 which attended by 23 pesticide applicators from BPPE and BPTE.	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices. - Critical (Major) compliance -	Based on interview with spraying team in Block H13 Division 2 BPTE and H32 Division 2 BPPE, the personnel aware about pesticide container handling, from how to storage it to mitigation of the hazardous sources. The pesticide storage in warehouse is equipped with adequate ventilation, the pesticide mixing place is equipped with bunds, the warehouse staff has PPE was given in the form of rubber gloves and masks, and warehouse staff also received special health checks.	Complied
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging. - Minor compliance -	Based on field observation, all used hazardous chemical container store in licensed temporary hazardous storage. There's no use of used chemical containers by workers for daily uses, such as water reservoir and house material. The pesticide application supervisors says that all ex-agrochemical container produce sends to the temporary hazardous waste storage.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Based on field observation and documentation review, there's no aerial spraying activities in company operational area.	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	PT Bumi Permai Lestari has programme the MCU for pesticide operator each semester. Latest MCU for pesticide operator Bukit Perak Estate and Bukit Permata Estate conducted on 27 May 2024. MCU for pesticide operator has include cholinesterase test and spirometri. MCU conducted by clinic laboratory Dipa Jaya Medika cooperated with PT BPL. MCU result can be shown during audit. Total workers MCU in Bukit Permata Estate was 17 person and in Bukit Perak Estate was 32 person (workers MCU are included	Complied

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		<p>supervisor, warehouse sprayer, fertilizer workers and Epi operator who is exposed/contacted with agrochemical)</p> <p>Based on result of MCU it was noted that all workers are in normal condition and fit to work. Spirometry test shown average flow velocity detection range between 83.7 – 101.7% which is normal condition (> 75%). Cholinesterase test shown the result of cholinesterase value average in range of 5,416 – 9,963 (normal threshold for male 4,620 – 11,500 and female 3,930 – 10,800).</p> <p>Next MCU for semester II year 2024 will be planned to be conducted on September 2024.</p>	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field visit and interview with sprayers in Bukit Permata Estate and Bukit Perak Estate, audit team found that PT BPL has policy to prohibit pregnant and/or breastfeeding women to conduct pesticide-related work.</p>	Not Applicable
<p>Note For 7.2.11</p> <p>Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>The unit of certification has developed waste management plan and documented in "Program dan Evaluasi Pengelolaan Limbah (F/SMART/LEMS-EHSD/SADV/002/002) period 2024.</p> <p>Waste management plan consists of:</p> <ol style="list-style-type: none"> 1. Solid waste <ul style="list-style-type: none"> - Domestic solid waste managed by providing organic and inorganic waste bin, segregate the organic and inorganic waste, transporting to land fill, socialization of waste separation and prohibition of waste burning. - Used goods waste managed by collecting used goods (scrap metal, wire rope, etc) in particular area; reuse or sold to third party. 	Complied

		<p>2. Liquid Waste</p> <ul style="list-style-type: none"> - Domestic liquid waste manage by provide septic tank in each bathroom, maintenance of septic tank and ditch, IPAL (waste water treatment plant) domestic. - Mill waste water manage by IPAL (wastewater treatment plant), monthly waste water analysis, maintenance of waste water treatment plant. <p>3. Hazardous waste</p> <ul style="list-style-type: none"> - Used oil, used filter oil, used battery, used lamp, ex chemical container – manage by provide the hazardous waste storage, record volume in out of hazardous waste, collect and deliver the hazardous waste to licenced collector. <p>4. Air emission</p> <ul style="list-style-type: none"> - Vehicle emission manage by maintenance and regular service, emission monitoring annually. - Genset emission manage by maintenance and regular service, genset overhaul, emission monitoring annually. - Boiler emission manage by maintenance and regular service, emission monitoring annually. <p>PT Bumi Permai Lestari has had Waste Management Procedure (SOP/SMART/LEMS-ESHD/SADV/I/002), and work instruction for ex-pesticide containers handling (IK/SPO/SMART/LH- 09/01).</p> <p>Record of waste management can be shown during audit, such as:</p> <ul style="list-style-type: none"> - Surat Kelayakan operasional persetujuan teknis pembuangan air limbah domestik ke Badan Air Permukaan PT Bumi Permai Lestari No. 500.10.2.7/138.A/DLH/2024 dated 10 June 2024 – visibility permit for domestic waste water instalation in PT BPL - Persetujuan Teknis Pembuang Air Limbah Domestik ke Badan Air Permukaan Nomor: 660/210/DLH/2022 dated 21 April 2022 – source of domestic liquid waste consist of: central office Bukit Perak Mill, Laboratorium, Security Pos, 	
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		<p>the canteen, workshop.</p> <ul style="list-style-type: none"> - Monthly domestic liquid waste monitoring conducted monthly and reported quarterly DLH Provinsi Kepulauan Bangka Belitung, sample seen: Report of testing No. 3025/SL/IV/24 (April 2024), Report of Testing No. 660/136.2/SHU-LAB/VI/2024 (May 2024), Report of Testing No. 660/211.1/SHU-LAB/VII/2024 (June 2024) – result of testing shown that all parameter analyzed was met the threshold according to PermenLHK RI No. P.68/Menlhk/Setjen/Kum.1/8/2016 concerning domestic wastewater quality standards. <p>Hazardous waste storage permit based on "Rincian Teknis Penyimpanan Limbah B3 Nomor: LH.02.00/583/DLH/2022 dated 30 Dec 2022. PT BPL has one central hazardous waste storage in Bukit Perak Mill and one hazardous waste storage satellite in each estate (Bukit Perak and Bukit Permata). Record of hazardous waste management and monitoring present in "Neraca Limbah B3" and "Manifest Limbah B3".</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Audit team has visited sampling of landfill at Bukit Permata Estate which located at Block J06, Div.2 Bukit Permata Estate, landfill condition is good and maintained. Organic and inorganic waste domestic was well managed. Company provide the waste bin in each housing and schedule the inorganic waste disposal from housing area in to the landfill weekly. Distance of landfill > 2.5 km from housing and river; landfill area is not an area at risk of flooding.</p> <p>Domestic waste disposal was aligned with the procedure.</p> <p>Also, during interview in sample of activities at Bukit Perak Estate and Bukit Permata Estate, the workers understand waste disposal management.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Based on field visit and interview with sample of workers at Bukit Perak Estate and Bukit Permata Estate, there are no use of open fire for waste disposal.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			

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7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>The certification unit has Fertilizer SOP (SOP / SMART / MCAR / IX / TA-PPK) to maintain soil fertility. The company has implemented practices to optimize production results in accordance with established procedures, including:</p> <ul style="list-style-type: none"> • SMARTRI routinely collects soil and leaf samples to ensure the elements needed by plants to produce optimally. The results of the soil and leaf analysis tested will be the basis for determining the dose of fertilizer in each Estate. • Fertilization activities that prioritize the principles of being on time, on target, at the right dosage and on application. In addition, marginal land (sandy) is given extra fertilization in the form of empty fruit bunches at a dose of 27.2 MT/Ha (depends on the SMARTRI recommendation). • The company's commitment to no longer use pesticides with the active ingredient paraquat or those belonging to WHO Classes 1A and 1B. • Application of palm oil effluent (POME) to increase soil fertility. • Maintenance of cover crops to reduce evaporation (maintain soil moisture). For example, planting beneficial plants (<i>Antigonon leptopus</i>). To all employees, spraying is always conveyed at morning apples not to spray the plants. <p>At the time the audit was carried out, the auditor observed the liquid waste application activities in the Land Application area, it was found that POME had been applied to the land in accordance with the permits and recommendations owned marginal land.</p>	Complied
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>The company carries out soil analysis activities in the context of planning follow-up plant maintenance, including recommendations for fertilizer to be used for each land block. For example, the company carried out a leaf analysis examination for period 2024 by SMART Research Institute Division:</p> <ul style="list-style-type: none"> • Sample Reference Number: 0214/DAUN/LAB-SMARTRI/IV/2024 dated 22 April 2024 for BPPE. Sample analysed: N, P, K, Mg, Ca, Cu, Zn, Mn, Na, Fe, Cl. 	Complied

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		<ul style="list-style-type: none"> Sample Reference Number: 0238/DAUN/LAB-SMARTRI/IV/2024 dated 27 April 2024 for BPPE. Sample analysed: N, P, K, Mg, Ca, Cu, Zn, Mn, Na, Fe, Cl. <p>In addition, there are also soil analysis records for each company unit, for example Records of soil testing at Bukit Perak and Bukit Permata Estate carried out on August 2023 by SMART Research Institute Division in the many locations. Here's the examples:</p> <ul style="list-style-type: none"> Sample Reference Number: 173/TANAH/AL/ANLZ/08/2023 dated 14 August 2023 for BPPE. Sample analysed: Texture, pH, C. Org. N Total, P, K, Mg, P Bray, KTK and H-Al. Sample Reference Number: 510/TANAH/AL/ANLZ/12/20 dated 15 December 2020 for BPPE. Sample analysed: Texture, pH, C. Org. N Total, P, K, Mg, P Bray, KTK and H-Al. <p>The results of soil and leaf analysis will become a basis for fertilizer program in the next year.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The company has IK/SMART/MCAR/IX/TA-PPK/05-LSU Leaf Sampling Return Work Instructions as a basis for leaf sampling which is carried out once a year. In the Fertilization SOP made by SMARTRI Fertilizer dosage is determined based on consideration of LSU results, research results (specific to location), age, plant conditions, soil, and climate as well as cost efficiency. One of strategy for fulfil nutrition need for oil palm plantation, the company also use organic fertilizer such as empty bunches and mill effluent on the field. Here's the realization recording:</p> <p>Apart from using inorganic fertilizer, Unit of certification also uses organic fertilizer with the following realization:</p> <ul style="list-style-type: none"> POME: there are 11 application blocks covering an area of 252.73 Ha. According to MCAR, POME dosage maximum 750 M3/Ha/Year. As of June 	Complied

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		<p>2024, 138,814.12 m3 have been applied (whilst Jan – December 2023 applied 211,215 M3).</p> <ul style="list-style-type: none"> • EFB: marginal land (sandy) is given extra fertilization in the form of empty fruit bunches at a dose of 27.2 MT/Ha (or depends on the SMARTRI recommendation). As per June 2024, BPRE has applied 15,115.67 MT EFB to 555.72 Ha area (27.2 MT/Ha/Year). 	
7.4.4	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The certificate holder showed manuring record for BPRE:</p> <ul style="list-style-type: none"> • Keieserite (year to date 2024) as amount as 90,182 MT (86.83% from budget). • RP realization (year to date 2024) as amount as 73,409 MT (46.82% from budget). • NPK 15 realization (year to date 2024) as amount as 493.02 MT (29.17% from budget). • Urea realization (year to date 2024) as amount as 454,663 MT (114.87% from budget). • HGFB realization (year to date 2024) as amount as 33.369 MT (112.35% from budget). • MOP realization (year to date 2024) as amount as 230,482 MT (115.98% from budget). • TSP realization (year to date 2024) as amount as 6,550 MT (3.76% from budget). • SP36 realization (year to date 2024) as amount as 83.30 MT (5.2% from budget). <p>Realization of fertilizer refer to manuring program which has been set before. The record stored in estate office and presented in Bahasa Indonesia.</p>	Complied
Criteria 7.5: Practices minimise and control erosion and degradation of soils.			

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7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>PT Bumi Permai Lestari has shown the document of soil analysis to identify soil type, slope, topography and land suitability class on 27-27 June 2005, that the result is documented in Semi-detail soil survey. Maps that identify marginal and fragile soils, including steep sloped land are available for BPRE and BPTE. There is no marginal and fragile soil identified in both estates.</p> <p>Based on Semi-detail Maps of Soil scale 1:50,000, soil characteristic in BPRE and BPTE were presented in table below:</p> <p>Bukit Perak Estate:</p> <table><tr><th>Soil Type</th><th>Slope (%)</th><th>Area (ha)</th><th>%</th><th>Suitability</th></tr><tr><td>Typic Dystropepts</td><td>0 – 8</td><td rowspan="3">1,512.59</td><td rowspan="3">35.3</td><td>S2 (medium suitable)</td></tr><tr><td>Typic Dystropepts</td><td>0 – 8</td><td>S2 (medium suitable)</td></tr><tr><td>Aquic Dystropepts</td><td>0 – 3</td><td>S2 (medium suitable)</td></tr><tr><td>Typic Dystropepts</td><td>8 – 15</td><td rowspan="2">732.73</td><td rowspan="2">17.1</td><td>S2 (medium suitable)</td></tr><tr><td>Typic Dystropepts</td><td>8 – 15</td><td>S2 (medium suitable)</td></tr><tr><td>Typic Tropopsamments</td><td>0 – 8</td><td rowspan="2">1,932.51</td><td rowspan="2">45.1</td><td>S3 (suitable marginal) Limitation factor: texture (loamysand)</td></tr><tr><td>Aquic Tropopsamments</td><td>0 – 3</td><td>N (Not suitable) Limitation factor: texture (loamysan-sand)</td></tr><tr><td>Typic Tropaquepts</td><td>0 – 3</td><td>107.12</td><td>2.5</td><td>S3 (suitable marginal) Limitation factor: drainage</td></tr><tr><td>Total</td><td></td><td>4,284.95</td><td>100</td><td></td></tr></table> <p>Bukit Permata Estate:</p>	Soil Type	Slope (%)	Area (ha)	%	Suitability	Typic Dystropepts	0 – 8	1,512.59	35.3	S2 (medium suitable)	Typic Dystropepts	0 – 8	S2 (medium suitable)	Aquic Dystropepts	0 – 3	S2 (medium suitable)	Typic Dystropepts	8 – 15	732.73	17.1	S2 (medium suitable)	Typic Dystropepts	8 – 15	S2 (medium suitable)	Typic Tropopsamments	0 – 8	1,932.51	45.1	S3 (suitable marginal) Limitation factor: texture (loamysand)	Aquic Tropopsamments	0 – 3	N (Not suitable) Limitation factor: texture (loamysan-sand)	Typic Tropaquepts	0 – 3	107.12	2.5	S3 (suitable marginal) Limitation factor: drainage	Total		4,284.95	100		Complied
Soil Type	Slope (%)	Area (ha)	%	Suitability																																									
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Total		1,800.00	100																																																
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	PT Bumi Permai Lestari has performed replanting since 2018, based on field visit, there is no replanting performed on steep terrain. Based on maps of soil unit, there are no slopes above certain limit in BPRE and BPTE, maximum slopes in BPRE and BPTE was 15%.			Complied																																														
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	There is no new planting activity since November 2005. PT Bumi Permai Lestari has performed replanting since 2018, based on field visit, there is no replanting performed on steep terrain. Based on maps of soil unit,			Complied																																														

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		there are no slopes above certain limit in BPRE and BPTE, maximum slopes in BPRE and BPTE was 15%.	
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	PT Bumi Permai Lestari has performed soil analysis to identify soil type, slope, topography, and land suitability class on 27-27 June 2005, that the result is documented in Semi-detail soil survey. Based on Semi-detail Maps of Soil scale 1:50,000, there is no marginal or fragile soil present in BPRE and BPTE. There is marginal-suitable soil in PT BPL area, which is sandy soil (loamysand) 1,932.51 Ha in BPRE and 11,011.88 Ha in BPTE. The maps have described the sandy soil clearly with boundary. PT BPL has implementing the empty bunch application as a mulching and frond stacking in area of sandy to enhance the organic material in the soil.	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	There is no extensification activity in PT BPL area. All activities carried out according to the best-practice soil management plan.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	PT Bumi Permai Lestari has performed soil analysis to identify soil type, slope, topography, and land suitability class on 27-27 June 2005, that the result is documented in Semi-detail soil survey. The semi-detail soil survey result is used to guide the planning of drainage and irrigation systems, road, and other infrastructure. All activities carried out according to the best-practice soil management plan. Road maintenances are consistently implemented. Based on field visit all road are accessible and well maintained.	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			

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7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	There is no new planting since November 2005. In addition PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	There is no peat soil in area of PT BPL. According to maps overlay scale 1:250,00 with peat soil area based on SK MenLHK RI Nomor: SK.12764/MENLHK-PTKL/IPSDH/PLA.1/11/2023 – Peta indikatif penghentian pemberian perizinan berusaha, persetujuan penggunaan kawasan hutan, atau perubahan peruntukan kawasan hutan baru pada hutan alam primer dan lahan gambut tahun 2023”. PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil	PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Not Applicable



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	<p>palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>		
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Complied
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already</p>	PT Bumi Permai Lestari has shown the document of semi-detail soil map scale 1: 50,000 and field observation there were no peat soils in PT Bumi Permai Lestari, Bukit Perak Estate and Bukit Permata Estate.	Complied

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	exists in Peatlands' (the latest version) along with relevant audit guidelines. - Critical (Major) compliance -		
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Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.

No	Category of River	Cross Section	Outside the Settlement		Inside at the Settlement		Articles
			Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	
1	Levee		–	5 m	–	3 m	Article 6
2	Rivers with no dike (from river bank)		Big River River Basin > 500 km ²	100 m	Depth : > 20 m	30 m	Articles 7 & 8
					Depth : 3 m to 20 m	15 m	Articles 7 & 8
			Small River River Basin < 500 km ²	50 m	Depth : 0 m to 3 m	10 m	Articles 7 & 8
3	Lake / Reservoir		–	50 m	–	50 m	Article 10
4	Water Springs		–	200 m	–	200 m	Article 10
5	Rivers affected by tides (from river bank)		–	100 m	–	100 m	Article 10

7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Unit of Certification establish water management plan in form of "Program Efisiensi Penggunaan Air PT Bumi Permai Lestari Tahun 2024". The program for Estate unit consists of:</p> <ul style="list-style-type: none"> • Saving water from optimizing the use of pesticides. Description: reuse of rinsed water used for pesticide packaging for spraying activities. Timeline: routine (during the spray activity). Objective: Save water usage for spraying. • Water savings in housing and public facilities. Description: using water used for ablution to flush roads and plants. Timeline: routine. Objective: employees and residents of housing. • Socialization of water use savings for domestic needs. Description: socializing water use savings to all employees, placing warnings. Timeline: as needed. Objective: improvement of water-saving behavior. 	Complied
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		<ul style="list-style-type: none"> Monitoring water use. Description: water use monitoring (m3). Timeline: routine (recap every month). Objective: actual use of water as needed. <p>Water management program for Mill, consists of:</p> <ul style="list-style-type: none"> Recycle. Program: reuse of air condensate sterilizer for dilution 10% to FFB. Evaluation: reuse condensate water. Recycle. Program: reuse of turbine cooling water to Raw Water for use as washing water. Evaluation: used turbine water is reused as washing water to minimize domestic water use. Water Use Efficiency. Program: reuse 80% of soxhlet cooling water for the same activity. Evaluation: reuse of soxhlet water reduces the burden of using Raw Water. <p>The unit of certification does not limit access to clean water for workers and local community. Also, does not pollute the water and measure the surface water quality by tested in accredited laboratory periodically. The water management plan be reviewed once a year at the end of each year to see the actual plan for the current year.</p>	
	7.8.1b Workers have adequate access to clean water.	<p>Based on visit to employees housing complex at Division 5 Bukit Perak Estate and Division 2 Bukit Permata Estate, water source for bathing and washing are using ground water. While the water for consumption (drink and cooking), all employees buying bottled or gallon water.</p> <p>Ground water analysis conducted each semester to ensure the water quality met with the standard "Permenkes RI No. 02 Tahun 2023 Tentang Kesehatan Lingkungan (BAB II.A.2.a. Standar Baku Mutu Kesehatan Lingkungan Parameter Air untuk keperluan higiene dan sanitasi). Latest monitoring conducted on 30 - 31 January 2024 by PT Mutu Agung Lestari Testing Laboratory (KAN Akredited LP-001-IDN). Report of testing No. 1624/SL/II/24 (at Bukit Permata Estate) and 1617/SL/II/24 dated 16/02/2024 shown that all parameter analyzed was met with standard Permenkes RI No. 02 Tahun 2023.</p>	

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7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>Watercourses which available in unit of certification is stream and reservoir for Mill. Maintaining riparian areas is by planting with local woody species. Maintaining progress are documented within "Rencana dan Rehabilitasi KBKT".</p> <p>Auditor team conducting onsite visit to stream buffer zones at Riparian Sungai Duku Block J38/H18 Division Bukit Permata Estate, Riparian Sungai Lagok Block F30 Division Bukit Perak Estate, stream width is 3-5 meters. Actual buffer zones which is maintained is 15 meters or two lines of palm crops from edge waterways.</p> <p>PT BPL has program the riparian rehabilitation by planting bamboo and Guatemala grass, such as: in January 2024 at Block J12 – H12 (Sungai Rakai), Block G11 (Sungai Medang keranak), Block H18 (Sungai Air Duku), Block J05 – H2 (Sungai Air Terentang).</p>	Complied																														
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Wastewater quality Bukit Perak Mill has been analysed by third party accredited laboratory "UPTD Laboratorium Lingkungan Dinas Lingkungan Hidup dan Kehutanan Provinsi Kepulauan Bangka Belitung" Result of wastewater quality year 2023/2024 (July – June) as below:</p> <table><tr><th>Month - Year</th><th>BOD (mg/l) – standard of quality 5,000</th><th>pH – standard of quality 6-9</th></tr><tr><td>July 2023</td><td>763</td><td>7.32</td></tr><tr><td>August</td><td>933</td><td>8.14</td></tr><tr><td>September</td><td>982</td><td>7.66</td></tr><tr><td>October</td><td>611</td><td>7.64</td></tr><tr><td>November</td><td>613</td><td>7.95</td></tr><tr><td>December</td><td>1.170</td><td>8.00</td></tr><tr><td>January - 2024</td><td>1,721</td><td>8.15</td></tr><tr><td>February</td><td>969</td><td>8.42</td></tr><tr><td>March</td><td>1,575</td><td>7.97</td></tr></table>	Month - Year	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9	July 2023	763	7.32	August	933	8.14	September	982	7.66	October	611	7.64	November	613	7.95	December	1.170	8.00	January - 2024	1,721	8.15	February	969	8.42	March	1,575	7.97	Complied
Month - Year	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9																															
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		<table><tr><td>April</td><td>1,187</td><td>6.80</td></tr><tr><td>May</td><td>481</td><td>7.62</td></tr><tr><td>June</td><td>597</td><td>7.91</td></tr></table> <p>Based on above result of waste water quality analysis can be shown that all parameter pH and BOD was met the threshold according to KemenLH No. 28 Tahun 2003 Tentang Pedoman Syarat dan Tata Cara Perizinan Pemanfaatan Air Limbah Industri Minyak Sawit pada Tanah di Perkebunan Kelapa Sawit.</p>	April	1,187	6.80	May	481	7.62	June	597	7.91																																								
April	1,187	6.80																																																	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Bukit Perak Mill has recorded the mill water use per ton FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under "Data Penggunaan Air" year 2023/2024.</p> <p>Record in July 2023 – June 2024 has shown:</p> <table><tr><th>Month - Year</th><th>FFB processed</th><th>Water usage (m³)</th><th>Water use per ton FFB</th></tr><tr><td>July 2023</td><td>20,253.60</td><td>13,532</td><td>0.67</td></tr><tr><td>August</td><td>21,034.45</td><td>13,031</td><td>0.62</td></tr><tr><td>September</td><td>18,873.76</td><td>12,685</td><td>0,67</td></tr><tr><td>October</td><td>19,251.62</td><td>12,601</td><td>0.65</td></tr><tr><td>November</td><td>18,652.54</td><td>12,764</td><td>0.68</td></tr><tr><td>December</td><td>19,263.92</td><td>12,668</td><td>0.66</td></tr><tr><td>January - 2024</td><td>15,333.12</td><td>11,188</td><td>0.73</td></tr><tr><td>February</td><td>13,642.78</td><td>10,672</td><td>0.78</td></tr><tr><td>March</td><td>13,348.16</td><td>10,008</td><td>0.75</td></tr><tr><td>April</td><td>16,836.39</td><td>12,271</td><td>0.73</td></tr><tr><td>May</td><td>20,007.81</td><td>14,230</td><td>0.71</td></tr></table>	Month - Year	FFB processed	Water usage (m³)	Water use per ton FFB	July 2023	20,253.60	13,532	0.67	August	21,034.45	13,031	0.62	September	18,873.76	12,685	0,67	October	19,251.62	12,601	0.65	November	18,652.54	12,764	0.68	December	19,263.92	12,668	0.66	January - 2024	15,333.12	11,188	0.73	February	13,642.78	10,672	0.78	March	13,348.16	10,008	0.75	April	16,836.39	12,271	0.73	May	20,007.81	14,230	0.71	Complied
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		June	14,137.05	10,062	0.71		
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised							
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	Unit of certification has developed program to increase the efficiency of fossil fuel use and to optimize renewable energy. Fossil fuel records and trends are maintained and available during audit. Energy uses are recorded include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.				Complied	
		Period	Total HSD needs (L)	Actual HSD usage (L)	HSD efficiency (L)		
		Jul 23	130,615	8,159	122,456		
		Aug	126,487	5,477	121,010		
		Sept	116,018	4,834	111,184		
		Oct	119,083	4,826	114,257		
		Nov	114,711	4,690	110,021		
		Dec	117,687	5,268	112,419		
		Jan 24	104,114	4,735	99,379		
		Feb	94,672	4,709	89,963		
		Mar	95,310	4,715	90,595		
		Apr	106,802	4,332	102,470		
		May	122,478	4,980	117,498		

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			Jun	97,371	4,052	93,319		
			Fiber and shell usage as a renewable energy to substitute the fossil fuel are as below:					
			Period	Fiber (ton)	Shell (ton)	Total energy potential from sheel + fiber (Kcal)	Total energy for processing (Kcal)	
			Jul 23	2,531.70	1,164.58	11,456,702,010	8,509,358,880	
			Aug	2,629.31	1,209.48	11,898,399,573	8,110,648,260	
			Sept	2,359.22	1,085.24	10,676,178,266	7,231,983,660	
			Oct	2,406.45	1,106.97	10,889,919,498	7,395,574,230	
			Nov	2,331.57	1,072.52	10,551,042,408	7,105,703,220	
			Dec	2,407.99	1,107.68	10,896,877,147	7,260,683,760	
			Jan 24	1,916.64	881.65	5,054,179,680	5,949,751,500	
			Feb	1,705.35	784.46	4,497,001,358	5,302,674,630	
			Mar	1,668.52	767.52	4,399,887,240	5,099,345,460	
			Apr	2,104.55	968.09	5,549,695,054	6,341,839,020	
			May	2,500.98	1,150.45	6,595,074,371	7,723,417,680	
			Jun	1,767.13	812.88	4,659,925,106	5,430,942,000	
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.								

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7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring to reduce GHG emissions are recorded in PalmGHG Calculator as demonstrated in Appendix B in this report.</p> <p>The source of greenhouse gas emission has been identified on Environmental aspect and impact identification for mill and estates, as listed below:</p> <ul style="list-style-type: none"> - Boiler stack emission including particulate and soot. - Diesel electric generator emission - POME methane emission - Use of fertiliser - Vehicle and heave equipment emission <p>Several efforts to reduce GHG emissions are prepared as follows:</p> <ul style="list-style-type: none"> - Zero burning - Utilization of waste fibre and shell as boiler fuel and electricity from turbines - Reduce chemical fertilizer using EFB composting and land application. <p>GHG emission mitigation programe 2024 has been developed by company as record in "F/SMART/CERS-EHSD/SADV/005/001, such as:</p> <ul style="list-style-type: none"> - Efficient use of fossil fuels by maximizing load capacity - Application of fertilizers according to SMARTRI recommendations appropriately and on target. Leaf analysis is carried out to determine the actual elements contained and fertilizer recommendations. - Application of empty bunches and land applications to reduce the use of chemical fertilizers - Implementing IPM by optimizing natural enemies, routine monitoring of pests and diseases/early detection of pests - Use of environmentally friendly pesticides and licensed by the pesticide commission, reducing the volume of pesticide use. 	Complied
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		<ul style="list-style-type: none"> - Saving electricity use in factories/kebuns by installing warnings, awareness and replacing TL/SL lamps with LEDs. <p>The source of pollution, type of pollution and its control are documented in list of environmental aspect and impact evaluation.</p> <p>Implementation records of each programme were sighted. The program was including objectives, targets, and timelines for a year.</p> <p>There was monitoring and evaluation every 6 months to ensure target was achieved.</p> <p>Bukit Perak Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Bumi Permai Lestari after November 2005.</p>	Complied
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has identified other significant pollutants such as emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>PT BPL also has identify the source of pollutant and mitigation as present in "Form Identifikasi dan Evaluasi Aspek Lingkungan – F/SMART/LEMS-EHSD/SADV/001/001" update 17 May 2024.</p> <p>Monitoring of air emissions and ambient quality conducted every semester. Emissions test conducted by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months,</p>	Complied

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		<p>e.g: Subject of analysis for air emission and Ambient in Bukit Perak Mill, Bukit Perak Estate and Bukit Permata Estate. Report of Testing verified:</p> <ul style="list-style-type: none"> - Report of Analysis No. 1594/SL/II/24 dated 16 February 2024, sampling date 30 January 2024, location: Genset 04 – 350KVA, there are 9 parameter analyzed according to standard PermenLHK No. 11 year 2021 Appendix I No. 1 (fossil fuel) regarding the emission standards for internal combustion engines or generators. The analysis results show that all parameter analyzed meet environmental quality standards. - Report of Analysis No. 1595/SL/II/24 dated 16 February 2024, sampling date 30 Januari 2024, location: Genset 05 – 350KVA, there are 9 parameter analyzed according to standard PermenLHK No. 11 year 2021 Appendix I No. 1 (fossil fuel) regarding the emission standards for internal combustion engines or generators. The analysis results show that all parameter analyzed meet environmental quality standards. - Report of Analysis No. 1596/SL/II/24 dated 16 February 2024, sampling date 30 January 2024, location: Boiler 01 (Maxithem), there are 14 parameter analyzed according to standard PermenLH No. 7 tahun 2007 Appendix I regarding emission quality standards for stationary sources for steam boilers using biomass fuel in the form of fibers or shells. The analysis results show that all parameter analyzed meet environmental quality standards. - Report of Analysis No. 1597/SL/II/24 dated 16 February 2024, sampling date 30 January 2024, location: Boiler 02 (Mechmart), there are 14 parameter analyzed according to standard PermenLH No. 7 tahun 2007 Lampiran I regarding emission quality standards for stationary sources for steam boilers using biomass fuel in the form of fibers or shells. The analysis results show that all parameter analyzed meet environmental quality standards. - Report of Analysis No. 15776/SL/IX/23 dated 2 Oct 2023, sampling date 19 Sept 2023, location: Water Pump machine 1 Mistubishi 85kVA, there are 7 parameter analyzed according to standard PermenLHK No. 11 tahun 	
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		<p>2021 Appendix I No. 1 (fossil fuel) regarding the emission standards for internal combustion engines or generators. The analysis results show that all parameter analyzed meet environmental quality standards.</p> <p>Management efforts to reduce or minimize those pollutant are such as implementation of zero burning, planting trees at the riparian, utilization EFB, reducing the use of diesel fuel with the use of fibres substitution and shells for boiler fuel, emissions test, routine engine/genset maintenance and GHG calculation. Sample of management efforts to reduce pollutants are observed during audit, such as there is no burning activities, there are bamboo and waru planted at the riparian area, and the Mill uses fibers and shell as fuel.</p>	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Perak Mill and its supply bases as unit of certification is existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations, therefore no new planting is occurring.</p> <p>Replanting activities have been done in Bukit Perak Estate at the end of year 2021. While for Bukit Permata Estate replanting done on January 2023.</p> <p>According to the result of replanting activities in Bukit Perak Estate and Bukit Permata Estate, it is known that land preparation for replanting is using third party contractor. Land preparation is using mechanical (for felling and chipping palm crops).</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Unit of certification establish fire prevention and control measures for land such as provides Fire Danger Index, Firefighting team and its equipment, erecting fire watch tower, conduct monitoring for hotspots.</p> <p>PT BPL reported to "Dinas Pemadam Kebakaran dan Penanggulangan Bencana Kab. Bangka barat, Bupati Kab. Bangka Barat, Gubernur Prov. Kepulauan Bangka Belitung, Dinas Pertanian & pangan Kab. Bangka Barat" each semester the management, monitoring and mitigation plan of land fire. Latest report semester I year 2024 (Jan – Jun) has been reported on 8 July 2024. Report receipt available in "Berita Acara Serah Terima".</p>	Complied

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		<p>According to report of monitoring, company has implementing the monitoring and mitigation plan of land fire such as:</p> <ul style="list-style-type: none"> - Mapping the area of fire prone area; there are 12 points of fire prone areas that are on the border with community-owned land, i.e in Div 1 border J10, G10; Div 2 border block J20, K15, border block J36, J27; Div 3 border block B25. - Monitoring the level of fire hazard/vulnerability each month (2 weeks). Since January – June the level of fire hazard in level of low to medium. - Monitoring the rainfall level each month by installing ombrometer. Rainfall range since January – June 2024 were 125 mm – 649 mm in BPPE and BPTE with number of rainy days/month between 7 – 21 days. - Socialization and awareness related to fire prevention and mitigation to all workers and surrounding community. Latest socialization conducted on 21 June 2024. - Emergency response team structure. Both BPPE and BPTE has structure organisation of emergency response team. <p>Provision of emergency fire response facilities and infrastructure, such as: high pressure water pump (45.6 KW) 4 unit, master hose 2.5" length 100 m 16 roll, nozzle 1.5" 11 pcs, water tank truck (capacity 4,000L) 3 unit and other facilities. During field visit to warehouse of fire mitigation facilities it was found that facility is in good condition and ready to use.</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Unit of certification forming fire program by involving surrounding local communities namely Fire Alert Society of "Masyarakat Siaga Api". The training and dissemination of this program conducted since 20 February 2020 and attended by representative of surrounding villagers (Kacung Village, Dendang village, Kelapa district, etc.)</p> <p>There are list of "Masyarakat Siaga Api" consist of 45 personal who has been trained from Tugang village, Kacung village, Rakai village, Berang village, Dendang village, Terentang village, Ibul Village, Air Bulin village.</p>	Complied

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		Socialization of fire prevention and mitigation also conducted to surrounding community, latest socialization and awareness conducted on 14 – 16 November 2023. No fires or hotspot detected in last one year.	
Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
PROCEDURAL NOTE for 7.12: <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests. Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2). - Critical (Major) compliance -	Unit of certification is an existing plantation since 1992. HCV assessment conducted in 2012 by internal team which has been registered as RSPO-approved assessor. In 2018, first replanting activities started in Bukit Perak Estate. Implementation of replanting activities is referred to HCV Identification Assessment 2012. No expansion area or new planting was conducted by PT BPL. Riparian identified during HCV assessment is remain conserve and no replanting conducted in riparian area.	Complied

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7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> - Critical (Major) compliance - <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p> <p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>Unit of certification is an existing plantation since 1992. HCV assessment conducted in 2012 by internal team which has been registered as RSPO-approved assessor.</p> <p>There is no new acquisition or expansion area within this unit of certification.</p>	Complied
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	This indicator is not relevant to Indonesia.	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3:</p> <p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements.</p>	<p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Permai Lestari, 2012". There is no change in HCV assessment report since latest audit.</p>	Complied

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	<p>The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>HCV Assessment was conducted on 26 to 28 November 2010 internally using HCV Toolkit Indonesia 2008, where the assessor is registered as RSPO HCV approved assessor.</p> <p>Based on the assessment report, in Bukit Perak and Bukit Permata Estate there are three (3) types of HCV been identified such as HCV 1.2 (Endangered Species), HCV 4.1 (riparian area) and HCV 6 (cemetery) cover total area of 116.38 Ha.</p> <p>As refer to HCV Toolkit Indonesia (2008), unit of certification shall make integrated management plan which are developed, implemented and adapted (if necessary). Therefore, onsite verification of HCV area is conducted on 1-5 February 2021 by internal team where HCV assessor is involved namely Mr. Sandy Puspoyo (ALS license number: ALS19007SP). This onsite verification is aims to re-measurement of HCV area, particularly in riparian zone, prior to replanting activities as part of adaptive management plan.</p> <p>Based on document of "Berita Acara Verifikasi Sempadan Area NKT" , dated 5 February 2021, there are list identification of riparian zone which categorized as HCV for all estates under PT Bumi Permai Lestari. The result of verification, it is known that HCV area (particularly riparian zone) are changes. Based on identification result, in Bukit Perak Estate known there are six (6) stream and one (1) reservoir; where in Bukit Permata Estate is five (5) stream was identified.</p> <p>On 21 April 2021, Sustainability Compliance Team propose several data to Top Management about result of desktop study related changes of riparian areas which refer to provincial regulation "Peraturan Daerah Provinsi Kepulauan Bangka Belitung No.02 Tahun 2014". Minutes of this meeting is a baseline decision to conduct additional replanting in Bukit Perak Estate which started in July 2021 (some palm crops as reducing area of riparian zone).</p> <p>Due to some changes of riparian zone against streams identified, therefore HCV management area are reducing from 116.38 Ha to 81.21 Ha. This change of HCV area was determined by top management as per Memorandum from Sustainability and Strategic Project Director number 03/SSP/MEM/CAD/BPL/2022, dated 11</p>	
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		<p>February 2022. This memorandum aims to replanting activity in Bukit Permata Estate which started in July 2022.</p> <p>Result of HCV verification determined as below:</p> <ol style="list-style-type: none"> 1. Bukit Perak Estate: 55.49 Ha (2012) to be 51.66 Ha (2022). 2. Bukit Permata Estate: 60.89 Ha (2012) to be 29.55 Ha (2022) <p>Changes of riparian zone width is referring to governor decree related provincial spatial plan "Rencana Tata Ruang Wilayah Propinsi Bangka Belitung 2014 – 2034" Number 02 Year 2014 and RSPO Manual on BMPs for the management and rehabilitation of riparian reserves (April 2017). All width streams were identified in certificate holder area is average 3-4 meters, previously determining of riparian zone is 25 meters. Currently, as refer to governor decree, the riparian zone that will maintain is minimum 10 meters from the edge of stream. Based on that, total HCV managed area is reduced.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Unit of certification is existing plantations since 1992 where since 2018 start for replanting activities. There is no expansion area for plantations. Entire land compensation is accomplished since 1994.</p> <p>Land status of certificate holder prior to developed is State Land and have obtaining Location Permit from relevant authority. Community land which located within location permit already compensated for its crops only and not for its land, due to as national land status is State Land.</p> <p>As a reciprocal, the company hires villagers/local communities as workers. This is form of benefit given by the plantation to surrounding communities.</p> <p>HCV assessment has been conducted and documented in the "Report of the identification and analysis of the existence of high conservation value (HCV) area at PT Bumi Permai Lestari, 2012".</p> <p>HCV Assessment was conducted on 26 to 28 November 2010 internally using HCV Toolkit Indonesia 2008, where the assessor is registered as RSPO HCV approved assessor.</p>	Complied

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		There is no rights of local communities have been identified in HCV area, also no peatland or other conservation area within the unit of certification.	
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	<p>Unit of certification has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through muster morning in each division by field assistant. Sample seen on socialization to workers dated 2 May 2024 in Bukit Permata Estate and 15 – 19 April 2024 in Bukit Perak Estate.</p> <p>Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p> <p>During field visit and interview with sampled workers it was confirmed that they have aware regarding the RTE species protection and the sanction of any violation of company regulation and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	<p>Unit of certification conduct monitoring of animal wildlife and HCV area since the HCV assessment conducted in 2012. Based on analyzing of HCV area, there is no RTE species was found. Therefore, on 21 April 2021, Sustainability Compliance Team propose several data to Top Management about result of desktop study related changes of riparian areas which refer to provincial regulation "Peraturan Daerah Provinsi Kepulauan Bangka Belitung No.02 Tahun 2014". Minutes of this meeting is a baseline decision to conduct additional replanting in Bukit Perak Estate which started in July 2021 (some palm crops as reducing area of riparian zone).</p> <p>This is part of adaptive management and monitoring of HCV area outcome as fed back into management plan.</p>	Complied

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		<p>HCV management and monitoring reports are prepared and reported once a year. The 2023 management and monitoring report was reported to the BKSDA (natural resources conservation agency) of Bangka Belitung Province on 29 February 2024. Animal monitoring is carried out every 3 months. Animal monitoring is carried out using the recce walk method within the primary observation route. The primary observation route is in the river boundary/riparian area. The results of primary animal monitoring in 2023 still found the following animals (some of them are protected animal by law) such as:</p> <p>Monyet ekor panjang (<i>Macaca fascicularis</i>), Beruk (<i>Macaca nemestrina</i>), Raja udang meninting (<i>Alcedo meninting</i>), cekakak sungai (<i>Todirhamphus chloris</i>), kuntul kerbau (<i>Bubulcus ibis</i>), elang tikus (<i>Elanus caeruleus</i>), elang hitam (<i>Ictinaetus malaiensis</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), biawak air asia (<i>Varanus salvator</i>), phyton (<i>Phyton reticulatus</i>).</p>	
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 Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Perak Estate and Bukit Permata Estate is long established oil palm company. The oldest planting year of palm crops was 1992 and no more expansion area afterwards. Current status of palm crops is replanting activities since 2018 – 2023 where HCV assessment was conducted in November 2010.</p> <p>Therefore, no land clearing for new planting since November 2005 or 15 November 2018 in the Unit of Certification.</p>	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Bukit Perak Mill and supply base was calculated using the PalmGHG Calculator 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 Bukit Perak Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.8
PKO	0.00

Extraction	%
OER	19.88
KER	5.34

Production	t/yr
FFB Process	200,047.65
CPO Produced	39,771.81
PKO Produced	0

Land Use	Ha
OP Planted Area	18,182.98
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	306.62
Total	18,489.60

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	38103.86	0.91	7163.35	0.10	0.00	0.00	45,267.21	1.01
CO ₂ Emission from fertilizer	4,597.52	0.11	2,457.24	0.03	0.00	0.00	7,054.76	0.14
NO ₂ Emission from fertilizer	4761.47	0.11	1,972.44	0.03	0.00	0.00	6,733.91	0.14
Fuel Consumption	286.53	0.01	113.67	0.00	0.00	0.00	400.20	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-50,116.81	-1.19	-5,174.00	-0.07	0.00	0.00	-55,290.81	-1.26
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	-2,367.43	-0.06	6,532.70	0.09	86,654.89	0.00	90,820.16	-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	39,066.96	0.20
Fuel Consumption	59.44	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	39,126.40	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

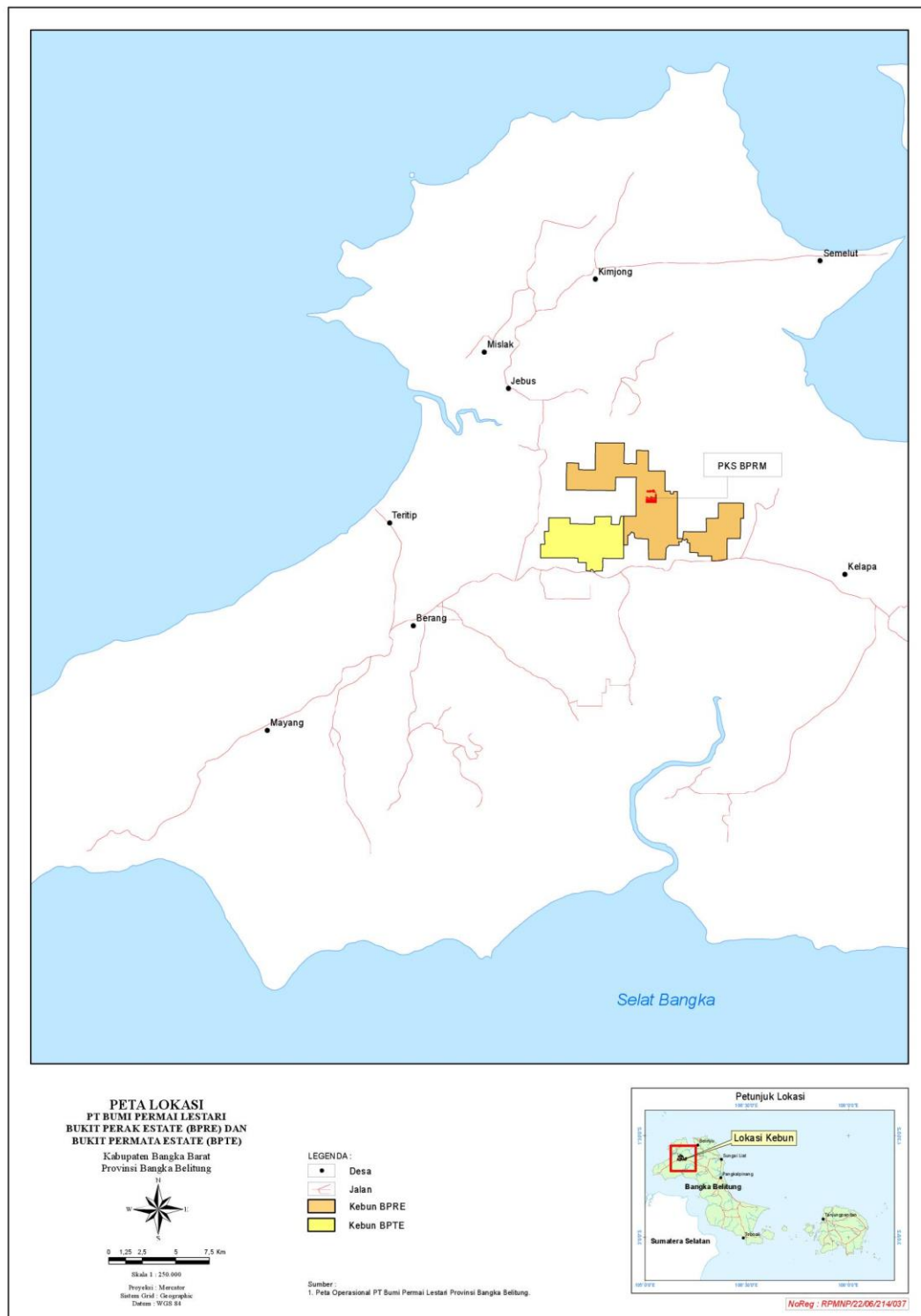
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

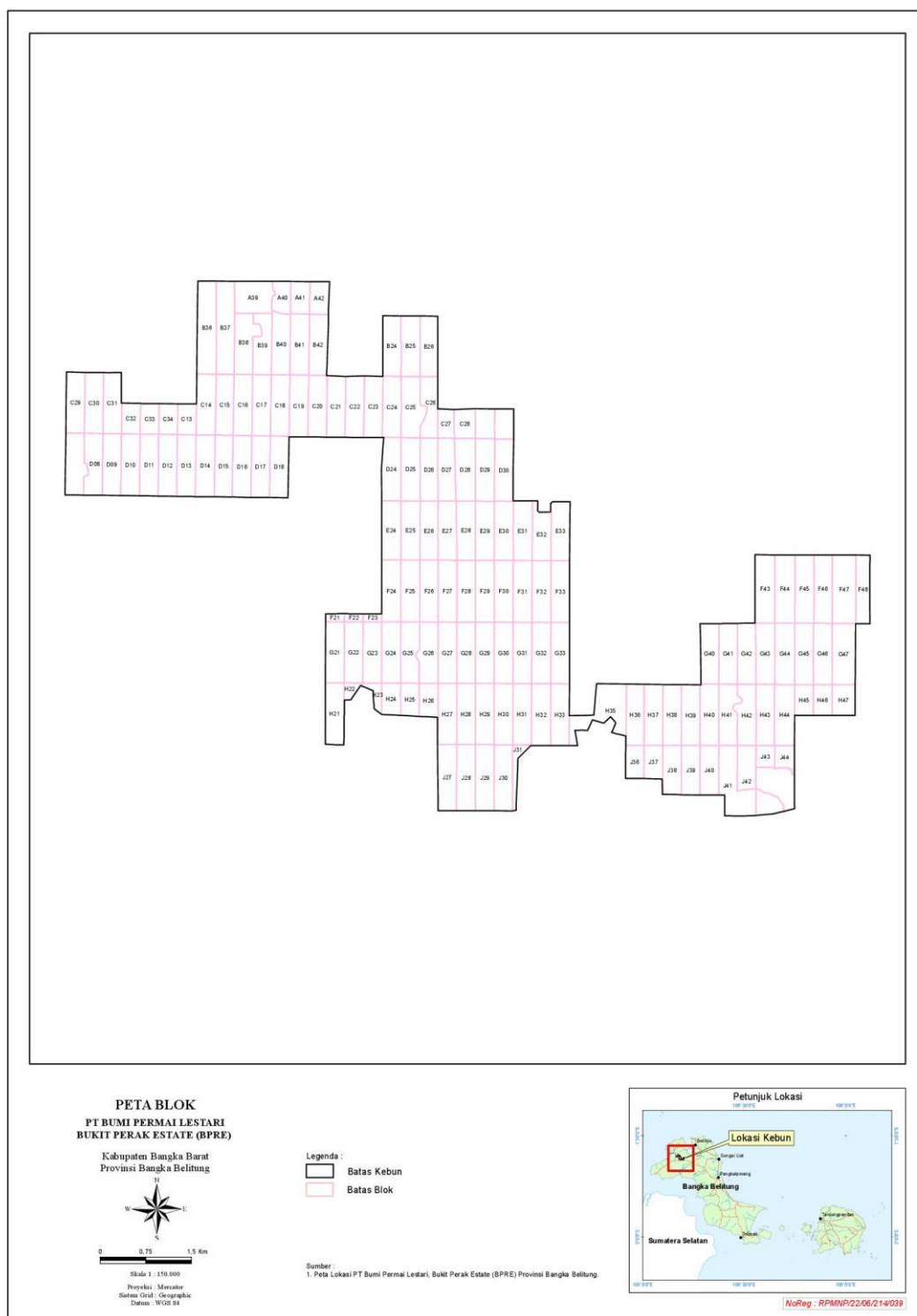
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

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Appendix F: List of Abbreviations

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