

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name / Parent Company: PT SAWIT SUMBERMAS SARANA
Client Company / Parent Company Address: Jalan H. Udan Said No. 47, Pangkalanbun, Central Kalimantan Province, 74113, Indonesia
Certification Unit: PT Mirza Pratama Putra Sumber Cahaya Palm Oil Mill Location of Certification Unit: Desa Sumber Cahaya, Kecamatan Belantikan Raya, Kabupaten Lamandau, Propinsi Kalimantan Tengah, 74663, Indonesia
Date of Final Report: 27/08/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT Sawit Sumbermas Sarana		
RSPO Membership Number	1-0111-07-000-00	Membership Approval Date	17 April 2007
Address	Jalan H. Udan Said No. 47, Pangkalanbun, Arut Selatan District, Kotawaringin Barat Regency, Kalimantan Tengah Province, 74113, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Mirza Pratama Putra Sumber Cahaya Palm Oil Mill		
Location / Address	Desa Sumber Cahaya, Kecamatan Belantikan Raya, Kabupaten Lamandau, Propinsi Kalimantan Tengah, 74663, Indonesia		
Website	www.ssms.co.id		
Management Representative	Angga Sanggraha	E-mail	angga@citraborneo.co.id
Telephone	+62 532 21 297	Facsimile	+62 532 21396

2. Certification Information			
Certificate Number	RSPO 759455	Certificate Start Date	10/08/2023
Date of First Certification	10/08/2023	Certificate Expiry Date	09/08/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK).		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> 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	30 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
AJAINDO/ISPO-IN/049/VII/2022	ISPO	PT AJA SERTIFIKASI	30/07/2027
SCC/INT/2310PA/3094	ISO 9001:2015	PT TSI	12/10/2026
SCC/INT/2310PA/3095	ISO 14001:2015	PT TSI	12/10/2026
SCC/INT/2310PA/3096	ISO 45001:2018	PT TSI	12/10/2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sumber Cahaya Mill	Sumber Cahaya Village, Belantikan Raya District, Lamandau Regency, Kalimantan Tengah Province, Indonesia.	1° 57' 25.29" S	111° 29' 52.38" E
Sumber Cahaya Estate	Sumber Cahaya Village, Belantikan Raya District, Lamandau Regency, Kalimantan Tengah Province, Indonesia.	1° 56' 51.85" S	111° 29' 46.55" 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
Sumber Cahaya Estate	2,714.70	2.5	699.78	3,416.99	79%
Total	2,714.70	2.5	699.78	3,416.99	79%

Note: In the ASA-1 audit, there was a reduction in the certification unit, previously 3,727.11 Ha to 3,416.99 Ha. Due to there is a reduction in HGU and detailed explanation can refer to indicator 4.4.1

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sumber Cahaya Estate	0	2,714.70	0	0	2,714.70	-
Total (ha)	0	2,714.70	0	0	2,714.70	-

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 (Aug 2023 – July 2024)	Actual (Aug 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
		Previous license period	Current license period (Aug 2023 – April 2024)	
Sumber Cahaya Estate	85,642	N/A	40,850	65,501
Total	85,642	40,850		65,501
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year	Actual (Aug 2023 – April 2024)		Forecast
		Previous license period	Current license period (Aug 2023 – April 2024)	
Malata Estate		N/A	20,131	
Merambang Estate		N/A	1,481	
Nanga Kiu Estate		N/A	859	
Batu Tunggal Estate		N/A	679	
Sungai Bulik Estate		N/A	303	
Nanuah Estate		N/A	224	
Sepondam Estate		N/A	2,656	
Total		26,333		
Note:				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (Aug 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
		Previous license period	Current license period (Aug 2023 – April 2024)	
Plasma	N/A	N/A	15,290	N/A
PT. MUA	N/A	N/A	6,718	N/A
Sumber Cahaya Estate (HGU on process)	N/A	N/A	25,809	N/A
Malata Estate	N/A	N/A	14,512	N/A

(HGU on process)				
Total	N/A		62,329	N/A
Note:				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Aug 2023	5,773	8,046	13,819
2	Sept 2023	7,155	4,025	11,180
3	Oct 2023	8,448	6,994	15,442
4	Nov 2023	7,744	10,659	18,403
5	Dec 2023	7,365	10,464	17,829
6	Jan 2024	7,233	9,097	16,330
7	Feb 2024	5,925	4,579	10,504
8	Mar 2024	6,875	5,145	12,020
9	Apr 2024	10,665	3,320	13,985
TOTAL		67,183	62,329	129,512
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Aug 2023 – July 2024)	Actual (Aug 2023 – April 2024)		Forecast (Aug 2024 – July 2025)
	Previous license period (key in period covered)	Current license period (Aug 2023 – Apr 2024)	
FFB	FFB		FFB
85,642 mt	N/A	67,183 mt	65,501 mt
	TOTAL	67,183 mt	
CPO (OER: 22.73 %)	CPO (OER: 23.21 %)		CPO (OER: 23.55 %)
19,466 mt	N/A	15,594 mt	15,425 mt
	TOTAL	15,594 mt	
PK (KER: 4.37 %)	PK (KER: 3.76 %)		PK (KER: 4.37 %)
3,743 mt	N/A	2,524 mt	2,862 mt
	TOTAL	2,524 mt	
Note:			

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Aug 2023	1,444	209
2	Sept 2023	1,767	252
3	Oct 2023	1,967	333
4	Nov 2023	1,727	307
5	Dec 2023	1,645	259
6	Jan 2024	1,580	282
7	Feb 2024	1,370	241
8	Mar 2024	1,521	264
9	Apr 2024	2,573	377
TOTAL		15,594	2,524
Note:			

11. Summary of Actual Volume sold					
Current License period (Aug 2023 – Apr 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	0	0	15,594	15,594
PK (MT)	0	0	0	2,524	2,524
Credits	0	0	0	0	0
Previous License period (N/A)					
CPO (MT)	N/A	N/A	N/A	N/A	N/A
PK (MT)	N/A	N/A	N/A	N/A	N/A
Credits	N/A	N/A	N/A	N/A	N/A
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)
N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A
Note:				

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

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	PT. Citra Borneo Utama	15,594	2,524
TOTAL		15,594	2,524
Note:			

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	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
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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-CSP0	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)

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **13 – 16 June 2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **15 August 2024**. The audit programs are included in Section 2.3.

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

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

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

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

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

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.

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (Recertification)
Sumber Cahaya POM	X	X	X	X	X
Sumber Cahaya Estate	X	X	X	X	X

Tentative Date of Next Visit: May 12, 2025 - May 15, 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: 10 years 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 checked="" 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>
Eko Purwanto	Team Member	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience as auditor since 2012 covering ISO9001, RSPO and ISPO.</p> <p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018</p>

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		<p>Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Nanang Rusmana	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</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 type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

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

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Date	Time	Subjects	Naila	Eko	Nanang
Monday, 13/5/2024	06.15 – 07.30	Flight Jakarta - Pangkalan Bun (QG470)	√	√	√
	07.30 – 11.00	Traveling Pangkalan Bun – Site (PT Mirza Pratama Putra)	√	√	√
	11.00 – 12.00	Opening Meeting: - Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) - Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	Document review : General information; time bound plan; partial certification verification; RSPO P&C (Management Plan); Best Management Practices, Social policy and implementation, Continual Improvement	√	√	√
Tuesday, , 14/5/2024	08.00 – 12.00	Stakeholder Consultation with interested and affected parties • Stakeholder consultation to relevant agencies of Lamandau Regency; • Stakeholder consultation with local community/villagers; • Stakeholder consultation with previous landowners; • Stakeholder consultation with gender committee and worker union. Stakeholder consultation with contractor & FFB supplier	√		
		Document review Sumber Cahaya POM • Review information related to Economic management plan. • Mill best management practices, supply chain (which includes Rules on market communication and claim) • Review information related to OHS Management System, EIA, and Environmental MS, Training, waste management, GHG mitigation. • Review information related to Policy and commitment, smallholder welfare, FFB suppliers, social requirements, contract agreement, human rights, workers' welfare.		√	√
	12.00 – 14.00	Break	√	√	√

Date	Time	Subjects	Naila	Eko	Nanang
Wednesday 15/5/2024	14.00 – 16.30	Field Visit Sumber Cahaya POM: <ul style="list-style-type: none"> 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 	√	√	√
	16.30 – 17.00	Wash up meeting	√	√	√
	08.00 – 12.00	Field Visit Sumber Cahaya Estate Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal aspect (boundaries, occupied land, disputes – if any) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place) 	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Document review Sumber Cahaya 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. 	√	√	√

Date	Time	Subjects	Naila	Eko	Nanang
	16.30 – 17.00	Wash up meeting	√	√	√
Thursday 16/5/2024	08.00 - 12.00	Document review Sumber Cahaya POM dan Sumber Cahaya 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. Mill best management practices, supply chain (which includes Rules on market communication and claim) 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. 	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√
	14.00 – 15.00	Completion of checklist and clarification/ follow-up on outstanding audit issues	√	√	√
	15.00 – 16.00	Auditor team discussion and Report Preparation			
	16.00 – 17.00	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 	√	√	√
	17.00 – 21.00	Traveling Site – Pangkalan Bun	√	√	√
Friday 17/5/2024	08.05 – 09.25	Flight Pangkalan Bun – Jakarta (QG471)	√	√	√

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Date	Time	Subjects	Naila
Thursday, 15/08/2024	09.00 – 09.30	Opening Meeting: <ul style="list-style-type: none">- Presentation By Lead Auditor- Confirmation CAP, requirements, document access permission and clarifying audit plan	√
	09.30 – 11.30	NCR Close Out Verification (Document & Interview) <ul style="list-style-type: none">• Indicator critical 3.8.5 (2494045-202405-M1)• Indicator critical 5.1.6 (2494045-202405-M2)	√
	11.30 – 12.00	Closing Meeting <ul style="list-style-type: none">• Presentation of NCR Report• 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?	<p>PT Sawit Sumbermas Sarana which has 8 mills, It was stated in RSPO website (www.rspo.org) PT Sawit Sumbermas Sarana is RSPO membership and gained the number of RSPO membership 1-0111-07-000-00</p> <p>Following are subsidiaries companies where PT SSMS as major shareholders:</p> <ul style="list-style-type: none"> • PT Sawit Sumbermas Sarana (SSMS): Selangkun and Sulung Mill • PT Kalimantan Sawit Abadi (KSA): Natai Baru Mill • PT Mitra Mendawai Sejati (MMS): Suayap Mill • PT Tanjung Sawit Abadi (TSA): Malata Mill • PT Sawit Multi Utama (SMU): Nanga Kiu Mill • PT Mirza Pratama Putra (MPP): Sumber Cahaya Mill • PT Menteng Kencana Mas (MKM): Kanamit Mill 	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	<p>PT Sawit Sumbermas Sarana (SSMS) as RSPO member since 17 Apr 2007, there are 5 mills (under 4 companies) has been certified within 5 years. There are new acquired companies in 2016 (PT Mirza Pratama Putra – Sumber Cahaya POM and PT Menteng Kencana Mas – Kanamit POM). PT Mirza Pratama Putra – Sumber Cahaya POM has been certified in August 2023. PT Menteng Kencana Mas – Kanamit POM has been Initial Certification audit in 2023.</p> <p>RSPO secretariat has approve the change of Time Bound Plan PT Sawit Sumbermas Sarana on 23 November 2023.</p>	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.	<p>In 2015, there are two companies been acquisition under SSMS, (PT Mirza Pratama Putra – Sumber Cahaya POM and PT Menteng Kencana Mas – Kanamit POM). None newly acquired subsidiaries after that.</p> <p>PT Mirza Pratama Putra – Sumber Cahaya POM has been certified in August 2023. PT Menteng Kencana Mas – Kanamit POM has been Initial Certification audit in 2023.</p>	Complied

	RSPO secretariat has approve the change of Time Bound Plan PT Sawit Sumbermas Sarana on 23 November 2023.	
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	RSPO secretariat has approve the change of Time Bound Plan PT Sawit Sumbermas Sarana on 23 November 2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>There was change as per 23 November 2023 the time bound plan has been updated and justified to include the following:</p> <ul style="list-style-type: none"> Includes scheme smallholder into time bound plan Including all planted area which is their land status is not HGU, either previously already certified (such as partly of Sulung and Kenambui Estate of PT SSS) or un-certified estate (such as partly of Natai Baru estate of PT KSA). <p>PT Sawit Sumbermas Sarana has set up a time bound to achieve RSPO certification for all subsidiary companies. However, adjustment has been made on the completion of certification due some several issues:</p> <ul style="list-style-type: none"> PT Menteng Kencana Mas (MKM): 1 mill and 3 estate audit in 2023, and 1 smallholder postpone become 2026 due to RaCP. PT Mirza Pratama Putra (MPP): 1 mill and 1 estate audit in 2023, and 2 smallholders postpone become 2026 due to RaCP and land title. PT Tanjung Sawit Abadi (TSA): 5 smallholders and 3 estates (partially from certified estate) postpone become 2026 due to RaCP and land title. PT Sawit Multi Utama (SMU): 1 estate, 4 estates (partially from certified estate) and 4 smallholders postpone become 2026 due to RaCP and land title. PT Sawit Sumbermas Sarana (SSMS): 3 smallholders and 7 estates (partially from certified estate) postpone become 2026 due to RaCP and land title. PT Mitra Mendawai Sejati (MMS): 2 smallholders and 2 estates (partially from certified estate) postpone become 2026 due to RaCP and land title. 	Complied

	<ul style="list-style-type: none"> PT Kalimantan Sawit Abadi (KSA): 1 estate (partially from certified estate) postpone become 2026 due to land title. 	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	<p>See explanation above.</p> <p>There was a challenging time bound plan for all its relevant entities of the PT Sawit Sumbermas Sarana. However, adjustment has been made on the target completion of certification due some several issues (e.g. RaCP, HGU).</p> <p>RSPO secretariat has approve the change of Time Bound Plan PT Sawit Sumbermas Sarana on 23 November 2023.</p>	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	<p>In 2015, there are two companies been acquisition under SSMS, (PT Mirza Pratama Putra – Sumber Cahaya POM and PT Menteng Kencana Mas – Kanamit POM). None newly acquired subsidiaries after that. From those new acquired companies, there is no fundamental failure.</p> <p>PT Mirza Pratama Putra – Sumber Cahaya POM has been certified in August 2023. PT Menteng Kencana Mas – Kanamit POM has been Initial Certification audit in 2023.</p> <p>RSPO secretariat has approve the change of Time Bound Plan PT Sawit Sumbermas Sarana on 23 November 2023.</p>	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>According to internal audit results for un-certified units on 04 January 2023, has conducted HCV assessment and land use change analysis (LUCA) by external consultant (Remark Asia). The internal audit report confirmed that no replacement of primary forests on those uncertified areas.</p> <p>PT Menteng Kencana Mas and PT Mirza Pratama Putra are newly acquired on 2015, such areas has been cleared before acquired by PT Sawit Sumbermas Sarana (SSMS), therefore, SSMS as parent company prefer to take LUCA since 2016 to a whole uncertified areas then follow RaCP procedure.</p>	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>According to internal audit results for un-certified units on 04 January 2023, has been conducted HCV assessment and land use change analysis (LUCA) by external consultant (Remark Asia). The internal audit report confirmed that no replacement of primary forests on those uncertified areas.</p>	Complied

	PT Menteng Kencana Mas and PT Mirza Pratama Putra are newly acquired in 2015, such areas has been cleared before acquired by PT Sawit Sumbermas Sarana (SSMS), therefore, SSMS as parent company prefer to take LUCA since 2016 to a whole uncertified areas then follow RaCP procedure.	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit results for un-certified units on 04 January 2023, there are some cases of land conflict being in progress and resolved. Company has noticed these cases and fully committed to comply with RSPO requirements particularly land conflict resolution process.</p> <p>However, there was no land conflict that being logged in RSPO Grievance procedure or Dispute Settlement Facility processes.</p> <p>The progress of this requirement will be further checked during next assessment visits.</p>	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>According to internal audit results for un-certified units on 04 January 2023, there is no labour dispute cases found to be happened according to internal audit</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>According to internal audit results for un-certified units on 04 January 2023, there is case found related to legal non-compliance related to HGU.</p> <p>Company has noticed these cases and fully committed to comply with RSPO requirements.</p> <p>However, adjustment has been made on the target completion of certification due some several issues (e.g. RaCP, HGU, etc) – See appendix C</p> <p>The progress of this requirement will be further checked during next assessment visits.</p>	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	<p>Yes, the parent company conduct internal audit for uncertified management units on 04 January 2023. The internal audit covers RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Positive assurances are available in the report, where the uncertified management unit will proceed certification as refer to approved Time Bound Plan.</p>	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	<p>Based on partial audit for uncertified management unit on 04 January 2023, there is no Critical NC raise against the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p>	Complied

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Have there been any stakeholder (including NGO) consultation conducted?	<p>PT Menteng Kencana Mas has been ISPO certified since Jul 2022 (Certificate No: AJAINDO/ISPO-IN/048/VII/2022).</p> <p>PT Menteng Kencana Mas submit mandatory report to relevants authorities periodically.</p> <ol style="list-style-type: none"> 1. Land use report or Laporan Penggunaan HGU, dated 7 June 2022 2. Manpower report or Laporan Wajib Tenaga Kerja, 29 May 2022 3. Plantation report or Laporan PUP, dated 5 Feb 2023 <p>Stakeholder consultation is frequently performed by the unit concurrently with submitting the report and surveillance visit from authorities.</p> <p>None stakeholder comments received regarding un-certified companies under SSMS holding</p>	Complied
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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>	<p>PT Mirza Pratama Putra obtained Izin Usaha Perkebunan in 27 November 2006, as refer to Lamandau Regent Decree No. EK.525.26/271/XI/2006, prior to Permentan No. 26 Tahun 2007 issued. Therefore development of smallholder scheme was not mandatory.</p> <p>PT Mirza Pratama Putra supports scheme smallholders by making partnership to scheme development.</p> <p>There are two organisation that been established:</p> <ul style="list-style-type: none"> - Koperasi Jasa Nuangan Kasuma Jaya (MoU #29/LGL/PLSM/MPP-KNKJ/X/2019, dated 21-10-2019). Cover area 967.53 Ha (404 members). - KUD Sumber Tani (MoU #18//LGL/PLSM/MPP-KUDST/IX/2016, dated 14-09-2016). Cover area 320.54 Ha (234 members). <p>For those smallholder partnerships, still ongoing process because the prospective smallholders member just approved by Plantation Department in 2021.</p>	Complied

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	In the future, this smallholders scheme will directed for RSPO certification.	
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Approved Time Bound Plan

Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
PT Mirza Pratama Putra	Indonesia	PKS Sumber Cahaya	Desa Sumber Cahaya, Kec. Belantikan Raya, Kab. Lamandau, Provinsi Kalteng		Certified	2022	2023	4-7-2023
	Indonesia	Sumber Cahaya Estate	Kecamatan Bulik, Belantikan Raya dan Menthobi Raya Kabupaten Lamandau, Kalimantan Tengah	3,727.11	Certified	2022	2023	4-7-2023
	Indonesia	KUD Sumber Tani	Kecamatan Bulik, Belantikan Raya dan Menthobi Raya Kabupaten Lamandau, Kalimantan Tengah	194.02	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Nuangan Kasuma Jaya	Kecamatan Bulik, Belantikan Raya dan Menthobi Raya Kabupaten Lamandau, Kalimantan Tengah	82.24	Not Certified	2026	-	4-7-2023
PT Menteng Kencana Mas	Indonesia	PKS Kanamit	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah		IC 2023	2023	-	
	Indonesia	Badirih Estate	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	398.40	IC 2023	2023	-	
	Indonesia	Badirih Estate (HGU on process)	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	3,128.71	Not Certified	2026	-	17-11-2023

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
	Indonesia	Kanamit Estate	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	1,477.06	IC 2023	2023	-	-
	Indonesia	Kanamit Estate (HGU on process)	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	1,248.97	Not Certified	2026	-	17-11-2023
	Indonesia	Bahaur Estate	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	759.60	IC 2023	2023	-	-
	Indonesia	Bahaur Estate (HGU on process)	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	565.23	Not Certified	2026	-	17-11-2023
	Indonesia	Koperasi Sumber Air Jaya	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah	1,393.22	Not Certified	2026	-	4-7-2023
PT Tanjung Sawit Abadi	Indonesia	PKS Malata	Kecamatan Maluku, Pandih Batu dan Kahayan Kuala Kabupaten Pulang Pisau - Kalimantan Tengah		Certified	2022	2020	18-06-22
	Indonesia	Malata Estate	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	2,720.95	Certified	2022	2020	18-06-22

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
	Indonesia	Malata Estate	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	2,159.84	Not Certified	2026	-	4-7-2023
	Indonesia	Nanuah Estate	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	415.06	Certified	2022	2020	18-06-22
	Indonesia	Nanuah Estate	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	4,286.20	Not Certified	2026	-	4-7-2023
	Indonesia	Sungai Bulik Estate	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	3,276.20	Certified	2022	2020	18-06-22
	Indonesia	Sungai Bulik Estate	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	1,547.98	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Batu Dara Omas	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	160.54	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Maraga Jaya Bersama	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	260.68	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Melata Jaya Indah	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	340.65	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Seluai Jaya Abadi	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	345.34	Not Certified	2026	-	4-7-2023

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
	Indonesia	Koperasi Turun Bakunyit Abadi	Kecamatan Bulik Timur & Mentobi Raya, Kabupaten Lamandau - Kalimantan Tengah	51.61	Not Certified	2026	-	4-7-2023
PT Sawit Multi Utama	Indonesia	PKS Nanga Kiu	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah		Certified	2022	2020	11-06-22
	Indonesia	Nanga Kiu Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	1,641.85	Certified	2022	2020	11-06-22
	Indonesia	Nanga Kiu Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	2,042.11	Not Certified	2026	-	4-7-2023
	Indonesia	Sepondam Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	3,097.89	Certified	2022	2020	11-06-22
	Indonesia	Sepondam Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	273.46	Not Certified	2026	-	4-7-2023
	Indonesia	Merambang Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	1,616.74	Certified	2022	2020	11-06-22
	Indonesia	Merambang Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	555.99	Not Certified	2026	-	4-7-2023
	Indonesia	Batu Tunggal Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	2,602.49	Certified	2022	2020	

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
	Indonesia	Batu Tunggal Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	788.95	Not Certified	2026	-	4-7-2023
	Indonesia	Pedongatan Estate	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	4,097.67	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Rimba Baguna	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	139.76	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Natai Suka Sejahtera	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	105.13	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Pusaka Bulau Sahabun	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	357.87	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Harapan Makmur Bersama	Kecamatan Bulik Timur Kabupaten Lamandau - Kalimantan Tengah	214.80	Not Certified	2026	-	4-7-2023
PT Kalimantan Sawit Abadi	Indonesia	PKS Natai Baru	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	1,784.00	Certified	2022	2018	25-03-2022
	Indonesia	Natai Baru Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	2,131.58	Certified	2022	2018	25-03-2022
	Indonesia	Natai Baru Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	743	Not Certified	2026	-	4-7-2023

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
PT Sawit Sumbermas Sarana	Indonesia	PKS Selangkun	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah		Certified	2022	2015	04-09-2021
	Indonesia	Selangkun Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	2,424.07	Certified	2022	2015	04-09-2021
	Indonesia	Selangkun Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	62.85	Not Certified	2026	-	4-7-2023
	Indonesia	Rungun Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	2,793.19	Certified	2022	2015	04-09-2021
	Indonesia	Rungun Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	191.58	Not Certified	2026	-	4-7-2023
	Indonesia	Kondang Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	3,236.48	Certified	2022	2015	04-09-2021
	Indonesia	Kondang Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	28.50	Not Certified	2026	-	4-7-2023
	Indonesia	Batu Kotam Estate – PT KSA	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	2,501.96	Certified	2022	2015	04-09-2021
	Indonesia	Batu Kotam Estate – PT KSA (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	1,784.00	Not Certified	2026	-	4-7-2023

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
	Indonesia	Koperasi Ardhamewa	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	96.79	Not Certified	2026	-	4-7-2023
	Indonesia	PKS Sulung	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah		Certified	2022	2013	25-03-2022
	Indonesia	Sulung Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	2,041.40	Certified	2022	2013	25-03-2022
	Indonesia	Sulung Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	1,388.35	Not Certified	2026	-	4-7-2023
	Indonesia	Rangda Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	2,416.03	Certified	2022	2013	25-03-2022
	Indonesia	Rangda Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	333.97	Not Certified	2026	-	4-7-2023
	Indonesia	Kenambui Estate	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	1,424.80	Certified	2022	2013	25-03-2022
	Indonesia	Kenambui Estate (HGU on process)	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	1,271.56	Not Certified	2026	-	4-7-2023
	Indonesia	Koperasi Sepakat Jaya	Kecamatan Kotawaringin Lama, Kabupaten Kotawaringin Barat - Kalimantan Tengah	256.85	Not Certified	2026	-	4-7-2023

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Name of the Unit of Certification	Country	Mill and supply base	Location address	Total Managed Area	Certification Status	Plan Year for Certification	Actual Year for Certification	Date of Last TBP Verified by CB
PT Mitra Mendawai Sejati	Indonesia	PKS Suayap	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah		Certified	2021	2016	16-10-2021
	Indonesia	Suayap Estate	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah	5,081.26	Certified	2021	2016	16-10-2021
	Indonesia	Suayap Estate (HGU on process)	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah	443.08	Not Certified	2026	-	4-7-2023
	Indonesia	Umpang Estate	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah	3,840.12	Certified	2021	2016	16-10-2021
	Indonesia	Umpang Estate (HGU on process)	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah	589,60	Not Certified	2026	-	4-7-2023
	Indonesia	Kelompok Tani Citra Mua Sejati	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah	102.80	Not Certified	2026	-	4-7-2023
	Indonesia	Kelompok Tani Bina Mitra Suayap	Kecamatan Arut Selatan, Kabupaten Kotawaringin Barat - Kalimantan Tengah	27.01	Not Certified	2026	-	4-7-2023

3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical; four (4) Minor nonconformities and no (0) Opportunity For Improvement raised. The PT Mirza Pratama Putra 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 #	2494045-202405-M1	Issued Date	16/05/2024
Due Date	15/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	3.8.5 (Critical)		
Statement of Nonconformity:	The procedure for the implementation of supply chain requirement is no longer updated.		
Requirement Reference:	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 		
Objective Evidence:	Sumber Cahaya POM has established procedure covering the implementation of all the elements of the supply chain model requirements, that documented in "Prosedur Supply Chain" (SOP-PKS.GN-20) dated 25 July 2022. However, in Section 3 "Acuan", stated that one of the references is RSPO Market Communication and Claim version January 2019, this version is no longer updated.		
Corrections:	<p>Engineering Department updates reference points in accordance with the latest version of the RSPO Rules on Market Communication and Claims</p> <p>Verification 15 August 2024</p>		

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	The company shown "Prosedur Supply Chain" (SOP-PKS.GN-20. Rev.13) effective date 01 July 2024, in Section 3 "Acuan", has been stated the reference is RSPO Market Communication and Claim version October 2022.
Root Cause Analysis:	SOP Supply Chain reference has not been updated because the SOP has not been reviewed, especially if there are updated references
Corrective Actions:	<p>Engineering Department invites the relevant departments to periodically review SOPs at least once a year at reference points if there are updates to either the applicable laws and regulations or the Certification System Requirements and immediately update them if there are changes.</p> <p>Verification 15 August 2024</p> <p>The company shown Controlled Document Master List updated 01 February 2024.</p>
Assessment Conclusion:	Unit of certification has identified root cause, prepare correction and corrective action plan. The correction and corrective action has been implemented as planned. NC Critical/Major closed satisfactory.

Non-conformity			
NCR Ref #	2494045-202405-M2	Issued Date	16/05/2024
Due Date	15/08/2024	Closure Date	15/08/2024
Indicator & Category (Critical / Minor)	5.1.6 (Critical)		
Statement of Nonconformity:	There is no sufficient evidence that the unit of certification has established and implemented mechanism for timely payment to the FFB supplier.		
Requirement Reference:	Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.		
Objective Evidence:	<p>During ASA-1, audit team verified the contract of FFB Supplier, PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). The contract mentioned that Payment will be made after the First Party (PT MPP) receives complete and correct billing documents, in the form of invoice, tax invoice, copy of the work agreement, recap of weighing and grading results from the POM, and checklist for completeness of supporting documents. However, the contract did not mention specific timeframe for payment.</p> <p>Based on verification to contract of FFB Transporter, PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January 2024) followed by Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024 that PT Banua Sarana Jaya sub-contracted the activity to CV Karya Berkah Bersama. It verified that timeframe for payment is three weeks after invoice and all supporting documents received by first party (PT MPP). However, based on interview with representative of FFB Transporter, revealed that payments from the company are often more than 2 months late. The unit of certification also cannot show proof of payment for FFB transport for the period March and April 2024.</p>		
Corrections:	<ul style="list-style-type: none"> Both parties added a payment term clause to PT MUA's 2024 Agreement with PT MPP to ensure payment deadlines based on mutual agreement. 		

	<ul style="list-style-type: none"> Finance will make payments to FFB transportation contractors for the period March and April 2024. <p>Verification 15 August 2024</p> <p>FFB Sale and Purchase Agreement between PT Mirza Pratama Putra (first party) and PT Multi Usaha Abadi (second party) No. 09/LGL/MKT/MPP-MUA/I/2024 dated 2 January 2024 with a term of 1 year, the agreement was signed both parties in June 2024. In the Agreement in Article 6 Point 4 it is stated that payment will be made no later than 2 (two) weeks after the First Party Finance Department receives the billing documents.</p> <p>Proof of cash disbursement dated 4 July 2024 paid to CV Karya Berkah Bersama for payment of Agreement No. 36/KBN/BSJ.248-KBB/2024 pay for FFB transport work at Sumber Cahaya Estate for the period 01 to 31 March 2024.</p> <p>Proof of cash disbursement dated 5 July 2024 paid to CV Karya Berkah Bersama for payment of Agreement No. 36/KBN/BSJ.248-KBB/2024 pay for FFB transport work at Sumber Cahaya Estate for the period 01 to 30 April 2024.</p>
Root Cause Analysis:	<ul style="list-style-type: none"> Agreement between PT Mirza Pratama Putra and PT Multi Usaha Abadi for 2023 does not yet include a payment period because the agreement between the company and PT MUA in the agreement only focuses on payment procedures. Payment for FFB transportation for the period March and April 2024 has not been made by PT MPP to the contractor because they are still waiting for the payment queue process.
Corrective Actions:	<ul style="list-style-type: none"> Marketing and Contractor Users review the suitability of the contents of the agreement every year. Heads of departments or heads of work units that use contractor services ensure that contractor payments are made in accordance with the time period set out in the agreement by appointing personnel to monitor payments. <p>Verification 15 August 2024</p> <p>The Commercial Division Marketing Staff is tasked with making FFB records per period for each supplier and monitoring outstanding FFB payment.</p>
Assessment Conclusion:	Unit of certification has identified root cause, prepare correction and corrective action plan. The correction and corrective action has been implemented as planned. NC Critical/Major closed satisfactory.

Non-conformity			
NCR Ref #	2494045-202405-N1	Issued Date	16/05/2024
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	2.1.3 minor		
Statement of Nonconformity:	The HGU benchmarks sampled were not found during the ASA1 audit.		

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Requirement Reference:	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.
Objective Evidence:	Based on the results of the field visit to the company boundaries, it was known that the sampled HGU pegs were not found, these pegs were: HGU IV-48, HGU IV-44 and HGU IV-40.
Corrections:	PIC GIS reports the results of HGU maintenance monitoring to the work unit. The work unit takes corrective action in the form of procuring missing HGU poles.
Root Cause Analysis:	When the audit was carried out, the HGU poles with HGU sample numbers IV-48, IV-44, IV-40 were not found because the poles were made of wood, which had rotted and disappeared. PIC GIS has monitored the HGU poles but it has not been reported to the work unit so there has been no follow-up on the missing poles.
Corrective Actions:	The work unit leader ensures that the GIS team carries out HGU poles checks and that follow-up actions on the poles report are reported to the work unit and carried out consistently every semester.
Assessment Conclusion:	Unit of certification has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.

Non-conformity			
NCR Ref #	2494045-202405-N2	Issued Date	16/05/2024
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	5.1.5 (Minor)		
Statement of Nonconformity:	There is not enough evident that all contract with third party are legally valid.		
Requirement Reference:	Contracts are fair, legal and transparent and have an agreed timeframe..		
Objective Evidence:	During ASA 1, audit team verified the contract of FFB Supplier, PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). However, based on Article 17, the validity period of the contract has been expired on 31 December 2023.		
Corrections:	The Marketing Department communicates with the legal team so that the agreement revision can be completed and ratified immediately.		
Root Cause Analysis:	The draft agreement for 2024 has been processed for approval, but at the time the audit was carried out, the agreement for PT MUA and PT MPP had not been completed due to a revision of the clauses in the agreement from interested parties. During the approval process, PT MUA sends the FFB to the PT MPP with reference to the previous period's agreement.		
Corrective Actions:	Marketing staff reviews the contents of the agreement before the end of the contract for at least 3 months so that the FFB delivery collaboration continues with the valid agreement and monitors the validity period of the existing agreement's.		

Assessment Conclusion:	Unit of certification has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.
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Non-conformity			
NCR Ref #	2494045-202405-N3	Issued Date	16/05/2024
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	6.2.7 Minor		
Statement of Nonconformity:	There is not sufficient evidence that permanent fulltime employment is used for all core work performed by the unit of certification.		
Requirement Reference:	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.		
Objective Evidence:	<p>Verification of the Employee Monthly Report for the period April 2024 revealed that there were 18 Casual Workers with the position of harvester with Work Entry Dates being 2019, 2022, 2023 and 2024. From the management explanation provided in the monthly report there was an input error in the Position column. However, this explanation cannot be validated because there is no other supporting evidence.</p> <p>Letter dated 19 March 2024 from the SCE Estate Manager addressed to Act. Regional Head II regarding Applications for New Employees for harvest activities as many as 16 persons.</p> <p>Letter dated 20 March 2024 from the SCE Estate Manager addressed to Act. Regional Head II regarding Applications for New Employees for harvest activities as many as 26 persons.</p> <p>Verified <i>Form Pemeriksaan Kesehatan Calon Karyawan</i> for Harvest Workers 21 March 2024 in the name of for example:</p> <ul style="list-style-type: none"> - Muhammad Reza - M. Alqosim - M. Fauzi - Muhammad Raihan Azmi - Muhammad Rizky - M. Naufal Fadillah - Saut Pandapotan Hutasoit - Wasnita <p>Furthermore, the Company showed the Daily Work Agreement between PT Mirza Pratama Putra and Muhammad Reza No. 69/MPP-SCE/III/2024 declared the position as Maintenance Worker. From the verification results, it was discovered that the work agreement contained an error in writing the date and there was no stamp attached to the signature, so the evidence could not be validated. Apart from that, the Work Agreement is not made according to the type of work specified.</p>		

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	<i>Prosedur Penerimaan Pekerja Harian Tetap</i> (SOP-HRDGA.GN-015, 01 September 2022) Attachment 3 "Estate Position Groups are declared harvesters is permanent workers".
Corrections:	Personnel corrects employee agreement that are incorrect in writing the position and date of the SPK and adjusts them to the type of work of the employee concerned. Referring to the procedures for hiring workers and the SPK which has been corrected is verified again by KTU
Root Cause Analysis:	The employee in the name of M. Reza at the time of the initial application from the Estate office to the Regional Office was for harvest labor, but due to the need for upkeep workers, the person concerned was moved to become an upkeep employee so that the agreement in the name of M. Reza became the agreement for upkeep Employees. As well as a lack of verification from the head of personnel admin in ensuring the validation of the agreement, resulting in the wrong date being written and without a stamp.
Corrective Actions:	Work unit leaders ensure that personnel create employee agreement's according to their type of work through Head of Administration verification and referring to employee recruitment procedures.
Assessment Conclusion:	Unit of certification has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.

Non-conformity			
NCR Ref #	2494045-202405-N4	Issued Date	16/05/2024
Due Date	Next Assessment	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.1 minor		
Statement of Nonconformity:	Based on field visit, the auditor found that the certificate holder has not consistence on disposal of waste material according to procedures.		
Requirement Reference:	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.		
Objective Evidence:	<p>It is known that the company has established a SOP for Hazardous Waste Management SOP - SUS.EHS-002 rev.1 dated 7 November 2022 which explains the prohibition on disposing of B3 waste produced directly into environmental media, however storing it in hazardous waste storage facilities or TPS LB3.</p> <p>However, based on the results of a field visit to the landfill at Block J15 Afd Delta, it was known that there is chemical packaging that has been disposed of in the landfill, this was not in accordance with established procedures.</p> <p>Based on field visits to the Polibun and TPS LB3 at POM revealed that there was infectious waste stored in yellow bags lined with cardboard. However, based on Minister of Environment and Forestry Regulation Number 56 of 2015 Article 8 Paragraph 2 it is stated that Hazardous Waste as intended in Article 4 letters a, b, and/or letter c (Hazardous Waste in this Ministerial Regulation includes Waste: a. with infectious characteristics; b. objects sharp; c. pathological) stored in the</p>		

	<p>Hazardous Waste Storage area prior to Hazardous Waste Transport, Hazardous Waste Processing, and/or Hazardous Waste Stockpiling no later than:</p> <ol style="list-style-type: none"> 1. 2 (two) days, at a temperature greater than 0°C (zero degrees Celsius); or 2. 90 (ninety) days, at a temperature equal to or less than 0°C (zero degrees Celsius), from the time the hazardous waste is produced.
Corrections:	<ol style="list-style-type: none"> 1. Estate employees collect hazardous waste in the final waste disposal site to be stored in the hazardous waste warehouse in accordance with the SOP of management hazardous waste. 2. The Sustainability Coordinator arranges the procurement and issue of warnings prohibiting the disposal of hazardous waste directly to the final waste disposal site. 3. Hazardous waste Warehouse Officers manage medical waste at hazardous waste in accordance with the provisions of the SOP of management hazardous waste.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Estate employees and hazardous waste warehouse managers do not understand the procedures for managing hazardous waste due to the lack of warnings prohibiting direct disposal of hazardous waste posted in the field. So there are still employees who throw away used chemical packaging at final waste disposal site. 2. Licensed hazardous waste warehouse managers at mill have not managed medical waste in accordance with the provisions of the SOP of management hazardous waste.
Corrective Actions:	<ol style="list-style-type: none"> 1. PIC Compliance Sustainability carries out dissemination of hazardous waste management to Estate employees in accordance with the SOP of management hazardous waste. 2. The Sustainability Coordinator carries out environmental and OHS inspections every month. 3. Work unit leaders ensure that hazardous waste management dissemination is carried out regularly to all employees at least 2 times a year by the Afdeling Assistant
Assessment Conclusion:	<p>Unit of certification has identified the root cause; prepare correction plan and corrective action plan. All the evidence will be followed up at next surveillance. Minor NC remains open.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Minor Non-conformity			
NCR Ref #	2341289-202305-N1	Issued Date	05-05-2023
Due Date	ASA 1	Closure Date	16-05-2024
Indicator & Category (Critical / Minor)	2.2.2 Minor		
Statement of Nonconformity:	Unit of certification have not contained specific clause on meeting relevant legal requirements within contract with third party.		
Requirement Reference:	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.		
Objective Evidence:	Contract sighted: Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit antara PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra dengan CV Hosana No. 132/LGL/MKT/SSMS.G-HOSANA/VII/2022, tanggal 1 Juni 2022 (valid until 1 July 2023).		
Corrections:	Develop a mechanism for evaluating contractors regarding the fulfilment of legal obligations (employment, K3, and others) that are relevant in Indonesia.		
Root Cause Analysis:	The company does not yet have a contractor evaluation mechanism regarding the fulfilment of legal obligations (employment, K3, and others) that are relevant in Indonesia.		
Corrective Actions:	The Logistics Department ensures that evaluations of contractors regarding the fulfilment of legal obligations (employment, K3, and others) that are relevant in Indonesia are carried out periodically according to procedures.		
Assessment Conclusion:	<p>The unit of certification provides evidence of contract that been evaluated. In example:</p> <p>Contract name: Perjanjian Jasa Pengangkutan Palm Product Kelapa Sawit antara PT Sawit Sumbermas Sarana dan anak perusahaannya (PT Mirza Pratama Putra) dengan CV Hosana Perkasa.</p> <p>Contract number: 120/LGL/MKT/SSMS-HP/VII/2023.</p> <p>Contract date: 1 July 2023.</p> <p>Contract evaluation:</p> <ul style="list-style-type: none"> - Manpower regulation: available in Article 3: scope, No. 13. Status: comply. - OSH regulation: available in Article 3: scope, No. 13. Status: comply. - Social insurance regulation: available in Article 18: employment insurance. Status: comply. - No child labour: available in Article 16: Employment, No. 2. Status: comply. - Meet all relevant regulation requirements: available in Article 16: Employment, No. 3. Status: comply. 		

	<ul style="list-style-type: none"> - No forced labour: available in Article 16: Employment, No. 4. Status: comply. <p>Evaluated by: Legal department.</p> <p>The corrective action aligned with the root cause analysis. Implementation of the corrective action and consistency of its implementation will be verified during Surveillance. Because no new contract was made after the IAV.</p> <p>During ASA 1, audit team verified contract of CPO & PK Transporter, e.g.:</p> <ul style="list-style-type: none"> - PT Anugrah Lestari Transport (Contract No. 142/LGL/MKT/SSMS-ALT/X/2023, dated 2 October 2023). - CV Tri Mega Usaha (Contract No. 23/LGL/MKT/SSMS.G-TMU/I/2024, dated 5 January 2024). <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 3 verse 13; Article 15 verse 3; and Article 16 verse 1.</p> <p>Audit team verified contract of FFB Supplier, e.g.:</p> <ul style="list-style-type: none"> - PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 14 verse 3; Article 15 verse 1.</p> <p>Audit team verified contract of FFB Transporter, e.g.:</p> <ul style="list-style-type: none"> - PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January 2024). Followed by PT Banua Sarana Jaya sub-contracted to CV Karya Berkah Bersama, based on Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024. <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 12 verse 1.</p> <p>During interview with contractors, confirmed that they have aware and implemented this requirement.</p> <p>Minor NC closed on 16 May 2024.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2341289-202305-N2	Issued Date	05-05-2023
Due Date	ASA 1	Closure Date	16-05-2024
Indicator & Category (Critical / Minor)	2.2.3		
Statement of Nonconformity:	Unit of certification have not contained clauses disallowing child, forced and trafficked labour within contract with third party		
Requirement Reference:	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.		
Objective Evidence:	Contract sighted:		

	Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit antara PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra dengan CV Hosana No. 132/LGL/MKT/SSMS.G-HOSANA/VII/2022, tanggal 1 Juni 2022 (valid until 1 July 2023).
Corrections:	Adding new clauses to employment contracts with PK transporters regarding the prohibition of child labour, the prohibition of using labor from human trafficking and forced labour.
Root Cause Analysis:	The contract between the company and the CPO transporter does not include a clause regarding the prohibition of child labour, the prohibition on using labor from human trafficking and forced labor because the Legal department has not received socialization regarding these clauses.
Corrective Actions:	The Contract Drafter and User ensure that each new employment contract includes clauses regarding the prohibition of child labour, the prohibition of using labor from human trafficking and forced labour.
Assessment Conclusion:	<p>The unit of certification provides evidence of contract that been evaluated. In example:</p> <p>Contract name: Perjanjian Jasa Pengangkutan Palm Product Kelapa Sawit antara PT Sawit Sumbermas Sarana dan anak perusahaannya (PT Mirza Pratama Putra) dengan CV Hosana Perkasa.</p> <p>Contract number: 120/LGL/MKT/SSMS-HP/VII/2023.</p> <p>Contract date: 1 July 2023.</p> <p>Contract evaluation:</p> <ul style="list-style-type: none"> - Manpower regulation: available in Article 3: scope, No. 13. Status: comply. - OSH regulation: available in Article 3: scope, No. 13. Status: comply. - Social insurance regulation: available in Article 18: employment insurance. Status: comply. - No child labour: available in Article 16: Employment, No. 2. Status: comply. - Meet all relevant regulation requirements: available in Article 16: Employment, No. 3. Status: comply. - No forced labour: available in Article 16: Employment, No. 4. Status: comply. <p>Evaluated by: Legal department.</p> <p>The corrective action is aligned with the root cause analysis. Implementation of the corrective action and consistency of its implementation will be verified during Surveillance. Because no new contract was made after the IAV.</p> <p>During ASA 1, audit team verified contract of CPO & PK Transporter, e.g.:</p> <ul style="list-style-type: none"> - PT Anugrah Lestari Transport (Contract No. 142/LGL/MKT/SSMS-ALT/X/2023, dated 2 October 2023). - CV Tri Mega Usaha (Contract No. 23/LGL/MKT/SSMS.G-TMU/I/2024, dated 5 January 2024). <p>Based on contract evaluation, it was confirmed that clauses disallowing child, forced and trafficked labour has been available in Article 15 verse 2 and 4.</p>

	<p>Audit team verified contract of FFB Supplier, e.g.:</p> <ul style="list-style-type: none"> - PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). <p>Based on contract evaluation, it was confirmed that clauses disallowing child, forced and trafficked labour has been available in Article 14 verse 2 and 4.</p> <p>Audit team verified contract of FFB Transporter, e.g.:</p> <ul style="list-style-type: none"> - PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January 2024). Followed by PT Banua Sarana Jaya sub-contracted to CV Karya Berkah Bersama, based on Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024. <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 11 verse 2 and 3.</p> <p>During interview with contractors, confirmed that they have aware and implemented this requirement.</p> <p>Minor NC closed on 16 May 2024.</p>
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Previous Audit Minor Non-conformity			
NCR Ref #	2341289-202305-N3	Issued Date	05-05-2023
Due Date	ASA1	Closure Date	16-05-2024
Indicator & Category (Critical / Minor)	6.5.3		
Statement of Nonconformity:	Unit of certification have no evidence conducting assessment the needs of new mothers and its relevant documents.		
Requirement Reference:	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.		
Objective Evidence:	No evidence that assessment the needs of new mothers is conducted.		
Corrections:	Work unit head identify the needs of new mothers and follow up on them.		
Root Cause Analysis:	The site unit has not identified the needs of new mothers giving birth, because all this time the mothers who have just had children have been given permission to breastfeed their children at their respective homes in between jobs.		
Corrective Actions:	The work unit ensures that identification of the needs of new mothers is carried out and evaluated periodically.		
Assessment Conclusion:	<p>The unit of certification provides evidence of New Mother (Kuesioner Kebutuhan Ibu Muda) Form which consist of 10 questionnaires covering the needs of new mother.</p> <p>The corrective action is aligned with the root cause analysis. Implementation of the corrective action and consistency of its implementation will be verified during Surveillance.</p> <p>During ASA-1, the company shows documents:</p> <ul style="list-style-type: none"> - Questionnaire assessment the needs new mother of PT MPP 		

	<ul style="list-style-type: none"> - Minutes of Meeting assessment the needs new mothers results report of PT MPP - Internal Memo for Follow-up on the needs new mothers of PT MPP <p>The results of interviews with Paramedics at Polibun were presented to find out the needs of new mothers, interviews were conducted with workers who were pregnant by midwives/nurses and the sustainability team.</p> <p>Based on the explanation above, it can be concluded that the company 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 NC closed on 16 May 2024.</p>
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Previous Audit Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2341289-202305-N1	Minor	2.2.2	5 May 2023	Closed (16 May 2024)
2341289-202305-N2	Minor	2.2.3	5 May 2023	Closed (16 May 2024)
2341289-202305-N3	Minor	6.5.3	5 May 2023	Closed (16 May 2024)
2494045-202405-M1	Critical	3.8.5	16 May 2024	Closed (15 August 2024)
2494045-202405-M2	Critical	5.1.6	16 May 2024	Closed (15 August 2024)
2494045-202405-N1	Minor	2.1.3	16 May 2024	Open
2494045-202405-N2	Minor	5.1.5	16 May 2024	Open
2494045-202405-N3	Minor	6.2.7	16 May 2024	Open
2494045-202405-N4	Minor	7.3.1	16 May 2024	Open

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 Mirza Pratama Putra** Certification Unit's environmental and social performance, legal and any known dispute issues.

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

stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements / 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 of Lamandau Regency	Environmental Agency – Kepala Bidang Penataan dan Penaatan Lingkungan Hidup	Phone interview
Governmental Department of Lamandau Regency	Land Agency - Kasie Penyelesaian dan Pengangguhan Sengketa	Phone interview
Governmental Department of Lamandau Regency	Manpower Agency – Head of Agency	Phone interview
Governmental Department of Lamandau Regency	Plantation Agency - Analis Pemasaran Hasil Pertanian	Phone interview
Communities	Village Head of Nuangan	Face to face interview
Communities	Village Head of Sumber Cahaya	Face to face interview
Communities	Village Head of Bukit Jaya	Face to face interview
Contractor	FFB Supplier - PT Multi Usaha Abadi	Phone interview
Contractor	FFB Transporter - CV Karya Berkah Bersama	Phone interview
Contractor	CPO & PK Transporter - CV Anugrah Lestari Transport	Phone interview
Smallholders	KUD Sumber Tani	Face to face interview
Smallholders	Koperasi Jasa Nuangan Kasuma Jaya	Face to face interview
Internal Stakeholder	Gender Committee	Face to face interview
Internal Stakeholder	Bipartit Body (<i>LKS Bipartit</i>)	Face to face interview
NGO	Borneo Sarang Peruyak (BSP)	Cannot be contacted
NGO	Borneo Orangutan Survival (BOS)	Cannot be contacted

Stakeholders comment	
1	<p>Feedbacks:</p> <p>Environmental Agency</p> <p>The Unit of Certification has complied with applicable regulations, among others has had environmental document (ANDAL), license of hazardous temporary warehouse, license of POME Land Application, license of WWTP. All mandatory reports related environmental has been reported to agency. There is no official complaints from stakeholder related environmental issue.</p>

	<p>Audit Team verification and response:</p> <p>There is no negative issue to be followed up. However, during field observation, the Unit of Certification already follow up the feedback from environmental agency immediately and the objective evidence have been verified by auditor.</p>
2	<p>Feedbacks:</p> <p>Land Agency of Lamandau Regency</p> <p>The company carries out plantation cultivation and processing factories on land that has been granted cultivation rights (HGU). Reports related to developments in land use have been reported regularly by the company. The relinquishment of some HGU areas has been completed in 2024. There were no land disputes reported by the community or other agencies to the Lamandau Regency Land Office.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
3	<p>Feedbacks:</p> <p>Manpower Agency of Lamandau Regency</p> <ul style="list-style-type: none"> • There is no negative issue related to employment or OHS. Mandatory reports such as P2K3 (OHS Committee) and Annual Employment report have been submitted regularly. • No child labor practices. • As of May 2024, there are no Industrial Relations case reports. • As of May 2024, there are no cases of work accidents. • The implementation of wages has been in accordance with government regulations <p>Audit Team verification and response:</p> <p>There is no negative issue raised by stakeholder.</p>
4	<p>Feedbacks:</p> <p>Department of Plantation of Lamandau Regency</p> <p>Plantation business development reports have been reported regularly by the company. There were no land disputes reported by the community or other agencies to the Lamandau Regency Plantation Office. Currently two villages have been collaborated with the company through the formation of plasma (scheme smallholder), namely KUD Sumber Tani and Koperasi Jasa Nuangan Kasuma Jaya. Currently, the collaboration with Nanga Palikodan Village is in the process of land compensation to become a third plasma plantation. No land claims from the community were reported to the Lamandau Regency Plantation Service. The company continues to respect the rights of the community as previous landowners. The Plantation Service visits companies within the framework of PUP and is coordinated with PTSP. There were no complaints from the public regarding the FFB payments. The training that has been carried out in collaboration with the company is related to BPDPKS.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
5	<p>Feedbacks:</p> <p>Nuangan Village – Head of Village</p> <ul style="list-style-type: none"> • Communication has gone well between company and Nuangan Village • There is no land dispute during period Y2023. • There is no environmental pollution, or social issues during period Y2023. • The community of Nuangan Village majority are the local peoples. • Compansation process has gone well, until now there is no dispute.

	<p>The Village has carried out Forum Group Discussion in establishment of CSR Program Y2023. An example of the results of an FGD is that the organization has provided assistance in religious assistances, heavy equipment assistances, and basic material assistances.</p> <p>Audit Team verification and response: This is a positive response, there is no comment to verify.</p>
6	<p>Feedbacks: Sumber Cahaya Village – Head of Village</p> <ul style="list-style-type: none"> • Communication has gone well between company and Sumber Cahaya Village • There is no land dispute during period Y2023 • There is no environmental pollution, or social issues during period Y2023. • Compansation process has gone well, until now there is no dispute. • The Village has carried out Forum Group Discussion in establishment of CSR Program Y2023. An example of the results of an FGD is that the organization has provided assistance procure watermelon seeds, and the program has been implemented and has been harvested and has added to the community's economy. • The other implementation of CSR Program in Y2023 are religious assistances, heavy equipment assistances, basic material assistances and education assistances. <p>Audit Team verification and response: This is a positive response, there is no comment to verify.</p>
7	<p>Feedbacks: Bukit Jaya Village – Head of Village</p> <ul style="list-style-type: none"> • Communication has gone well between company and Bukit Jaya Village • There is no land dispute during period Y2023. • There is no environmental pollution, or social issues during period Y2023. • The community of Bukit Jaya Village majority are the transmigrant people from Java Island. • The Village has carried out Forum Group Discussion in establishment of CSR Program. An example of the results of an FGD is that the organization has provided assistance in management of Tanah Kas Desa (TKD), TKD is village's land that carried out fully managed by the organization namely planting oil palm and managed by the organization. Currently it is the harvest and production period, the net income value received by the village after deducting the costs of caring for and providing seeds. • The other implementation of CSR Program in Y2023 are religious assistances, heavy equipment assistances, and basic material assistances. <p>Audit Team verification and response: This is a positive response, there is no comment to verify.</p>
8	<p>Feedbacks: FFB Supplier (PT Multi Usaha Abadi)</p> <p>PT Multi Usaha Abadi (MUA) acts as a collector of FFB from several loading ramps, including: PJR, AIS, SRI and USG. Community plantation owners sell FFB from their plantations to their respective loading ramps (collectors) and payment is made in cash. Each collector then collects payment from PT MUA, then PT MUA collects payment from the certification unit. PT MUA has a database of all its FFB suppliers including farmer names, addresses, GPS coordinates and legality of land owned. This data is available because before a grower becomes a supplier, PT MUA conducts a location survey and interviews with the plantation owner. For payment, regular practice is the certification unit provides an advance payment to PT MUA, as capital for cash payments to growers. The remaining payment is paid if PT MUA has completed the invoice.</p> <p>Audit Team verification and response: There is no negative issue that need further verification.</p>

9	<p>Feedbacks:</p> <p>FFB Transporter (CV Karya Berkah Bersama)</p> <p>The company has a FFB transportation contract with PT Banua Sarana Jaya (BSJ) based on Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, then PT BSJ subcontracted the FFB transport activity to CV Karya Berkah Bersama (KBS), based on Contract No. 36/KBN/BSJ.248-KBB/I/2024. CV KBS has 7 unit of trucks, however currently there are 4 units are in operation, while the other 3 units are still under repair. The contractor experienced several delays in payment, for example activities from November 2023 to January 2024 was paid in April 2024. This has been conveyed to the company, however until this audit, payment for activities from February to March 2024 had not been made.</p> <p>Audit Team verification and response:</p> <p>Delay of payments have been raised as Critical NC in indicator 5.1.6</p>
10	<p>Feedbacks:</p> <p>CPO & PK Transporter (CV Anugrah Lestari Transport)</p> <p>Communication between the company and the cooperative is going well. The service provided is CPO and PK transportation from PT MPP - Sumber Cahaya POM to the PT Citra Borneo Utama Refinery, which is located in Kumai, Kotawaringin Barat. The contractor knows that while cooperating with PT MPP, they must comply with all applicable regulations and not use child labour or forced labour. PPE equipment is fully provided by the contractor. In accordance with RSPO requirements, the contractor is willing to be audited by a certification body if necessary and with prior notification. There were no complaints while collaborating with PT MPP.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
11	<p>Feedbacks:</p> <p>Bpk. Edy Wijaksono - KUD Sumber Tani</p> <p>Communication between the company and the cooperative is going well. Through its representatives, the company regularly visits the Cooperative. KUD Sumber Tani's oil palm plantations were planted in 2012 covering an area of 194.02 Ha, all of which were included in mature plantations. The members of KUD Sumber Tani consist of more than 200 people. The legality of plasma land is a Certificate of Ownership Rights (SHM). Plasma plantation operational activities are carried out entirely by company employees, so the cooperative only needs to receive the proceeds from FFB sales. Regular FFB payments by companies to cooperatives are made every month, with the TBS price following the Disbun price. Based on the agreement with members, payments from the Cooperative to members are made every 3 months, deducting 10% for administration and replanting savings. The Annual Member Meeting (RAT) is routinely held in May/June every year. For the 2023 Fiscal Year, the RAT will be held in June 2024. There are plans to add members, however it is currently still in process. The training that the company has provided to cooperatives is training related to taxes and administration.</p> <p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
12	<p>Feedbacks:</p> <p>Bpk. Yusnan - Koperasi Jasa Nuangan Kasuma Jaya</p> <p>Communication between the company and the cooperative is going well. Through its representatives, the company regularly visits the Cooperative. Koperasi Jasa Nuangan Kasuma Jaya's oil palm plantations were planted in 2015, 2016, 2017 and 2020 covering an area of 82,24 Ha. Some areas are already mature, and some are still immature. The members of Koperasi Jasa Nuangan Kasuma Jaya consist of 68 people. The legality of plasma land ownership consists of a Land Certificate (SKT). Plasma plantation operational activities are carried out entirely by company employees, so the cooperative only needs to receive the</p>

	<p>proceeds from FFB sales. Regular FFB payments by companies to cooperatives are made every month, with the TBS price following the Disbun price. Based on the agreement with members, payments from the Cooperative to members have not been made because the value is still small, considering that only a portion of the area can be harvested. The Annual Member Meeting (RAT) is routinely held in May/June every year. For the 2023 Fiscal Year, the RAT will be held in June 2024. The training that the company has provided to cooperatives is training related to taxes and administration.</p>
	<p>Audit Team verification and response:</p> <p>There is no negative issue that need further verification.</p>
13	<p>Feedbacks:</p> <p>Gender Committee</p> <p>The company has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. Have implemented regulations related to reproductive rights such as menstruation leave and childbirth, as well as prohibition of pregnant and breastfeeding women to work in chemical area.</p>
	<p>Audit Team verification and response:</p> <p>There is no negative issue to be followed up. The unit of certification has had Sustainability Policy that protect reproduction rights and prevent sexual harassment, also prohibition of pregnant and breastfeeding women to work in chemical area.</p>
14	<p>Feedbacks:</p> <p>Bipartite Body (<i>LKS Bipartit</i>)</p> <p><i>LKS Bipartit</i> (bipartite body) has been formed by the company and its member has cover the representatives of management and workers. The bipartite meetings have been conducted regularly. There is no negative issue related employment or PPE provision.</p>
	<p>Audit Team verification and response:</p> <p><i>LKS Bipartit</i> (bipartite body) has been registered in Manpower Agency of Lamandau Regency based on Decree No. 560/394/X/DTT-HI/2021 dated 28 October 2021.</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
Antonius Talea	1997	6	Yes	Yes	Complied
Firman Aseng	2000	14	Yes	Yes	Complied

Previous land owner / user comment	
	<p>Feedbacks:</p> <p>Mr Antonius Talea and Firman Aseng</p> <ul style="list-style-type: none"> The land has been managed since 1997 for Antonius Talea and since 2000 for Firman Aseng. The area is 6 Ha for Antonius Talea anf 14 Ha for Firman Aseng.

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	<ul style="list-style-type: none"> The company has carried out compensation process in 2016, the process has implemented FPIC process. Compensation process has witnessed by the Village head of Sumber Cahaya Village and Nuangan Village. <p>There is no conflict until now with the company.</p>
	<p>Audit Team verification and response:</p> <p>This is a positive response, there is no comment to verify.</p>

3.5 Impartiality and conflict of interest

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

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 Mirza Pratama Putra 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 Mirza Pratama Putra is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
Name: Naila Karima	Name: Henky Satrio Wibowo
Company Name: BSI Services Malaysia, Sdn. Bhd.	Company Name: PT Mirza Pratama Putra
Title: Lead Auditor	Title: Chief Sustainability Officer
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 15 August 2024	Date: 15 August 2024

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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 -	The company has established <i>Prosedur Pemberian Informasi Kepada Pihak Luar</i> (SOP-CS.GN-001, Rev.01, 1 December 2015)". According to the procedure, such documents that possible to provided to the public as requested officially. Information includes in public accessible (on chapter 6.2) such as: <ul style="list-style-type: none"> • Land Title • Health and Safety Plan • Environment and Social Impact Assessment (AMDAL) • HCV Assessment • Pollution mitigation Plan • Grievance records • Negotiation procedure • Continual improvement plan • Public summary of the certification assessment report • Human Rights Policy Information related location existence of RTE species might be secret in order to avoid unauthorized trade and hunt of the RTE species.	Complied

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		<p>For classified documents will follow Indonesian Act "UU No.14 Tahun 2008, <i>tentang Keterbukaan Informasi Publik</i>". Information that potentially negative impacts to social and environmental impact shall be considered for permission.</p> <p>The company also has listed stakeholders based on the category such as governments, head of village, NGOs, women group, university, public figures etc. The company always submit periodic reports to relevant institutions to inform regarding the company's performance such as report of implementation of environmental management and monitoring (twice a year), the plantation performance report (twice a year), P2K3 report (quarterly) and hazardous waste management report (quarterly). Based on consultation with stakeholders, they were aware the type of information available the procedure for accessing the information.</p> <p>Company also made mechanism to ensuring information related RSPO mad publicly through their company website https://ssms.co.id/en.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All information and public documents referred to in indicator 1.1.1 are available in Bahasa Indonesia and can be accessed by the public upon request.</p> <p>Based on interviews with stakeholders (e.g., representative of Manpower office of Lamandau Regency), they are aware of the type of information available and how to get access to the information based on the procedure mentioned in indicator 1.1.1.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The company shown <i>Prosedur Pemberian Informasi Kepada Pihak Luar</i> (SOP-CS.GN-001, Rev.01, 1 December 2015) that arranges any request for information to be directly aimed through email, letter, telephone, fax, or personally request through the CBI group Headquarters in Pangkalan Bun. Requests for information submitted in proposal and</p>	Complied

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		<p>send to company, all the information and aspirations will be addressed to organization with consideration company policy.</p> <p>The company has appointed a PIC to update the log book of company's information from external parties and its responses.</p> <p>Based on information logbook record review, it was known that there is not information requested by external or internal stakeholder during 2023/2024. The incoming letters are only related to requests for assistance from stakeholders.</p> <p>Based on interviews with representatives of Sumber Cahaya Village and Environmental Agency known that the company has conducted socialization regarding the mechanism for requesting information from the company. If there is a request for information, stakeholder will send a letter to the company and the company will respond.</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>The company has established <i>Prosedur Pemberian Informasi Kepada Pihak Luar</i> (SOP-CS.GN-001, Rev.01, 1 December 2015) Procedure for Publicly Information Request:</p> <ul style="list-style-type: none"> - Information request through email, mailbox, telephone, fax or direct visit. Retention time for documents of information request is one year. - Response for information request within 10 working days since information request received. <p>The organization also established <i>Prosedur Komunikasi, Partisipasi dan Konsultasi Lingkungan dan K3</i> (SOP-SUST.SYS-005, Rev.00, 01 January 2020) which outlines the procedure of consultation and communication. The procedure has determined open and transparent methods for communication and consultation between the company, local communities and other affected or interested parties. The document specifies the objectives of the document that is to manage, mechanism,</p>	Complied

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		<p>communicate, (internal and external), participation, health and safety, and environment (SMK3) so that it can be understood by stakeholders effectively. Communication and consultation is conducted by email, guest book, telephone, face-face, letter, fax, suggestion box, bulletin, etc, also the procedure has cover specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information.</p> <p>A number of consultation and communication implementation also has been verified during the audit and shown that company has well documented for all consultation and communication.</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 an up-to-date list of stakeholders with the frequency of updating the stakeholder list yearly. The latest update in April 2024. List of stakeholders consist of:</p> <ul style="list-style-type: none"> • Local Communities (Nuangan Village, Sumber Cahaya Village and Bukit Jaya Village) • FFB Supplier (PT MUA, KUD Sumber Tani, Nuangan Kusuma Jaya, TKD Sumber Cahaya) • CPO, PK, and FFB Transporter (CV Dwita Perdana, CV Rajawali Putera Mandiri, CV Tiga Putera Perkasa, CV Tri Mega Usaha, CV Askim Makmur Transportindo, CV Anugrah Lestari Transport, CV Karya Berkah Bersama) • Civil contractor (CV Mitra Sohibunjaha Eng) • <i>Kemitraan</i> (KTH Komunitas Karya Masoraian) • Hazardous Waste Transporter (Semesta Langgeng Sentosa) • Government agencies (Environment Agency, PTSP, Manpower Agency, Plantation Agency, Land Agency of Lamandau Regency) • Certification Body (PT ACube TIC International, PT TSI Sertifikasi International, PT BSI Indonesia) 	Complied

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		<ul style="list-style-type: none"> Internal (<i>LKS Bipartit</i>, Gender Committee) <p>The list has detailed stakeholder information such contact person, organization name, position, phone number, address, etc. Auditor checks by calling the numbers recorded in the document, from the results of checking that the phone numbers are in accordance with the existing list and it was reachable.</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 policies of ethical conduct are covered in Group (PT Sawit Sumbermas Sarana) Sustainability Policy dated 13 September 2017, Group Anti-corruption Policy dated 28 July 2021, and Employee Code of Conduct (<i>Pedoman Perilaku Karyawan</i>) dated 1 March 2018. The policy has stated the commitment of the company to operate transparently and ethically both within the organization and in all business dealings, to take a zero-tolerance approach to bribery and corruption, and strives to act in a professional, fair manner under international standards of corporate governance throughout its operations.</p> <p>Those policies have been disseminated to workers on 05 February and 06 May 2024 (SCM), 07 May 2024 (Afdeling Charlie SCE), 6 February 2024 (Afdeling Brafo SCE), 02 January 2024 (Afdeling Alpha SCE), 05 December 2023 (Afdeling Echo SCE), and 02 November 2023 (Afdeling Delta SCE).</p> <p>The ethical behavior policy was also socialized to village stakeholders, for example on 02 April 2024, which was attended by officials from Nanga Palikodan Village and Nuangan Village. And for contractors, the ethical behavior policy has been socialized on 15 May 2024.</p> <p>Based on review of contracts agreement of company with contractor (3rd Parties FFB Supplier & CPO transporter) was known that the commitment to company ethical policies has been incorporated on those contract agreement.</p>	Complied

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		Based on consultation with internal and external stakeholders (gender committee, LKS bipartite, village officials, contractors, and government agencies) is known that stakeholders received dissemination of these policies and understood the policy in ethical conduct, including anti-bribery and anti-corruption.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>To monitor compliance and implementation Code of Ethical Conduct policy, the company has several systems i.e.:</p> <ul style="list-style-type: none"> • Internal Audit Report, 25 January 2024. • Management Review & ROM, 18 March 2024. • Inspection conducted periodically by Visit Agronomy from head office. Every deviation from company ethical business practice which found during the inspection will be evaluated and corrected if needed as continual improvement. <p>The systems effectively implemented concluded from interviews with workers and document review which confirmed no issues regarding illegal payment (bribery) when they are recruited (for example). Regular inspections of all operational and contractors also doing during the audit. from the results of the internal audit conducted, there is no indication of a violation of ethical behaviour.</p> <p>The company also has SOP of Management System Evaluation (No. SOP-SUST.GN-003 dated 21 March 2018) and SOP of Sustainability of Third-Party Partnership (No. SOP-SUST.GN-005 dated 01 March 2020). These SOPs are used as guidance to select third party contractors/suppliers</p>	Complied
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 -	The company has shown compliance toward applicable national and ratified international regulations, in aspects of land tenure, operational	Complied

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		<p>practices, OHS, employment, environmental, that will be described in more detail in other specific indicators, such as:</p> <ul style="list-style-type: none"> • Land tenure: has land title in the form of <i>Hak Guna Usaha</i> (HGU) and plantation permit in the form of <i>Izin Usaha Perkebunan</i> (IUP). Refer to indicator 4.4.1 • Labour: has applied minimum wage, overtime, employment status accordance to employment regulation. Refer to criteria 6.2 • Agricultural practice: has had SOP and conducted land clearing with zero burning method, using registered agrochemical only. Refer to Criteria 7.1 • Environmental: has had Environmental Permit, AMDAL, and RKL/RPL. Refer to indicator 3.4.1 • Storage: had had licensed hazardous waste temporary warehouse. Refer to Criteria 7.3 • Processing practices: all processing stations have had license from governmental agency. <p>Has reported mandatory document to governmental agencies in the field of land tenure, employment, environmental, dan OHS.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>To ensure the laws and legal compliance, the company has a mechanism to assess the compliance toward the laws and regulations set in the <i>Prosedur Identifikasi dan Evaluasi Pemenuhan Peraturan LK3</i> (No. Doc: SOP-SUST.SYS-002, Rev.00, 01 January 2020). Evaluation of relevant standards and regulations that have been identified to ensure their suitability periodically (once a year). PIC who is responsible for identifying the regulation and for evaluating the regulations was Sustainability Department. Information of regulation from national, provincial and district regulatory bodies, and renewal of any changes to prevailing laws and regulations and monitoring of expired regulations/licenses. A list of regulatory identifications ranging from</p>	Complied

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		<p>Laws, Government Regulations, Presidential Decrees, Ministerial Regulations, Ministerial Decrees, Regional Regulations, and the ratification of the ILO. All regulations are noted in the list of rules which are always evaluated regularly at least once a year or if there are regulatory / latest requirements referenced.</p> <p>The company has a list of legal requirements, the list is updated regularly and was last updated on 26 September 2023, there are several legal requirements relevant to the company's activities that have been identified and listed in the list of legal requirements regarding Legal and BMP, Environment, Conservation, Safety and health, Manpower and Social aspect. Based on verification, this list has covered the latest regulation, such as:</p> <ul style="list-style-type: none">- Act (UU) No. 11 of 2020 concerning employment stimulation (<i>UU Cipta Kerja</i>).- Government Regulation (PP) No. 22 of 2021 concerning environmental management and protection.- Government Regulation (PP) No. 34 of 2021 concerning utilization of foreign worker.- Government Regulation (PP) No. 35 of 2021 concerning temporary worker (PKWT), outsourcing, working time, and working termination.- Government Regulation (PP) No. 36 of 2021 concerning payment method.- Government Regulation (PP) No. 37 of 2021 concerning insurance of lay off case. <p>To ensure compliance with law or regulations, the company conducts an internal audit. Internal audits have been conducted continuously and are documented and reviewed in the management review activities, latest</p>	
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		<p>audit was carried out on 25 January 2024 that carried out by the Sustainability Department.</p> <p>During ASA 1, unit of certification has an updated list of contracted parties and demonstrate in document of "Daftar Stakeholder PT Mirza Pratama Putra" updated May 2024. Contracted parties listed are FFB supplier, transporter, civil contractor, hazardous waste transporter, and there are no contractors for service provider.</p> <p>Evaluation of regulatory compliance has been carried out by the company for each relevant legal regulation. The company also conveys the obligation to fulfil the relevant regulations to the contractors. Based on contract evaluation (Transport of Palm Product Contract No. 23/LGL/MKT/SSMS.G-TMU/I/2024, dated 5 January 2024, valid until 5 January 2025), it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 3 verse 13; Article 15 verse 3; and Article 16 verse 1.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>Legal (HGU) boundaries are clearly demarcated and maintained based HGU Map No. 01-15.12-2019 issued by National Land Agency. Based on field observation on HGU stones and land demarcation in Estate, has known that HGU stones has been installed in accordance with the coordinates, and other boundaries such as boundary drain and boundary road were maintained. There was no planting exceed the HGU boundary. Moreover, the Unit of Certification has SOP of Boundary Demarcation and Monitoring (No. SOP-KBN.GN-017 dated 01 February 2018 revisi 02 dated 01 September 2023, the change regarding the change in colour of the boundary pegs from blue to red colour). The boundary maintenance will be conducted twice a year as stated in the poin 5.3.3. The Unit of Certification has shown updated documentation of</p>	Non-compliance

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		<p>semesterly HGU stones/boundary monitoring, described that all HGU stones are well maintained.</p> <p>During ASA1 has verified that the company has consistently maintained HGU boundary stones, the last monitoring and maintaining HGU pegs has carried out in April 2024 with a target of 218 stones.</p> <p>Field verification has also carried out for HGU pages samples, however the sampled of boundaries are not found. This is raised as noncompliance.</p>	
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>During ASA 1, unit of certification has an updated list of contracted parties and demonstrate in document of "Daftar Stakeholder PT Mirza Pratama Putra" updated May 2024. Contracted parties listed are:</p> <ul style="list-style-type: none"> - 4 FFB suppliers: PT Multi Usaha Abadi; KUD Sumber Tani; Koperasi Nuangan Kasuma Jaya, TKD Sumber Cahaya. - 7 Transporter: CV Dwita Perdana; CV Rajawali Putera Mandiri; CV Tiga Putera Perkasa; CV Tri Mega Usaha; CV Askim Makmur Transportindo; CV Anugrah Lestari Transport; CV Karya Bersama. - 1 Civil contractor: CV Mitra Sohibulhajjah Eng. - Hazardous waste transporter: PT Semesta Langgeng Sentosa. 	Complied
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>During ASA 1 verified sample of contracts as presented below:</p> <ul style="list-style-type: none"> - Transport of Palm Product: "<i>Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit</i>" between PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra with PT Anugrah Lestari Transport, Contract No. 142/LGL/MKT/SSMS-ALT/X/2023, dated 2 October 2023, valid until 2 October 2024. - Transport of Palm Product: "<i>Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit</i>" between PT Sawit Sumbermas Sarana, PT 	Complied

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		<p>Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra with CV Tri Mega Usaha, Contract No. 23/LGL/MKT/SSMS.G-TMU/I/2024, dated 5 January 2024), valid until 5 January 2025.</p> <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 3 verse 13; Article 15 verse 3; and Article 16 verse 1.</p> <p>Audit team verified contract of FFB Supplier, e.g.:</p> <ul style="list-style-type: none"> - PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 14 verse 3; Article 15 verse 1.</p> <p>Audit team verified contract of FFB Transporter, e.g.:</p> <ul style="list-style-type: none"> - PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January 2024). Followed by PT Banua Sarana Jaya sub-contracted to CV Karya Berkah Bersama, based on Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024. <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 12 verse 1.</p> <p>During interview with contractors, confirmed that they have aware and implemented this requirement.</p>	
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>During ASA 1 verified sample of contracts as presented below:</p> <ul style="list-style-type: none"> - Transport of Palm Product: "<i>Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit</i>" between PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra with PT 	Complied

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		<p>Anugrah Lestari Transport, Contract No. 142/LGL/MKT/SSMS-ALT/X/2023, dated 2 October 2023, valid until 2 October 2024.</p> <ul style="list-style-type: none"> - Transport of Palm Product: "<i>Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit</i>" between PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra with CV Tri Mega Usaha, Contract No. 23/LGL/MKT/SSMS.G-TMU/I/2024, dated 5 January 2024), valid until 5 January 2025. <p>Based on contract evaluation, it was confirmed that clauses disallowing child, forced and trafficked labour has been available in Article 15 verse 2 and 4.</p> <p>Audit team verified contract of FFB Supplier, e.g.:</p> <ul style="list-style-type: none"> - PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). <p>Based on contract evaluation, it was confirmed that clauses disallowing child, forced and trafficked labour has been available in Article 14 verse 2 and 4.</p> <p>Audit team verified contract of FFB Transporter, e.g.:</p> <ul style="list-style-type: none"> - PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January 2024). Followed by PT Banua Sarana Jaya sub-contracted to CV Karya Berkah Bersama, based on Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024. <p>Based on contract evaluation, it was confirmed that specific clause on meeting relevant legal requirements has been described in Article 11 verse 2 and 3.</p> <p>During interview with contractors, confirmed that they have aware and implemented this requirement.</p>	
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Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.																																							
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none">Information regarding the geolocation of FFB origins;Proof of ownership status, right/claim of the land by grower/smallholder;If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>During ASA 1, FFB received by Sumber Cahaya POM are sourced from Own Estate, scheme smallholder, Sisters company Estate and Outgrower. Information of geolocation of the FFB sources is documented in "Daftar Pemasok TBS PKS Sumber Cahaya.</p> <p>According to record of FFB receives, Sumber Cahaya POM in May 2023 to April 2024, FFB sources are:</p> <table><tr><th>No</th><th>FFB Sources</th><th>Land Status</th></tr><tr><td>1</td><td>Sumber Cahaya Estate (own estate)</td><td>HGU</td></tr><tr><td>2</td><td>Malata Estate (PT. TSA - sisters company estate)</td><td>HGU</td></tr><tr><td>3</td><td>KUD Sumber Tani (PT. MPP smallholders)</td><td>SHM</td></tr><tr><td>4</td><td>Plasma Nuangan (PT. MPP smallholders)</td><td>SHM</td></tr><tr><td>5</td><td>Plasma Batu Dara (PT. TSA smallholders)</td><td>SHM</td></tr><tr><td>6</td><td>Plasma Bina Semua Jaya (PT. SMU smallholders)</td><td>SHM</td></tr><tr><td>7</td><td>Plasma Batu Harapan (PT. SMU smallholders)</td><td>SHM</td></tr><tr><td>8</td><td>Plasma Bulau Sahabun (PT. SMU smallholders)</td><td>SHM</td></tr><tr><td>9</td><td>Plasma Pasif Batu Harapan (PT. SMU smallholders)</td><td>SHM</td></tr><tr><td>10</td><td>Plasma Natai Suka Sejahtera (PT. SMU smallholders)</td><td>SHM</td></tr><tr><td>11</td><td>PT Multi Usaha Abadi (FFB agent)</td><td>Business license</td></tr></table> <p>*TSA = Tanjung Sawit Abadi; SMU = Sawit Multi Utama</p>	No	FFB Sources	Land Status	1	Sumber Cahaya Estate (own estate)	HGU	2	Malata Estate (PT. TSA - sisters company estate)	HGU	3	KUD Sumber Tani (PT. MPP smallholders)	SHM	4	Plasma Nuangan (PT. MPP smallholders)	SHM	5	Plasma Batu Dara (PT. TSA smallholders)	SHM	6	Plasma Bina Semua Jaya (PT. SMU smallholders)	SHM	7	Plasma Batu Harapan (PT. SMU smallholders)	SHM	8	Plasma Bulau Sahabun (PT. SMU smallholders)	SHM	9	Plasma Pasif Batu Harapan (PT. SMU smallholders)	SHM	10	Plasma Natai Suka Sejahtera (PT. SMU smallholders)	SHM	11	PT Multi Usaha Abadi (FFB agent)	Business license	Complied
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2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	PT Multi Usaha Abadi is categorized as indirectly FFB source which collecting FFB from outgrower. PT Multi Usaha Abadi has been listed as FFB sources.	Complied																																				

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	- Minor compliance -	<p>PT Multi Usaha Abadi is FFB agent and collecting FFBs from independent smallholders surrounding the plantations. There are certain division at unit of certification for verifying and mapping the FFB sources from independent smallholders, namely "Divisi Pembelian Buah Luar". The team is under parent company PT Sawit Sumbermas Sarana that have responsibilities to verify locations of smallholders/outgrower as complied with corporate policy and national regulation requirements.</p> <p>PT MUA collecting FFB in several ramp, as follow:</p> <table border="1"> <thead> <tr> <th>No.</th><th>Ramp Code</th><th>Number of smallholders</th><th>Area (Ha)</th></tr> </thead> <tbody> <tr> <td>1</td><td>MUA PJR</td><td>125</td><td>502.96</td></tr> <tr> <td>2</td><td>MUA SRI</td><td>75</td><td>226.50</td></tr> <tr> <td>3</td><td>MUA USG</td><td>22</td><td>85.00</td></tr> <tr> <td>4</td><td>MUA AIS</td><td>618</td><td>1,174.73</td></tr> <tr> <td colspan="2">Total</td><td>840</td><td>1,989.19</td></tr> </tbody> </table> <p>Available as well document "Traceability Supply Base Mill Database" that contain smallholders name, ramp code, address and GPS coordinates.</p>	No.	Ramp Code	Number of smallholders	Area (Ha)	1	MUA PJR	125	502.96	2	MUA SRI	75	226.50	3	MUA USG	22	85.00	4	MUA AIS	618	1,174.73	Total		840	1,989.19	
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Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.																											
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.																											
3.1.1	<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>During ASA 1, verified that the Unit of Certification has had Long-Term Business Plan up until year 2031, covering estimates of production from own Estate/Mill and scheme smallholder (plasma). The estimation covering the area statement, FFB, CPO/OER, PK/KER, and financial indicators (cost, prices).</p>	Complied																								

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		<p>Based on Long-term Business Plan, production estimate for period 2024 – 2028 are as follow:</p> <table><tr><th rowspan="2">Description</th><th colspan="5">Year</th></tr><tr><th>2024</th><th>2025</th><th>2026</th><th>2027</th><th>2028</th></tr><tr><td>FFB Production (MT)</td><td>73,058</td><td>78,447</td><td>83,837</td><td>88,372</td><td>88,702</td></tr><tr><td>Own Estate</td><td>60,881</td><td>65,373</td><td>69,865</td><td>73,643</td><td>73,918</td></tr><tr><td>Outgrower</td><td>12,176</td><td>13,075</td><td>13,973</td><td>14,729</td><td>14,784</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>CPO Production (MT)</td><td>17,662</td><td>19,029</td><td>20,588</td><td>21,691</td><td>21,781</td></tr><tr><td>Own Estate</td><td>15,227</td><td>16,414</td><td>17,793</td><td>18,745</td><td>18,825</td></tr><tr><td>Outgrower</td><td>2,435</td><td>2,615</td><td>2,795</td><td>2,946</td><td>2,957</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>PK Production (MT)</td><td>3,288</td><td>3,530</td><td>3,773</td><td>3,977</td><td>3,992</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>OER (%)</td><td>24.18</td><td>24.26</td><td>24.56</td><td>24.55</td><td>24.56</td></tr><tr><td>KER (%)</td><td>4.50</td><td>4.50</td><td>4.50</td><td>4.50</td><td>4.50</td></tr></table> <p>Production estimates of scheme smallholders KUD Sumber Tani and Koperas Nuangan Kasuma Jaya has been included in Long-term Business Plan.</p> <p>Available "Independent Auditors Report" No. 00583/2.1032/AU.1/0687-3/1/III/2024, dated 27 March 2024. Report issued by Agung Purwanto (Public Accountant Registration No. AP.0687) from Public Accountant Office Purwantono, Sungkoro & Surja. The audit opinion "in our opinion, the accompanying financial statement present fairly, in all material respects, the financial position of the Company as at 31 December 2023.</p>	Description	Year					2024	2025	2026	2027	2028	FFB Production (MT)	73,058	78,447	83,837	88,372	88,702	Own Estate	60,881	65,373	69,865	73,643	73,918	Outgrower	12,176	13,075	13,973	14,729	14,784							CPO Production (MT)	17,662	19,029	20,588	21,691	21,781	Own Estate	15,227	16,414	17,793	18,745	18,825	Outgrower	2,435	2,615	2,795	2,946	2,957							PK Production (MT)	3,288	3,530	3,773	3,977	3,992							OER (%)	24.18	24.26	24.56	24.55	24.56	KER (%)	4.50	4.50	4.50	4.50	4.50	
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		and its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards".	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	Based on review during ASA 1 to the Area Statement of Sumber Cahaya Estataeis known that the planting years were between 2011 to 2017 (4 – 10 years old). Therefore, the replanting will not be implemented in the next five years.	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 -	The management review consist of Monthly and Annual Management Review (operational area), Annual Supply Chain Management Review, and Annual Financial Review. These documents have been sighted. The latest management review performed on 18 March 2024, attended by Board of Director, Plantation Advisor, Regional Head I – III, Chief Sustainability Officer. Based on verification to minutes of management review, the event have covered status of previous external and internal audit, update external and internal issues related sustainability, performance and effectivity of quality management system, availability of resources, relevant communication with stakeholder, follow-up records of inspection results from relevant agencies, and opportunities for improvement.	Complied
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification. - Critical (Major) compliance -	The action plan for continuous improvement has been conducted in several ways, such as: - Monthly and annual management review, financial review, and supply chain management review - Internal and external audits of operational, financial, RSPO. - Review of Social Impact Assessment (SIA) implementation. - Review of environmental documents reports (RKL/RPL, hazardous waste, wastewater).	Complied

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		Some continuous improvement that has been implemented such as prohibition of paraquat and implement integrated pest management system.	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template. - Minor compliance -	The company shows RSPO metric template version 2.1 during the time of audit. As checked properly, it was known that all data provided were match with actual situation. 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 social and environmental, included monitoring data of water consumption, management dan monitoring HCV. The annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment.	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	During ASA 1, verified that Unit of Certification has had bundle of procedures presented in Indonesian language, covering elements of: <ul style="list-style-type: none"> - Sustainability : 8 procedures. - QHSE : 16 procedures. - Plantation : 30 procedures and 21 WI. - Palm Oil Mill : 33 procedures and 43 WI. - Budget : 1 procedure. - Engineering : 4 procedures. - Central Workshop: 1 procedure and 9 WI. - IT : 9 procedures and 1 WI. - RnD : 32 procedures and 3 WI - HR : 38 procedures and 2 WI - EHS : 34 procedures and 8 WI 	Complied

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		<ul style="list-style-type: none"> - Conservation : 4 procedures. - Etc: training, general affair, procurement, financial, Logistic, marketing, legal. <p>Procedures related agronomy operations covering land clearing, maintenance, IPM, harvesting, transportation of FFB, replanting, delivery to POM, e.g.:</p> <p>SOP - KBN.GN - 001 Prosedur Penanaman Kelapa Sawit (Planting Oil Palm)</p> <p>SOP - KBN.GN - 002 Prosedur Pembibitan Kalapa Sawit (Nursery)</p> <p>SOP - KBN.GN – 003 Prosedur Pemupukan Kelapa Sawit (Fertilizing)</p> <p>SOP - KBN.GN. - 004 Prosedur Pengendalian gulma kelapa sawit (Weeding)</p> <p>SOP - KBN.GN. - 005 Prosedur Pengelolaan Water Management</p> <p>SOP - KBN.GN - 006 Prosedur Panen Kelapa Sawit (Harvesting)</p> <p>SOP - KBN.GN - 007 Prosedur Pengendalian Hama dan Penyakit (Pest and Disease Control)</p> <p>SOP - KBN.GN - 008 Prosedur Administrasi Kelapa Sawit (Oil Palm Administration)</p> <p>SOP - KBN.GN - 009 Prosedur Peremajaan (Replanting)</p> <p>SOP - KBN.GN - 010 Prosedur Pekerjaan GIS</p> <p>SOP - KBN.GN - 012 Prosedur Pembuatan dan Perawatan Jalan (Road Maintenance)</p> <p>SOP - KBN.GN - 013 Prosedur Pengiriman TBS dari Estate ke PKS (FFB Transport)</p>	
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		<p>SOP - KBN.GN - 014 Prosedur Permintaan dan Penerimaan Kecambah Kelapa Sawit (Oil Palm Seed Request and Receive Handling)</p> <p>SOP - KBN.GN - 015 Prosedur Konsolidasi Pokok (Oil Palm Consolidation)</p> <p>SOP - KBN.GN - 017 Prosedur Monitoring dan Pemeliharaan Patok Legal Tata Batas Perkebunan (Monitoring and Maintenance of Legal Boundary)</p> <p>SOP - KBN.GN - 018 Prosedur Canopy Management Tanaman Kelapa Sawit (Canopy Management)</p> <p>SOP - KBN.GN - 019 Prosedur Sistem Pengendalian Ganoderma (Control of Ganoderma)</p> <p>Whilst the procedures of Palm Oil Mill operation covering the aspects of FFB receiving, grading, processing, refinery, dispatch, supply chain, and quality/laboratory, e.g.:</p> <p>SOP – PKS.GN – 001 Prosedur Power Supply</p> <p>SOP – PKS.GN – 002 Prosedur Pengoperasian Boiler (Operating Boiler)</p> <p>SOP – PKS.GN – 003 Prosedur Penerimaan TBS (FFB Receiving)</p> <p>SOP – PKS.GN – 004 Prosedur Processing TBS (FFB Processing)</p> <p>SOP – PKS.GN – 005 Prosedur Processing Kernel (Kernel Processing)</p> <p>SOP – PKS.GN – 006 Prosedur Processing CPO (CPO Processing)</p>	
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		<p>SOP – PKS.GN – 007 Prosedur Pengelolaan Limbah (Waste Management)</p> <p>SOP – PKS.GN – 008 Prosedur Water Treatment</p> <p>SOP – PKS.GN – 009 Prosedur Analisa Limbah Cair (POME Analysis)</p> <p>SOP – PKS.GN – 010 Prosedur Analisa Mutu TBS (FFB Quality Analysis)</p> <p>SOP – PKS.GN – 014 Prosedur Analisa Mutu Palm Produk (Palm Product Analysis)</p> <p>SOP – PKS.GN – 016 Prosedur Maintenance</p> <p>SOP – PKS.GN – 017 Prosedur Pengiriman Palm Product (Palm Product Delivery)</p> <p>SOP – PKS.GN – 020 Prosedur Supply Chain</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>The monitoring mechanism for the implementation of procedures includes operational and RSPO internal audits, managerial supervision, documented reports, and management reviews. These documents have been verified by auditors.</p> <p>Daily internal supervision is conducted by a hierarchy of supervisors, starting from the Foreman, Division Assistant, and Head Assistant, up to the Estate Manager. The Internal Audit Department conducts assessments on a monthly and semi-annual basis. The operational internal audit evaluates the implementation of operational and administrative procedures in the estates and mills, whilst the RSPO internal audit assesses the implementation of sustainability procedures in these areas. The most recent RSPO internal audit was conducted on 25 January 2024, for Sumber Cahaya Estate and Palm Oil Mill.</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	The unit of certification monitors operational activity in all levels of workers. Each field supervisor has equipped with monitoring	Complied

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	<p>- Minor compliance -</p>	<p>sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to Estate Manager daily.</p> <p>In palm oil mill, daily operational activity recorded in daily worksheet by mill supervisor prior reported to the mill manager.</p> <p>To ensure the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p> <p>The records of monitoring and actions taken has been documented in the form of Monthly Management Review (in Monthly Manager Report), Annual Management Review, annual result and follow up of internal audit of RSPO. Based on interview with management, the input of RSPO external audit also will be considered for the next management review.</p> <p>The latest records of monitoring among others:</p> <ul style="list-style-type: none"> - Company Management Review on 18 March 2024 - RSPO internal audit for Estate on 25 January 2024 - Record of Non-Conformity and Corrective Action. <p>Sample verified:</p> <p>a. Non-Conformity:</p> <ul style="list-style-type: none"> o The tap connection on the eyewash installation came loose and fell at the SCE chemical storage warehouse area. o Inconsistency of harvester on the use of PPE. o Water for showering and rinsing work equipment and PPE is not available at the SCE rinse house; The Knapsack and PPE storage racks are damaged. 	
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		<ul style="list-style-type: none"> Spill kit tools are not yet available at temporary hazardous waste storage of Sumber Cahaya POM, this is not in accordance with the Spill Control Procedure (SOP-SUST.EHS-004). <p>b. Correction:</p> <ul style="list-style-type: none"> Repairs the eyewash faucet and carry out eyewash cleaning. Ensure that all employees wear PPE in accordance with the PPE matrix; Conduct dissemination on safe work and use of PPE at least once a month. Carry out a monitoring and maintenance program for the rinse house; Ensure employees stores PPE in the rinse house area; Conduct dissemination on the safe work of chemists so that employees understand the risk if chemical work equipment and PPE is washed at home. Provide spill kit tools such as brooms and spades. <p>c. Corrective action:</p> <ul style="list-style-type: none"> Carry out routine EHS inspections monthly and conduct regular dissemination of hazardous material management. Carry out routine EHS inspections monthly. Carry out regular inspections of rinse house facilities; Conduct regular outreach once a month regarding the chemical safe work. <p>Conduct outreach to warehouse employees to always provide spill kit tools such as brooms and shovels; carry out routine EHS inspections every month.</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.			
3.4.1	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders,	Unit of certification has the documents related to the SEIA as follows:	Complied

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	<p>inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Environmental Permit refer to Head of Lamandau Regency No: 188.45/234/VI/Huk/2018 dated 21 June 2018 related to Granting of Environmental Permits for Expansion Plan of Palm Oil Plantation Area and Palm Oil Mill Construction of PT MIRZA PRATAMA PUTRA located in Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah. Previous environmental permit refers to Head of Lamandau Regency No: 88.45/86/2008 dated 22 July 2021. • AMDAL Document (addendum of ANDAL, RKL, RPL) for Plantation Development and Palm Oil Mill of PT Mirza Pratama Putra, located in Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah. The scope of the area is ±7,032.954 Ha and palm oil mill with capacity 60 Ton FFB / hour. The document has been approved by the Head of Environmental Agency of Province Kalimantan Tengah as Chief of Social and Environmental Assessment Committee Province Kalimantan Tengah dated 18 May 2018. • Environmental Management Plan and Environmental Monitoring Plan (RKL-RPL) Document of PT Mirza Pratama Putra with a total area of ±7,032.954 Ha located in Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah. The document has been approved by the Head of Environmental Agency of Province Kalimantan Tengah as Chief of Social and Environmental Assessment Committee Province Kalimantan Tengah dated 18 May 2018. • The company has a social impact assessment document, which is the Social Impact Assessment (SIA) report prepared with PT. Remark Asia in 2016. Data collection and field observations during the SIA assessment were conducted on 29 September – 3 October 2016. SIA assessors gathered the information from internal stakeholders such as staff and employee of own estate and plasma. 	
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		Related information also gathered from external stakeholders such as villager's representative from surrounding plantation area such as Village of Sungkup, Nuangan, Nanga Palikodan, Sumber Cahaya, Beruta and Tamiang, Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders. - Minor compliance -	<p>PT Mirza Pratama Putra – Sumber Cahaya POM has conducted the environmental management in accordance with Environmental Management Plan and Environmental Monitoring Plan (RKL-RPL) Document. As informed in previous indicator, PT Mirza Pratama Putra has had Environmental Management Plan and Environmental Monitoring Plan (RKL-RPL) document with a total area of ±7,032.954 Ha located in Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah. The document has been approved by the Head of Environmental Agency of Province Kalimantan Tengah as Chief of Social and Environmental Assessment Committee Province Kalimantan Tengah dated 18 May 2018. That document covered the social and environmental issues gathered from affected parties from Village of Sungkup, Nuangan, Nanga Palikodan, Sumber Cahaya, Beruta and Tamiang, Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah.</p> <p>According to the RKL-RPL report Semester 1st and 2nd Semester year 2023 obtained information that there are no negative issues identified. All parameter has been in accordance with the national regulation. This document reported to the respective government agencies also.</p> <p>Environmental management based on document, e.g:</p> <ul style="list-style-type: none"> • Physical and chemical <ul style="list-style-type: none"> a. Water Quality 	Complied

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		<ol style="list-style-type: none"> 1. Clean water quality (refer to national regulation Permenkes RI No. 32 tahun 2017). 2. Potable water quality (refer to national regulation Permenkes RI No. 492 tahun 2010). 3. Surface water quality (refer to national regulation Peraturan Pemerintah No. 82 tahun 2001). b. Noise (refer to national regulation Permenaker No. 13 tahun 2011). c. Air quality <ol style="list-style-type: none"> 1. Ambient (refer to national regulation Peraturan Pemerintah No. 41 tahun 1999). 2. Air emission (refer to national regulation Permen LH No. 21 tahun 2008). d. Biological component Water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. • Mature Upkeep Component <ol style="list-style-type: none"> a. Road structure quality b. Low crop c. Traffic accident • Community complaint component <ol style="list-style-type: none"> a. Disease prevalence and incidence • Social, economy and culture <ol style="list-style-type: none"> a. Attitudes and perceptions/community unrest (potential conflict) <p>Recommendation from SIA 2016 are:</p> <ul style="list-style-type: none"> - Prioritizing employee recruitment is from local communities. 	
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		<ul style="list-style-type: none"> - Maintaining access for local people - Developing program with affected stakeholders - Participating in surrounding community program <p>The actual implemented plans was:</p> <ul style="list-style-type: none"> - 85% of workers (permanent and daily) recruited from local communities, based on List of Employee March 2024. - Frequently road maintenance on main road from/to the villages as explained in the CSR Report 2023. - CSR report 2023, partnership of smallholder's program. - Forum Group Discussion (FGD) at surrounding village or sub-district in May 2023. <p>During the document verification obtained that the SEIA has covered issues from the comments of stakeholders from the surrounding community such as Village of Sungkup, Nuangan, Nanga Palikodan, Sumber Cahaya, Beruta and Tamiang, Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah.</p> <p>Until this ASA1 audit, there is no negative issues gathered from the stakeholders.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Since the SEIA amended on 2018, the company has conducted scheduled review of SEIA assessment.</p> <p>Periodically, the management and monitoring plan annually updated and reviewed every 2 years. The last reviewed (see document of Laporan Kegiatan Pengelolaan dan Pemantauan Dampak Sosial Lingkungan PT MPP 2022-2024) was conducted by involving communities (see documents of Berita Acara Pemantauan Dampak Sosial No. 14/SC/X/2022 and No. 15/SC/X/2022). Through the last review report</p>	Complied

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		<p>obtained that the SEIA has covered the stakeholder from surrounding village communities such as Village of Sungkup, Nuangan, Nanga Palikodan, Sumber Cahaya, Beruta and Tamiang, Subdistrict of Nanga Bulik, Belantikan Raya and Bulik Timur, Lamandau Regency, Province of Kalimantan Tengah. The results of participatory impact assessment are used as basis for developing that management and monitoring plan for the next year.</p> <p>The document included matrix of social management and monitoring plan of the impact components i.e. access to natural resources, local workers, community health, socio-economic community, etc.</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 unit of certification has employment procedures for recruitment, selection, hiring, promotion, retirement and termination i.e:</p> <ul style="list-style-type: none"> • SOP <i>Penerimaan dan Seleksi Tenaga Kerja</i> No. SOP-HRDGA.GN-010, 01 June 2022, signed by President Director, • SOP <i>Promosi Karyawan Non Staf (Bulanan)</i> No. SOP-HRDGA.GN-012, 01 July 2022, signed by President Director, • SOP <i>Promosi Grade dan Jabatan Staf</i> No. SOP-HRDGA.GN-011, 01 June 2022, signed by President Director, • SOP <i>Pengunduran Diri</i> No. SOP-HRDGA.GN-002, 01 June 2022, signed by President Director. <p>The procedures as a guide and provisions related to employee selection and recruitment, and as a guideline to create a systematic, correct implementation of employee selection and recruitment processes, fair/indiscriminatory and consistent.</p> <p>Details recruitment, selection, acceptance and promotion are also recorded in the <i>Peraturan Perusahaan 2023 – 2025</i>, registered in Manpower Agency based on registration letter number <i>Surat Keputusan</i></p>	Complied

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		<p><i>Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Lamandau No. Kep.560/83/XI/DTT-HI/2023</i> dated 01 November 2023, valid until 01 November 2025. This document consists of clauses and procedure of contract termination including pension and resignation (Chapter VI, art 21 to 31), which all refer to Act No. 13 of 2003 about <i>Ketenagakerjaan</i> and Act No. 02 of 2004 about <i>Penyelesaian Perselisihan Hubungan Industrial</i>.</p> <p>The procedure and the <i>Peraturan Perusahaan</i> in Bahasa Indonesia and have been socialized to all level workforce when there are new employees that just joining.</p> <p>Record of recruitment was available and verified. The company has implemented promotion for employee based on skills, capabilities, qualities, jobs availability. Company also records all workers retirement and termination, based on review sample documents of retirement and terminations 2023 known that the process of retirement and termination has been carried out in accordance with the applicable regulation.</p>	
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>The company could demonstrate that all employment procedures are implemented, and records are maintained. Estates and mill demonstrate evidence showing the implementation of recruitment and selection and shows that the records are maintained. Evidences showed such as: a) Job vacancy announcements (security); b) Recapitulation of candidate for non- staff workers; c) Example of Worker appointment letter, (Andy Setiawan - <i>Surat Keputusan tentang Penetapan Karyawan Percobaan Nomor 471/SK.PKP/PT-MPP-SCM/IV/2024</i> dated 5 April 2024); d) Records of security recruitment 26 March 2024, consists of application letters, resume, copy of ID Card, medical check up result.</p> <p>Based on interview with the harvesters in Sumber Cahaya Estate and operators in the Sumber Cahaya Mill known that the employment</p>	Complied

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		procedure such as, MCU, application file, selection of administration was implemented when they are hiring by company. The record of recruitment was available in estate and mill office.	
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>The company has conducted a risk assessment of all operational activities (mill and estate) to identify risks arising from plantation and mill operational activities, H&S issues, including mitigation plans and procedures documented and implemented. The company has periodically reviewed and updated the risk assessment for Occupational Health and Safety (H&S). Risk assessment is carried out every year which is reflected in the Risk Opportunities Identification and Determining Control (ROIDC).</p> <p>Risk identification (ROIDC) was carried out by the H&S Expert as Secretary of P2K3 and reviewed by the Chairperson of P2K3 on 02 January 2024 for Sumber Cahaya Estate and Sumber Cahaya Mill. Based on verification of Opportunities Identification and Determining Control document, known that known that all plantation and mill operational activities have had their risks and controls identified.</p> <p>The company has documented the Occupational Safety and Health Policy, namely the Quality, Environment, Occupational Safety and Health Policy on 01 July 2019, which was approved by the President Director, committed to complying with and implementing all government regulations and other requirements relating to quality, environment, occupational safety and health according to the parties concerned, improving quality performance, environment, health and safety. The policies are available in Indonesian, and based on interviews with estate and mill workers it is known that these policies have been socialized to all workers and they understand the policies.</p> <p>In addition to OHS policies, each management unit has an OHS program for 2023/2024, such as HSE inspection and socialization in estates and</p>	Complied

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		<p>mills, incident investigations, HSE training, <i>P2K3</i> (OHS Committee) meetings, near miss reports, fire extinguisher inspections, Hydrants and first aid kits, risk analysis review, fire and emergency response drill, health checks, and others, where program evaluations are carried out every month in <i>P2K3</i> meetings. Evaluation mainly discusses the implementation of the program whether it has been implemented or is still running. Several programs have been implemented and recorded in the <i>P2K3</i> report, such as the minutes of the monthly meeting. Based on interviews with workers in the estate and mill, they are aware of the safety risks in their activities.</p> <p>The H&S work plan and its monitoring to reduce the risk of work accidents are included in the <i>P2K3</i> Report of PT Mirza Pratama Putra Quarter I (January – March 2024) which has been reported to <i>Kepala Dinas Tenaga Kerja dan Transmigrasi</i> of <i>Kalimantan Tengah</i> Province No. 011-SUST/IV/2024 with evidence receipt dated 19 April 2024, contains information on risk training and work accident statistical reports. Record of PT Mirza Pratama Putra's <i>P2K3</i> Meeting Minutes are available in each estate and mill unit per quarter to monitor the implementation of H&S along with evidence of H&S adjustments that need to be implemented.</p>	
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>The company demonstrates monitoring of the effectiveness of the H&S plan in dealing with health & safety risks including:</p> <p>OHS Committee</p> <ul style="list-style-type: none"> Monthly OHS Committee meeting, to discuss and address current OHS issues. Samples of document that has been reviewed during audit such as, meeting on 01 April 2024 with meeting agenda the consistency of using PPE when working and work accidents. Quarter Report of <i>P2K3</i> to Manpower Agency of Kalimantan Tengah Province. Samples of document that has been reviewed during 	Complied

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		<p>audit such as report for January to March 2024 period was reported on 19 April 2024 (Letter number 011-SUST/IV/2024).</p> <p>Periodic Medical Check-up</p> <p>The company has carried out periodic health checks for workers who have high risk potential, which are explained as follows:</p> <ul style="list-style-type: none"> • Audiometric examinations for workers with high noise risks are carried out once a year. The last audiometric examination was carried out on 15 November 2023 with all results being normal. • Spirometry examination for workers with high exposure to dust and chemical contact. The last spirometry examination was carried out on 15 November 2023 with all results being normal. • Cholinesterase examination for workers in contact with chemicals carried out twice a year. The last cholinesterase examination was carried out on 19 October 2023 with all results being normal. <p>Based on interviews with workers (harvester, pesticide applicator, and process operator) at Sumber Cahaya POM and Estate, it is known that every day when the morning briefing is carried out, the foreman will check the completeness of the PPE of the workers and will deliver a safety briefing. Meanwhile, every month an OHS inspection is held to see how it applies to all units. Based on the explanation above, it can be concluded that the certification unit has monitored the effectiveness of the OHS plan to handle OHS risk in people.</p>	
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 which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	Company has Training Program for Year 2024 addressed for all workers and smallholders. As for contractor workers, the training program already included together with company workers. Training program is documented in Annual Work Program of Sustainability Coordinator for	Complied

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	- Critical (Major) compliance -	<p>Year 2024 and Annual Work Program of NBE Smallholder for Year 2024. The training program listed already including the RSPO P&C, such as:</p> <ul style="list-style-type: none"> • Awareness of RSPO SCCS to all workers and smallholder farmers • Socialization of safe work practice for harvesting, manuring, and spraying • Socialization of HCV to all workers and smallholders • First aid training • Firefighting simulation • Socialization of quality, environment, and OHS policy • Etc. <p>The mechanism to identify the need of training and the person who need the training is set in SOP of Education and Training (No. SOP-TND.GN-001 dated 1 December 2020).</p> <p>Based on interview with workers in estate and mill, it is known that the workers received training or socialization from company related to company's policy and work procedures</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 training documentation for the period of 2023/2024 recorded in minutes of training, photos, and attendance lists. Samples of the training carried out are as follows:</p> <ul style="list-style-type: none"> - Training of MSDS, chemical management dan hazardous waste management has been conducted on 08 May 2024. - Firefighting training and drill have been conducted on 04 January 2024. - First aid training has been conducted on 23 November 2023. 	Complied

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		<ul style="list-style-type: none"> - Training of pesticide spraying best practices has been conducted on 12 July 2023. - 06 Mei 2024 emergency response training with a Fuel and Oil Spill scenario at Warehouse Sumber Cahaya POM. <p>Based on interview with harvest and upkeep worker in Sumber Cahaya Estate and mill workers, it is known that the workers already understand about the work procedure, PPE usage, and also environment management. Some operators in mill for example boiler operator (OHS License 0051130423/C-OPU1/62/IV/2023) and welder (certificate number 5/0290150923/AS.01.04/IX/2023) also already has OHS license and still valid.</p>	
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>During ASA 1, available evidence that unit of certification has appointed the mill's head clerk, Henry Sinaga as personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) according to Chief Engineer decree No. 002/SK-SCCS/ENG-UP/SSMS-IN/IV/2023 dated 28 April 2023. This person has responsibility to:</p> <ul style="list-style-type: none"> a) Ensure the management system of RSPO P&C and Supply Chain and ISPO are implemented and maintained according to the requirements. b) Act as management representative during initial certification and surveillance audit of RSPO and ISPO. c) Promoting the awareness of RSPO and ISPO Supply Chain. d) Ensure compliance of all functions according to RSPO and Supply Chain standards. e) Monitoring the process f) Conducting correction and preventive action needed. 	Complied

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		<p>Awareness training related to the latest version of supply chain for mill was conducted on 7 and 15 May 2024. The training was provided by head sustainability and attended by 7 and 62 participants from Sumber Cahaya POM. The training material has covered the following:</p> <ul style="list-style-type: none"> • INA – NI RSPO Principle and Criterion 2020, and the objective of RSPO certification. • Procedure of FFB received in mill and its traceability. • Palm product dispatch procedure. • Mass balance production monitoring. • Awareness of RSPO Supply Chain for mill. <p>RSPO Market Communication and Claim.</p>	
<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 the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Based on interview with management representatives, document verification and field visit, Sumber Cahaya POM has selected Mass Balanced Module for the supply chain implementation, due to mill received the uncertified FFB from third parties.</p> <p>Hence, this indicator is not applicable</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from</p>	<p>Based on interview with management representatives, document verification and field visit, Sumber Cahaya POM has selected Mass Balanced Module for the supply chain implementation, due to mill received the uncertified FFB from third parties.</p>	Complied

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	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.	According to record of FFB receives period May 2023 to April 2024, Sumber Cahaya POM received certified FFB from owned estate (Sumber Cahaya Estate) and sister company estate (with RSPO certificate SGS-RSPO/PC20-00031). Whilst uncertified FFB coming from Plasma KUD Sumber Tani and Plasma Nuangan Kasuma Jaya (PT MPP smallholders), Plasma Batu Dara (PT TSA smallholders), Plasma Bina Semua Jaya, Plasma Batu Harapan, Plasma Bulau Sahabun, Plasma Pasif Batu Harapan, Plasma Natai Suka Sejahtera (PT. SMU smallholders) and PT Multi Usaha Abadi (FFB agent).													
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>The previous RSPO P&C Public Summary Report, certificate, and RSPO IT Platform documented the projected tonnage of certified CPO and PK that PT Mirza Pratama Putra – Sumber Cahaya POM could potentially produce.</p> <p>Below is the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in period August 2023 to July 2024 and actual production for period August 2023 to April 2024:</p> <table><tr><th>Description</th><th>Estimate last year (August 2023 – July 2024)</th><th>Actual (August 2023 – April 2024)</th></tr><tr><td>FFB</td><td>85,642</td><td>67,183</td></tr><tr><td>CPO</td><td>19,466</td><td>15,594</td></tr><tr><td>PK</td><td>3,743</td><td>2,524</td></tr></table>	Description	Estimate last year (August 2023 – July 2024)	Actual (August 2023 – April 2024)	FFB	85,642	67,183	CPO	19,466	15,594	PK	3,743	2,524	Complied
Description	Estimate last year (August 2023 – July 2024)	Actual (August 2023 – April 2024)													
FFB	85,642	67,183													
CPO	19,466	15,594													
PK	3,743	2,524													
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT Mirza Pratama Putra is a subsidiary of PT. Sawit Sumbermas Sarana, an RSPO member since 17 April 2007, with RSPO membership No. 1-0111-07-000-00.	Complied												

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3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> e) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. f) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). g) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. h) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>PT Mirza Pratama Putra has a procedure for Supply Chain No. SOP-PKS.GN-020 rev.12 dated on 22 July 2022. The procedure has adopted the RSPO supply chain certification standard version 2020 and RSPO rules on market communication and claims version 2019. The procedure consists of FFB harvesting in estate, FFB delivery to the mill, FFB receiving at mill, FFB processing at mill, delivery of product (CPO and PK) to buyer, sales using Book and Claim, registration of product transaction, conversion factor, awareness and training.</p> <p>Unit of certification is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records.</p> <p>Sample verified:</p> <ul style="list-style-type: none"> - <i>Laporan Harian Produksi</i> (Daily Production Report) dated 30 April 2024 and 31 December 2023. - <i>Rekap Performance Produksi</i> (Production Performance Recap) period January – December 2023 and January – April 2024. - Training record dated 7 and 15 May 2024 to mill worker. - Contract of CPO/PK Transporter. - Record of awareness to contractors regarding RSPO Supply Chain requirement. <p>PIC responsible over the implementation of this procedure is Head Clerk of Palm Oil Mill. During ASA 1, available evidence that unit of certification has appointed the mill's head clerk (KTU), Henry Sinaga as personnel</p>	Non-compliance

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		<p>carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) according to Chief Engineer decree No. 002/SK-SCCS/ENG-UP/SSMS-IN/IV/2023 dated 28 April 2023. This person has responsibility to:</p> <ul style="list-style-type: none"> g) Ensure the management system of RSPO P&C and Supply Chain and ISPO are implemented and maintained according to the requirements. h) Act as management representative during initial certification and surveillance audit of RSPO and ISPO. i) Promoting the awareness of RSPO and ISPO Supply Chain. j) Ensure compliance of all functions according to RSPO and Supply Chain standards. k) Monitoring the process l) Conducting correction and preventive action needed. <p>The Supply Chain Procedure (SOP-PKS.GN-020 rev.12 dated on 22 July 2022) Section 6.5 has described mechanism for receiving and processing certified and non-certified FFB. If there is a discrepancy with the document of RSPO Certified FFB, KTU Mill will coordinate with the supplier and/or Marketing Department and wait for instructions from the Marketing Department whether it will still be weighed and downgraded as non-certified FFB or will be returned to the supplier.</p> <p>Critical Non-Conformity: <i>The procedure for the implementation of supply chain requirement is no longer updated.</i> <i>Sumber Cahaya POM has established procedure covering the implementation of all the elements of the supply chain model requirements, that documented in "Prosedur Supply Chain" (SOP-</i></p>	
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		<i>PKS.GN-20) dated 25 July 2022. However, in Section 3 "Acuan", stated that one of the references is RSPO Market Communication and Claim version January 2019, this version is no longer updated.</i>	
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>Unit of certification have a written procedure to conduct annual internal audit as per "Prosedur Internal Audit Manajemen Sistem" (SOP-SUST.GN-003), dated 1 January 2020. Internal audit reference includes RSPO P&C, Supply Chain and Rules on Market Communication and Claims.</p> <p>The most recent RSPO internal audit conducted on 25 January 2024, against the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and RSPO Rules on Market Communication 2022. There were 4 non-conformities identified in Sumber Cahaya POM, one of it was related to indicator 3.8.6 (supply chain requirement). The finding is that RSPO Supply chain refreshment training has not been carried out for respective officers in accordance with RSPO requirements. Root cause, correction and corrective action has been determined. The status of non-conformity has been subjected in management review that held on 18 March 2024. All records of internal audit and management review were available.</p>	Complied
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>The document "Prosedur Supply Chain"(SOP-PKS.GN-020), Section 6.5. (FFB Receiving at Mill) indicates the Mill must ensure supplier information covers information e.g., estate name and block number, mill name, date of delivery, product description and quantity, stamp of certified, transporter identity and unique identification number. Weighing and recording of FFB performed by weighbridge operator. Determining the status of whether the FFB from the plantation received is RSPO Certified FFB or Non-Certified FFB is done automatically in the "P-Pro" system based on the block database available in the "P-Pro" system. KTU document/record and make Mass Balance calculations to balance all FFB receipts and shipments of RSPO Certified and Non-</p>	Complied

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		<p>Certified products (CPO & PK) on a Three Monthly (Net Off) basis. As well as informing the RSPO Certified and Non-Certified CPO and PK Stock to the Marketing Department.</p> <p>Sumber Cahaya POM receive certified FFB from company owned estates (Sumber Cahaya Estate) and sister company estate (Malata Estate has bee RSPO certified with certficate SGS-RSPO/PC20-00031, valid until 24 June 2025). FFB weighing ticket described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> • Weighbridge ticket No.015693/MPP-SCM/SCMWB1/05/2024, dated 14 May 2024, for 338 FFB bunches; nett weight 7,780 kg; from SCE, Division B; Block A023A (11 bunches), C029A (15 bunches), A028A (20 bunches), C024A (292 bunches); vehicle KH 8329 RE; Driver Suratman. • Weighbridge ticket No.015733/MPP-SCM/SCMWB1/05/2024, dated 14 May 2024, for 843 FFB bunches; nett weight 6,230 kg; from SCE, Division D; Block J008A (243 bunches), I013A (600 bunches); vehicle KH 8891 AA; Driver Didik. <p>The mill also receives non-certified FFB, which is from smallholder and FFB collector/agent. Records of non-certified FFB receiving were available such as "<i>Surat Pengantar Angkutan TBS</i>" (Delivery Note) and weighbridge ticket.</p> <p>Available Mass Balance monitoring document that monitored by KTU (Mill's Head Clerk) daily. Sumber Cahaya POM has documented the tonnage and sources of certified and non-certified FFBs received.</p> <p>Monthly Records of Certified and Uncertified FFB Received</p>	
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No.	Month - Year	Volume of FFB from certified supply base (tons)	Volume of FFB from uncertified supply base (tons)	Total FFB/Month (tons)
1	Aug 2023	5,773	8,046	13,819
2	Sept 2023	7,155	4,025	11,180
3	Oct 2023	8,448	6,994	15,442
4	Nov 2023	7,744	10,659	18,403
5	Dec 2023	7,365	10,464	17,829
6	Jan 2024	7,233	9,097	16,330
7	Feb 2024	5,925	4,579	10,504
8	Mar 2024	6,875	5,145	12,020
9	Apr 2024	10,665	3,320	13,985
TOTAL		67,183	62,329	129,512

Mechanism to inform the CB immediately if there is a projected overproduction of certified tonnage has been regulated in document "*Prosedur Supply Chain*" (SOP-PKS.GN-020), Section 6.9.21 (Product Delivery). The procedure regulated if there is an indication/possibility of excess production of RSPO Certified CPO and PK from the quota that has been determined in RSPO PalmTrace, KTU Mill must inform the Marketing Department and give a copy to the Sustainability Directorate to be informed directly to the Certification Body so that the quota for RSPO Certified products can be extended in PalmTrace.

Mechanism for handling non-conforming FFB and/or documents have been described in document "*Prosedur Supply Chain*" (SOP-PKS.GN-020) Section 6.5.19. The procedure regulated that if there is a

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		discrepancy with the document of RSPO Certified FFB, KTU Mill will coordinate with the supplier and/or Marketing Department and wait for instructions from the Marketing Department whether it will still be weighed and downgraded as non-certified FFB or will be returned to the supplier.	
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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>The document "<i>Prosedur Supply Chain</i>" (SOP-PKS.GN-020), Section 6.9 (Product Delivery) has described that delivery of CPO and to the buyer is carried out according to the existing sales contract, including: (Sales Document, Bill of Lading, Delivery Notes, Invoice)</p> <ul style="list-style-type: none"> a. Buyer's Name and Address; b. Seller's Name and Address; c. Loading or Delivery Date; d. The date the document was issued; e. Product description, including Supply Chain Mass Balance Model; f. Product Delivery Quantity; g. Transportation supporting documents; h. RSPO Certificate Number (for products claimed to be RSPO Certified); i. ISPO Certificate Number (for products claimed to be ISPO Certified); j. Unique Identification Number (ID from RSPO PalmTrace or Sales and Purchase Contract number for products claimed to be RSPO Certified); k. Unique Identification Number (Sales and Purchase Contract number for products claimed to be ISPO Certified) and validity period of the ISPO certificate. <p>Based on review to the sales and goods out document, such as Sales Contract, Delivery Order and Weighbridge Ticket, Sumber Cahaya POM</p>	Complied

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		<p>has shown the record of minimum information for RSPO certified products.</p> <p>Sample of document verified:</p> <ul style="list-style-type: none"> - Sales Contract No.0002/MPP-CBU/CPO/01/2024, dated 10 January 2024, regarding sales of 2,000 MT CPO from PT Mirza Pratama Putra to PT Citra Borneo Utama. - Sales Contract No.0002/MPP-CBU/PK/01/2024, dated 8 January 2024, regarding sales of 750 MT Palm Kernel from PT Mirza Pratama Putra to PT Mitra Mendawai Sejati. - Delivery Order No.0006/SCM/DO-CPO/01/2024, dated 10 January 2024, regarding delivery of 500 MT CPO from PT Mirza Pratama Putra to PT Citra Borneo Utama. - Delivery Order No.0002/SCM/DO-PK/01/2024, dated 8 January 2024, regarding delivery of 750 MT Palm Kernel from PT Mirza Pratama Putra to PT Mitra Mendawai Sejati. - Weighbridge Ticket No.001336/MPP-SCM/SCMWB2/01/2024, dated 26 January 2024, regarding delivery of 26.44 MT CPO from PT Mirza Pratama Putra to PT Citra Borneo Utama. - Weighbridge Ticket No.001980/MPP-SCM/SCMWB2/01/2024, dated 13 February 2024, regarding delivery of 8.91 MT Palm Kernel from PT Mirza Pratama Putra to PT Mitra Mendawai Sejati. <p>Information available are Buyer's Name and Address; Seller's Name and Address; Loading or Delivery Date; The date the document was issued; Product description; Product Delivery Quantity; and Transportation supporting documents.</p> <p>Since certified on 10 August 2023, PT Mirza Pratama Putra has not claim any certified product, all CPO and PK are sold as conventional.</p>	
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3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Sumber Cahaya POM does not outsources its milling activities. The mill only outsourced the transport activity of CPO to the buyer's refinery, and PK to the buyer's KCP. The mill outsourced its product transportation to the following:</p> <ol style="list-style-type: none"> 1. CV Dwita Perdana (CPO & PK Transporter) 2. CV Rajawali Putera Mandiri (CPO Transporter) 3. CV Tiga Putera Perkasa (CPO & PK Transporter) 4. CV Tri Mega Usaha (CPO and CPKO Transporter) 5. CV Askim Makmur Tranportindo (CPO & PK Transporter) 6. CV Anugrah Lestari Transport (CPO & PK Transporter) <p>Each third parties have contractual agreement with the parent company group including PT Mirza Pratama Putra. During ASA 1 verified sample of contracts as presented below:</p> <ul style="list-style-type: none"> - Transport of Palm Product: "<i>Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit</i>" between PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra with PT Anugrah Lestari Transport, Contract No. 142/LGL/MKT/SSMS-ALT/X/2023, dated 2 October 2023, valid until 2 October 2024. - Transport of Palm Product: "<i>Perjanjian Jasa Pengangkutan Palm Product – Kelapa Sawit</i>" between PT Sawit Sumbermas Sarana, PT Kalimantan Sawit Abadi, PT Mitra Mendawai Sejati, PT Tanjung Sawit Abadi, PT Sawit Multi Utama, PT Mirza Pratama Putra with CV Tri Mega Usaha, Contract No. 23/LGL/MKT/SSMS.G-TMU/I/2024, dated 5 January 2024), valid until 5 January 2025. 	Complied
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		<p>Based on contract evaluation, it was confirmed that the mill has legal ownership of all input material to be included in outsourced processes as stated on Article 2 verse 1.</p> <p>The Mill has ensured that contractors accepted the mill policy to carry out an audit of the contractor's business activities by CB and provide operational access along with the system and all information held by the contractor, if necessary and with prior notification, as stated on the contract Article 18 verse 5.</p> <p>The mill has a documented control system as stated in "<i>Prosedur Supply Chain</i>" (SOP-PKS.GN-020), Section 6.9 (Product Delivery) for the outsourced process, which is regularly communicated to the relevant contractor, for example recently on 5 March 2024.</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>The names and contact details of all contractors used for the physical handling of oil palm products is listed in "<i>Daftar Stakeholder Eksternal</i>", as the following:</p> <ol style="list-style-type: none"> 1. CV Dwita Perdana (CPO & PK Transporter); contact person Alpha; phone *****4411. 2. CV Rajawali Putera Mandiri (CPO Transporter); contact person Imam Fauzi; phone *****1994 3. CV Tiga Putera Perkasa (CPO & PK Transporter); contact person Hamid; phone *****1017. 4. CV Tri Mega Usaha (CPO and CPKO Transporter); contact person Gunawan; phone *****7137. 5. CV Askim Makmur Transportindo (CPO & PK Transporter); contact person Carlos; phone *****8942. <p>CV Anugrah Lestari Transport (CPO & PK Transporter); contact person Teguh Adriyan; phone *****1802.</p>	Complied

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The aware to inform 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. Names and contact details of new contractors informed though RSPO Pre-Audit Information Checklist or "Daftar Stakeholder Eksternal".	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Verified that the Mill can demonstrate accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements, in examples:</p> <ul style="list-style-type: none"> - <i>Laporan Harian Produksi</i> (Daily Production Report) dated 30 April 2024 and 31 December 2023. - <i>Rekap Performance Produksi</i> (Production Performance Recap) period January – December 2023 and January – April 2024. - Training record dated 7 and 15 May 2024 to mill worker. - Contract of CPO/PK Transporter. - Record of awareness to contractors regarding RSPO Supply Chain requirement. <p>Based on Supply chain procedure known that retention time for supply chain document is 2 years. Records of transaction from the past two years were available.</p> <p>The mill has balance all receipts of RSPO certified FFB and deliveries of CPO and PK on three-monthly basis, in accordance to the "<i>Prosedur Supply Chain</i>" (SOP-PKS.GN-020), Section 4.11 and 6.5.17.</p> <p>The "<i>Prosedur Supply Chain</i>" (SOP-PKS.GN-020), Section 4.11 also described that it must be ensured that the stock of RSPO Certified products which refers to production quantities and product despatch (volume or weight) must be positive at the end of the 3 (three) month</p>	Complied

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		period. Currently the certified stock is positive due to no sales of RSPO certified product.	
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>	Extraction rate is applied to provide reliable estimation of CPO and PK produced. The Mill determine and set their own extraction rates based upon experience. For period August 2023 – July 2024, the estimated extraction rate from FFB into CPO is 22.73%, whilst from FFB to PK is 4.37%.	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in " <i>Laporan Harian Produksi</i> " dan " <i>Rekap Performance Produksi</i> ". Based on the record, extraction rate for period April 2023 – March 2024, actual OER is 23.21% and actual KER is 3.75%.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>According to the procedure of supply chain, mill operational and record of the FFB received, the mill has selected to implement Mass Balance Module.</p> <p>Not Applicable</p>	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Sumber Cahaya Mill have mechanism on registration of transactions, and it is described within Supply Chain Procedure (SOP-PKS.GN-020, Rev.12, dated 25 Jul 2022).</p> <p>Shipping Announcement explained in Section Product Deliveries to Buyer, at point 6.9.13 stated If the product delivered is claimed to be RSPO Certified, a Shipping Announcement process will be carried out at RSPO PalmTrace after completing the delivery process according to contract.</p>	Complied

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		<p>Section Product Registration at point 6.11.6 stated Marketing Department carries out Shipping Announcement at RSPO PalmTrace after completing product sales transactions.</p> <p>Section Baseline Policy at point 5.15 stated Shipping Announcement at Palm Trace RSPO must be made a maximum of 3 (three) months after the product is delivered to the buyer.</p> <p>Point 4.25 stated that "Remove" is done if:</p> <ol style="list-style-type: none"> There are RSPO certified products sold under other certification schemes outside RSPO. There are conventional sales of RSPO certified products (considered non-RSPO certified products). There is damage or loss of RSPO certified products caused by contamination, tank leaks, accidents, or other causes. <p>"Remove" is done on RSPO PalmTrace by Marketing Department where KTU Mill informs the volume of RSPO Certified products that must be removed.</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>Claims regarding the production of RSPO certified product that refer to the RSPO Rules on Market Communications and Claims is describes in Supply Chain Procedure (SOP-PKS.GN-020, Rev.12, dated 25 Jul 2022). Currently there is no claim being made by Sumber Cahaya POM due to there is no sales of RSPO certified product.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.</p>	<p>The company do not use any product claim and/or communication.</p> <p>PT Mirza Pratama Putra is a subsidiary of PT Sawit Sumbermas Sarana, an RSPO member since 17 April 2007, with RSPO membership No. 1-0111-07-000-00. A corporate communication and its commitment to the principles of the RSPO are covered in website: https://ssms.co.id/en</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p>	<p>The company do not use any product claim and/or communication.</p>	Complied

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	<p>A. display its RSPO membership status</p> <p>B. display the RSPO web address (www.rspo.org)</p> <p>C. state that the member supports the work of RSPO</p> <p>D. state the member's history with regard to RSPO</p> <p>E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership</p>	<p>PT Sawit Sumbermas Sarana (SSMS) in its website:</p> <p>a. Did not display its RSPO membership status.</p> <p>b. Did not display the RSPO web address.</p> <p>c. State the member supports the work of the RSPO. In the website, PT SSMS stated "In order to strengthen supply chain traceability, SSMS will take a role in encouraging more independent smallholders to be involved in the sustainable palm oil market through the RSPO certification program".</p> <p>d. State the member's history with regards to the RSPO. In the website PT SSMS stated has completed the RSPO certification of all business units towards the end of 2023.</p> <p>Use RSPO trademark.</p>	
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	<p>The company do not use any product claim and/or communication.</p> <p>In corporate communication, PT SSMS did not display the RSPO corporate logo.</p>	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.	<p>The company do not use any product claim and/or communication.</p> <p>In corporate communication, PT SSMS did not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.</p>	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." 	<p>The company do not use any product claim and/or communication.</p> <p>In corporate communication, PT SSMS does make statements that highlight their RSPO certification status, such as "PT SSMS stated has completed the certification of all business units towards the end of 2023" and "In order to strengthen supply chain traceability, SSMS will take a role in encouraging more independent smallholders to be involved in the sustainable palm oil market through the RSPO certification program".</p>	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>	<p>PT Mirza Pratama Putra is a subsidiary of PT. Sawit Sumbermas Sarana, an RSPO member since 17 April 2007, with RSPO membership No. 1-0111-07-000-00.</p> <p>Not applicable.</p>	Not Applicable
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters,	<p>The company do not use any product claim and/or communication.</p> <p>PT Mirza Pratama Putra does not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.</p>	Complied

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	displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.		
5.1.2	Product-specific communications are voluntary.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not display product-specific communications both on-pack or off-pack to any public statement about an individual product that contains RSPO sustainable palm oil.	Complied
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	PT Mirza Pratama Putra is not a retailers, traders, or distributors. This requirement is not applicable.	Not Applicable

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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 Mirza Pratama Putra is not a retailers, traders, or distributors. This requirement is not applicable.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made off-pack claims in their shipping documents, websites, emails, annual report.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not stating the supply chain model and certificate number in their sales documents such as contract, delivery order, weighbridge ticket, due to currently there is no sales of RSPO certified product.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. 	PT Mirza Pratama Putra is not a distributor or wholesaler.	Not Applicable

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	<p>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.</p> <ul style="list-style-type: none"> • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	<p>Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.</p>	<p>The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.</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> <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>The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.</p>	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	<p>PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.</p>	Complied

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	<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 Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.	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 Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.	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.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	The company do not use any product claim and/or communication. PT Mirza Pratama Putra does not made on-pack claims in their product. Furthermore, PT Mirza Pratama Putra is entering RSPO P&C certification.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	The Certified volume that can be sold is only the volume requested in the RSPO PalmTrace. Hence the CPO and PK volume sold is considered 100% content.	Complied

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	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 Certified volume that can be sold is only the volume requested in the RSPO PalmTrace. Hence the CPO and PK volume sold 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>	The company do not use any product claim and/or communication.	Complied
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 material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	The company do not use any product claim and/or communication.	Complied
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.			

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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 unit of certification has Human Rights Policy (Kebijakan Hak Asasi Manusia), 20 September 2023, signed by CEO PT SSMS. The policy including commitment to respects and supports the Universal Declaration of Human Rights as well as International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including prohibiting retaliation against Human Rights Defenders (HRD's).</p> <p>The policy has been implemented and communicated to all levels of the workforce, suppliers, contractors, and local communities, for example:</p> <ul style="list-style-type: none"> - All level workforces Sumber Cahaya Mill on 01 December 2023, 05 February and 06 May 2024. - All level workforces Sumber Cahaya Estate on 05 December 2023, 02 January, 06 February and 07 May 2024. - Local community Nanga Palikodan Village and Nuangan Village on 02 April 2024. - All Contractor on 15 May 2024. 	Complied
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' representative in Sumber Cahaya Mill and Estate, confirmed that company has no issue regarding human rights violation.</p> <p>Based on document review and interview with community representative of Sumber Cahaya Village and Bukit Jaya Village, there is no evidence the company triggers violence, harasses and intimidation in plantation and mill operations.</p> <p>Based on online research during the audit, there is no media reported relating complaint with human right issues.</p>	Complied
<p>Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			

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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>Unit of certification has established grievance mechanism in two sources, stakeholders and employees. Each mechanism is described in different procedures, as below:</p> <ul style="list-style-type: none"> - Stakeholder grievance. Procedure for Stakeholder Grievance and Complaints Handling Mechanism (SOP-SUST.GN-009) R.01, 28 December 2021. - Employee grievance. "Prosedur Penanganan Keluhan Karyawan (SOP-PERS.GN-017, Rev.01)", dated 1 March 2017. <p>There is no change regarding the SOP until this ASA1 audit.</p> <p>Clause 6.1.4 Communication staff will ask the complainant whether the identity of the reporter can be published or as anonymity. Stakeholder Complaint Form (F-SUST.GN-001.R01, 28 December 2021), notified that the Whistleblower can provide personal identification data and or as anonymity to maintain privacy and security.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Procedure that used to ensure that the system is understood by the affected parties including by illiterate parties is by picture of flow chart which installed in each operation unit, surrounding villages and socialization/dissemination of policy.</p> <p>The policy is in Bahasa Indonesia and has been socialized to all workers 2 November 2023, 5 December 2023, 2 January 2024, 6 February 2024, 7 May 2024 at Sumber Cahaya Mill and Estate and 2 April 2024 to surrounding community.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Unit of certification has established grievance procedure from stakeholder as described in Stakeholder grievance. "Prosedur Mekanisme Penanganan Keluhan & Pengaduan Stakeholder (SOP-SUST.GN-009) R.01, 28 December 2021.</p> <p>Within this procedure, progress of grievance handling including timeframe and the outcome already stipulated under section 6.3</p>	Complied

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		<p>"Prosedur Tindak Lanjut Penanganan Keluhan" or complaint handling progress.</p> <p>During stakeholder consultation, there is no complaint/grievance was delivered for period Y2023 and until May 2024.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Within this procedure ("Prosedur Mekanisme Penanganan Keluhan & Pengaduan Stakeholder (SOP-SUST.GN-009) R.01, 28 December 2021, option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator already stipulated in section 6.3</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Unit of certification when preparing the community development/CSR program, involving stakeholders or developing joint consultation with affected stakeholders meeting namely "Forum Group Discussion" in village and sub-district level. The last meeting with affected stakeholders is conducted in 23 May 2023 at Sumber Cahaya Village, and combined farmer group of CSR Regional 2 Pangkalan Bun.</p> <p>There are several programs that discussed during the meeting, there are Social Cultural Program and Community Empowerment Program for Y2023. The agreed program by community and company is Program Tanam Hortikultura – Buah Semangka kelas A – Kelompok Tani Sumber Segar.</p>	Complied
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>PT Mirza Pratama Putra initially established based on Notarial Deed No. 12 dated 9 June 2004, then in 2016 has been taken over by PT Sawit Sumbermas Sarana (parent company – RSPO membership) based on Notarial Deed No. 23 dated 23 September 2015.</p>	Complied

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		<p>The Unit of Certification has historical of plantation legality documents as follows:</p> <ul style="list-style-type: none"> • Location Permit (<i>Izin Lokasi</i>) of PT Mirza Pratama Putra based on Lamandau Regent Decree No. Ek.525.26/02/VIII/2006 dated 15 August 2006 covers an area of 6,000 ha. • Plantation Business Permit (<i>Izin Usaha Perkebunan /IUP</i>) of PT Mirza Pratama Putra based on Lamandau Regent Decree No. EK.525.26/271/XI/2006 dated 27 November 2006 covers an area of 6,000 ha and 30 ton FFB/hour of mill capacity. • Renewal of Location Permit (<i>Izin Lokasi</i>) of PT Mirza Pratama Putra based on Lamandau Regent Decree No. 503.4/03/SK-OL/VII/BPPTPM-2016 dated 27 July 2016 covers an area of 4,799.95 ha. • Forest area exchange of PT Mirza Pratama Putra amount of 4,799.96 ha, based on Environment and Forestry Minister Decree No. SK.3/MENLHK/SETJEN/PLA.0/1/2018 dated 3 January 2018. Total area 4,799.95 Ha. • Land Title in the form of <i>Hak Guna Usaha</i> (HGU) of PT Mirza Pratama Putra based on Agrarian Minister Decree No. 59/HGU/KEM-ATR/BPN/IX/2021 dated 9 September 2021 covering an area of 3,727.114 ha, valid for 35 years. • Revise of Land Title / <i>Hak Guna Usaha</i> (HGU): Revise of Land Title / <i>Hak Guna Usaha</i> (HGU) as per document of "Tanda Terima Hapusnya Hak" from Kantor Pertanahan Kabupaten Lamandau No. D1301A dated 24 April 2024, Tanda Terima No. Bukti Penyerahan 729 berkas No. 1006/2024 dated 24 April 2024, Tanda Terima No. Bukti Penyerahan 728 berkas No. 1005/2024 dated 24 April 2024, Tanda Terima No. Bukti Penyerahan 730 berkas No. 1010/2024 dated 24 April 2024. 	
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		<p>The reduction is for land parcels: Parcel No. NIB-15.12.00.00.00.01516 with area 79.64 Ha; No. NIB-15.12.00.00.00.01517 with area 36.78 Ha; No. NIB-15.12.00.00.00.01518 with area 193.70 Ha. Total of reduction area of HGU is 310.12 Ha. The final area of HGU is 3,416.99 Ha.</p> <p>The consideration for reducing HGU is due to community members at Tamiang Village are not willing to undergo land compensation and still want to cultivate the land. And this area also coincides with some being included in PT MPP's HCV area which must be maintained by the company.</p> <p>Based on interview to the Agrarian Agency of Lamandau during ASA1, the revise of Land Title HGU was in accordance with the Agrarian Regulation and no revision of the HGU Decree is required. The 3 parcels (NIB-15.12.00.00.00.01516, NIB-15.12.00.00.00.01517, NIB-15.12.00.00.00.01518) with area 310.12 Ha that were abolished automatically returned to the state according to BPN's ATR/Agrarian regulations.</p> <p>Refer to indicator 4.4.2 for more information on the history of FPIC.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>The Unit of Certification development was started since acquired Location Permit in 2006. Based on review of HGU Decree and stakeholder consultation with Agrarian Agency, Villages Officials, and previous landowner during ASA1, were known that the operational area was initially sources from state land (<i>Tanah Negara</i>), with some of area occupied by previous landowners and have been compensated.</p> <p>Agrarian Agency also explained that the area of land title / HGU of PT MPP has been reduction as of 310.12 Ha in April 2024, and the reduction area has followed the agrarian regulation in Indonesia. The consideration for reducing HGU is due to community members at Tamiang Village are not willing to undergo land compensation and still want to cultivate the land. And this area also coincides with some being</p>	Complied

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		<p>included in PT MPP's HCV area which must be maintained by the company.</p> <p>The document verified related to the revise of Land Title / <i>Hak Guna Usaha</i> (HGU) as follows:</p> <ul style="list-style-type: none"> - "Berita Acara Rapat Penyelesaian Permasalahan Pencabutan Izin HGU pada PT MPP" dated 4 November 2023. Minute of meeting has explained related to the resolving of HGU Permit revocation problems as of 310.12 Ha located in Tamiang Village, the minute of meeting also explained that the Village Head is the representative of the affected community. The meeting has carried out in Tamiang Village Office that has attended by "Kepala Adat"/Traditional Head of Tamiang Village, Village staffs, members of the village consultative body/"Badan Permusyawaratan Desa/BPD" and Tamiang village public figure, and Tamiang village community land owners. - Letter No. 195/MPP/PKN/III/2023 dated March 2023 from PT Mirza Pratama Putra to Kepala Kantor Pertanahan Kabupaten Lamandau related to "Surat Penjelasan Permohonan Penghapusan Sertifikat HGU PT MPP". The letter explained the reduction for land parcels: Parcel No. NIB-15.12.00.00.00.01516 with area 79.64 Ha; No. NIB-15.12.00.00.00.01517 with area 36.78 Ha; No. NIB-15.12.00.00.00.01518 with area 193.70 Ha. Total of reduction area of HGU is 310.12 Ha. - Letter No. MP.01.03/263-62.09/II/2024 dated 21 February 2024 from Kantor Pertanahan Lamandau Regency to Kepala Kantor Wilayah Badan Pertanahan Nasional Kalimantan Tengah Province related to "Permohonan Izin Penghapusan HGU No. 00099, Nomor 00100 dan Nomor 00104" on behalf PT Mirza 	
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		<p>Pratama Putra located in Lamandau Regency, Kalimantan tengah Province.</p> <ul style="list-style-type: none"> - Revise of Land Title / <i>Hak Guna Usaha</i> (HGU) as per document of "Tanda Terima Hapusnya Hak" from Kantor Pertanahan Kabupaten Lamandau No. D1301A dated 24 April 2024, Tanda Terima No. Bukti Penyerahan 729 berkas No. 1006/2024 dated 24 April 2024, Tanda Terima No. Bukti Penyerahan 728 berkas No. 1005/2024 dated 24 April 2024, Tanda Terima No. Bukti Penyerahan 730 berkas No. 1010/2024 dated 24 April 2024. <p>The reduction is for land parcels: Parcel No. NIB-15.12.00.00.00.01516 with area 79.64 Ha; No. NIB-15.12.00.00.00.01517 with area 36.78 Ha; No. NIB-15.12.00.00.00.01518 with area 193.70 Ha. Total of reduction area of HGU is 310.12 Ha. The final area of HGU is 3,416.99 Ha.</p> <p>During ASA1 obtained that the previous landowners and management unit have explained that the land acquisitions had been done long before PT Sawit Sumbermas Sarana (parent company – RSPO Membership) took over PT Mirza Pratama Putra in 2016. Moreover, the documentation of FPIC process from previous owner cannot be fully transferred to current owner due to lack of documentation system of previous management.</p> <p>However, the previous landowners have explained that the land acquisition processes have been conducted through FPIC manner, such as started with consultation of the project, participatory land identification and mapping, negotiation process with no coercion, the documentations have been made in Indonesian language, and have involved Village Head and Sub-District Head as community representatives.</p>	
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		<p>Other than that, during the take-over process in 2016, the current company's owner has conduct re-inventory of land acquisition documents. For some lands that were proven to have no sufficient evidence of land compensation, the current owner has conducted re-compensation (<i>tali asih</i>) according to the SOP of Land Acquisition (No. SOP-LEGAL.GN-001 dated 1 December 2016).</p> <p>It has been verified some samples of re-compensation of 2016 and is concluded that the process has been made in FPIC manner. Document verified for compensation during ASA1 for example, compensation for F*r*a* As*n* with total area of 15.77 ha, the documentation consists of:</p> <ul style="list-style-type: none"> - Proposal of Land Acquisition to Top Management. - Agreement of land owners with the land acquisition mechanism. - Land Verification and Participatory Mapping (with photograph of both party). - Minutes of Land Acquisition. - Statement Letter of Land Ownership from land owner. - Statement Letter of Land Ownership from Village Head. - Statement Letter of Land Title Relinquishment from land owner. - Agreement Letter of Price and Payment. - Proposal of Payment to Top Management. - Payment Slip and photo documentation with previous land owners. <p>These documentations have been made in Indonesian language and signed by both parties, including witnesser such as boundary landowner, Village Head.</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>The land development had started since acquired Location Permit in 2006 and had finished prior to the takeover by current owner in 2016. The documentation of FPIC process from previous owner cannot be fully</p>	

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		<p>transferred to current owner due to lack of documentation system of previous management.</p> <p>However, based on interviews with previous landowners during ASA1, was mentioned that the land acquisitions were conducted without coercion, and the landowner was given the freedom to refuse the offer.</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>The land development had been started since acquired Location Permit in 2006 and has finished prior to the takeover by current owner in 2016. The documentation of FPIC process from previous owner cannot be fully transferred to current owner due to lack of documentation system of previous management.</p> <p>However, based on interviews with previous landowners during ASA1, was mentioned that some positive and negative impacts have been understood such as the loss of forest and diversity, opportunity to be employed, opportunity to have a better road access, etc.</p>	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>The land development had been started since acquired Location Permit in 2006 and has finished prior to the takeover by current owner in 2016. The documentation of FPIC process from previous owner cannot be fully transferred to current owner due to lack of documentation system of previous management.</p> <p>However, based on interviews with previous landowners during ASA1, was mentioned that the land acquisition process was started with participatory land identification and mapping, involving neighboring landowner and Village Official.</p> <p>Moreover, in the re-compensation process in 2016 (as has been mentioned in indicator 4.4.2 a), the SOP of Land Acquisition and its implementation has covered participatory land identification and mappings involving neighboring owner.</p>	Complied

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4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	Based on public consultation with related stakeholder (government agencies of Lamandau Regency and village representatives from Sumber Cahaya Village, Bukit Jaya Village and Nuangan Village) during ASA1 obtained information that all relevant information is available in Bahasa Indonesia.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, it was known that they represent the villagers who receives land compensation previously.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	The land development had been started since acquired Location Permit in 2006 and has finished prior to the takeover by current owner in 2016. The documentation of FPIC process from previous owner cannot be fully transferred to current owner due to lack of documentation system of previous management. However, based on interviews with previous landowners during ASA1, was mentioned that the land acquisition process was started with participatory land identification and mapping, involving neighboring landowner and Village Official. Moreover, in the re-compensation process in 2016 (as has been mentioned in indicator 4.4.2 a), the SOP of Land Acquisition and its implementation has covered participatory land identification and mapping involving neighboring owner.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	The land development had started since acquired Location Permit in 2006 and has finished prior to the takeover by current owner in 2016. The documentation of land identification from previous owner cannot be fully transferred to current owner due to lack of documentation system.	Complied

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		<p>However, based on interviews with previous landowners during ASA1, was mentioned that the land acquisition process was started with participatory land identification and mapping, involving neighboring landowner and Village Official.</p> <p>Moreover, in the re-compensation process in 2016 (as has been mentioned in indicator 4.4.2 a), the SOP of Land Acquisition and its implementation has covered participatory land identification and mapping involving neighboring owner.</p>	
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>	Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions were conducted by the previous company's owner. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved.	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, 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>	Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions were conducted by the previous company's owner. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved.	Complied
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>	Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions were conducted by the previous company's owner. The process has been conducted in a FPIC	Complied

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	- Minor compliance -	manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved.	
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions were conducted by the previous company's owner. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved.	Complied
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions were conducted by the previous company's owner. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved.	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 -	The location permit was obtained in 2006 by the previous owner (non-member RSPO) of PT Mirza Pratama Putra, but the plantation has not been developed yet or in other words that the development process was discontinued due to internal management issues, and only certain areas can be planted. In 2011-2012, land compensation to local communities still occurs, then land clearing and planting are continued. In 2016, PT MPP was taken over legally by RSPO member PT Sawit Sumbermas Sarana and registered in Time Bound Plan. In that period, re-compensated of lands conducted by current owner with FPIC process. Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions process has been conducted in a FPIC manner, such as initiated by dissemination of the project,	Complied

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		<p>participative mapping, all steps were well documented and village officials have been involved.</p> <p>No land acquired after 15 November 2018 by unit of certification.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with previous landowners and local communities' representatives (Bukit Jaya village, Sumber Cahaya village and Nuangan village) during ASA1, the land acquisitions were conducted by the previous company's owner in period 2011-2012. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved.</p> <p>No land acquired after 15 November 2018 by unit of certification.</p>	Complied
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The procedure for identifying legal, customary or user rights, and person entitled to compensation is set in SOP of Land Acquisition (No. SOP-SPD.GN-002 dated 1 January 2015). There is no change related to the SOP until this audit.</p> <p>Currently, there is no new land acquisition. Unit management stated that if any new land acquisition in the future, this procedure will be disseminated to landowners.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>In the SOP of Land Acquisition (No. SOP-LEGAL.GN-001 dated 1 December 2016) has described mechanism to fairly calculate and distribute compensation in participatory manner. There is no change related to the SOP until this audit.</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>PT Mirza Pratama Putra (PT. MPP) as unit of certification has acquired the company from an non-RSPO member in 2016. When acquisition took place, plantation has been developed and oil palm crops was planted.</p>	Complied

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	<p>- Minor compliance -</p>	<p>During stakeholder interview with previous landowners, explained that the current company operational area was initially sources from state land (<i>Tanah Negara</i>), with some of area occupied by previous landowners and have been compensated. For some area above the State Land which has been planted, no land title can be proven. Therefore, the company making compensation for all crops growth at land surface to both men and women.</p> <p>It has been verified some samples of re-compensation of 2016 and is concluded that the process has been made in FPIC manner. Document verified during ASA1 for example, compensation for F*r*a* As*n* with total area of 15.77 ha, the documentation consists of:</p> <ul style="list-style-type: none"> - Proposal of Land Acquisition to Top Management. - Agreement of land owners with the land acquisition mechanism. - Land Verification and Participatory Mapping (with photograph of both party). - Minutes of Land Acquisition. - Statement Letter of Land Ownership from land owner. - Statement Letter of Land Ownership from Village Head. - Statement Letter of Land Title Relinquishment from land owner. - Agreement Letter of Price and Payment. - Proposal of Payment to Top Management. - Payment Slip and photo documentation with previous land owners. <p>These documentations have been made in Indonesian language and signed by both parties, including witnesser such as boundary landowner, Village Head.</p> <p>Also, the company making development for independent smallholders' partnership.</p>	
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4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties.</p> <p>It has been verified some samples of re-compensation of 2016 and is concluded that the process has been made in FPIC manner. Document verified during ASA1 for example, compensation for F*r*a* As*n* with total area of 15.77 ha, the documentation consists of:</p> <ul style="list-style-type: none"> - Proposal of Land Acquisition to Top Management. - Agreement of land owners with the land acquisition mechanism. - Land Verification and Participatory Mapping (with photograph of both party). - Minutes of Land Acquisition. - Statement Letter of Land Ownership from land owner. - Statement Letter of Land Ownership from Village Head. - Statement Letter of Land Title Relinquishment from land owner. - Agreement Letter of Price and Payment. <p>Proposal of Payment to Top Management.</p>	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	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>A mutually agreed procedure for identifying people entitled to compensation is stipulated within Land Compensation procedure or "Prosedur Pembebasan Lahan (SOP-LEGAL.GN-001) Rev.03", dated 1 December 2016. It is stated under Section 4 and 6.</p> <p>There is no change related to the SOP until this audit.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>A mutually agreed procedure for identifying people entitled to compensation is stipulated within Land Compensation procedure or</p>	Complied

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	- Critical (Major) compliance -	"Prosedur Pembebasan Lahan (SOP-LEGAL.GN-001) Rev.03", dated 1 December 2016. It is stated under Section 4 and 6. There is no change related to the SOP until this audit.	
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 unit of certification making development for independent smallholders' partnership for communities that have lost access and rights to land. Please refer to Criterion 5.1	Complied
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Based on interview with previous landowner during ASA1, the land acquisitions were conducted by the previous company's owner. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved. There is no negative issue or land disputes concerning the FPIC process.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on interview with previous landowners, stated that: - The land acquisition process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved. During the took over in 2016, the new company's owner conducted re-inventory the documentation of previous landowner. For the land parcels that did not have sufficient evidence of land acquisition documentation, the new owner has conducted re-payment to make a new documentation of land acquisition. - The land acquisitions were conducted in the period of 2011 – 2012. The process has been conducted in a FPIC manner, such as initiated by dissemination of the project, participative mapping, all steps were well documented and village officials have been involved. During the negotiation process, the company and landowners also agreed to	Complied

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		build plasma (smallholder), the realization is ongoing by the current company's owner. No land conflict raised since the company acquired in 2016.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Based on interview with previous landowners and local communities' representatives during ASA1, there is no customary land were existed in PT Mirza Pratama Putra.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Based on interview with previous landowners and local communities' representatives during ASA1, there is no customary land were existed in PT Mirza Pratama Putra.	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 -	Sumber Cahaya POM receives FFB from own estate, sisters company estates, smallholders from other estate and out grower/independent smallholder as per describe in indicator 2.3.1. Based on interview during ASA 1 with the smallholder (KUD Sumber Tani, Koperasi Jasa Nuangan Kasuma Jaya) and FFB supplier (PT MUA), revealed that the unit of certification explained the FFB prices regularly in monthly basis. FFB prices for outgrower are publicly available at the Mill and refer to FFB prices which determined by government.	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	FFB prices which determined by the Sumber Cahaya POM was explains to smallholder and FFB supplier as agreed within the contracts. FFB prices are communicate by phone and text message daily. FFB prices for	Complied

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		outgrower are publicly available at the Mill and refer to FFB prices which determined by government.	
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented within the contracts.</p> <ul style="list-style-type: none"> - Scheme smallholder: Koperasi Jasa Nuangan Kasuma Jaya (MoU #29/LGL/PLSM/MPP-KNKJ/X/2019, dated 21-10-2019) - Scheme smallholder: KUD Sumber Tani (MoU #18//LGL/PLSM/MPP-KUDST/IX/2016, dated 14-09-2016). - FFB supplier: PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). - FFB transporter: PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January 2024). Followed by PT Banua Sarana Jaya sub-contracted to CV Karya Berkah Bersama, based on Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024. <p>Based on interview during ASA 1 with the smallholder (KUD Sumber Tani, Koperasi Jasa Nuangan Kasuma Jaya), FFB supplier (PT MUA), and FFB transporter (CV KBB), revealed that unit of certification has implemented fair pricing.</p>	Complied
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of certification has contract of scheme smallholder, FFB supplier and FFB transporter. Based on interview during ASA 1 with the smallholder (KUD Sumber Tani, Koperasi Jasa Nuangan Kasuma Jaya), FFB supplier (PT MUA), and FFB transporter (CV KBB), revealed that decision making is involving all parties, including women and independent representative. The decision making is include finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p>	Complied

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5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>The partnership contracts of scheme smallholder, FFB supplier and FFB transporter are fair, legal and transparent and have an agreed timeframe.</p> <p>Minor Non-Conformities:</p> <p>During ASA 1, audit team contract of FFB Supplier, PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). However, based on Article 17, the validity period of the contract has been expired on 31 December 2023.</p>	Non-compliance
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview during ASA 1 with the smallholder (KUD Sumber Tani, Koperasi Jasa Nuangan Kasuma Jaya), revealed that agreed payment has been made in timely manner and receipts specifying price, weigh, deductions, and amount paid are available. However, based on review to contract of FFB supplier (PT MUA) and FFB transporter (CV KBB), found that there is no sufficient evident that the unit of certification has established and implemented mechanism for timely payment.</p> <p>Critical Non-Conformities:</p> <p>During ASA 1, audit team contract of FFB Supplier, PT Multi Usaha Abadi (Contract No. 08/LGL/MKT/MPP-MUA/I/2023, dated 1 January 2023). The contract mentioned that Payment will be made after the First Party (PT MPP) receives complete and correct billing documents, in the form of invoice, tax invoice, copy of the work agreement, recap of weighing and grading results from the POM, and checklist for completeness of supporting documents. However, the contract did not mention specific timeframe for payment.</p> <p>Based on verification to contract of FFB Transporter, PT Banua Sarana Jaya (Contract No. 03/LGL/KBN/MPP-BSJ.248/I/2024, dated 15 January</p>	Non-compliance

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		2024) followed by Contract No. 36/KBN/BSJ.248-KBB/I/2024, dated 15 January 2024 that PT Banua Sarana Jaya sub-contracted the activity to CV Karya Berkah Bersama. It verified that timeframe for payment is three weeks after invoice and all supporting documents received by first party (PT MPP). However, based on interview with representative of FFB Transporter, revealed that payments from the company are often more than 2 months late. The unit of certification also cannot show proof of payment for FFB transport for the period March and April 2024.	
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	Weighbridge at Sumber Cahaya POM is annually calibrated by an independent third party. Latest calibration is on 30 April 2024, based on "Berita Acara Tera Ulang" No.0370/BA-TU/GGH/IV/2024, by PT Gewinn Gold Hotama; Weighing Type Gewinn/SMART; Serial Number TS0070 and TS0071; Capacity 40.000 Kg.	Complied
5.1.8	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>During ASA 1, the unit of certification has two group of scheme smallholder, namely KUD Sumber Tani and Koperasi Jasa Nuangan Kasuma Jaya.</p> <p>KUD Sumber Tani's oil palm plantations were planted in 2012 covering an area of 194.02 Ha, all of which were included in mature plantations. The members of KUD Sumber Tani consist of more than 200 people. The legality of plasma land is a Certificate of Ownership Rights (SHM).</p> <p>Koperasi Jasa Nuangan Kasuma Jaya's oil palm plantations were planted in 2015, 2016, 2017 and 2020 covering an area of 82,24 Ha. Some areas are already mature, and some are still immature. The members of Koperasi Jasa Nuangan Kasuma Jaya consist of 68 people. The legality of plasma land ownership consists of a Land Certificate (SKT).</p> <p>Plasma plantation operational activities are carried out entirely by company employees, so the cooperative only needs to receive the proceeds from FFB sales. Regular FFB payments by companies to cooperatives are made every month, with the TBS price following the</p>	Complied

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		<p>Disbun (government) price. Through its representatives, the company regularly visits the Cooperative.</p> <p>Currently there is no independent smallholder organization adjacent to the unit of certification. The company is carrying out outreach for the establishment of an Internal Controlling System (ICS) for independent smallholder. In order to strengthen supply chain traceability, PT SSMS (parent company of PT Mirza Pratama Putra) has take a role in encouraging more independent smallholders to be involved in the sustainable palm oil market through the RSPO certification program. Currently there are 932 independent smallholders with an area of 2,300 hectares that have received RSPO certification. These smallholders come from 2 groups supported by PT SSMS, namely Asosiasi Petani Kelapa Sawit Mandiri (APKSM) Kotawaringin Barat and BUMDess Berkah Mulya Jaya Lamandau, through a partnership with Ecogreen.</p>	
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>During ASA 1, the unit of certification has no change in Grievance mechanism including for smallholders. All grievances managed refer to procedure of Stakeholder Grievance and Handling. "Prosedur Mekanisme Penanganan Keluhan & Pengaduan Stakeholder (SOP-SUST.GN-009) R.01, dated 28 December 2021.</p> <p>Based on logbook of grievance, there is no grievance issued in 2023 and 2024. The latest grievance recorded in March 2022, and it has been followed up.</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>Based on interview with the representatives of KUD Sumber Tani and Koperasi Jasa Nuangan Kasuma Jaya during ASA 1, it was confirmed that prior to development of scheme smallholder, the unit of certification consults with interested smallholders, including women or other partners to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	Complied

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		<p>The unit of certification supports scheme smallholders with certification by making partnership to scheme smallholder development.</p> <p>There are two organisation that been established:</p> <ul style="list-style-type: none"> - Koperasi Jasa Nuangan Kasuma Jaya (MoU #29/LGL/PLSM/MPP-KNKJ/X/2019, dated 21-10-2019). Cover area 967.53 Ha (404 members). - KUD Sumber Tani (MoU #18//LGL/PLSM/MPP-KUDST/IX/2016, dated 14-09-2016). Cover area 320.54 Ha (234 members). <p>Up to this ASA 1, the progress of Koperasi Jasa Nuangan Kasuma Jaya has covers 82.24 Ha, and KUD Sumber Tani has covers 194.02 Ha.</p>	
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>Based on interview with the representatives of KUD Sumber Tani and Koperasi Jasa Nuangan Kasuma Jaya during ASA 1, it was confirmed that the unit of certification has 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. Confirmed that regular meeting has been conducted by the company and several training has been conducted, e.g. regarding tax and administration.</p> <p>The unit of certification supports scheme smallholders with certification by making partnership to scheme smallholder development.</p> <p>There are two organisation that been established:</p> <ul style="list-style-type: none"> - Koperasi Jasa Nuangan Kasuma Jaya (MoU #29/LGL/PLSM/MPP-KNKJ/X/2019, dated 21-10-2019). Cover area 967.53 Ha (404 members). - KUD Sumber Tani (MoU #18//LGL/PLSM/MPP-KUDST/IX/2016, dated 14-09-2016). Cover area 320.54 Ha (234 members). <p>Up to this ASA 1, the progress of Koperasi Jasa Nuangan Kasuma Jaya has covers 82.24 Ha, and KUD Sumber Tani has covers 194.02 Ha. The</p>	Complied

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		company has implemented continuous monitoring and evaluation to ensure ongoing compliance with RSPO standards.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	<p>During ASA 1, verified that the unit of certification has provided supports to smallholders by making partnership to scheme smallholder.</p> <p>There are two organisation that been established:</p> <ul style="list-style-type: none"> - Koperasi Jasa Nuangan Kasuma Jaya (MoU #29/LGL/PLSM/MPP-KNKJ/X/2019, dated 21-10-2019). Cover area 967.53 Ha (404 members). - KUD Sumber Tani (MoU #18//LGL/PLSM/MPP-KUDST/IX/2016, dated 14-09-2016). Cover area 320.54 Ha (234 members). <p>Establishment of smallholder's members are approved by Plantation Department as per letter below:</p> <ol style="list-style-type: none"> 1. Decree of Investment Head Department "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Lamandau" Nomor: 503.6/04/SK/XII/DPMPTSP-2019, dated 16 December 2019. Approved Prospective Smallholders or Penetapan Calon Petani dan Calon Lahan Koperasi Nuangan Kasuma Jaya", cover area 967.53 Ha for 404 smallholder members. 2. Decree of Investment Head Department "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Lamandau" Nomor: 503.6/03/SK/VII/DPMPTSP-2021, dated 15 July 2021. Approved Prospective Smallholders or Penetapan Calon Petani dan Calon Lahan KUD Sumber Tani", cover area 320.54 Ha for 234 smallholder members. <p>Up to this ASA 1, the progress of Koperasi Jasa Nuangan Kasuma Jaya has covers 82.24 Ha, and KUD Sumber Tani has covers 194.02 Ha. The company has implemented continuous monitoring and evaluation to ensure ongoing compliance with RSPO standards. Currently, KUD Sumber Tani has already had land legality in form of ownership</p>	Complied

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		certificate (SHM), whilst Koperasi Jasa Nuangan Kasuma Jaya is still under process for SHM.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Unit of certification implemented full managed for the operation of scheme smallholder, therefore training of pesticide handling only conducted to the company's employee. However, based on interview with scheme smallholder representative, the company has provided training regarding tax and organization administrative.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Reviews and publicly reports on the progress of the smallholder support programme has been conducted annually. The status and progress of scheme smallholder development are presented within Annual Report of PT Mirza Pratama Putra. This one also confirmed during interview with Plantation Agency of Lamandau Regency.	Complied
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>Nondiscrimination and equal opportunity policy are available in document Human Rights Policy (<i>Kebijakan Hak Asasi Manusia</i>), 20 September 2023, signed by CEO PT SSMS. It stated that the company avoid any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, and political affiliation. The policy itself has been socialized to relevant stakeholders in the company website.</p> <p>The policy is in Bahasa Indonesia and has been disseminated to:</p> <ul style="list-style-type: none"> - All level workforces Sumber Cahaya Mill on 01 December 2023, 05 February, and 06 May 2024 - All level workforces Sumber Cahaya Estate on 05 December 2023, 02 January, 06 February, and 07 May 2024 	Complied

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6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>There is no evidence the unit of certification discriminated against, and no payment of recruitment fees for workers. The unit of certification implemented the equal opportunities for all employee through the following:</p> <ul style="list-style-type: none"> • All workers come from local and outside communities. They are many ethnic groups (Javanese, Sundanese, Buginese, Minang, Melayu, Batak, etc.). • The workers are women and men (office in the estate and mill). • Employment opportunities are provided fairly based on qualification and advertised in local mass media or local government office. • Training is given to the workers on a yearly basis covering training relating to their working station, personnel training such as safety and health training. • All employees are covered with working insurance; and • Termination is conducted based on local laws and is stated in the workers employment agreement and the <i>Peraturan Perusahaan</i>. <p>Based on interview with harvesters, upkeep workers, and gender committee in Sumber Cahaya Estate, they say there is no discrimination from company. All of religions, ethnic, and gender have equal opportunities.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company has established the procedure for Manpower such as:</p> <ul style="list-style-type: none"> • SOP <i>Penerimaan dan Seleksi Tenaga Kerja</i> No. SOP-HRDGA.GN-010, 01 June 2022, signed by President Director. • SOP <i>Promosi Karyawan Non Staf (Bulanan)</i> No. SOP-HRDGA.GN-012, 01 July 2022, signed by President Director. • SOP <i>Promosi Grade dan Jabatan Staf</i> No. SOP-HRDGA.GN-011, 01June 01, 2022, signed by President Director. 	Complied

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		<ul style="list-style-type: none"> SOP Pengunduran Diri No. SOP-HRDGA.GN-002, 01 June 2022, signed by President Director. <p>The procedure stated that for each applicant must be checked as follows:</p> <ul style="list-style-type: none"> Staff level: administration, psycho test, technical test, interview and medical test. Non Staff level (Region Office, Estate, Mill and Workshop): administration, technical test, interview and medical test. Permanent and Certain Time Contract Time Worker level: administration and medical test. <p>All worker personal files consist of :</p> <ul style="list-style-type: none"> - Copy of KTP (ID Card) and Family Card/Kartu Keluarga - Application Letter and Personal Photograph - Copy of BPJS Application Form - Checklist of New Worker Orientation: a) Company Regulation; b) Job Description; c) Compensation and Benefit; d) Pay Roll; e) OSH; f) Company Policies (Code of Conduct, Gender, Sexual harassment handling, Minimum Worker Age). - Medical Check Up Result - Casual Worker Contract (Copy). - Ethical Conduct Compliance Commitment Statement of Worker <p>Based on verification of employee personal files and interviews with the company's human resources staff, it shows that the recruitment process for all employees is carried out through the same process where prospective workers must meet the requirements in the form of:</p>	
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		application letter, photocopy of personal and family identity, medical check-up results and obtaining an acceptance letter Work.	
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 interview with representative of gender committee and female workers in Sumber Cahaya POM and Estate, the unit of certification not conducting pregnancy test as part of recruitment procedure. According to them, pregnancy test conducted only to protection of female workers in the field. The pregnant or breastfeeding women are prohibited and are not allowed to work in fertilization and chemical work (spraying pesticides) or hazardous materials and contain poison. Female workers who are declared pregnant will be transferred to alternative field that are not related to chemical until the end of the child breastfeeding period (2-year-old of child).</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>The company has established gender committee to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Further explained that the gender committee provides support for female employees, including protection and maintenance of women's health, maintenance of family life and welfare, protection from sexual harassment and violence, providing continuing education that gender equality exists in the unit of certification.</p> <p>The update for organization structure set on 05 January 2024 by Mill and 01 April 2024 by Estate. GC composition was included male and female for example, Mr. Ahmad Miftah Efansyah as chairman from gender committee Sumber Cahaya Estate, and Rodos Nababan as chairman from GC Sumber Cahaya Mill.</p> <p>During interview with gender committee Sumber Cahaya Estate and Mill, known that the company support all activities to be carried out. The company also provides assistance in increasing the capacity of management to understand developing issues, including increasing the capacity of women. Furthermore, since they worked at PT Mirza Pratama</p>	Complied

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		Putra, no negative issue concerning women, including no issue on sexual harassment. If it occurs, the mechanism is report to gender committee.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	<p>The company showed evidence indicating that company applying equal pay for the same work. Evidence showed such as:</p> <ul style="list-style-type: none"> - Director decree regarding Applied Minimum Wage of 2024 for daily worker (<i>Surat Keputusan Direksi Nomor 1824/SSS-DIR/SK/XII/2023</i>, 01 December 2023, valid since 01 January 2024) - Example of payslips January, February and March 2024 for Upkeep workers Sumber Cahaya Estate. - Example of payslips January, February and March 2024 of Weighbridge operators in the Sumber Cahaya Mill (female) and Male workers at Laboratorium Sumber Cahaya Mill. All of workers are daily workers which receive the same daily rate. <p>Based on interview with two weighbridge operators in the Sumber Cahaya Mill, the company was paid their wage according to PP 78/2015 regarding payment of wages.</p> <p>The unit of certification pays equal wages for all employees in the same scope of work. The name of each worker, level and amount of wages recorded in detail in the document above.</p>	Complied
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>	The company showed evidence indicating that company applying pay and conditions which align with applicable laws. Evidence showed such as:	Complied

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		<ul style="list-style-type: none"> • <i>Keputusan Gubernur Kalimantan Tengah No. 188.44/552/2023 tentang Upah Minimum Kabupaten/Kota di Provinsi Kalimantan Tengah Tahun 2024</i>, Rp. 3,550,532/month. • Director decree regarding Applied Minimum Wage of 2024 for daily worker (<i>Surat Keputusan Direksi Nomor 1824/SSS-DIR/SK/XII/2023</i>, 01 December 2023, valid since 01 January 2024 Rp. 142,021/day and Rp. 3,550,532/month). • <i>Peraturan Perusahaan 2023 – 2025</i>, registered in Manpower Agency based on registration letter number <i>Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Lamandau No. Kep.560/83/XI/DTT-HI/2023</i> dated 01 November 2023, valid until 01 November 2025. This document contain worker pay and conditions for workers. • Example of payslips January, February and March 2024 for Upkeep workers Sumber Cahaya Estate. • Example of payslips January, February and March 2024 of Weighbridge operators in the Sumber Cahaya Mill (female) and Male workers at Laboratorium Sumber Cahaya Mill. All of workers are daily workers which receive the same daily rate. <p>Based on interviews with workers in the mill and estate, information can be obtained that workers understand payment documentation on payslips such as basic wages, benefits, premiums, overtime, BPJS deductions, and so on.</p>	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal	PT Mirza Pratama Putra has company regulations (<i>Peraturan Perusahaan</i>) 2023 – 2025, registered in Manpower Agency based on registration letter number <i>Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Lamandau No. Kep.560/83/XI/DTT-HI/2023</i> dated 01 November 2023, valid until 01 November 2025. This	Complied

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	<p>requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>document contain worker pay and conditions for workers. This document contains clauses as follow:</p> <ul style="list-style-type: none"> • Chapter II, Right and Obligation of worker and company • Chapter III, Recruitment, placement and status; • Chapter IV, Working Hours and attendance • Chapter V, Discipline and sanction • Chapter VI, Termination. • Chapter VII, Paid Leave and off day • Chapter VIII, Payment • Chapter IX, Social Security and Welfare • Chapter X, Training and Development • Chapter XI, Grievance Mechanism <p>Based on review of pay slip and other employment contracts documents, pay and condition of employment clearly detailed in the documents e.g., working hours, deductions, overtime, sick leaves, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. All documents in Bahasa Indonesia.</p> <p>Interview with workers, known that they already know working hours, overtime, deduction, leave, holiday entitlement, etc. Workers also explain, payslip has accurate information about income and deduction.</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>The company showed evidences regarding their compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	Complied

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		<ul style="list-style-type: none"> • Example of payslips January, February, and March 2024 of Security and boilerman in Sumber Cahaya Mill. Deduction such as tax salary, and insurance was complied. • Overtime records and recapitulation for mill workers for January, February, and March 2024 • Working hours has been determined in Company Regulation as 7 hour/day with working day 6 days or 40 hour/weeks. Overtime has determined according to KepMenakertrans RI No. KEP-102/MEN/VI/2004 with formula (monthly wages + rice intensive incentive monthly)/173. Overtime will adjust for workday, holiday, number of hour overtime according to regulation. • Sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice are stipulated in Company Regulation and has refer to UU No. 13 Tahun 2003. <p>Based on document verification of Payslip, attendant registered and employee documentation, can be demonstrated that legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice are complied.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has provided the housing sanitation facilities, water supplies, medical, educational and welfare amenities to national standards.</p> <p>Based on verification on list workers facilities updated in April 2024, as per "<i>Daftar Fasiitas PT Mirza Pratama Putra</i>", there facilities were shown as bellow:</p> <ul style="list-style-type: none"> • Employee hall: 2 unit • Employee housing: 63 unit • Masjid/Mosque: 2 unit • Gereja/Church: 1 unit 	Complied

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		<ul style="list-style-type: none"> • TPA/Childcare: 2 unit • Poliklinik/Clinic: 1 unit • Football field: 1 unit • Badminton field: 1 unit • Water reservoir: 15 unit • Rubbish bin: 17 unit • School bus: 2 unit (capacity 20 passenger) <p>Clean water was provided by company (from drilling well and treatment water from mill). Clean water analysis has been conducted each semester by Accredited laboratory. Based on water analysis result shown that all parameter analysed was met with the requirement standard.</p> <p>Based on field visit at the housing facilities in each afdeling of estate was confirmed that the material of housing were made from concrete (permanent) and some housing made from woods, company has had Capital Expenditure (CAPEX) budget to replace the house which made from woods to the concrete / permanent. Based on field visit to Sumber Cahaya Estate Afdeling Delta, the company was build the housing G10 for workers, in the Sumber Cahaya Estate Afdeling Alpha also was build the housing workers G6. The development of housing workers will be conducted continually.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The company has provided the access to adequate, sufficient and affordable food through giving space for planting vegetables at housing complex (each house) in backyard. Also, the plantations are located in several villages which traditional market is available at each village. Besides, vegetable sellers always come by pick-up truck every week to housing complex. Not only selling vegetables, but all kind of food is also sale (meat, eggs, flour, herbs, kitchen seasoning, etc).</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>The company has calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has also conducted an account of the DLW year 2023 period with data drawn from Estate and POM.</p> <p>In accordance with national/local regulation related on minimum wages. According to the latest regulation which is "Surat Keputusan Gubernur Kalimantan Tengah No. 188.44/552/2023 dated on 6 December 2023 on Minimum Wage 2024" that stipulated the minimum wage in Lamandau Regency was IDR. 3,550,532/month.</p> <p>The company has also calculate prevailing wage and in kind benefits of 2023. In kind benefits considered on the calculation such as: a) Basic minimum wage; b) Average premium; c) Rice allowance; d) BPJS; e) Holiday Allowances (THR); f) on duty travel allowance; g) uniform; h) housing; i) Water and electricity; j) PPE; k) Education (transportation). All of components considering the minimum values as Rp. 5,890,487. This number is an eligible number considering local rate.</p>	Complied
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>Verification of the Employee Monthly Report for the period April 2024 revealed that there were 18 Casual Workers with the position of harvester with Work Entry Dates being 2019, 2022, 2023 and 2024. From the management explanation provided in the monthly report there was an input error in the Position column. However, this explanation cannot be validated because there is no other supporting evidence.</p> <p>Letter dated 19 March 2024 from the SCE Estate Manager addressed to Act. Regional Head II regarding Applications for New Employees for harvest activities as many as 16 persons.</p> <p>Letter dated 20 March 2024 from the SCE Estate Manager addressed to Act. Regional Head II regarding Applications for New Employees for harvest activities as many as 26 persons.</p>	Non-compliance

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		<p>Verified <i>Form Pemeriksaan Kesehatan Calon Karyawan</i> for Harvest Workers 21 March 2024 in the name of for example:</p> <ul style="list-style-type: none">- Muhammad Reza- M. Alqosim- M. Fauzi- Muhammad Raihan Azmi- Muhammad Rizky- M. Naufal Fadillah- Saut Pandapotan Hutasoit- Wasnita <p>Furthermore, the Company showed the Daily Work Agreement between PT Mirza Pratama Putra and Muhammad Reza No. 69/MPP-SCE/III/2024, declared the position as Maintenance Worker. From the verification results, it was discovered that the work agreement contained an error in writing the date and there was no stamp attached to the signature, so the evidence could not be validated. Apart from that, the Work Agreement is not made according to the type of work specified.</p> <p><i>Prosedur Penerimaan Pekerja Harian Tetap</i> (SOP-HRDGA.GN-015, 01 September 2022) Attachment 3 "Estate Position Groups are declared harvesters is permanent workers".</p> <p>Minor Non-conformity There is not sufficient evidence that permanent fulltime employment is used for all core work performed by the unit of certification.</p>	
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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>A statement of recognizing freedom of association has been as part of Human rights Policy PT Sawit Sumbermas Sarana (group of PT MPP), 20 September 2023, signed by CEO PT SSMS. This document states at point 5, "We respect workers freedom to join associations".</p> <p>The policy itself has been socialized to all workers and published in the company website. Based on interview with mill and estate workers, they know that the company frees employees to form a union worker.</p> <p>Currently the company has established <i>Lembaga Kerjasama Bipartit (LKS Bipartite)</i> as discussion and or bargaining formal forum between workers and company, the LKS Bipartite also has been registered to the Manpower Agency of Lamandau Regency through Surat Keputusan No. 560/49/III/DTT-HI/2024, 19 March 2024. The LKS Bipartite members consisting of 5 management representatives and 5 worker's representatives.</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 LKS Bipartite is held meeting periodically. The latest minutes of meeting held on 25 November 2023 was documented and verified by auditor. This meeting discussed and disseminated the annual leave, health insurance and work discipline. Meeting attended by company and LKS Bipartite representatives.</p> <p>The company has reported the <i>LKS Bipartite</i> activities for Semester I and II of 2023 to the Manpower Agency of Lamandau Regency on 21 March 2024 with document receipt Number 0001/LKS-MPP/III/2024.</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>Based on interview with representative of LKS Bipartite, in LKS Bipartite election meeting as described in previous indicator, there is no interference by the unit of certification in the formation of worker's</p>	Complied

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	- Minor compliance -	representative in LKS Bipartite structure. Based on interview with workers representative in the LKS Bipartite and workers in the field, they not yet want to form the union workers because they feel there is no industrial relations issues during as workers in the company.	
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The company has published statement for the protection of children, including prohibition of child labour and remediation within Human Rights Policy or "Kebijakan Hak Asasi Manusia PT Sawit Sumbermas Sarana", dated 20 September 2023 signed by CEO. The commitment has explained on point 1 stated "We strictly implement regulations not to use child labour". The company has a standard for hiring workers by requiring a minimum age of workers. The policy is in Bahasa Indonesia has been socialized to all workers and published in the company website. Based on interview with workers in Sumber Cahaya Mill and Estate, confirmed there is no child labour in the estate and mill.</p> <p>Based on documents review (see documents of List of Employees period January to April 2024), no child labor was found. Based on review of contractual agreement between company and their contractors the prohibition of child labour requirements included in contracts.</p>	Complied
6.4.2	<p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a Procedure of recruitment, SOP <i>Penerimaan dan Seleksi Tenaga Kerja</i> (No. SOP-HRDGA.GN-010, 01 June 2022), signed by President Director, which stated and ensure not hiring employees under 18 years old. This minimum working age complied with national regulation (Act No.13/2003 sub chapter 68).</p> <p>Based on documents review of List of Employees period January to April 2024 and interview with workers and field observation ensure that there is no child labour in the estate and mill.</p>	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>In the context of oil palm plantations of RSPO members in Indonesia, young workers are not recognized, but there are students who carry out</p>	Complied

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	- Critical (Major) compliance -	fieldwork practices at the palm oil plantations to meet the learning curriculum requirements as referred to in Article 70 of Act No. 13 of 2003 concerning Manpower.	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Based on observation and interview of workers in Sumber Cahaya Mill and Estate it was confirmed that there was no worker with age below than 18 years. They were understood that the company prohibits the children worker in the company.</p> <p>The company published a formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>The results of the verification of the labor list document, interviews with internal and external stakeholders, and field observations revealed that there was no indication of any workers under the age of 18.</p>	Complied
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 published statement to prevent sexual and all other form of harassment and violence within Human Rights Policy or "<i>Kebijakan Hak Asasi Manusia</i> PT Sawit Sumbermas Sarana", dated 20 September 2023 signed by CEO. The commitment has explained on point 6 stated "We provide a safe, comfortable and free work environment from sexual harassment". The policy is in Bahasa Indonesia and published in the company website.</p> <p>Dissemination regarding this policy has been conducted annually. The last showed during audit such as on 02 January 2024 (attended worker of Sumber Cahaya Estate) and 06 February 2024 (attended worker of Sumber Cahaya POM). Based on interview with estate and mill workers, they understood that the company have policy to prohibit the harassment and violation.</p>	Complied

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		Based on review of logbook Keluhan Karyawan and interview with Gender Committee representative, and workers at the estate and mill, there is no case of sexual and all other forms of harassment and violence in the workplace being reported in period last year.	
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>The company has published statement to prevent sexual and all other form of harassment and violence within Human Rights Policy or “<i>Kebijakan Hak Asasi Manusia</i> PT Sawit Sumbermas Sarana”, dated 20 September 2023 signed by CEO. The commitment has explained on point 3 stated “We strictly protect of reproductive rights to all employees”. The policy is in Bahasa Indonesia and published in the company website.</p> <p>Dissemination regarding this policy has been conducted annually. The last showed during audit such as on 02 January 2024 (attended worker of Sumber Cahaya Estate) and 06 February 2024 (attended worker of Sumber Cahaya POM). Based on interview with estate and mill workers, they understood that the company have policy to protect the reproductive rights of all, especially of 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>During ASA-1, the company shows documents:</p> <ul style="list-style-type: none"> - Questionnaire assessment the needs new mother of PT MPP - Minutes of Meeting assessment the needs new mothers results report of PT MPP - Internal Memo for Follow-up on the needs new mothers of PT MPP <p>The New Mother assessment result rise three main expectations:</p> <ul style="list-style-type: none"> • Childcare facilities for worker who stay outside company’s housing facilities, • Availability for clean water, • Vitamins for toddlers, • Breast feeding permit. 	Complied

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		<p>The results of interviews with Paramedics at Polibun were presented to find out the needs of new mothers, interviews were conducted with workers who were pregnant by midwives/nurses and the sustainability team.</p> <p>Based on the explanation above, it can be concluded that the company 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>	
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 established grievance mechanism in two sources, stakeholders and employees. Each mechanism is described in different procedures, as below:</p> <ul style="list-style-type: none"> - Stakeholder grievance. <i>Prosedur Mekanisme Penanganan Keluhan & Pengaduan Stakeholder</i> (SOP-SUST.GN-009 R.01, 28 December 2021). - Employee grievance. <i>Prosedur Penanganan Keluhan Karyawan</i> (SOP-PERS.GN-017, Rev.01, dated 1 March 2017). <p>Clause 6.1.4 Communication staff will ask the complainant whether the identity of the reporter can be published or as anonymity. Stakeholder Complaint Form (F-SUST.GN-001.R01, 28 December 2021), notified that the Whistleblower can provide personal identification data and or as anonymity to maintain privacy and security.</p> <p>The company was shared grievance mechanism in the company website ssms.co.id/uploads/2023/06/Prosedur-Mekanisme-Penanganan-Keluhan-dan-Pengaduan-Stakeholder-R011685674608.pdf</p> <p>During 2023/2024, there was no serious complaint from workers to the Mill and Estate of PT Mirza Pratama Putra.</p>	Complied
Criteria 6.6: No forms of forced or trafficked labour are used.			

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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 published statement that workers receive fair wages and benefit within Human Rights Policy or "Kebijakan Hak Asasi Manusia PT Sawit Sumbermas Sarana", dated 20 September 2023 signed by CEO.</p> <p>The commitment has explained on point 9 stated "We ensure and commitment to give fairly wage, benefit and remuneration to all workers". The company has a standard for hiring workers by requiring a minimum age of workers. The policy is in Bahasa Indonesia and and has been socialized to all workers and published in the company website.</p> <p>Also, the company has established employment procedures as per described in "Prosedur Penerimaan dan Seleksi Tenaga Kerja (No. SOP-HRDGA.GN-010, 01 June 2022) and "Prosedur Permintaan Tenaga Kerja (SOP-PERS.GN-002, Rev.00", dated 1 Sep 2011).</p> <p>Based on interviews with operational staff revealed that all employees were those who passed the recruitment and selection process according to certification unit procedures and requirements. Certification unit post job vacancies then prospective workers come voluntarily to apply for jobs that are available for free and there is no holding of identity documents. Overtime is monitored by the certification unit and workers are given the freedom to choose overtime. The certification unit also does not force or make it difficult for employees to resign. There is no penalty for termination if they wish to terminate the contract early.</p> <p>Based on verification document, field observation, and interviews with workers and stakeholders, auditors did not see any harvester accompanied by their wife or children and any indication of forced labor. There is no threat against family members. Based on document verifications and field observations in spraying & harvesting activities at Estate and Mill operations activities, there were no forms of forced or trafficked labor are used. Besides that, there are no foreign workers who work at certification unit.</p>	Complied
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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>There are no migrant workers, it is verified during document review, interview with workers, and related stakeholders. Even so the unit of certification has established policy and procedure for special labour (temporary and migrant workers) titled employee recruitment and selection procedure (SOP-PERS.GN-001, Rev. 01, June 01, 2013).</p> <p>Based on database workers January to April 2024, there is no PKWT status in the mill and estate. All workers only as PHT/PKWTT and PHL/daily workers.</p>	Complied
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>The responsible in health and safety has been established in accordance with the legal requirements, that is OHS Committee (<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/P2K3</i>) that has been approved by Manpower Agency, and the Secretary is a legal OHS Expert. Record of OHS Committee registration such as <i>Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Kalimantan Tengah Nomor: KEP.44/DISNAKERTRANS/III/2023 tanggal 13 Maret 2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3)</i> PT Mirza Pratama Putra, with the structure i.e:</p> <ul style="list-style-type: none"> - Chairman: Suprianto - Secretary: Alim Pujianto (OHS Expert with Keputusan Menteri Ketenagakerjaan RI Nomor 5/15406/AS.02.04/XI/2021, OHS License No. Reg.61681/PK3/AJ/64/2021/P1, date 19 November 2021, valid for three years. - OHS & Environment Section: 6 persons from Mill and 6 persons from Estate. <p>The safety committee (P2K3) regular meeting has been performed each month, discussed regarding OHS plan program achievement and corrective actions to achieve target and improve the program such as Personal Protective Equipment (PPE), hazard from animal, safety notes,</p>	Complied

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		<p>accidents etc. The actions were monitored for realization and reported to management and local authority. Concerns of all parties about health, safety and welfare were discussed at the meeting such as: review of accident, PPE Checklist update, result of internal audit, incident investigation, etc. Samples of document that has been reviewed during audit such as meeting on 01 April 2024.</p> <p>Quarter Report of P2K3 to Manpower Agency of Kalimantan Tengah Province. Samples of document that has been reviewed during audit such as report for January to March 2024 period was reported on 19 April 2024 (Letter number 011-SUST/IV/2024).</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The company shows emergency and work accident response procedures which are documented in Indonesian and are listed in:</p> <ul style="list-style-type: none"> • Procedure Emergency Response (SOP-EHS.GN-039 dated 1 April 2018). • Procedures First Aid (SOP-SUST.EHS-003 dated 15 July 2019) • Procedure Work Accident Investigation (SOP-SUST.EHS-008 dated 01 January 2020). <p>The company has also provided first aid training to the workers assigned to the field and other work locations. The company has shown recordings of first aid training, for example training on 23 November 2023 (Sumber Cahaya Mill) and 04 January 2024 (Sumber Cahaya Estate. In addition, based on interviews with paramedics at polibun, known that paramedics have hyperkes certificate. Furthermore, the company also shown record of all accident and based on the record, known that there were only minor accidents and no serious or fatality accidents in the last 1 year.</p> <p>The results of field observations at Sumber Cahaya POM and Estate, known that the company has provided a first aid kit at the workplace</p>	Complied

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		<p>whose contents refer to the applicable provisions, namely 21 items according to regulation number 15/MEN/VIII/2008 with an updated monitoring form. First aid kits at POM, such as at workshop, hazardous waste warehouse, warehouses etc. Based on field observation at Sumber Cahaya Estate such as harvesting known that company has provide first aid kit and brought by the field foreman. From the results of the interview with the officer who brought the first aid kit, known that workers had understood the function of the first aid kit.</p> <p>Based on the results of the field visit, found warnings of evacuation routes and assembly points in the Mill areas. The results of the simulation on the hydrant in Sumber Cahaya Mill, known that the hydrant is functioning properly, and emergency response officers have been able to implement fire emergency response procedures.</p>	
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>The company has shown PPE Matrix Documents for Estate and Mill. The document describes the type of PPE that must be worn for each type of work. For example, in harvesting work, the PPE that must be used is a helmet, face shields, gloves, and boots. Based on field observation at harvesting activity, known that workers have used PPE according to company standards. In addition, based on interview with workers such as harvester, spraying worker, mill workers also explained that if the PPE is damaged, the worker can report it to the foreman to ask for the replacement of the PPE including PPE with short lifetime, such as gloves and mask, this is also indicated by the availability of sufficient PPE stock in the PPE storage warehouse which aims to replace if any PPE is found that is damaged or does not provide optimal protection.</p> <p>Based on the field visit to the rinse house, it is known that there is a storage area for PPE and spraying equipment as well as sanitation facilities for employees after the spraying work is completed. Based on the results of field visits and interviews with workers, it is known that workers have used PPE completely and company management always</p>	Complied

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		monitors workers regularly regarding the use of PPE properly and correctly.	
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>The company provided health services such as polibun and first aid kit. Based on field observations, it was known that the facilities and infrastructure provided for workers are still functioning properly. Based on the documents review and interviews with workers (such as harvesters, spraying workers, mill operators), it revealed that all workers (daily workers and permanent workers were registered in the BPJS program. The company has showed evidence of BPJS payment.</p> <p>Based on interviews with workers (such as harvesters and land application operator), it is known that they have been included in the BPJS program, and they hold BPJS cards.</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The company has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents.</p> <p>The company shown the Lost Time Accident calculation per from January to December 2023. This document informs the number of workers, number of working days, the number of non-effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of SR and FR is reviewed regularly and will be evaluated at monthly meeting of OHS Committee.</p>	Complied
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>	The Unit of Certification has demonstrated effective management of pests, diseases, weeds, and invasive species using appropriate Integrated Pest Management (IPM) methods. The integrated pest management plan is detailed in the SOP for Pest and Disease Control	Complied

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		<p>(No. SOP-KBN.GN-007, dated 1 February 2015) and the SOP for Weed Control (No. SOP-KBN.GN-004, dated 1 February 2015).</p> <p>These procedures specify that pest and disease control is managed in an integrated manner, starting with an early warning system for detecting potential pests and diseases (e.g. leaf eater caterpillars, rats). Emphasis is placed on mechanical and biological controls, such as planting beneficial plants (<i>Turnera subulata</i> and <i>Antigonon leptopus</i>) and installing and monitoring barn owl boxes to reduce rat infestations. The procedures also establish economic thresholds for each pest and disease, with chemical control being implemented only if infestations exceed these thresholds. The weed management procedure outlines the company's policy of selective weeding to maintain biodiversity and suppress pest and disease infestations.</p> <p>The Unit of Certification has documented monthly detections of potential pests and diseases (leaf eater caterpillars, oryctes, rats, termites, tirathaba) conducted by trained workers. According to the census summary and infestation maps from May 2023 to April 2024, no pest or disease infestations exceeded the economic threshold, so no pesticides were used for pest and disease control, except for routine weed control. Pest infestation only observed in April 2024, for Oryctes 0.42% of infestation; and spear base root 0.02% of infestation.</p> <p>Field observations confirmed that beneficial plants have been planted along the main and collection roads.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Based on document review and field observation, the Unit of Certification implement some biological control practices to suppress pest and diseases infestation such as planting <i>Turnera subulata</i> and <i>Antigonon leptopus</i>, as well as has planned to use barn owl (<i>Tyto alba</i>). Verification result on website of cabi.org has known that these species stated as not invasive in Indonesia. Monitoring of planting and upkeep</p>	Complied

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		of <i>Turnera subulata</i> and <i>Antigonon leptosus</i> were evident. Program for barn-owl box installation 2024 was evident.	
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on review of pest and disease procedure, field observation, interview with management and stakeholders during ASA 1, verified that the Unit of Certification never used fire for pest control.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	<p>During ASA 1, there is no change in the procedure for pesticide management, which described in document No. SOP-EHS.GN-019, dated 15 June 2012). The procedure mentioned that pesticides must be target-specific (narrow spectrum), have minimal negative impact on non-target species, and be legally registered with the Pesticide Commission of the Ministry of Agriculture.</p> <p>The Unit of Certification also has a Pesticide Recommendation issued in 2021 by the R&D Department. This document summarizes recommended pesticides based on specific targets, active ingredients, WHO classification, trademarks, and priority. The recommended pesticides include herbicides, insecticides, rodenticides, and fungicides, all classified as WHO Class II, III, and IV. Verification on the website https://pestisida.id/ confirms these pesticides are registered with the National Pesticides Commission.</p> <p>Field observations of agrochemical storage and interview with spraying applicators revealed that no use of pesticides that categorized as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat. Workers demonstrated that spraying is applied only to specific areas and weeds using knapsack sprayers, with regularly calibrated nozzles. Workers were equipped with PPE, including face covers, rubber gloves, aprons, and rubber boots. Regular medical surveillance is conducted, with evidence available from</p>	Complied

		the Unit of Certification. There are no workers under the age of 18, pregnant or breastfeeding women, or individuals with medical restrictions.	
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 unit of certification has recorded all pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) as per "Monitoring Agrochemical Tahun 2023" and "Monitoring Agrochemical Tahun 2024", data available per month. Item recorded covers name of active ingredients (AI), LD50 (mg/Kg), volume of pesticides uses, volume of AI, application area (Ha), total AI, AI applied/Ha, round of application. Active ingredient used by Sumber Cahaya Estate such as <i>Isopropil Amina Glifosat</i> 480 g/l; <i>Floroksipil Metil Heptil Ester</i> 288 g/l; <i>Triklopir Butoksi Etil Ester</i> 670 g/l; <i>Metil Metsulfuron</i> 20%; <i>Saflufenacil</i> 70%; <i>Difenokonazol</i> 150 g/l + <i>Propikonazol</i> 150 g/l; <i>Fipronil</i> 50 g/l; and <i>Nonil Fenol Poliglikol Ester</i>.</p>	Complied
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>Minimizing pesticide usage is integrated into the plan, aligning with Integrated Pest Management (IPM) Plans. No pesticides are applied outside the specified target species and planned intervals. Pesticides are solely employed to mitigate existing pests that have surpassed the economic threshold. The usage of pesticides has been monitored in monthly and yearly basis.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>Based on document review, field observation, interview with management and stakeholder during ASA 1, verified that there is no prophylactic use of pesticides. If the conditions of circle and harvesting path are still clean, the weed control will be postponed. Based on interview with spraying worker, the application method was not a preventive application, but rather selective to the specific locations and target.</p>	Complied

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7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not 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: - Minor compliance -	Based on document review, field observation and interview to the spraying worker during ASA 1, verified that since 2017 the Unit of Certification did not use World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, or pesticide that prohibited by the government as mentioned in Annex II Regulation of Ministry of Agriculture No 39 year of 2015 about Pesticide Registration, for example aldrin, formaldehyde, and monokrotofos. There was available Internal Memo from R&D Head dated 3 February 2017 regarding the commitment not to use paraquat anymore since 2017. This selection and application of pesticides align with the company's commitment to minimizing environmental impact and promoting sustainable agricultural practices. By following these guidelines, the unit of certification ensures the use of safe and responsible products while avoiding hazardous materials known to pose significant risks to human health and the environment.	Complied
	7.2.5a Judgment of the threat and verify why this is a major threat.		
	7.2.5b Why there is no other alternative which can be used.		
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.		
	7.2.5d Process to limit the negative impacts of the application.		
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct. - Critical (Major) compliance -	During ASA 1, verified that Sumber Cahaya Estate has conducted annual training for pesticide operator. The latest training of spraying operator has been conducted on 8 May 2024. Training material includes MSDS, hazardous material and waste, first aid, correct dosage and practices were evident. Training attended by spraying operators, mandore (supervisor) and storekeeper.	Complied
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices. - Critical (Major) compliance -	Based on field visit to agrochemical storage during ASA 1, the unit of certification has stored all pesticides properly. Each pesticide equipped with MSDS. The storage also provided PPE's, hand/eye wash facilities and first aid kit. Each pesticide/herbicide stored separated with its level of toxicity, material and its use. Agrochemical material store at specific warehouse.	Complied

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7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>The company has procedures for handling chemicals including pesticides including:</p> <ul style="list-style-type: none"> • Procedure for the management of hazardous and toxic materials (SOP-EHS.GN-015): which includes the placement of MSDS, WI, storage, use of PPE, installation of symbols. • Procedures for storage, handling of hazardous and toxic waste materials and their packaging containers such as pesticides, including the Hazardous Waste Management Procedure (SOP EHS.GN-016) which describes the responsibilities for waste identification, waste classification, storage & handling, waste management methods, approvals hazardous waste disposal, waste disposal, emergency response incident reporting. • The company has a policy on pesticide management in the SOP (SOP – EHS.GN – 019 which is effective from 15 June 2012) point 6.7.1: Used pesticide packaging is controlled in a way that is safe for the environment, human health and according to the disposal instructions listed on the packaging label. • The company has procedures for managing hazardous and toxic materials (SOP-EHS.GN-015): MSDS, WI, Storage, PPE and symbol. <p>There is no change related to the SOP until this audit.</p> <p>Based on field visit to the random area in field and agrochemical store during ASA1 obtain information that those area has been equipped with chemical handling signboard.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with Estate Management, surrounding community and field observation during ASA 1, there was no pesticide applied aerially in Sumber Cahaya Estate.</p>	Complied

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7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	The company has been conducted specific annual medical (Cholinesterase) to all pesticide operators and fertilizer operator carried out twice a year. The last cholinesterase examination was carried out on 19 October 2023 with all results being normal. Based on interview with spraying worker, it is known that all workers are in good condition	Complied
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	During audit ASA-1, there was no chemical spraying activity. So, the worker is transferred to manual upkeep such as racking. Based on interview with pesticides applicator known that there was no worker age under 18 years old or pregnant and breastfeeding worker worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. If there was a worker detected pregnant, she will be transferred to the place not related with chemical material.	Complied
<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>PT Mirza Pratama Putra has identified its waste and pollution source and developed waste and pollution management plan in 2023/2024. The identification is grouped based on estate and mill activity. Among the identified waste and pollution source in estate are manuring activity, clinic, workshop, spraying activity, office, warehouse and housing complex, generator use and transportation. Meanwhile, the source of pollution and waste identified in mill among others are processing activities, workshop, office, laboratory and WWTP.</p> <p>The unit of certification has a waste management plan that has been documented and implemented including:</p> <ul style="list-style-type: none"> • POME: POME is produced in Mill and then processed in effluent pond, having managed to produce a parameter below the quality 	Non-compliance

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		<p>standard, especially for BOD, COD and pH then flowed into the Land Application.</p> <ul style="list-style-type: none"> • Solid waste: Solid waste generated from plantation activities. Solid wastes such as empty bunks are applied to the plantation area to be used as organic fertilizer. Fibre and shells serve as boiler fuel. • Medical waste: Medical waste is transporter to PT Semesta Langgeng which has a medical waste transport license. • Domestic waste: Every domestic waste generated is collected in front of the house and delivered to the landfill. In the previous assessment this became OFI and will be verified again when the onsite audit is conducted. <p>The result of inventory in Sumber Cahaya Mill and Estate such as from spray activities, it produced waste such as former pesticide container, waste preparation and maintenance block mark, such as former paint cans and plastic waste fertilizer. The mentioned waste placed in hazardous waste warehouse.</p> <p>PT Mirza Pratama Putra has shown the temporary hazardous waste storage based on "Keputusan Bupati Lamandau No: 188.45/228/VII/HUK/2022 tentang Kelayakan Lingkungan Hidup Kegiatan Pengembangan Pembangunan Pabrik Pengolahan Kelapa Sawit dan Sarana Pendukungnya PT Mirza Pratama Putra", dated 26 June 2022.</p> <p>The company also shows a Letter of Agreement on the Management of hazardous Waste with PT Semesta Langgeng Sentosa (Number 199/LGL/QHSE/SSMS-SLS/XI/2022) 17 December 2023. This agreement is valid for 1 years.</p> <p>In addition, there is a license to transporter from the Ministry of Transportation of the Directorate General of Land Transportation SK.00660/AJ.309/DJPD/2018 dated 26 July 2022. Hazardous waste transport recommendation from the Ministry of Environmental and</p>	
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		<p>Forestry of the Directorate General of Waste Management, hazardous Waste dated on 30 May 2023 number S.337/PSLB3-PLB3/PK/PLB.3/5/2023. This recommendation is valid for 5 years.</p> <p>However, based on field visit, the auditor found that the certificate holder has not consistence on disposal of waste material according to procedures. This is raised as noncompliance.</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>PT Mirza Pratama Putra has shown the temporary hazardous waste storage based on "Keputusan Bupati Lamandau No: 188.45/228/VII/HUK/2022 tentang Kelayakan Lingkungan Hidup Kegiatan Pengembangan Pembangunan Pabrik Pengolahan Kelapa Sawit dan Sarana Pendukungnya PT Mirza Pratama Putra", dated 26 June 2022.</p> <p>The company also shows a Letter of Agreement on the Management of hazardous Waste with PT Semesta Langgeng Sentosa (Number 199/LGL/QHSE/SSMS-SLS/XI/2022) 17 December 2023. This agreement is valid for 1 years.</p> <p>In addition, there is a license to transporter from the Ministry of Transportation of the Directorate General of Land Transportation SK.00660/AJ.309/DJPD/2018 dated 26 July 2022. Hazardous waste transport recommendation from the Ministry of Environmental and Forestry of the Directorate General of Waste Management, hazardous Waste dated on 30 May 2023 number S.337/PSLB3-PLB3/PK/PLB.3/5/2023. This recommendation is valid for 5 years.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Waste management plan is documented in "Rencana pengelolaan Limbah". Waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution into the environment. Company also prepares waste management plan according to procedure, waste management plan for Y2023 is continuation of the previous program, the plan such as:</p>	Complied

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		<ul style="list-style-type: none"> ➤ Domestic waste, managed by segregation of organic and inorganic waste, transport the waste to sanitary landfill. ➤ Liquid domestic waste, managed by providing septic tank and trench each house. ➤ Solid waste resulted from mill such as: shell and fiber used as boiler fuel, EFB applied to plantation used as mulched and organic fertilizer. ➤ Liquid waste from mill managed by application to plantation as fertilizer (Land application). ➤ Hazardous waste resulted from mill and estate managed by store in the temporary storage which has licensed and delivered to licensed transporter and collector. ➤ Waste of used goods/scrap, collect and sell to vendors. ➤ Air emission, water and soil pollutant managed by dust collector installation. <p>PT Mirza Pratama Putra has socialized to the workers and their families who are stay in housing complex to aware on the disposal of domestic waste to the separate waste bin (organic and an-organic). Based on field visits in estate and mill housing complex, it was found that organic and an-organic waste is separated in waste bin and also found no scattered waste. All domestic wastes are disposed of in the landfill (<i>Tempat Pengumpulan Akhir Sampah</i>). Fire usage in waste management is strictly prohibited.</p> <p>Based on field visit during ASA1 at workers housing complex of Afd Alfa, Afd Delta and Mill, domestic waste already collected in the landfill.</p>	
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 Unit of Certification has established mechanism to maintain and improve long term soil fertility in line with good agricultural practices, set in SOP of Fertilization (SOP-KBN.GN-003 dated 1 February 2015).</p> <p>This procedure establishes a strategy for maintaining and enhancing long-term fertility. It involves combining efficient and measurable organic and inorganic fertilization with considerations of the oil palm's age and the soil's nutrient properties. This is achieved by conducting leaf and soil sampling, along with implementing best fertilization practices in the field.</p> <p>Based on field observation and interview, the applicators have used calibrated cup as a spreading tool. The fertilizer was spread on the edge of the circle according to the SOP. Fertilizer is applied based on the principles of being on time, on the right dose and on target.</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>Mechanism for Soil and leaf analysis has been set in the SOP of SSU (Soil Sample Unit) for Fertilization Recommendation (No. SOP-RND.GN-031 dated 1 October 2015), and SOP of LSU (Leaf Sample Unit) for Fertilization Recommendation (No. RND.GN-002 dated 1 September 2011). The soil analysis parameters covering texture, acidity (pH), contents of N Total, P-Total, K, Ca, Mg, B, Cu, Zn. Whilst the leaf analysis parameters covering of N, P, K, Mg and Ca and Indicator Minor elements namely B, Cu and Zn. Other than that, the visual analysis which is done as part of the points in determining the fertilizing recommendation, identifying nutrient deficiency symptoms, and analysing the disease attacks that are potential in becoming an endemic of certain disease.</p> <p>The current soil analysis still using soil nutrient identification covered in Semi Detail Soil Survey of PT Mirza Pratama Putra in 2016. Whilst the latest LSU conducted based on Certificate of Analysis No. 555/LAB.01/INT/VII/2023, with Reference No. 267/AGV-SSS/SRS-LAB/VI/2023. Date of sample receive on 26 June 2023, quantity 21</p>	Complied

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		samples; date of analysis on 10 July 2023; contain parameters such as, levels of N, P, K, Mg, Ca, and B.												
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>According to the Fertilization SOP, efficient and moderate inorganic fertilization is essential for preserving soil structure and texture. This is complemented by manuring through POME land application and EFB mulching. Manuring is particularly important in areas with low nutrient levels, as it enhances soil structure, texture, and microbiological properties, and helps to reduce the need for inorganic fertilization whenever possible.</p> <p>The nutrient recycling strategies have been observed as follows:</p> <ul style="list-style-type: none">- POME Land Application in Division of Charlie Blok: F18, F19, F20, F21, F22, and G22. In January – December 2023, has been applied 52,713.94 m³ of POME.- EFB mulching application amount of 30 tons/ha particularly in sandy area. In January – December 2023, has been applied 23,108 tons of EFB. <p>Replanting activities have not yet been conducted. However, the Replanting SOP (No. SOP-KBN.GN-009, dated 1 August 2012) specifies that the oil palm trunks will be chipped to accelerate the decomposition process.</p>	Complied											
7.4.4	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Unit of certification has recorded and maintained fertilizer input as on "<i>Rekomendasi dan Realisasi Pemupukan</i>". The types and amount of fertilizer input for period January – December 2023 as follow:</p> <table><tr><th rowspan="2">Type of Fertilizer</th><th colspan="2">Realization 2023 (Kg)</th></tr><tr><th>1st Semester</th><th>2nd Semester</th></tr><tr><td>Urea</td><td>35,550</td><td>-</td></tr><tr><td>MOP</td><td>90,393</td><td>-</td></tr></table>	Type of Fertilizer	Realization 2023 (Kg)		1 st Semester	2 nd Semester	Urea	35,550	-	MOP	90,393	-	Complied
Type of Fertilizer	Realization 2023 (Kg)													
	1 st Semester	2 nd Semester												
Urea	35,550	-												
MOP	90,393	-												

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		Rock Phosphate	2,968	-		
		HGFB	46,745	-		
		Compound 13/6/27/4/0,65	1,253,713	693,429		
Criteria 7.5: Practices minimise and control erosion and degradation of soils.						
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -	Unit of certification can demonstrate soil surveys and topographic information through Soil Type Map (scale 1:125,000) and Slope Map (scale 1:125,000) dated January 2021. According to Soil Type Map (scale 1:125,000) and HCV Assessment Report, no peatland soil is identified. Soil type in PT Mirza Pratama Putra are Tropudults, Paleudults, Tropohumults, Dystropepts and Tropaquepts. All these soil types are mineral soil and no peat identified. Based on the SRTM (Shuttle Radar Topographic Model) Digital Elevation Model (DEM) version 5 with a spatial resolution of 90 meters, PT MPP is topographically located in the lowlands with an altitude range of 16 - 72 meters above sea level. The slope class found in the PT MPP areas are dominated by flat and choppy slope classes (0-15%).				Complied
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on interview and document verification during ASA-1 it was known that PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When acquisition takes place, plantation has been developed and oil palm crops was planted. Year of Planting PT MPP is 2011 to 2017, therefore no replanting program developed.				Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	Based on interview and document verification during ASA-1 it was known that PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When				Complied

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		acquisition takes place, plantation has been developed and oil palm crops was planted. Year of Planting PT MPP is 2011 to 2017, there is no new planting in concession area afterwards within current scope of certification.	
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 -	According to Soil Type Map (scale 1:125,000) and HCV Assessment Report, no peatland soil is identified. Soil type in PT Mirza Pratama Putra are Tropudults, Paleudults, Tropohumults, Dystropepts and Tropaquepts. All these soil types are mineral soil and no peat identified. Based on the SRTM (Shuttle Radar Topographic Model) Digital Elevation Model (DEM) version 5 with a spatial resolution of 90 meters, PT MPP is topographically located in the lowlands with an altitude range of 16 - 72 meters above sea level. The slope class found in the PT MPP areas are dominated by flat and choppy slope classes (0-15%).	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 -	Based on the SRTM (Shuttle Radar Topographic Model) Digital Elevation Model (DEM) version 5 with a spatial resolution of 90 meters, PT MPP is topographically located in the lowlands with an altitude range of 16 - 72 meters above sea level. The slope class found in the PT MPP areas are dominated by flat and choppy slope classes (0-15%). Steep slope area is identified 6.78 Ha located in forested land cover area with high erosion hazard and already stated as HCV. There is no planting on marginal/fragile soil or steep area.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Unit of certification can demonstrate soil surveys and topographic information through Soil Type Map (scale 1:35,000) and Slope Map (scale 1:125,000) dated January 2021. PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When acquisition takes place, plantation has been developed and oil palm crops was planted.	Complied

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		Also, drainage and irrigation systems, roads and other infrastructure has been existed.	
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	Based on Semi Detail Soil Assessment of PT Mirza Pratama Putra of 2016, stakeholder consultation, and field observation, is known that there is no peatland in operational area. All soil types in unit of certification's area are categorized as mineral soil with the subgroups of <i>Typic dystrodepts</i> , <i>Aquic dystrodepts</i> , <i>Lithic dystrodepts</i> , and <i>Typic hapludults</i> . Therefore, this indicator is not applicable.	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 peatland in operational area based on description of indicator 7.7.1. Therefore, this indicator is not applicable.	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 -	There is no peatland in operational area based on description of indicator 7.7.1. Therefore, this indicator is not applicable.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance -	There is no peatland in operational area based on description of indicator 7.7.1. Therefore, this indicator is not applicable.	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 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	There is no peatland in operational area based on description of indicator 7.7.1. Therefore, this indicator is not applicable.	Not Applicable

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	gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation. - Critical (Major) compliance -		
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.			
7.7.6	(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019). - Critical (Major) compliance -	There is no peatland in operational area based on description of indicator 7.7.1. Therefore, this indicator is not applicable.	Not Applicable
7.7.7	(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines. - Critical (Major) compliance -	There is no peatland in operational area based on description of indicator 7.7.1. Therefore, this indicator is not applicable.	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid	The company has developed water management plans issued in these documents for 2006 and 2011; In addition, the HCV Management Plan	Complied

	<p>negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>Document; water management procedures. Updated Water Management Implementation: Testing Water Quality Testing (Drinking Water, Clean Water, Surface Water / Water and Wastewater) periodically, Marking Spray Sprays, and reforestation in River Basin Areas. In addition, they also make the Water Treatment Plant a source of clean air and drinking water and monitors its use. The company has a riparian management SOP and the area around the lake / reservoir (SOP-EHS.GN-027).</p> <p>Water management strategies applied. Some strategies as follows for Y2023 is continuation of the previous program:</p> <ul style="list-style-type: none"> • Protect riparians from chemical contamination. The company has posted a sign prohibiting the application of pesticides and fertilizers. These signs are monitored every semester. The last report in December 2023. • Enriching species and rehabilitating HCV areas and monitoring the success of species enrichment and rehabilitation activities. <p>Surface water monitoring every semester, by PT GMV (accredited laboratory), compliance test parameters in annex 4, Government Regulation Number. 82/2001. Based on the results of tests in October 2023 in the Palikodan River and Anak Sei Bulik River (upstream and downstream), all parameters still correspond to the water surface quality threshold (refers to "Laporan hasil analisa No: 88881/DBBPAP PT MPP, bulan Oktober 2023")</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>The company provide the clean water for workers at housing area with ground water (drill well) at Sumber Cahaya Estate and Mill.</p> <p>During the interview with sampled workers (harvester, spraying workers, mill workers and office workers) at ASA1 confirmed that the company provides clean water freely for workers. For drinking water, some workers buy bottled/gallon water. Company also has carried out clean water analysis, the result is refers to "Laporan hasil analisa No:</p>	

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		88881/DBBPAP bulan Oktober 2023”, the results of analysis was in accordance with regulation Permenkes RI No. 32 Tahun 2017 (Lampiran I).	
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>PT Mirza Pratama Putra has established management plan period Y2023 to protect water courses and wetlands, including securing and maintaining appropriate riparian. The program is continuation of the previous program:</p> <ul style="list-style-type: none"> – Riparian restoration with forest vegetation plant/tree. – Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Riparian of Palikodan River). – Conserve the natural vegetation in riparian zone. – Restricted to conduct replanting palm oil in riparian area. <p>During field visit to Riparian of Palikodan River and Tolah River can be shown that riparian areas are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</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>POME processing has processed through Wastewater Treatment Plant (WWTP) with 7 waste ponds. Monitoring of BOD has carried out every month by third party accredited laboratory and reported to Environment Agency every three month.</p> <p>The result of analysis has meet the regulation Permenlh No. 28/MENLH/2023 and has been reported to Environment Agency of Lamandau Regency. Verified document as follows:</p> <ul style="list-style-type: none"> - The result of Wastewater Analysis period April 2024 is carried out on 3 April 2024, refers to report No. 18926/ANBPAQ, BOD level is 94 mg/L (threshold is 5,000 mg/L) and pH is 7.31 (threshold is 6-9). 	Complied

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		<ul style="list-style-type: none"> - The result of Wastewater Analysis period March 2024 is carried out on 26 March 2024, refers to report No. 18925/ANBPAQ, BOD level is 173 mg/L (threshold is 5,000 mg/L) and pH is 6.95 (threshold is 6-9). - The result of Wastewater Analysis period February 2024 is carried out on 28 February 2024, refers to report No. 18924/ANBPAQ, BOD level is 410 mg/L (threshold is 5,000 mg/L) and pH is 7.05 (threshold is 6-9). <p>The wastewater test conducted by accredited laboratory of Sucofindo in accordance with Minister of Environment Decree No. 28 of 2003.</p>	
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill has monitoring of water use for FFB processing and domestic use (housing). The average water use period January to December 2023 is 0.70 m³/ton FFB accordance with 1.20 m³/ton FFB budget and accordance with utilization water permit that issued by Lamandau Regency.</p>	Complied
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The company has maximized the use of renewable energy (fibre & shell) as boiler fuel. For Y2023, use of shells in January – December 2023 was 4,792,171 Kg and fibre was 17,937,413 Kg which produces 12,120 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 0.38 kwh/ton CPO or 0.085 kWh/MT FFB.</p>	Complied
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.			
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>The company has conducted GHG emission calculations period 2023 use of Calculator Palm GHG version 4.0. Accurate data has been input to the</p>	Complied

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	- Critical (Major) compliance -	RSPO Palm GHG Calculator (Palm GHG version 4.0) and has been verified by the auditor. Detail of GHG calculation can be seen in Appendix B: GHG Reporting Executive Summary on this report.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When acquisition takes place, plantation has been developed and oil palm crops was planted. Current management decides to conduct replanting on the area that crops have abnormal growth and stated planting year is YoP 2014 onwards. Based on the information above, this is stated as Not Applicable .	Complied
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored. - Critical (Major) compliance -	PT Mirza Pratama Putra has identified source of waste including emissions from plantation and activities, as indicated in the EIA document and Waste Identification document. In the mill, the major emission source is from POME and the use of diesel fuel for generators and vehicles. Some of the main sources of pollution in palm oil mills are as follows: liquid waste from processing, generator / engine emissions, boiler emission of combustion of renewable fuel, dust from road transportation, emission from CPO and FFB transportation. Greenhouse gas emissions source in plantation are mostly from the use of chemical fertilizers, fossil fuel for transportation, and N ₂ O emission. Fossil fuel reducing have been implemented by fibre and shell usage. Realization of renewable energy have been monitored on monthly report for fibre and shell usage. The monitoring every month and the last monitoring periods January to December 2023. Monitoring for emission and pollutants (air emission, air ambient, odour, noise, and vibration) from estate and mill was done periodically every 6 months covered on RKL/RPL implementation report and reported to environmental agency periodically.	Complied

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		Semester II year 2023, testing result indicates all parameters related to emission are still comply with standard quality. Such as, CH conducts air quality level testing according to decision of Government regulation number 41-year 1999.	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	The company has zero burning policy which is contained in the Sustainability policy. Furthermore, company also has SOP Land Clearing with Zero Burning No. SOP-SPD.GN-001 dated 01 January 2015, approved by the COO Plantation. The procedure explains that land clearing activities are carried out without burning.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -	<p>The Unit of Certification has had mechanism to prevent land burning set in SOP of Land Burning Prevention (No. SOP-EHS.GN-013 dated 6 April 2018).</p> <p>The Unit of Certification has had List of Fire Fighting Equipment for Estate and Mill that refer to government regulation. Based on field observation in Estate and Mill, the fire-fighting equipment is provided and ready to use, as well as the fire-fighting team can demonstrated the fire emergency response.</p> <p>The preventive actions that have been conducted among others:</p> <ul style="list-style-type: none"> - Has had SOP of Land Burning Prevention. - Has had fire-fighting equipment, including monitoring tower in the field. - Has had team of emergency respond. - Has had fire-fighting training and simulation twice a year. The latest training was conducted on 4 January 2024 for Estate and Mill. - Training of first aid kit on 13 February 2024 and attended by 30 participants. 	Complied

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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 engages stakeholders in adjacent locations for fire prevention and control measures by forming "Masyarakat Peduli Api" or Joint Committee for Community Based Fire Prevention. This team has established for Sumber Cahaya village, Nanga Palikodan village and Nuangan village. This is multistakeholder team for Fire Prevention. The last socialization has conducted on 04/01/2024.</p>	Complied
<p>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.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When acquisition takes place, plantation was developed with oil palm crops. Year of planting for oil palm crops are 2011 – 2017, therefore this unit of certification required to make HCV assessment and LUCA.</p> <p>LUCA progress of PT. MPP that sent by email, as follow:</p> <ol style="list-style-type: none"> 1. 21 March 2019: LUCA submission to RSPO in accordance to RSPO LUCA Guidance document. 	Complied

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		<ol style="list-style-type: none"> 2. 21 August 2019: PT. MPP asking to RSPO regarding review LUCA PT. MPP. Responded by RSPO on 22 August 2019. 3. 24 September 2019: Re-asking to RSPO related LUCA review, but RSPO reply that LUCA still on progress to be reviewed. 4. 7 October 2019: PT. MPP re-asking to RSPO related LUCA review. 5. 16 October 2019: 1st review from RSPO that LUCA need clarifications in several items. 6. 15 January 2020: Unit of Certification provide supporting documents to respond clarification review by RSPO. 7. 19 January 2020: RSPO replied that HCV assessment date shall be revised based on HCV Assessment Report. 8. 30 January 2020: RSPO sent 2nd review and need more clarification on LUCA data. 9. 31 January 2020: PT. MPP provide the revised data. 10. 26 March 2020: PT. MPP respond to RSPO and sent the additional data. 11. 1 April 2020: Clarification and 3rd review from RSPO. 12. 17 April 2020: PT. MPP sent the additional data for 3rd review. 13. 6 May 2021: RSPO informed that Concept Note of PT. MPP has been approved by Compensation Panel. 14. 8 Sep 2021: PT. MPP submit Compensation Plan to RSPO. 15. 8 November 2021: PT. MPP re-asking to RSPO related progress of Compensation Plan. <p>Unit of certification has developed LUCA in accordance with the RSPO LUCA Guidance document.</p>	
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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>PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When acquisition takes place, plantation has been developed and oil palm crops was planted.</p> <p>The HCV assessment (after acquisition) was conducted by ALS 15020CS, Full Licensed Assessor on 28 September - 5 October 2016 and the Final HCV Assessment Report was completed in February 2017. Total HCV assessment area is 4,799.95 Ha and HCV managed area decided by unit of certification is 706.31 Ha.</p> <p>HCV Assessment Report already submit to HCVRN with status satisfactory (https://hcvnetwork.org/reports/hcv-assessment-report-of-pt-mirza-pratama-putra-provence-of-central-kalimantan-indonesia/).</p> <p>For Semester II 2024, precisely since the decision was issued from the Kantor Pertanahan Kabupaten Lamandau on 24 April 2024 regarding the release of the HGU area as explained in the indicator 4.4.1 and 4.4.2, the HCV area to be 2.5 Ha identified as riparian buffer zone.</p>	Complied
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>PT Mirza Pratama Putra (PT. MPP) as unit of certification is acquired company from non-RSPO member since 2016. When acquisition takes place, plantation has been developed and oil palm crops was planted.</p> <p>There are no new plantings after 15 November 2018 within current scope of certification.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	Not Applicable for 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>			

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7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>According to Soil Type Map and HCV Assessment Report, no peatland soil is identified. Soil type in PT Mirza Pratama Putra are Tropudults, Paleudults, Tropohumults, Dystropepts and Tropaquepts.</p> <p>HCVs found in the assessment area are HCV 1, HCV 4, and HCV 5. Elements of HCV 1 are associated with a population of several endemic or RTE species.</p> <p>In the PT MPP area, there were 69 species of birds (36 families), 14 species of mammals (10 families), 14 species of herpetofauna (11 families) and 39 species of plants. There is a forest area where the flora and fauna live. The location of the HCV 4 area in PT MPP includes the river and its riverbanks. Whereas the area that has HCV 5 value is a forest covered area which is also an HCV 1 area. The area is still used by the community to fulfill their daily needs.</p> <p>Management and monitoring plans to protect and/or enhance HCV and other conservation areas are developed as recommendation of HCV assessment and presented in document of Conservation Management Program year 2023.</p> <p>The implementation of program i.e:</p> <ol style="list-style-type: none"> 1. Monitoring of HCV boundaries mark (Y2023) 2. Monitoring of HCV signboard (Y2023) 3. HCV area inspection (monthly basis, the latest monitoring was December 2023) 4. RTE species monitoring (monthly basis, the latest monitoring was December 2023) 5. Continuation enrichment planting of tree species (Y2023) 6. Dissemination of HCV area, RTE species and way to protect/conservate to employees and local communities (completed in December 2023). 	Complied
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		<p>For Semester II 2024, precisely since the decision was issued from the Kantor Pertanahan Kabupaten Lamandau on 24 April 2024 regarding the release of the HGU area as explained in the indicator 4.4.1 and 4.4.2, the HCV area to be 2.5 Ha identified as riparian buffer zone (HCV 4).</p> <p>Based on document verification and interview to the management due to the revision of the HGU area which has an impact on reducing the HCV area, the organization has established Conservation Management Program for Semester II 2024. Management and monitoring will be implemented per July 2024, the plan is not much different from the previous Conservation Management Program, only the area covered has changed.</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>Rights of local communities have been identified in HCV areas is only HCV4 and HCV5, where Tolah river and Podah river still use for fishing to get additional protein. But this activity is rare occurs, most of villagers consume protein or meat from market.</p> <p>The presence of HCV 5 in unit of certification area was found to be the dependence of the community in the surrounding village on water needs for toilets, boards and non-timber forest products such as rattan and medicinal plants and fruits. The unit of certification giving access to local communities for these and encourage to manage and protect the HCV area.</p> <p>For Semester II 2024, precisely since the decision was issued from the Kantor Pertanahan Kabupaten Lamandau on 24 April 2024 regarding the release of the HGU area as explained in the indicator 4.4.1 and 4.4.2, the HCV area to be 2.5 Ha identified as riparian buffer zone (HCV 4).</p> <p>Based on document verification and interview to the management due to the revision of the HGU area which has an impact on reducing the HCV area, the organization has established Conservation Management Program for Semester II 2024. Management and monitoring will be</p>	Complied

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		implemented per July 2024, the plan is not much different from the previous Conservation Management Program, only the area covered has changed.	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>According to HCV Assessment report 2017, the HCVs found in the assessment area are HCV 1, HCV 4, and HCV 5. Elements of HCV 1 are associated with a population of several endemic or RTE species.</p> <p>In the PT MPP area, there were 69 species of birds (36 families), 14 species of mammals (10 families), 14 species of herpetofauna (11 families) and 39 species of plants.</p> <p>Based on monitoring report of biodiversity 2022, only one (1) RTE species was identified with status Endangered by IUCN, that is Bornean white-bearded gibbon (<i>Hylobates albibarbis</i>).</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken through installing signboard near the HCV area and access road.</p> <p>For Semester II 2024, precisely since the decision was issued from the Kantor Pertanahan Kabupaten Lamandau on 24 April 2024 regarding the release of the HGU area as explained in the indicator 4.4.1 and 4.4.2, the HCV area to be 2.5 Ha identified as riparian buffer zone (HCV 4).</p> <p>Based on document verification and interview to the management due to the revision of the HGU area which has an impact on reducing the HCV area, the organization has established Conservation Management Program for Semester II 2024. Management and monitoring will be implemented per July 2024, the plan is not much different from the previous Conservation Management Program, only the area covered has changed.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>Monitoring of HCV is conducted in monthly basis. Every year the unit of certification produce report specifically for HCV managed area. In example: Monitoring Report of Biodiversity in HCV Managed Area, 2022.</p>	Complied

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	- Minor compliance -	<p>Output from this report will be integrated to the next management and monitoring plan of HCV.</p> <p>For Semester II 2024, precisely since the decision was issued from the Kantor Pertanahan Kabupaten Lamandau on 24 April 2024 regarding the release of the HGU area as explained in the indicator 4.4.1 and 4.4.2, the HCV area to be 2.5 Ha identified as riparian buffer zone (HCV 4).</p> <p>Based on document verification and interview to the management due to the revision of the HGU area which has an impact on reducing the HCV area, the organization has established Conservation Management Program for Semester II 2024. Management and monitoring will be implemented per July 2024, the plan is not much different from the previous Conservation Management Program, only the area covered has changed.</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>PT Mirza Pratama Putra is an acquisition company since 2016 from a non-RSPO member. Land clearing and planting was carried out without an HCV assessment prior to the acquisition by PT Sawit Sumbermas Sarana (RSPO member). The HCV assessment (after acquisition) was conducted on 28 September - 5 October 2016 and the Final HCV Assessment Report was completed in February 2017.</p> <p>The company has also conducted a Land Use Change Analysis (LUCA) where there is a liability. LUCA was submitted to the RSPO on 21 March 2019. The Concept Note has been endorsed since 6 May 2021 and the Compensation Plan was submitted to the RSPO on 8 September 2021.</p> <p>13 June 2022: PT MPP's Compensation Plan has been approved by the RSPO according to the Compensation Plan Evaluation Report 13/06/2022.</p> <p>Total Remediation and Compensation liability for PT MPP is 2,270.38 Ha consist of 2,257.17 Ha (Compensation) and 13.21 Ha (Remediation). Implementation program namely Social Forestry Partnership of</p>	Complied

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		<p>Masoraian or Kemitraan Hutan Kemasyarakatan Masoraian with total managed area is 3,006 Ha located in Kotawaringin Lama Regency, Central Kalimantan. This project was started in 2022 by collaborating with Forest Farmer Group or Kelompok Tani Hutan Komunitas Karya Masoraian through agreement partnership refer to "Surat Perjanjian Kerja No. 31/LGL/QHSE/MPP-KKM/VIII/2022.</p> <p>Scope of agreement consist of:</p> <ul style="list-style-type: none">- Protection and security of the KTH Community Forest Management Business Permit (IUPHkm) area of the Komunitas Karya Masoraian in a participatory and collaborative manner.- Prevention and control of forest and land fires (karhutla) in the IUPHkm area of KTH Komunitas Karya Masoraian.- Community empowerment through efforts to increase knowledge, skills/expertise and management as well as economic development in the area and around IUPHkm KTH Komunitas Karya Masoraian.- Research , education , Social impact management on the area and around IUPHkm KTH Kommunitas Karya Masoraian. <p>Promotion and publication of IUPHkm KTH Komunitas Karya Masoraian area.</p>	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2023** for **Sumber Cahaya POM** and supply base was calculated using the PalmGHG Calculator version 4. 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 **Sumber Cahaya POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.51
PKO	0.00

Extraction	%
OER	22.24
KER	3.70

Production	t/yr
FFB Process	142,759.41
CPO Produced	31746,03
PKO Produced	5285,41

Land Use	Ha
OP Planted Area	5,024.01
OP Planted on peat	0.00
Conservation (forested)	202.38
Conservation (non-forested)	2.50
Total	5,228.89

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	27411.90	10.10	35292.01	0.91	0.00	0.00	62703.91	
CO ₂ Emission from fertilizer	224.08	0.08	119.79	0.00	0.00	0.00	343.87	
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Fuel Consumption	593.79	0.22	18.41	0.00	0.00	0.00	612.19	
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Sink								
Crop Sequestration	-25414.39	-9.36	-21619.10	-0.56	0.00	0.00	-47033.49	
Conservation Sequestration	0.00	0.00	-1855.82	-0.05	0.00	0.00	-1855.82	
Total	2944.27	1.08	12082.61	0.31	0.00	0.00	15971.24	

*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	2156.06	0.02
Fuel Consumption	839.35	0.01
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	2995.40	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

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

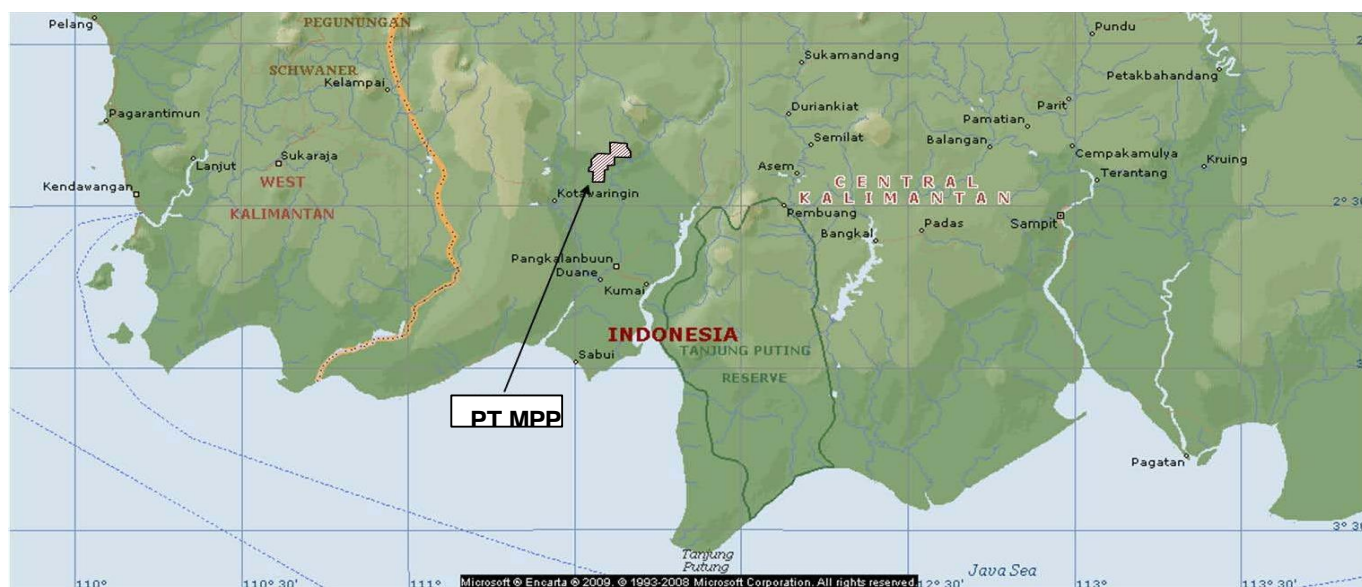
*This mill has no kernel crusher operation.

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

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

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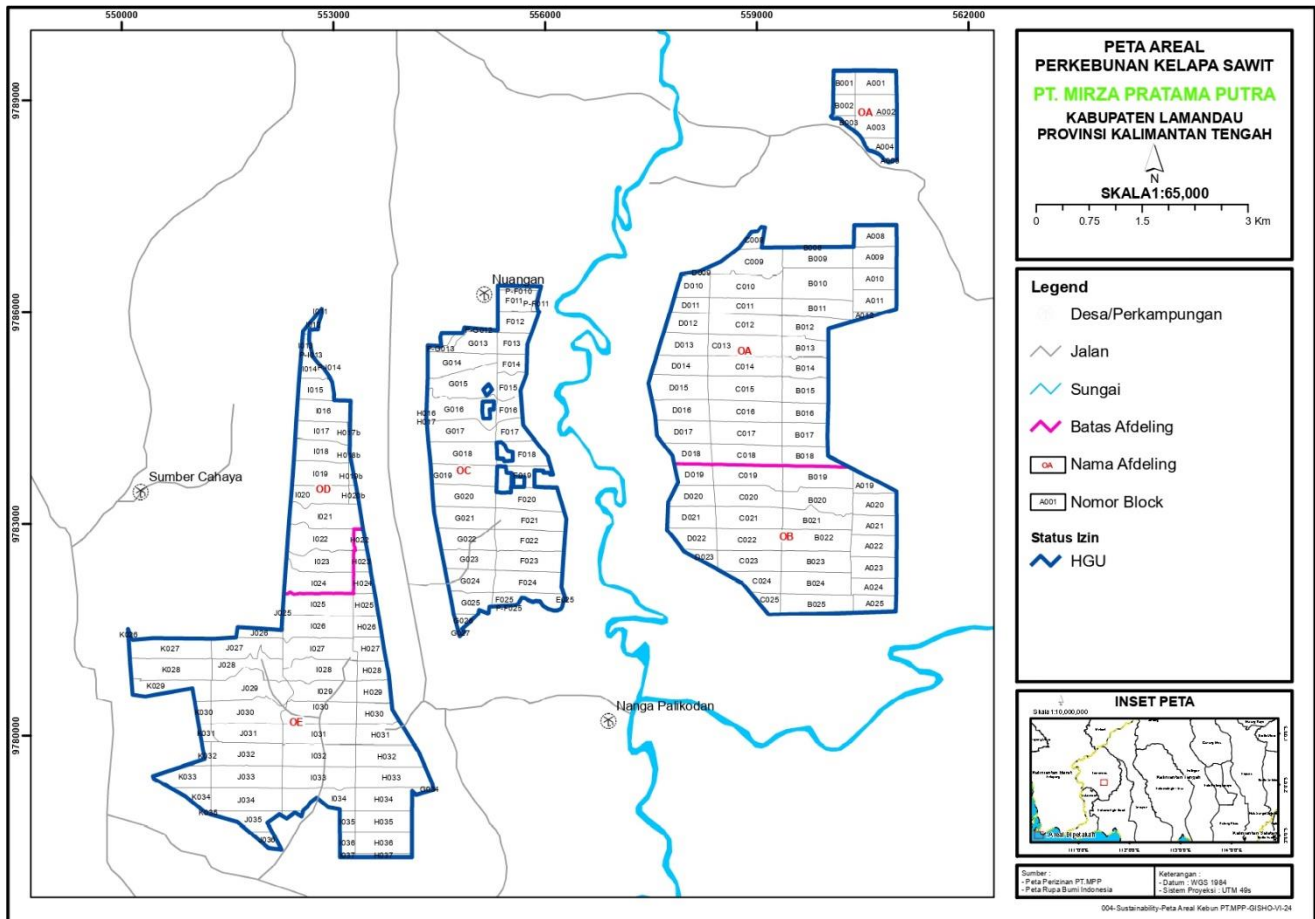
Appendix C: Location Map of Certification Unit and Supply bases



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